

July 2023 | **Draft Subsequent Environmental Impact Report**

State Clearinghouse No. 2023010013

# **SCHOOL UPGRADE PROGRAM**

Los Angeles Unified School District

## **VOLUME I**

*Prepared for:*

**Los Angeles Unified School District**

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### **APPENDICES (Appendices are under separate cover as Volume II)**

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## Abbreviations and Acronyms

%	percent
AAQS	ambient air quality standards
AB	Assembly Bill
ACCM	asbestos-containing construction materials
ACGIH	American Conference of Governmental Industrial Hygienist
ACLU	American Civil Liberties Union
ACM	asbestos-containing materials
ACT	Advanced Clean Trucks
ACWM	Agricultural Commissioner/Weights and Measures
ADA	Americans with Disabilities Act of 1990
af	acre-foot
AFV	alternative fuel vehicle
afy	acre-feet per year
AJR	Assembly Joint Resolution
AGWA	Association of Ground Water Agencies
AHERA	Asbestos Hazard Emergency Response Act
ALUC	airport land use commission
ALUCP	Airport Land Use Compatibility Plan
ALUP	airport land use plan
ANF	Angeles National Forest
ANSI	American National Standards Institute
AOP	Advanced Oxidation Process
APE	area of potential effect
AQMP	air quality management plan
ARA	Agricultural Resource Area
ASA	Acoustical Society of America
ASHA	American Speech-Language-Hearing Association
ASHRAE	American Society of Heating, Refrigeration and Air-Conditioning Engineers
ASTM	ASTM International
BAAQMD	Bay Area Air Quality Management District
BHFD	Beverly Hills Fire Department
BMP	best management practice
BTU	British thermal units

## Abbreviations and Acronyms

BUG	Backlight-Uplight-Glare
CAA	Clean Air Act
CAC	California Administration Code
CA CDPH	California Department of Public Health
CA DOSH	California Department of Occupational Safety and Health
Cal/EPA	California Environmental Protection Agency
CAFE	Corporate Average Fuel Economy
CalARP	California Accidental Release Prevention Program
CalEMA	California Emergency Management Agency
CalGEM	California Geologic Energy Management Division
CALGreen	California Green Building Code
Cal/OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAN	Corrective Action Notice
CARB	California Air Resources Board
CASQA	California Stormwater Quality Association
CBC	California Building Code
CBD	Center for Biological Diversity
CBMWD	Central Basin Municipal Water District
CCAA	California Clean Air Act
CCAP	Community Climate Action Plan
CCC	California Coastal Commission
CCR	California Code of Regulations
C&D	construction and demolition
CDC	California Department of Conservation
CDC	Centers for Disease Control
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CDP	Coastal Development Permit
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act

## Abbreviations and Acronyms

CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CESA	California Endangered Species Act
cf	cubic feet
C <sub>2</sub> F <sub>6</sub>	perfluoroethane
CFC	California Fire Code
CFC	Chlorofluorocarbon
CFR	Code of Federal Regulations
CFS	cubic feet per second
CGBSC	California Green Building Standards Code
CGEU	California Gas and Electric Utilities
CGS	California Geological Survey
CH <sub>4</sub>	Methane
CHPS	Collaborative for High Performance Schools
CHRIS	California Historical Resources Information System
CIFF	California Important Farmland Finder
CIMP	Coordinated Integrated Monitoring Plan
CIPR	Capital Improvement Program
CLAPL	County of Los Angeles Public Library
CMP	Los Angeles County Congestion Management Program
CNDDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CNG	compressed natural gas
CNPS	California Native Plant Society
CO	carbon monoxide
CO <sub>2</sub>	Carbon dioxide
COC	chemicals of concern
CO <sub>2</sub> e	carbon dioxide equivalent
COGS	Colorado Geological Survey
Corps	United States Army Corps of Engineers
CoSA	Community of Schools Administrators
CPUC	California Public Utilities Commission
CRA	California Resources Agency
CRA	Colorado River Aqueduct

## Abbreviations and Acronyms

CRHR	California Register of Historical Resources
CSD	Community Standards District
CTE	Career Technical Education
CUPA	certified unified program agency
CVC	California Vehicle Code
CVP	Central Valley Project
CWA	Clean Water Act
dB	Decibel
dBA	A-Weighted Decibel
DCP	Delta Conveyance Project
DDT	Dichlorodiphenyltrichloroethane
DDW	Division of Drinking Water
DLRP	Division of Land Resource Protection
DOC	Department of Conservation
DOGGR	Division of Oil, Gas, and Geothermal Resources
DONE	Department of Neighborhood Empowerment
DOT	Department of Transportation (federal)
DPM	diesel particulate matter
DROPS	Drought Response Outreach Program for Schools
DPR	Department of Parks and Recreation
DRA	Drought Risk Assessment
DRP	Department of Regional Planning
DSA	Division of the State Architect (under the California Department of General Services)
DTSC	Department of Toxic Substances Control
ED	equestrian district
EFZ	Earthquake Fault Zone
EIR	Environmental Impact Report
EMD	Emergency Management Department (Los Angeles)
EMF	electromagnetic field
EMRP	Environmental Monitoring and Reporting Program
EMU	Energy Management Unit
Envision	Envision Rating System
EOC	emergency operations center

## Abbreviations and Acronyms

EPA	Environmental Protection Agency (US)
EPCRA	Emergency Planning and Community Right-to-Know Act
ESA	Environmental Site Assessment
°F	degrees Fahrenheit
FAA	Federal Aviation Administration
FAR	Floor Area Ratio
FCA	Facilities Condition Assessment
FCI	Facility Condition Index
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FETU	Facilities Environmental Technical Unit
FHSZ	Fire Hazard Severity Zones
FIRM	flood insurance rate map
FMMP	Farmland Mapping and Monitoring Program
FRA	Federal Railroad Administration
FRA	Federal Responsibility Area
FRAP	Fire and Resource Assessment Program
FSD	Facilities Services Division (LAUSD)
FTA	Federal Transit Administration
GHG	greenhouse gases
GIS	geographic information systems
GW	gigawatt
GWh	gigawatt-hours
GWP	global warming potential
H <sub>2</sub> S	hydrogen sulfide
H&SC	(California) Health and Safety Code
HAP	hazardous air pollutant
HCFC	Hydrochlorofluorocarbon
HCM	Historic-Cultural Monument
HCP	habitat conservation plan
HFC	Hydrofluorocarbon
HIN	High-Injury Network
HOV	high occupancy vehicle

## Abbreviations and Acronyms

HPOZ	Historic Preservation Overlay Zone
HRA	health risk assessment
HVAC	Heating, ventilation, and air conditioning
Hz	hertz
IBC	International Building Code
ICC	International Code Council
ICS	Incident Command System
IDA	International Dark-Sky Association
IES	Illuminating Engineering Society
IICRC	Institute of Inspection, Cleaning and Restoration
IPCC	Intergovernmental Panel on Climate Change
IRA	Identified Resource Area
ISIC	Intensive Support and Innovation Center
JPA	joint powers authority
JWPCP	Joint Water Pollution Control Plant
IS	Initial Study
KVA	kilovolt amps
kWh	kilowatt-hour
LAA	Los Angeles Aqueduct
LABOS	Los Angeles Bureau of Sanitation
LACFCD	Los Angeles County Flood Control District
LACoFD	Los Angeles County Fire Department
LACP	Los Angeles City Planning
LACSD	Los Angeles County Sanitation District
LADOT	City of Los Angeles Department of Transportation
LADPW	Los Angeles County Department of Public Works
LADWP	City of Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAHCM	Los Angeles Historic Cultural Monument
LAPD	Los Angeles Police Department
LAPL	Los Angeles Public Library
LARA	Los Angeles Regional Agency
LASD	Los Angeles County Sheriff's Department



## Abbreviations and Acronyms

LASPD	Los Angeles School Police Department
LAUS	Los Angeles Union Station
LAUSD	Los Angeles Unified School District
LAX	Los Angeles International Airport
LCFS	low carbon fuel standard
LCP	Local Coastal Plan
$L_{dn}$	Day-Night Level
LE	Land Evaluation
LEED	Leadership in Energy and Environmental Design
LEPC	local emergency planning committee
$L_{eq}$	Equivalent Continuous Noise Level
LESA	land evaluation and site assessment
LID	Low Impact Development
LOS	level of service
LRA	Local Responsibility Area
LSA	Lake and Streambed Alteration Agreement
LST	localized significance threshold
LZ	lighting zones
MAF	million acre-feet
MATES	Multiple Air Toxics Exposure Study
MBTA	Migratory Bird Treaty Act
MCR	Mandatory Commercial Recycling
Metro	Los Angeles County Metropolitan Transportation Authority
mgd	million gallons per day
$\mu\text{g}/\text{m}^3$	micrograms per cubic meter
MLO	Model Lighting Ordinance
MMcf/day	million cubic feet per day
MMI	Modified Mercalli Intensity
MMT	million metric tons
MMTCO <sub>2e</sub>	Million metric tons of CO <sub>2e</sub>
MORe	Mandatory Organics Recycling
MOU	Memorandum of Understanding
MPO	metropolitan planning organization

## Abbreviations and Acronyms

MT	metric ton
MTCO <sub>2</sub> e	Metric ton of CO <sub>2</sub> e
MPO	metropolitan planning organization
MRZ	mineral recovery zone
MS4	municipal separate storm sewer system
MUTCD	California Manual on Uniform Traffic Control Devices
MW	megawatts
Mw	moment magnitude
MWD	Metropolitan Water District of Southern California
MWh	megawatt-hours
mybp	million years before present
N <sub>2</sub> O	nitrous oxide
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	Native American Heritage Commission
NCCP/HCP	natural communities conservation plan/habitat conservation plan
NFIP	National Flood Insurance Program
NFPA	National Fire Protection Association
NFRAP	No Further Remedial Action Planned
NHPA	National Historic Preservation Act of 1966
NHPA	National Historic Preservation Act of 1966
NHTSA	National Highway Traffic Safety Administration
NIMS	National Incident Management System
NO	nitric oxide
NO <sub>2</sub>	nitrogen dioxide
NOA	Naturally Occurring Asbestos
NOAA	National Oceanic and Atmospheric Administration
NOP	Notice of Preparation
NO <sub>x</sub>	nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
NPS	National Park Service
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places

## Abbreviations and Acronyms

NSWD	non-stormwater discharges
NYDHS	New York Department of Health Services
O <sub>3</sub>	ozone
OEHS	Office of Environmental Health and Safety
OEM	Office of Emergency Management
OES	Office of Emergency Services
OHP	Office of Historic Preservation
OITC	outdoor-indoor transmission class
OPR	Office of Planning and Research
OPSC	Office of Public School Construction
OSHPD	Office of Statewide Health Planning & Development
OU	per- and polyfluoroalkyl substances
PACM	presumed asbestos-containing materials
PAH	polycyclic aromatic hydrocarbon
Pb	lead
P-C	Production-Consumption
PCB	polychlorinated biphenyl
PCC	Portland cement concrete
PCE	Tetrachloroethylene
PDF	project design feature
PEA	Preliminary Environmental Assessment
PEX	Project Execution
PFAS	per- and polyfluoroalkyl substances
PFC	Perfluorocarbon
PM	particulate matter
PM <sub>2.5</sub>	respirable particulate matter less than 2.5 microns in diameter
PM <sub>10</sub>	respirable particulate matter less than 10 microns in diameter
POU	publicly owned electric utility
ppb	parts per billion
ppm	parts per million
PRC	Public Resources Code
PSHA	pipeline safety hazard assessment
PWA	Public Works Administration

## Abbreviations and Acronyms

RAP	Rapid Access Program
RCRA	Resource Conservation and Recovery Act
RCRIS	Resource Conservation and Recovery Act Information System
RF	radiofrequency
ROG	Reactive Organic Gas
ROWD	Report of Waste Discharge
RPS	renewable portfolio standard
RTP	regional transportation plan
RWQCB	Regional Water Quality Control Board
SA	Site Assessment
SAB	State Allocation Board
SAFE	Safer Affordable Fuel-Efficient
SARA	Superfund Amendments and Reauthorization Act
SC	standard conditions
SCA	School Cleanup Agreement
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCEC	Southern California Earthquake Center
SCGC	Southern California Gas Company
SCLC	Southern California Library Cooperative
SCP	Sustainable Communities Program
SCS	sustainable communities strategy
SDS	Safety Data Sheet
SDWA	Safe Drinking Water Act
SEA	significant ecological area
SEEDS	Sustainable environment enhancement developments for schools
SEMS	Standardized Emergency Management System
SEP	Strategic Execution Plan
SERC	State Emergency Response Commission
SF <sub>6</sub>	Sulfur Hexafluoride
SFB	San Fernando Basin
SFP	School Facility Program

## Abbreviations and Acronyms

SFPD	School Facilities Planning Division
SFTSD	School Facilities and Transportation Services Division
SHPO	State Historic Preservation Officer
SHRC	State Historical Resources Commission
SIG	Sustainable Infrastructure Guidelines
SIP	State Implementation Plan
SLCP	Short-Lived Climate Pollutants
SLF	Sacred Lands File
SMARA	Surface Mining and Reclamation Act of 1975
SFTSD	School Facilities and Transportation Services Division
SMMNRA	Santa Monica Mountains National Recreation Area
SO <sub>2</sub>	sulfur dioxide
SO <sub>4</sub>	sulfates
SO <sub>x</sub>	sulfur oxides
SoCAB	South Coast Air Basin
SoCalGas	Southern California Gas
SPCC	Spill Prevention Control and Countermeasure Plan
SPEIR	Subsequent Program Environmental Impact Report
S-Permit	Sewer Permit
SRA	State Responsibility Area
SRTS	Safe Routes to School
SSO	school safety officer
SSP	Safe School Plan
STC	sound transmission class
SUP	School Upgrade Program
SUSMP	Standard Urban Stormwater Mitigation Plan
SWP	State Water Project
SWPPP	stormwater pollution prevention plan
SWQDv	stormwater quality design volume
SWRCB	State Water Resources Control Board
SZ	Scientific Resource Zones
TAC	toxic air contaminant
TCE	Trichloroethylene

## Abbreviations and Acronyms

TCR	tribal cultural resources
TDM	transportation demand management
TIA	traffic impact analysis
TIP	Transportation Improvement Program
TMDL	total maximum daily load
TRI	toxic release inventory
TTCP	traditional tribal cultural place
UBC	Uniform Building Code
ULEV	ultra-low emission vehicle
USCB	U.S. Census Bureau
U.S. EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UWMP	urban water management plan
V/C	volume-to-capacity ratio
VCA	Voluntary Cleanup Agreement
VMT	vehicle miles traveled
VOC	volatile organic compounds
W	watts
WBMWD	West Basin Municipal Water District
WDR	waste discharge requirement
Wh	watt-hours
WMP	Watershed Management Program
WRCC	Western Regional Climate Center
WRD	Water Replenishment District of Southern California
WSAP	water supply allocation plan
WSDM	Water Surplus and Drought Management
WSPA	Western States Petroleum Association
WUI	Wildland Urban Interface
YOUAHS	Youth Opportunities Unlimited
ZEV	Zero-Emissions Vehicle

## 1. Executive Summary

# 1. Executive Summary

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## 1.1 INTRODUCTION

This Draft Subsequent Program Environmental Impact Report (SPEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code [PRC] Section 21000 et seq.), the State CEQA Guidelines (California Code of Regulations [CCR] Title 14, Section 15000 et seq.), and the Los Angeles Unified School District (LAUSD) CEQA procedures.

This Draft SPEIR addresses the environmental effects associated with the implementation of the LAUSD's School Upgrade Program (SUP) (see Section 1.4). CEQA requires that local government agencies, prior to taking action on projects over which they have discretionary approval authority, consider the environmental consequences of such projects. An Environmental Impact Report (EIR) is a public document designed to provide the public and local and state governmental agency decision makers with an analysis of potential environmental consequences to support informed decision-making. This document considers and incorporates appropriate information from six agency comment letters received during the NOP comment period (January 3, 2023 to February 2, 2023).

LAUSD, as the lead agency, has drafted this document to reflect its own independent judgment, including reliance on applicable LAUSD technical personnel from the Office of Environmental Health and Safety (OEHS) and other departments.

Data for this Draft SPEIR were obtained from field observations; discussions with affected agencies; analysis of adopted jurisdictional agency plans and policies and LAUSD Standard Conditions of Approval; review of available studies, reports, data, and similar literature; specialized environmental assessments prepared for previous site-specific projects;<sup>1</sup> and past experience with school construction and upgrade projects.

## 1.2 ENVIRONMENTAL PROCEDURES

This Draft SPEIR has been prepared to assess the environmental effects associated with implementation of the updated SUP, as well as anticipated future discretionary actions and approvals. The six main objectives of this document as established by CEQA are as follows:

- 1) To disclose to decision makers and the public the significant environmental effects of proposed activities.
- 2) To identify ways to avoid or reduce environmental damage.

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<sup>1</sup> Aesthetics, agricultural resources, air quality, biological resources, cultural resources, geological resources, hazards and hazardous materials, hydrology and water quality, land use, mineral resources, noise, population and housing, public services, recreation, transportation and traffic, and utilities and service systems.

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- 3) To prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures.
- 4) To disclose to the public reasons for agency approval of projects with significant environmental effects.
- 5) To foster interagency coordination in the review of projects.
- 6) To enhance public participation in the planning process.<sup>2</sup>

An EIR is the most comprehensive form of environmental documentation identified in CEQA and the State CEQA Guidelines and provides the information needed to assess the environmental consequences of a proposed project, to the extent feasible. EIRs are intended to provide an objective, factually supported, full-disclosure analysis of the environmental consequences associated with a proposed project that has the potential to result in significant, adverse environmental impacts.

An EIR is also one of the various decision-making tools used by a lead agency to consider the merits and disadvantages of a project that is subject to its discretionary authority. Prior to approving a proposed project, the lead agency must consider the information in the EIR, determine whether the EIR was properly prepared in accordance with CEQA and State CEQA Guidelines, determine whether it reflects the independent judgment of the lead agency, adopt findings concerning the project's significant environmental impacts and alternatives, and adopt a Statement of Overriding Considerations if the proposed project would result in significant impacts that cannot be reduced to less than significant.

### 1.2.1 EIR Format

This Draft SPEIR has been formatted as described:

**Chapter 1, Executive Summary.** Summarizes the background and description of the proposed project, the format of this EIR, project alternatives, any critical issues remaining to be resolved, and the potential environmental impacts.

**Chapter 2, Introduction.** Describes the purpose of this EIR, background on the project, Notice of Preparation, and Final EIR certification.

**Chapter 3, Environmental Setting.** A description of the physical environmental conditions in the District as they existed at the time the Notice of Preparation was published, from both a local and regional perspective. The environmental setting provides baseline physical conditions from which the lead agency determines the significance of environmental impacts resulting from the proposed project.

**Chapter 4, Project Description.** Location of the District, a detailed description of the SUP, the objectives of the SUP, an overview of student enrollment projections, approvals anticipated to be included as part of the project, the necessary environmental clearances for the project, and the intended uses of this EIR.

**Chapter 5, Environmental Analysis.** For each environmental topic analyzed, provides a description of the thresholds used to determine if a significant impact would occur; the methodology to identify and evaluate the

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<sup>2</sup> PCR, Section 21002.1. Use of Environmental Impact Reports; Policy.



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the potential impacts of the project; the existing environmental setting; the potential adverse and beneficial effects of the SUP; the level of impact significance before mitigation; the mitigation measures for the SUP, if any; the level of significance of the adverse impacts after compliance with jurisdictional regulations, LAUSD Standard Conditions of Approval, and any mitigation. Bibliographical references for information sources and technical data are footnoted. A stand-alone bibliography is not required. Because this is a program-level document, it inherently assesses cumulative impacts associated with the SUP; therefore, cumulative impacts are analyzed in each section of Chapter 5.

**Chapter 6, Significant Unavoidable Adverse Impacts.** Describes the significant unavoidable adverse impacts of the SUP.

**Chapter 7, Alternatives to the SUP.** Describes the impacts of the alternatives to the SUP, including the No Project Alternative and a Reduced Intensity Alternative.

**Chapter 8, Significant Irreversible Changes Due to the SUP.** Describes the significant irreversible environmental changes associated with the SUP.

**Chapter 9, Growth-Inducing Impacts of the SUP.** Describes the ways in which the SUP would cause increases in employment or population that could result in new physical or environmental impacts.

**Chapter 10, Comments on the Draft EIR.** Discusses the legal requirements for comments and responses and provides all written comments on the Draft SPEIR and the District's responses to each comment.

**Chapter 11, Persons Preparing the EIR.** Lists the people who prepared this Draft SPEIR for the SUP.

**Appendices.** The appendix for this Draft SPEIR has the following supporting documents and information:

Appendix A. CEQA Notices

- A-1 Notice of Preparation
- A-2 Notice of Preparation Comment Letters
- A-3 Notice of Availability of Draft EIR

Appendix B. Cultural Resource

- B-1 Historic Resource Context Statement 2014
- B-2 Historic Schools Design Guidelines 2015
- B-3 Historic Resource Exemptions 2005
- B-4 Historic Resource CEQA Flowchart 2015

Appendix C. Student Population Forecast

Appendix D. CEQA Procedures 2003

Appendix E. LAUSD Standard Conditions of Approval

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### 1.2.2 Type and Purpose of This EIR

This Draft SPEIR was prepared according to CEQA 14 CCR Section 15162(a) due to substantial changes in the goals and funding for the SUP from what was evaluated in the 2015 EIR, and the implementation of Measure RR within the LAUSD SUP. According to CEQA, a subsequent EIR shall be prepared when the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
  - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
  - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
  - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

This Draft SPEIR fulfills the requirements for a Program EIR. Although the legally required contents of a program-level EIR are the same as those of a project-level EIR, a Program EIR is typically more conceptual and may contain a more general discussion of impacts, alternatives, and measures than a Project EIR. As provided in Section 15168 of the State CEQA Guidelines, a Program EIR may be prepared on a series of actions that can be characterized as one large project. Use of a Program EIR provides the LAUSD (as lead agency) with the opportunity to consider broad policy alternatives and program-wide measures and provides the LAUSD with greater flexibility to address project-specific and cumulative environmental impacts on a comprehensive basis.

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Agencies generally prepare Program EIRs for programs or a series of related actions that are linked geographically; are logical parts of a chain of contemplated events, rules, regulations, or plans that govern the conduct of a continuing program; or are individual activities carried out under the same authority and having generally similar environmental effects that can be mitigated in similar ways.

Once a Program EIR has been prepared, subsequent activities within the program must be evaluated to determine whether an additional CEQA document needs to be prepared. However, if the Program EIR addresses the program's effects as specifically and comprehensively as possible, many subsequent activities could be found to be within the Program EIR scope, and additional environmental documents may not be required.<sup>3</sup> When a Program EIR is relied on for a subsequent activity, the lead agency must incorporate any mitigation measures and alternatives developed in the Program EIR into the subsequent activities.<sup>4</sup> If a subsequent activity would have effects not within the scope of the Program EIR, the lead agency must prepare a new Initial Study leading to a Negative Declaration, Mitigated Negative Declaration, or an EIR. In this case, the Program EIR still serves a valuable purpose as the first-tier environmental analysis. The State CEQA Guidelines encourage the use of Program EIRs, citing the following five advantages:<sup>5</sup>

- Provide a more exhaustive consideration of impacts and alternatives than would be practical in an EIR on an individual action.
- Focus on cumulative impacts that might be slighted in a case-by-case analysis.
- Avoid continual reconsideration of recurring policy or program issues.
- Consider broad policy alternatives and programmatic mitigation measures at an early stage when the agency has greater flexibility to deal with them.
- Reduce paperwork by encouraging the reuse of data (through tiering).

### 1.3 SUP LOCATION

The SUP is a District-wide program that covers schools throughout the entire District. The District boundary covers a 710-square-mile area in southern Los Angeles County. The District extends north to the San Gabriel Mountains in the Angeles National Forest; west to the Ventura County boundary and to the Pacific Ocean, including the communities of Venice, Marina Del Rey, and Playa Del Rey in the City of Los Angeles; east to the community of East Los Angeles in unincorporated Los Angeles County; and south to the community of San Pedro in the City of Los Angeles, and parts of the cities of Rancho Palos Verdes and Rolling Hills Estates in the Palos Verdes Peninsula. This area includes most of the city of Los Angeles, along with all or portions of 31 cities and unincorporated areas of Los Angeles County (see Figure ES-1, *Regional Location* and Figure ES-2, *Local Vicinity*).

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<sup>3</sup> 14 CCR Section 15168(c).

<sup>4</sup> 14 CCR Section 15168(c)(3).

<sup>5</sup> 14 CCR Section 15168(b).

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### Cities Entirely within LAUSD

Gardena	Maywood	Vernon
Huntington Park	San Fernando	West Hollywood
Lomita		

### Cities Partially within LAUSD

Bell	Hawthorne	Rancho Palos Verdes
Bell Gardens	Inglewood	Santa Clarita*
Beverly Hills	Long Beach	South Gate
Carson	Los Angeles	Torrance
Commerce	Lynwood	
Cudahy	Montebello	
Culver City	Monterey Park	

\* Only a few parcels of land are in LAUSD, and they generate no enrollment.

## 1.4 SUP COMPONENT SUMMARY

Because of the extensive number of individual projects anticipated under the SUP, they have been grouped into four categories based on the amount and type of construction and on location of the project. Currently, site-specific projects at individual school campuses have not been identified.

- Type 1. New Construction on New Property (adjacent to existing campus).
- 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 types of projects anticipated to be undertaken as part of the SUP are explained in the following subsections.

### 1.4.1 Type 1. New Construction on New Property

- Property acquisition adjacent to existing campus for campus expansion. These projects may include, but are not limited to, new building construction for classrooms, library/media center, performing arts, gymnasium, administration offices, and other construction, such as a stadium, athletic fields, restrooms, drop-off zones, parking, and driveways.

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### Figure ES-1 Regional Location



Source: LA County DRP, 2023; ESRI, 2023

0 25 50 Miles



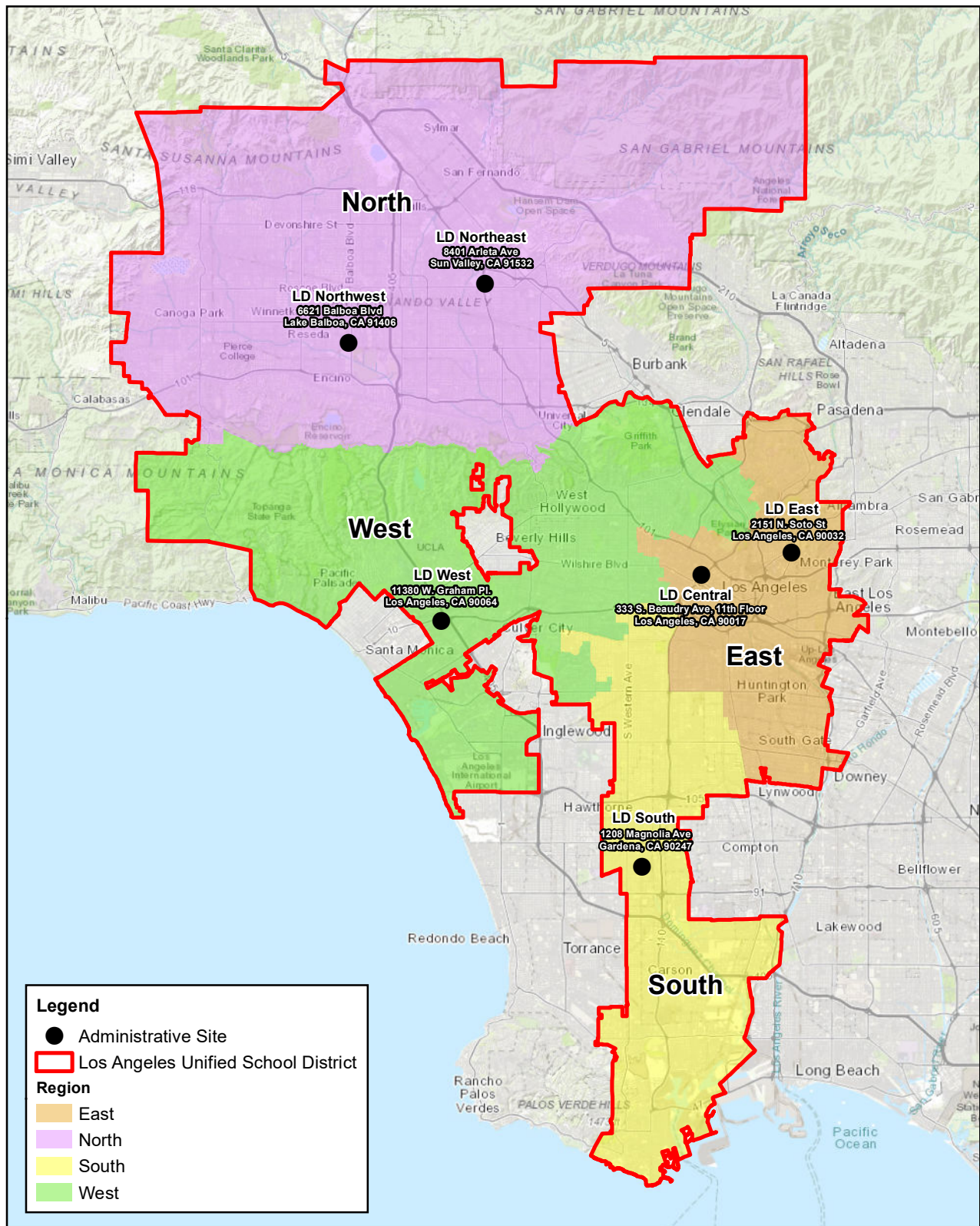
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### Figure ES-2 Local Vicinity



Source: Los Angeles Unified School District, 2023

0 3 6 Miles



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### 1.4.2 Type 2. New Construction on Existing Campus

- New classroom building; net increase in student capacity greater than 25% or 10 classrooms, whichever is greater.
- New buildings, including, but not limited to, library/media center, performing arts, auditorium, gymnasium, food services, outdoor classrooms, and other construction, such as athletic venue lights (for field or outdoor pool), stadiums, outdoor pools, athletic fields.
- New specialized facilities for visual and performing arts and school reconfigurations for new academies and pilot schools.
- Sustainable environment enhancement developments for schools (SEEDS) projects, and urban greening partnerships.
- Demolition and new building construction on existing campus.
- Installation of temporary structures.
- Construction of new wellness clinics, a parent and family center, and other community uses, including joint use on existing campus.
- Construction of restrooms, drop-off zones, new parking lots, and new driveways.
- Expansions and/or additions to existing early education centers and/or elementary schools and existing adult education centers.

### 1.4.3 Type 3. Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation

- Upgrade and/or retrofit old and outdated school campuses to create 21st century learning environments while upgrading earthquake safety and environmental sustainability.
- Upgrade deteriorating and outdated school building systems, grounds, furniture, and equipment to reduce safety hazards, complete necessary updates in schools, and provide clean, renewable energy improvements.
- Upgrade, modernize and/or construct charter school facilities.
- Replacement/upgrade of aging, undersized, and inadequate school cafeterias.
- Improve school safety, security, network, and emergency communications systems.
- Furnish and equip schools with 21st century learning technologies, and upgrade/install technology infrastructure, information systems, hardware, and software.
- Replacement of outdated and inefficient school buses to meet 21st century environmental and safety standards.

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- Installation of modular units, portable classrooms, or bungalows; net increase in student capacity is greater than 25% or 10 classrooms, whichever is greater.
- Installation of modular units, portable classrooms, or bungalows; net increase in student capacity is less than 25% or 10 classrooms, whichever is greater (considered a minor addition because it qualifies for a CEQA Exemption).
- Improvements and/or expansions to existing health clinic, parent and family center, or other community uses on existing campus.
- Demolition and removal of permanent buildings or structures.
- Installation at existing schools, such as play equipment, fencing, and ADA compliance.
- Outdoor repair, modernization, replacement, or upgrade of athletic fields (natural grass to synthetic turf), play equipment, fencing, parking, replace shade shelter, asphalt/concrete paths, driveways, ADA compliance, seismic retrofits.
- Sustainability energy conservation installations, such as new photovoltaic panels on rooftops and parking lot shade structures or wind arrays.
- Repair and replacement of building systems, such as flooring, windows, and roofing.
- New or replacement furniture or other interior equipment.
- Replace existing diesel buses with higher efficiency buses.
- Sustainability energy conservation changes, with methods such as replacement, upgrade, or retrofit of inefficient lighting, electrical transformers, or building insulation, or with installation of irrigation smart controllers.
- Construction and/or upgrade renewable, sustainable, and efficient water systems, equipment, and features.
- Structural upgrades of modular units or portable classrooms, relocation of portables on campus.
- Exterior cosmetic improvements, such as Facelift Program, painting, site cleanup.
- Interior remodeling and renovations; painting; installation, repair, and upgrades to fire/life-safety/security/emergency systems; ADA; plumbing, lighting, electrical, HVAC, and computer systems; low-flow restroom fixtures, food service equipment.
- Replacement of lead water pipes.
- Abatement of lead-based paint and asbestos in buildings.

### 1.4.4 Type 4. Operational and Other Campus Changes

- Removal of modular units, portable classrooms, bungalows, or other temporary structures at existing school facilities.
- Change in student capacity (student classroom loading).

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- Change in grade structure (e.g., change grades from 4–6 to 7–8 or other).
- Change in use or occupancy of existing facilities (charter school, co-locations, joint use).
- Co-location or land lease agreements for charter school facilities.
- Closure of existing school or transfer of students to another school.
- Reopening closed schools.
- Lease or use of non-District property for student classroom purposes.

### 1.5 PROJECT ALTERNATIVES

#### 1.5.1 No Project Alternative

The No Project Alternative would only involve projects that were approved under the 2015 Program EIR or maintenance and critical repairs required for health and safety, that is, repair and maintenance of those construction, protection, and occupancy features necessary to minimize danger to life and to maintain full compliance with current codes and regulations.

This alternative would not involve property acquisition or construction or installation of any buildings. Existing buildings and school campuses would continue to deteriorate (most noticeably cosmetically as nonessential maintenance and repairs are deferred). The No Project Alternative would include, but not be limited to, the following types of minor essential projects:

- Heating, ventilation, and air conditioning (HVAC) repairs needed to maintain classroom temperatures conducive to learning.
- Repair of broken unsafe walkways and driveways.
- Seismic retrofits.
- Maintenance of fire alarm and fire suppression systems.
- Replacement of poor lighting.
- Repairs to security systems and emergency communications systems.
- Abatement of asbestos and lead-based paint.
- Replacement of lead pipes.
- Improvements for Americans with Disabilities Act (ADA) compliance: ramps, rails, etc.
- Replacement fencing.
- Essential replacement of building systems, such as flooring, windows, and roofing.
- Essential repair of modular units or portable classrooms.
- Relocation of portables on campus to avoid a safety hazard.

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### 1.5.2 Reduced SUP Alternative

This alternative would not entail installation of more than nine modular or portable classroom buildings, acquisition of any property, or the construction of any permanent buildings. All projects under this alternative would qualify for one or more of the CEQA statutory or categorical exemptions listed in Chapter 4, *Project Description*.

- Installation of modular units, portable classrooms, or bungalows; resulting in a net increase student capacity *less than 25%* or 10 classrooms, whichever is greater.
- Sustainability energy conservation installations, such as new photovoltaic panels on rooftops and parking lot shade structures or small wind arrays.
- Essential and cosmetic replacement of building systems, such as flooring, windows, and roofing.
- New or replacement furniture or other interior equipment.
- Replace existing diesel buses with higher efficiency buses.
- Sustainability energy conservation changes, such as replacement, upgrade, or retrofit of inefficient lighting, electrical transformers, or building insulation, and installation of irrigation smart controllers.
- Essential and cosmetic upgrades of modular units or portable classrooms, relocation of portables on campus.
- Exterior cosmetic improvements, such as Facelift Program, painting, site cleanup.
- Essential and nonessential interior remodeling and renovations; painting; installation, repair, and upgrades to fire/life-safety/security/emergency systems; ADA; plumbing, lighting, electrical, HVAC, and computer systems; low-flow restroom fixtures; food service equipment.
- Change in student capacity (student classroom loading, but not an increase in school seating).
- Closure of existing school or transfer of students to another school (as long as the increase at the new school does not generate a significant environmental impact).

## 1.6 ISSUES TO BE RESOLVED

The State CEQA Guidelines Section 15123(b)(3) requires that an EIR contain issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With regard to the proposed project, the major issues to be resolved include decisions by the lead agency as to:

1. Whether this EIR adequately describes the environmental impacts of the project.
2. Whether the benefits of the SUP override environmental impacts that cannot be feasibly avoided or mitigated to a level of insignificance.
3. Whether the LAUSD Standard Conditions of Approval should be adopted or modified.
4. Whether there are any alternatives to the project that would substantially lessen any of the significant impacts of the SUP and achieve most of the objectives.

## 1. Executive Summary

### 1.7 AREAS OF CONTROVERSY

In accordance with the State CEQA Guidelines Section 15123(b)(2) the EIR summary must identify areas of controversy known to the lead agency, including issues raised by agencies and the public. There are no specific areas of known controversy concerning the SUP. The LAUSD has no knowledge of any expressed opposition to the SUP.

Prior to preparation of the EIR, the Notice of Preparation was distributed for comment between January 3, 2023, and February 2, 2023. A summary of the NOP comment letters received are summarized in Section 2.0, *Introduction* (see Table 2-1). Agency letters in response to the NOP included requests to address topical concerns such as cultural resources, tribal cultural resources, biological resources, noise, public services, school safety measures, parking, and traffic.

### 1.8 SUMMARY OF ENVIRONMENTAL IMPACTS

Table 1-1 summarizes the conclusions of the environmental analysis in this EIR. The table lists impacts identified as no impact, less than significant, or potentially significant; any feasible mitigation measures<sup>6</sup> that are available to reduce significant impacts; and the level of significance after compliance with any measures.

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<sup>6</sup> Mitigation measures must reduce significant environmental impacts and are above and beyond any project design features (PDFs), implementation of Standard Conditions of Approval (SCs) and compliance with federal, state, and local laws and regulations.

## 1. Executive Summary

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**Table 1-1 Summary of Environmental Impacts, Mitigation Measures, and Level of Significance After Mitigation**

Environmental Topics and Thresholds		Level of Impact Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<b>5.1 AESTHETICS</b>				
5.1-1	Updated SUP-related projects would not have a substantial adverse effect on scenic vistas.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.1-2	SUP-related projects would not alter scenic resources within a state scenic highway.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.1-3	SUP-related projects would not substantially degrade the existing visual character or quality of the site and its surroundings. Nor would they conflict with applicable zoning and other regulations governing scenic quality.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.1-4	SUP-related projects would not generate substantial light or glare which would adversely affect day- or nighttime views.	Less Than Significant	No mitigation measures are required	Less Than Significant
<b>5.2 AGRICULTURE AND FORESTRY RESOURCES</b>				
5.2-1	The SUP would not result in conversion of mapped farmland to nonagricultural uses.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.2-2	The SUP would not conflict with existing zoning for agricultural use or with land covered by an existing Williamson Act contract.	No Impact	No mitigation measures are required	Less Than Significant
5.2-3	The SUP would not conflict with zoning for forest land or timberland.	No Impact	No mitigation measures are required	Less Than Significant
5.2-4	The SUP would not result in the loss of forest land or conversion of forest land to non-forest use.	No Impact	No mitigation measures are required	Less Than Significant
5.2-5	SUP implementation would not involve other changes in the existing environment which could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use.	Less Than Significant	No mitigation measures are required	Less Than Significant
<b>5.3 AIR QUALITY</b>				
5.3-1	SUP-related projects would be consistent with the applicable air quality management plan.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.3-2	SUP-related projects construction activities may generate short-term emissions that exceed of the South Coast Air Quality Management District's regional significance thresholds and cumulatively contribute to the South Coast Air Basin nonattainment designations	Potentially Significant	No mitigation measures are available that would further reduce short-term emissions and impacts to the regional air quality.	Significant and Unavoidable

## 1. Executive Summary

Environmental Topics and Thresholds	Level of Impact Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.3-3 SUP-related projects would not generate long-term emissions that would exceed the South Coast Air Quality Management District's regional significance thresholds and would not cumulatively contribute to the South Coast Air Basin nonattainment designations	Less Than Significant	No mitigation measures are required	Less Than Significant
5.3-4 Site-specific SUP projects may generate short-term emissions that exceed South Coast Air Quality Management District's localized significance thresholds and expose sensitive receptors to substantial pollutant concentrations.	Potentially Significant	No mitigation measures are available that would further reduce short-term onsite emissions and impacts to the localized air quality.	Significant and Unavoidable
5.3-5 Operation of SUP-related projects would not expose sensitive receptors to substantial pollutant concentrations.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.3-6 Implementation of SUP-related projects would not create objectionable odors.	Less Than Significant	No mitigation measures are required	Less Than Significant
<b>5.4 BIOLOGICAL RESOURCES</b>			
5.4-1 SUP-related projects are not anticipated to substantially affect sensitive species.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.4-2 SUP-related project are not anticipated to substantially affect riparian habitats or other sensitive natural communities.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.4-3 SUP-related project implementation would not have a substantial adverse effect on jurisdictional waters or wetlands.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.4-4 SUP-related project implementation would not interfere substantially with wildlife movement or nesting.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.4-5 SUP-related project implementation would not conflict with any local policies or ordinances protecting biological resources.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.4-6 SUP implementation would not conflict with an adopted Habitat Conservation Plan or Natural Community Conservation Plan.	Less Than Significant	No mitigation measures are required	Less Than Significant



## 1. Executive Summary

Environmental Topics and Thresholds		Level of Impact Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<b>5.5 CULTURAL RESOURCES</b>				
5.5-1	SUP-related project implementation may substantially degrade the significance of historical resources.	Potentially Significant	No mitigation measures are available that would further reduce significant impacts to historic resources.	Significant and Unavoidable
5.5-2	SUP implementation would not cause a substantial adverse change in the significance of archaeological resources.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.5-3	Grading activities could potentially disturb human remains.	Less Than Significant	No mitigation measures are required	Less Than Significant
<b>5.6 Energy</b>				
5.6-1	SUP-related projects would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.6-2	SUP-related projects would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	Less Than Significant	No mitigation measures are required	Less Than Significant
<b>5.7 GEOLOGY AND SOILS</b>				
5.7	SUP implementation would not subject people or structures to substantial hazards from:	Less Than Significant	No mitigation measures are required	Less Than Significant
	5.7-1 Surface rupture of a known active fault.			
	5.7-2 Strong seismic ground shaking.	Less Than Significant	No mitigation measures are required	Less Than Significant
	5.7-3 Seismic-related ground failure, including liquefaction.	Less Than Significant	No mitigation measures are required	Less Than Significant
	5.7-4 Landslides.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.7-5	Implementation of SUP-related projects would not cause substantial soil erosion or loss of topsoil.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.7-6	SUP-related projects would not 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 collapsible soils, ground subsidence, or corrosive soils.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.7-7	SUP implementation would not subject people or structures to substantial hazards from expansive soils.	Less Than Significant	No mitigation measures are required	Less Than Significant

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Environmental Topics and Thresholds	Level of Impact Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.7-8 SUP implementation would not use septic tanks or alternative waste water disposal systems.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.7-9 The SUP-related projects are not anticipated to destroy paleontological resources or unique geologic features.	Less Than Significant	No mitigation measures are required	Less Than Significant
<b>5.8 GREENHOUSE GAS EMISSIONS</b>			
5.8-1 SUP-related projects may generate GHG emissions that could exceed the thresholds and cumulatively contribute to GHG emissions impacts.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.8-2 The SUP would not conflict with plans adopted for the purpose of reducing GHG emissions.	Less Than Significant	No mitigation measures are required	Less Than Significant
<b>5.9 HAZARDS AND HAZARDOUS MATERIALS</b>			
5.9-1 SUP-related projects would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.9-2 SUP Implementation would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.9-3 SUP-related projects would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of an existing or proposed school.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.9-4 SUP-related projects may be located on a site which is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 but would not create a significant hazard to the public or the environment.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.9-5 SUP-related projects would not result in an airport safety hazard for people residing or working in the project area.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.9-6 The SUP would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.9-7 The SUP would not expose people or structures to a significant risk of loss, injury or death involving wildland fires.	Less Than Significant	No mitigation measures are required	Less Than Significant

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Environmental Topics and Thresholds	Level of Impact Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.9-9 SUP-related project sites are not anticipated to contain a current or former hazardous waste disposal site or solid waste disposal site and, if so, wastes have been removed.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.9-10 SUP-related project sites may be located on a hazardous substance release site, that DTSC previously listed under Health & Safety Code Section 25356 for removal or remedial action so long as all response actions are taken and DTSC certifies the school may be occupied.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.9-11 SUP-related project site would not contain one or more pipelines, situated underground or aboveground, which carry hazardous substances, acutely hazardous materials, or hazardous wastes.	Less Than Significant	No mitigation measures are required	Less Than Significant
<b>5.10 HYDROLOGY AND WATER QUALITY</b>			
5.10-1 SUP-related projects would not violate any water quality standards or waste discharge requirements.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.10-2 SUP-related projects would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.10-3 SUP-related projects would not substantially alter the existing drainage pattern of the site or area in a manner which would result in a substantial erosion or siltation on- or off-site.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.10-4 SUP-related projects would not substantially alter the existing drainage pattern of the site or area or increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.10-5 SUP-related projects 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.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.10-6 SUP related projects would not impede or redirect flood flows.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.10-7 SUP-related projects would not place housing within a 100-year flood hazard area.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.10-8 SUP-related projects would not place structures within a 100-year flood hazard area that would impede or redirect flood flows.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.10-9 SUP-related projects would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.	Less Than Significant	No mitigation measures are required	Less Than Significant

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Environmental Topics and Thresholds	Level of Impact Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.10-10 SUP-related projects would not be subject to inundation by seiche, tsunami, or mudflow.	Less Than Significant	No mitigation measures are required	Less Than Significant
<b>5.11 LAND USE AND PLANNING</b>			
5.11-1 SUP implementation would not divide established communities.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.11-2 SUP implementation would not conflict with applicable plans adopted for the purpose of avoiding or mitigating an environmental effect.	Less Than Significant	No mitigation measures are required	Less Than Significant
<b>5.12 MINERAL RESOURCES</b>			
5.12-1 SUP implementation would not result in the loss of availability of a known mineral resource or recovery site.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.12-2 SUP implementation would not 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.	Less Than Significant	No mitigation measures are required	Less Than Significant
<b>5.13 NOISE</b>			
5.13-1 SUP implementation may result in 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 applicable standards of other agencies.	Potentially Significant	No mitigation measures are available that would further reduce construction noise impacts	Significant and Unavoidable
5.13-2 SUP-related project construction activities may result in generation of excessive groundborne vibration.	Potentially Significant	No mitigation measures are available that would further reduce construction vibration impacts	Significant and Unavoidable
5.13-3 If a SUP-related project is 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, the project would expose people residing or working in the project area to excessive noise levels.	Less Than Significant	No mitigation measures are required	Less Than Significant

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Environmental Topics and Thresholds	Level of Impact Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<b>5.14 PEDESTRIAN SAFETY</b>			
5.13-1 SUP-related project implementation would not substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.13-2 SUP implementation would not create unsafe routes to schools for students walking from local neighborhoods.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.13-3 SUP-related projects would not pose a safety hazard if located adjacent to or near a major arterial roadway or freeway.	Less Than Significant	No mitigation measures are required	Less Than Significant
<b>5.15 POPULATION AND HOUSING</b>			
5.14-1 SUP-related projects would not induce substantial unplanned population growth in an area.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.14-2 SUP implementation would not displace substantial numbers of existing housing, necessitating the construction of replacement housing.	Less Than Significant	No mitigation measures are required	Less Than Significant
<b>5.16 PUBLIC SERVICES</b>			
<b>FIRE PROTECTION AND EMERGENCY SERVICES</b>			
5.15-1 SUP-related projects would not require the construction of new or physically altered fire protection and emergency facilities.	Less Than Significant	No mitigation measures are required	Less Than Significant
<b>POLICE PROTECTION SERVICES</b>			
5.15-2 SUP-related projects would not require the construction of new or physically altered police protection facilities.	Less Than Significant	No mitigation measures are required	Less Than Significant
<b>LIBRARY SERVICES</b>			
5.15-3 SUP-related projects would not require the construction of new or physically altered library facilities.	Less Than Significant	No mitigation measures are required	Less Than Significant
<b>5.17 RECREATION</b>			
5.16-1 Updated SUP implementation would not increase the use of existing neighborhood and regional parks or other recreational facilities causing substantial physical deterioration in parks or recreational facilities.	Less Than Significant	No mitigation measures are required	Less Than Significant

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Environmental Topics and Thresholds	Level of Impact Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.16-2 Updated SUP implementation would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	Less Than Significant	No mitigation measures are required	Less Than Significant
<b>5.18 TRANSPORTATION and TRAFFIC</b>			
5.17-1 SUP-related projects would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.	Potentially Significant	No mitigation measures are available that would reduce traffic impacts to less than significant	Significant and Unavoidable
5.17-2 Large-scale SUP projects may increase VMT.	Potentially Significant	No mitigation measures are available that would reduce traffic impacts to less than significant	Significant and Unavoidable
5.17-3 SUP-related circulation improvements would not create potentially hazardous conditions (sharp curves, etc.), incompatible uses, or inadequate emergency access.	Less Than Significant	No mitigation measures are required	Less Than Significant
<b>5.19 TRIBAL CULTURAL RESOURCES</b>			
5.19-1 SUP implementation would not cause a substantial adverse change in the significance of tribal cultural resource; I) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code 5020.1(k) and: II) 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 Resources Code section 5024.1, as the CEQA lead agency, has considered the significance of the resource to a California Native American tribe.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.19 2 Grading activities are not anticipated to disturb human remains or Tribal Cultural Resources.	Less Than Significant	No mitigation measures are required	Less Than Significant
<b>5.20 UTILITIES AND SERVICE SYSTEMS</b>			
5.20-1 The SUP would not exceed wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board.	Less Than Significant	No mitigation measures are required	Less Than Significant

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Environmental Topics and Thresholds	Level of Impact Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.20-2 The SUP would not require relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.20-3 The SUP would not cause significant environmental effects from the construction of new or expanded stormwater drainage facilities.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.20-4 SUP-related projects would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.20-5 Landfill facilities would be able to accommodate SUP-related solid waste and the District would comply with related solid waste regulations.	Less Than Significant	No mitigation measures are required	Less Than Significant
<b>5.21 Wildfire</b>			
5.21-1 SUP-related projects would not substantially impair an adopted emergency response plan or emergency evacuation plan.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.21-2 SUP-related projects would not, 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	No mitigation measures are required	Less Than Significant
5.21-3 SUP-related projects would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.	Less Than Significant	No mitigation measures are required	Less Than Significant
5.21-4 SUP-related projects would not 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	No mitigation measures are required	Less Than Significant

Note: Table 1-1 lists SUP District-wide cumulative impacts. Future environmental analysis would be conducted on a project-by-project basis and for site-specific locations and mitigation measures may be identified to reduce individual project-related impacts to less than significant levels.

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

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## 2. Introduction

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### 2.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

Under CEQA, the proposed LAUSD SUP is considered a “project” and therefore is required to be compliant through an environmental analysis. “Project,” as defined by the CEQA Guidelines, means “the whole of an action, which 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: (1)... An activity directly undertaken by any public agency<sup>7</sup> [school district]... (2) An activity undertaken by a person<sup>8</sup> 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.”<sup>9</sup> The activity may be subject to several discretionary approvals by governmental agencies.<sup>10</sup> A Lead Agency is “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment.”<sup>11</sup> The LAUSD has the principal responsibility for approval of the SUP. For this reason, the LAUSD is the CEQA Lead Agency for this project.

CEQA requires that all state and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority prior to taking action on those projects. The EIR is the public document designed to provide decision makers and the public with an analysis of the environmental effects of the proposed project, to indicate possible ways to reduce or avoid environmental damage, and to identify alternatives to the project. The EIR must also disclose significant environmental impacts that cannot be avoided; growth-inducing impacts; effects not found to be significant; and significant cumulative impacts of all past, present, and reasonably foreseeable future projects.

According to CEQA, a program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: “1) Geographically, 2) As logical parts in the chain of contemplated actions, 3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or 4) As 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.”<sup>12</sup> The program EIR can provide several advantages, including the following: 1) Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical

<sup>7</sup> “Public agency” includes any state agency, board, or commission and any local or regional agency, as defined in these Guidelines. It does not include the courts of the state. This term does not include agencies of the federal government. (14 CCR Section 15376)

<sup>8</sup> “Person” includes any person, firm, association, organization, partnership, business, trust, corporation, limited liability company, company, district, city, county, city and county, town, the state, and any of the agencies and political subdivisions of such entities, and to the extent permitted by federal law, the United States, or any of its agencies or political subdivisions. (14 CCR Section 15379)

<sup>9</sup> 14 CCR Section 15378(a)

<sup>10</sup> 14 CCR Section 15378(c)

<sup>11</sup> PCR Section 21067

<sup>12</sup> 14 CCR Section 15168(a)

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in an EIR on an individual action, 2) Ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis, 3) Avoid duplicative reconsideration of basic policy considerations, 4) Allow the Lead Agency to consider broad policy alternatives and program wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts, and 5) Allow reduction in paperwork. Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.

A Subsequent EIR is prepared after an EIR has been certified or a negative declaration adopted for a project, when an agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

“(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.”<sup>13</sup>

The intent of the Subsequent Program EIR is to provide sufficient information on the potential environmental impacts of the proposed SUP to allow the LAUSD Board of Education to make an informed decision regarding

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<sup>13</sup> 14 CCR 15162(a)

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approval of the project, and if approved, to streamline future CEQA compliance. Specific discretionary actions to be reviewed by the LAUSD are described later in Section 3.4, *Intended Uses of the EIR*.

This Subsequent Program EIR has been prepared in accordance with requirements of the:

- California Environmental Quality Act (CEQA) of 1970, as amended (PRC, Section 21000 et seq.)
- State Guidelines for the Implementation of the CEQA of 1970 (CEQA Guidelines), as amended (California Code of Regulations [CCR], Title 14, Sections 15000 et seq.)

The overall purpose of this Subsequent Program EIR is to inform the Lead Agency, responsible agencies, decision makers, and the general public of the potential environmental effects from implementation of the SUP. This Subsequent Program EIR addresses the potential environmental effects of the SUP, including effects that may be significant and adverse, and evaluates alternatives to the SUP.

### 2.2 NOTICE OF PREPARATION

Per the CEQA Guidelines Section 15082, the LAUSD determined that a Subsequent Program EIR would be required for this project and issued a Notice of Preparation (NOP) on January 3, 2023. The NOP and comments received during the public review period (January 3, 2023 to February 2, 2023) can be found in Appendix A. The NOP process is used to help determine the scope of the environmental issues to be addressed in the Subsequent Program EIR. Public outreach for the NOP included distribution using the following methods:

- Publication on January 3, 2023 in the *Los Angeles Daily News* (English) and *La Opinion* (Spanish) newspapers.
- Direct mail via USPS certified mail to 37 state and local agencies.
- Distributed to nine state agencies through the Office of Planning and Research, State Clearinghouse.
- Posted at the Los Angeles County Clerk.

The NOP was also available for review at the following locations:

- LAUSD Office of Environmental Health and Safety Office, 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017.
- LAUSD Office of Environmental Health and Safety website at <https://achieve.lausd.net/ceqa>.

Comments received during the NOP public review period are in Appendix A. A total of six agencies submitted comments to the NOP. Table 2-1 summarizes the issues identified by the commenting agencies, along with an added reference to the sections of this Subsequent Program EIR where the issues are addressed.

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**Table 2-1 NOP Comment Summary**

Commenting Agency	Comment Type	Comment Summary	Issue Addressed In:
California Department of Fish and Wildlife (01/30/2023)	Biological Resources	Letter offers comments and recommendations to assist LAUSD in identifying, avoiding, and/or mitigating impacts on biological resources.	Section 5-4, <i>Biological Resources</i>
Los Angeles Conservancy (02/02/2023)	Historic Resource Preservation	Letter outlining recommendations for preserving historically significant schools within the District.	Chapter 5-5, <i>Cultural Resources</i>
City of Huntington Park (02/02/2023)	Concern over District-Wide Redevelopments	Concerns regarding increased traffic, noise, and need for public services and additional parking.	Section 5-13, <i>Noise</i> Section 5-16, <i>Public Services</i> Section 5-18, <i>Transportation and Traffic</i>
City of Cudahy (01/31/2023)	School Safety Measures	Requests evaluation of increased safety measures, especially at vehicle drop-off and pick-up zones.	Section 5-14, <i>Pedestrian Safety</i>
California Department of Transportation, District 7 (01/25/2023)	Transportation and Parking	Letter outlining suggestions to reduce Vehicle Miles Traveled (VMT) and reduce traffic congestion through various methods.	Section 5-18, <i>Transportation and Traffic</i>
Native American Heritage Commission (01/05/2023)	Cultural Resources	Letter identifies state and federal statutes relating to Native American historic properties and resources, and Native American Contacts.	Section 5-19, <i>Tribal Cultural Resources</i>

## 2.3 SCOPE OF THIS EIR

Based on past experience and the magnitude of the proposed SUP, the LAUSD staff determined that a Subsequent Program EIR should be prepared. Because of the large reach of the proposed program, LAUSD did not prepare an Initial Study (IS) to reduce the scope of the Subsequent Program EIR; the Subsequent Program EIR includes an analysis of all 20 CEQA topics and one additional LAUSD topic (pedestrian safety).<sup>14</sup> The Subsequent Program EIR is required to identify any potentially significant adverse impacts and recommend mitigation that would reduce the impacts to less than insignificant.<sup>15</sup>

The information in Chapter 4, *Program Description*, establishes the basis for analyzing future SUP-related environmental impacts. However, further environmental review by the LAUSD may be required as more detailed information and plans are drafted on a site-specific, project-by-project basis.

## 2.4 SUMMARY OF ENVIRONMENTAL IMPACTS

All impact thresholds in each of the 21 environmental resources assessed are analyzed in detail in Chapter 5 of this Subsequent Program EIR. Impact significance levels are summarized in Chapter 1, *Executive Summary*, Table 1-1.

<sup>14</sup> 14 CCR Section 15060(d).

<sup>15</sup> 14 CCR Sections 15126.2 and 15126.4.

## 2. Introduction

### 2.4.1 Impacts Considered Less Than Significant

SUP-related impacts to the following 17 environmental topics were identified as less than significant, after compliance with regulatory requirements and implementation of LAUSD Standards, as discussed in Chapter 5.

- Aesthetics
- Agriculture and Forestry Resources
- Biological Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Pedestrian Safety
- Population and Housing
- Public Services
- Recreation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

### 2.4.2 Impacts Considered Potentially Significant and Unavoidable

SUP-related impacts under four environmental topics were identified as potentially significant and unavoidable.

- Air Quality
- Cultural Resources
- Noise
- Transportation and Traffic

The LAUSD, as the Lead Agency, determined that unavoidable significant adverse impacts would likely result from the SUP; therefore, the LAUSD must prepare a “Statement of Overriding Considerations” before it can approve the SUP. A Statement of Overriding Considerations explains that the decision-making body (Board of Education) has balanced the benefits of the SUP against its potentially significant and unavoidable

## 2. Introduction

environmental effects and has determined that the benefits outweigh the adverse effects and, therefore, the environmental impacts are considered to be acceptable.

### 2.5 FINAL EIR CERTIFICATION AND PROJECT CONSIDERATION

The Draft SPEIR is being circulated for a 45-day public review period (July 5, 2023 to August 19, 2023). Interested agencies and members of the public have been invited to provide written comments on the Subsequent Program EIR. Upon completion of the public review period, the LAUSD staff will review all written comments and prepare a written response for each comment. The Final Subsequent Program EIR will incorporate all of the comments received, responses to the comments, and any changes to the Subsequent Program EIR that result from the comments. All agencies that comment on the Draft SPEIR will be notified of the availability of the Final Subsequent Program EIR and the date of the public hearing before the Board.

The LAUSD Board of Education will review and consider the Final EIR. If the Board finds that the Final Subsequent Program EIR is “adequate and complete”, the Board may certify the Final Subsequent Program EIR. The rule of adequacy generally holds that the EIR can be certified if: (1) it shows a good faith effort at full disclosure of environmental information; and (2) it provides sufficient analysis to allow decisions to be made regarding the project in contemplation of its environmental consequences.

Upon review and consideration of the Final Subsequent Program EIR, the Board may take action to adopt, revise, or reject the proposed SUP. The Final Subsequent Program EIR will be available for review at the following locations:

- LAUSD Office of Environmental Health and Safety Office, 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017.
- LAUSD Office of Environmental Health and Safety website at <https://achieve.lausd.net/ceqa>.

A decision to approve the SUP would be accompanied by written findings and a statement of overriding considerations in accordance with State CEQA Guidelines Section 15091 and Section 15093.

No mitigation measures are required by this Subsequent program-level EIR. LAUSD Standard Conditions of Approval will be adopted by the Board of Education and incorporated into future projects. These conditions provide sufficient performance standards for future projects to reduce environmental impacts. Preparation of an Environmental Monitoring and Reporting Program<sup>16</sup> will commit the District to compliance tracking and follow-up on future SUP-related projects.

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<sup>16</sup> The LAUSD Environmental Monitoring and Reporting Program (EMRP) will fully comply with the requirements under CEQA Section 21081.6 and CEQA Guidelines Section 15097 for preparation of a “reporting or monitoring program”.

## 3. Environmental Setting

# 3. Environmental Setting

## 3.1 INTRODUCTION

The purpose of this chapter is to provide, pursuant to provisions of the CEQA and the State CEQA Guidelines, a “description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, from both a local and a regional perspective.” The environmental setting will provide a set of baseline physical conditions that will serve as a tool from which the lead agency will determine the significance of environmental impacts resulting from the proposed SUP Update and Measure RR Implementation.

## 3.2 REGIONAL ENVIRONMENTAL SETTING

### 3.2.1 Regional Location

The SUP Update covers schools within the entire LAUSD. The District boundary covers a 710-square-mile area in southern Los Angeles County (see Figure 3-1, *Regional Location*). LAUSD enrollment is the largest in California and the second largest in the United States.<sup>17</sup>

## 3.3 LOCAL ENVIRONMENTAL SETTING

### 3.3.1 Project Location

LAUSD includes most of the city of Los Angeles, along with all or portions of 25 cities and unincorporated areas of Los Angeles County (see Figure 3-2, *Local Vicinity*).<sup>18</sup> The District extends north to the San Gabriel Mountains in the Angeles National Forest; and the communities of Sylmar and Granada Hills; west to the Ventura County boundary and to the Pacific Ocean, including the communities of Venice, Marina Del Rey, and Playa Del Rey in the City of Los Angeles; east to the community of East Los Angeles in unincorporated Los Angeles County; and south to the community of San Pedro, and parts of the cities of Rancho Palos Verdes and Rolling Hills Estates in the Palos Verdes Peninsula.

#### Cities Entirely within LAUSD

Gardena  
Huntington Park

Lomita  
Maywood

San Fernando  
Vernon  
West Hollywood

<sup>17</sup> New York City Department of Education has the largest enrollment in the U.S.

<sup>18</sup> LAUSD. LAUSD Fingertip Facts 2022-23, LAUSD Net, November 17, 2022. LAUSD Fingertip Facts 2023.pdf. <https://achieve.lausd.net/facts>. Accessed May 2, 2023.

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#### Cities Partially within LAUSD

Bell	Hawthorne	Rancho Palos Verdes
Bell Gardens	Inglewood	Rolling Hills Estates
Beverly Hills	Long Beach	Santa Clarita*
Carson	Los Angeles	South Gate
Commerce	Lynwood	Torrance
Cudahay	Montebello	
Culver City	Monterey Park	

\* Only a few parcels of land are in LAUSD, and they generate no students.

#### LAUSD Regions

The District is divided geographically into four regions: North, West, East, and South (see Figure 3-2). These four regions provide instructional and operational support, as well as parental and community engagement on a localized, constituency-specific level.

Incorporated cities and communities in unincorporated Los Angeles County that are completely or partially in the school district are listed in Table 3-1.<sup>19</sup>

**Table 3-1 Cities and County Areas in LAUSD Regions**

Region	Geography	Cities and Unincorporated Communities
North	Western half of the San Fernando Valley and adjoining areas of the Santa Monica Mountains and Santa Susana Mountains  Eastern half of the San Fernando Valley and part of the southwest San Gabriel Mountains	<ul style="list-style-type: none"> <li>• Los Angeles</li> <li>• San Fernando</li> <li>• Santa Clarita</li> </ul> Unincorporated Los Angeles County, including communities of: <ul style="list-style-type: none"> <li>- Kagel Canyon</li> <li>- Lopez Canyon</li> <li>- Twin Lakes</li> </ul>
West	City of Gardena on the south to Griffith Park and the Santa Monica Mountains on the north and bounded by the Pacific Ocean and the west District boundary on the west.	<ul style="list-style-type: none"> <li>• Beverly Hills</li> <li>• Culver City</li> <li>• Hawthorne</li> <li>• Inglewood</li> <li>• Los Angeles</li> <li>• West Hollywood</li> </ul> Unincorporated Los Angeles County, including community of Marina Del Rey

<sup>19</sup> LAUSD. 2023. LAUSD Regions. <https://achieve.lausd.net/regions>.



### 3. Environmental Setting

Region	Geography	Cities and Unincorporated Communities
East	<p>Part of Los Angeles Basin; east end of Hollywood Hills; and hills north of downtown Los Angeles</p> <p>Part of Los Angeles Basin; hills in northeast</p>	<ul style="list-style-type: none"> <li>• Bell</li> <li>• Bell Gardens</li> <li>• Commerce</li> <li>• Cudahy</li> <li>• Huntington Park</li> <li>• Los Angeles</li> <li>• Lynwood</li> <li>• Maywood</li> <li>• Montebello</li> <li>• Monterey Park</li> <li>• Vernon</li> </ul> <p>Unincorporated Los Angeles County, including community of East Los Angeles</p>
South	Part of central and southern Los Angeles Basin extending south to Port of Los Angeles and east edge of the Palos Verdes Hills	<ul style="list-style-type: none"> <li>• Carson</li> <li>• Gardena</li> <li>• Lomita</li> <li>• Long Beach</li> <li>• Lynwood</li> <li>• Rancho Palos Verdes</li> </ul> <p>Unincorporated Los Angeles County, including communities of:</p> <ul style="list-style-type: none"> <li>- Florence-Graham</li> <li>- West Carson</li> <li>- West Rancho Dominguez</li> <li>- Willowbrook</li> </ul>

#### Superintendent's Intensive Support and Innovation Center

Approximately 132 schools from across the District are served by the Superintendent's Intensive Support and Innovation Center (ISIC).<sup>20</sup> The mission of the ISIC is to ensure that every LAUSD site receives the support and guidance it requires toward maintaining a safe and caring environment that supports learning and high student achievement.

### 3.3.2 LAUSD Schools

#### District Enrollment

During the 2021–2022 school year, total LAUSD enrollment in grades K–12 was 519,586, including:<sup>21</sup>

- 236,281 in grades K–5 (elementary school grades)
- 114,243 in grades 6–8 (middle school grades)
- 161,986 in grades 9–12 (high school grades)

<sup>20</sup> LAUSD Instructional Service Center – ISIC. Accessed on May 2, 2023: <https://sisic-instruction-laUSD-ca.schoolloop.com/>.

<sup>21</sup> LAUSD Enrollment Projections 2018–2033.

### 3. Environmental Setting

Some schools extend from grades K–8; and some charter schools provide education in both middle school and high school grades.

#### Schools by City

The number of schools by city are listed in Table 3-2.

<b>Table 3-2 Number of Schools in Each City</b>	
<b>City</b>	<b>Schools</b>
Bell	13
Bellflower	1
Carson	25
Cudahy	6
Culver City	3
Gardena	11
Hawthorne	1
Huntington Park	26
Inglewood	1
Lomita	4
Long Beach	1
Los Angeles	919
Maywood	6
Monterey Park	1
Rancho Palos Verdes	2
San Fernando	11
South Gate	33
Vernon	1
West Hollywood	2
City not specified	86
<b>Total</b>	<b>1,149</b>

Source: LAUSD. Enrollment projections 2018-2033.

California Department of Education. California Public Schools Directory. April 28, 2023: <http://www.cde.ca.gov/re/sd/>.

California State Geoportal: May 9, 2023: <https://gis.data.ca.gov/datasets/CALFIRE-Forestry::city-boundaries/explore?appid=cf412a17daaa47bca93c6d6b7e77aff0&edit=true&location=37.056293%2C-119.391730%2C6.97>.

Note: This table includes 138 magnet centers on regular public school campuses.

### 3. Environmental Setting

#### Figure 3-1 Regional Location



Source: LA County DRP, 2023; ESRI, 2023

0 25 50 Miles



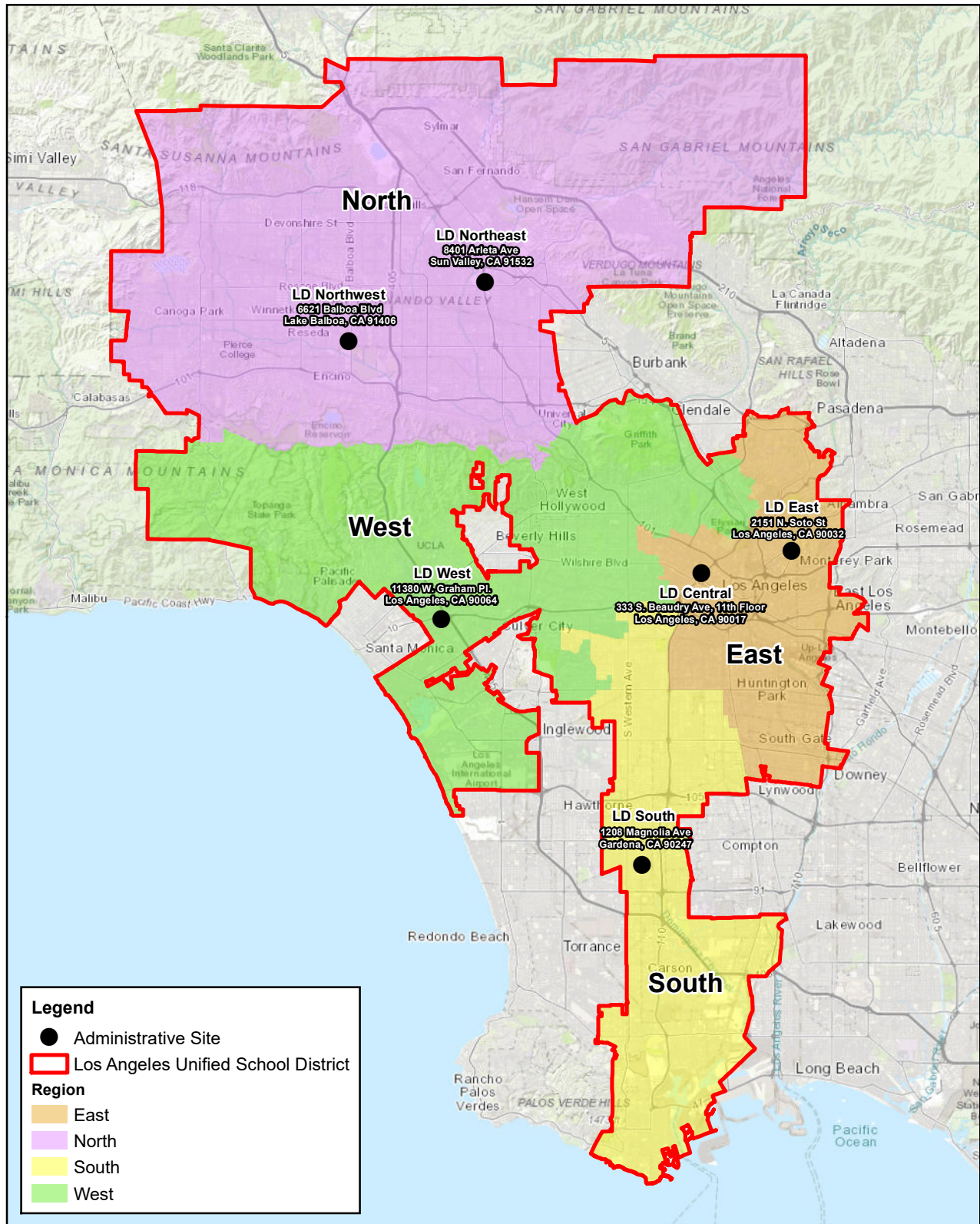
### 3. Environmental Setting

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### 3. Environmental Setting

#### Figure 3-2 Local Vicinity



Source: Los Angeles Unified School District, 2023

0 3 6 Miles



### 3. Environmental Setting

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### 3. Environmental Setting

#### Schools by Type and Level

The LAUSD operates 1,438 schools and centers as listed in Table 3-3.

**Table 3-3 LAUSD Schools Summary**

School Type	Number of Schools in District
<b>Primary School Centers</b> Schools offering primary grades, ranging from kindergarten only to K–3. Most are smaller schools with enrollments of approximately 150 to 250 each.	18
<b>Elementary Schools</b> Traditional academic elementary schools. Most serve grades K–5 or K–6. Typical enrollments range from approximately 300 to 800.	435
<b>Middle Schools</b> Traditional academic middle schools. Nearly all serve grades 6–8. Enrollment for most District middle schools range from about 800 to 1,600.	77
<b>High Schools</b> Traditional comprehensive high schools; most range between 1,500 and 3,000 enrollments.	86
<b>Option Schools</b> Small centers, mostly within comprehensive high schools, offering individualized instruction to students at risk of dropping out.	59
<b>Magnet Schools</b>	67
<b>Multi-Level Schools</b>	30
<b>Magnet Centers Magnet programs housed on regular campuses</b>	264
<b>Special Education Schools</b> Schools focused on educating students with disabilities, including learning disabilities and physical disabilities.	12
<b>Home / Hospital</b>	2
<b>Independent Charter Schools</b> Schools operated under charter granted by LAUSD. School levels include elementary, middle, high, and span schools.	224
<b>Other Schools and Centers</b>	164
<b>Total</b>	<b>1,438</b>

Source: LAUSD. May 1, 2023. Master List of Schools. <http://www.laschools.org/new-site/my-school/>.

#### Primary School Centers

Schools offering primary grades, ranging from kindergarten only to K–3. Most are smaller schools with enrollments of approximately 150 to 250 students.

#### Elementary School

Elementary schools typically serve students in grades K–5; enrollment at most range from 300 to 1,000 students, a few have up to 1,200 students. Schools range in size between 2 and 8 acres. The daily operational hours of elementary schools vary from school to school; however, staff and students arrive onsite between 7:00 AM and 8:00 AM, and leave between 2:30 PM and 5:00 PM. Most schools offer after-school programs, which typically end between 4:00 PM and 5:00 PM. Students walk, bike, are driven, use public transportation, or ride the school public transportation to and from school (special needs students may be transported in District-provided vehicles). During the school year, elementary schools occasionally host nighttime events, such as fairs, performances, and “open houses”. These events generally occur on school nights

### 3. Environmental Setting

between approximately 6:00 PM and 8:00 PM. Some of these events are for the entire student body, while others are grade-specific. Selected elementary schools additionally house summer school programs, depending on District need and available capacity. The summer sessions typically run from mid-June to mid-July, Monday through Friday, from approximately 8:00 AM to 12:30 PM.

#### *Middle School*

Middle schools typically serve students in grades 6–8; enrollment at most range from 800 to 1,800 students. One middle school has a student enrollment of over 2,500. Schools range in size between 8 and 18 acres. Similar to elementary schools, middle school staff and students arrive on campus between 7:00 AM and 8:00 AM and leave between 3:00 PM and 5:00 PM. The students are normally dismissed at approximately 3:00 PM; however, many of the middle schools have after school programs, such as athletic activities, special-interest clubs, and extracurricular activities. Middle schools also have occasional nighttime events during the school year. Some of these events are campus-wide, and others are grade-specific. Students walk, bike, are driven, or use public transportation to and from school (special needs students may be transported in District vehicles).

#### *High School*

High schools serve students in grades 9–12; enrollment at most range from 500 and 2,500 students. Typical high schools range in size between 20 and 30 acres. Small sites in dense urban areas can also accommodate a high school (e.g., 1,215 student campus on an 8-acre site).

The high schools generally operate from 7:00 AM to 5:00 PM. Similar to middle and elementary schools, students and staff arrive on campus between 7:00 AM and 8:00 AM and depart between 3:00 PM and 5:00 PM. The students are dismissed at 3:00 PM, but high schools offer after-school programs such as special interest clubs and athletic activities. Operation of the high schools additionally includes periodic nighttime events, and some of the campuses house continuation high schools, adult education programs, and summer school that operate after 5:00 PM.

Students walk, bike, drive, are driven, use public transportation to and from school (special needs students may be transported in District vehicles). The overall proportion of students using a given mode of transportation is variable, and dependent upon a given school's location and general demographic profile. Some of the high schools provide limited onsite student parking.

#### *Span School*

Span schools cover more grades than conventional elementary, middle, or high schools, which usually cover grades K–5, 6–8, and 9–12, respectively. Span schools typically cover grades K–8, 7–12, or K–12.

The daily operations of span schools vary from school to school. Span schools with multiple grade levels operate similarly to elementary, middle, and senior high schools; staff and students arrive on campus between 7:00 AM and 8:00 AM and leave between 2:30 PM and 5:00 PM. Many schools may offer after-school programs for the students, such as athletic activities, special-interest clubs, and extracurricular activities. Operations of span schools may also include periodic evening and nighttime events during the school year. Some of these events are campus-wide, and others are grade-specific.



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Students walk, drive, bike, are driven, use public transportation, and are bused to and from the schools. The overall proportion of students using a given mode of transportation varies depending on a given school's location and general demographic profile.<sup>22</sup>

#### ***Option Schools***

Option Schools provide instruction in a variety of settings, including small campuses, small classes, independent study, and instruction in home or hospital.<sup>23</sup> Typical students are those who have dropped out of school, are at risk of not completing their education, pregnant minors, and students with certain disciplinary issues, including expulsion. There are seven types of Option Schools each serving a different type of student need.

#### ***City of Angels K–12 Independent Study School***

City of Angels School is an independent study school for students who are unable to attend a traditional classroom environment. The curriculum at City of Angels School is California standards-based instruction. Students must meet a minimum of one hour per week with their assigned teacher and receive 30 hours of coursework to complete at home. Students can have concurrent enrollment in community college to receive high school and college credits. City of Angels has many sites throughout LAUSD. Through the City of Angels Virtual Academy, students complete online classes.

#### ***Pregnant Minor Schools***

Pregnant minor schools consist of small campuses throughout the District. Their primary goal is to provide interim educational opportunities to expectant mothers so that they can continue their education and graduate. Schools provide counseling by school nurses, information on health and nutrition, and prenatal and infant care. McAlister High School and Riley High School are pregnant minor schools with multiple campuses located throughout the District.

#### ***Alternative School: Youth Opportunities Unlimited Alternative High School***

The alternative school, Youth Opportunities Unlimited (YOUAHS), is an option school within LAUSD that serves students who are low in credits. The three primary focuses of the schools are educational development, employment training, and youth and family development. The school was developed as a model of community based, collaborative education between the U.S. Department of Labor, the City of Los Angeles, and the District.

#### ***Carlson Home/Hospital School***

Instruction in the home or hospital is provided for eligible students in grades K–12 whose non-contagious temporary medical disability prevents attendance in regular day class for a limited period of time. The intent is to maintain continuity of the student's instructional program during the interim period of disability. A home/hospital teacher provides instruction in courses correlated with the student's school program to the maximum extent possible. It does not replace the regularly required instructional program. Instruction in the

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<sup>22</sup> LAUSD Span Schools. <https://achieve.lausd.net/Page/11777>. Accessed April 28, 2023.

<sup>23</sup> LAUSD. Option Schools. <https://achieve.lausd.net/Page/4490>. Accessed April 28, 2023.

### 3. Environmental Setting

home/hospital commences when the attending physician authorizes service to begin, based upon the student's ability to participate, and the parents authorize temporary transfer of educational duties.

#### ***Continuation High Schools***

Continuation high schools are small campuses with low student-to-teacher ratios, offering instruction to students between the ages of 16 and 18 who are deemed at-risk of not completing their education. The goal of each student is to make up credit deficiencies and either be graduated from the continuation school or transferred back to traditional high school. Some continuation schools offer evening classes to serve high school students who are regularly employed 30 hours or more a week. The major emphases in the evening classes are occupational orientation and work experience while working toward graduation requirements. Continuation high schools are listed by Regions in Table 3-4.

**Table 3-4 Continuation High Schools by Region**

East	North	South	West
Boyle Heights	Addams	Angel's Gate	Cheviot Hills
Central	Burke	Avalon	Ellington
Highland Park	Earhart	Eagle Tree	Owensmouth
Kahlo	Einstein	Hope	Patton
Monterey	Evergreen	Moneta	Phoenix
New Mark	Grey	Patton	View Park
Pueblo	Independence		Whitman
Metropolitan	Lewis		Young
Odyssey	London		
Ramona	Mission		
Rodia	Mt Lukens		
San Antonio	Owensmouth		
	Rogers		
	Stoney Point		
	Thoreau		
	Wooden		

Source: LAUSD. Educational Options Programs. <https://achieve.lausd.net/Page/4490>.

#### ***Community Day Schools***

Community day schools are small schools providing interim educational opportunities for K–12 students who have been expelled, are at high risk, or have been referred by probation, or a School Attendance Review Board. The goal of community day schools is to provide a challenging academic curriculum, develop social skills, and return students back to traditional schools. The District operates the following schools:

### 3. Environmental Setting

**Table 3-5 Community Day Schools**

School <sup>a</sup>	City or Community <sup>b</sup>	Region	Grade Levels
Aggeler	Chatsworth [Los Angeles]	North	7–12
London	Valley Glen [Los Angeles]	North	9–12
Elementary	Chatsworth [Los Angeles]	North	K–6
Alonzo	Los Angeles	West	7–12
West Hollywood	West Hollywood	West	7–12
Tri-C	Los Angeles	East	7–12
Secondary	Los Angeles	East	6–12
Johnson	Los Angeles	South	9–12
Johnson	San Pedro [Los Angeles]	South	7–12

Source: LAUSD. Options Schools. <https://achieve.lausd.net/Page/4490>. Accessed May 1, 2023.

<sup>a</sup> All community day schools are part of the Intensive Support and Innovation Center (ISIC)

<sup>b</sup> Communities in the City of Los Angeles.

#### *Opportunity Schools*

An opportunity school has a small campus serving students in grades 7–12 who are habitually truant, have irregular attendance, and exhibit other at-risk behaviors. This school offers specialized instruction, guidance and counseling, psychological services, and tutorial assistance to help students overcome barriers to learning. The District operates two Opportunity Schools at Ramona High School in East Los Angeles and William Tell Aggeler in Chatsworth.

#### *Magnet Schools*

Magnet schools offer programs emphasizing a field of science, technology, art, or industry. Magnet school themes include business, communications/technology, enriched studies, foreign language, gifted/highly gifted, global awareness, humanities, law/government/police studies, medical careers, science/technology/engineering/math, and visual and performing arts. Magnet schools are on traditional school campuses at all three levels, and magnet schools are separate school campuses.

#### *Special Education Schools*

Special education schools educate students with disabilities such as learning disabilities, physical disabilities, including hearing and vision problems, social and emotional development issues, and serious or chronic medical conditions. Most special education schools offer grades pre-K–12, 7–12, or 9–12.

#### *Charter Schools*

LAUSD views charter schools as integral to the District's offerings and an opportunity to teach both students and educators. Currently, there are 275 charter schools (51 Affiliated, 224 Independent) under the jurisdiction of the LAUSD, serving more than 150,000 students in grades K–12. Charter schools operate under charters granted by LAUSD. School levels include elementary, middle, high, and span schools. A charter is granted by the LAUSD Board of Education and approved by the state for a period of up to five years. Charter schools are open to any child who wishes to attend, from any part of the state. Although certain attendance preferences may be given, enrollment is conducted by lottery. There are two types of charter schools in the district: Conversion and Start-up.

### 3. Environmental Setting

- A conversion charter is an existing district school that later becomes a charter.
- A start-up is a charter school that is created “from scratch” by any member of the public—educators, parents, foundations, and others.

Charter schools include schools of all levels—elementary, middle, and high schools and span schools serving various ranges of grade levels. Most charter school enrollments range between 200 and 600, less than most traditional District schools.<sup>24</sup>

#### *Community Adult Schools*

Community adult schools’ curricula include occupational courses, academic courses, and English as a Second Language. Adult schools serve adults and in- and out-of-school teens and are typically located on an existing school campus.<sup>25</sup>

#### *Occupational Centers and Skills Centers*

Occupational centers and skills centers, operated by the District’s Division of Adult and Career Education, offer career and technical education as well as classes in a range of academic subjects. Career and technical education are offered for 15 industry sectors.<sup>26</sup>

#### *Early Education Centers*

Early education centers are preschool programs that address the social-emotional, physical, and cognitive needs of the population served. Early education centers serve children aged 2 through 2nd grade. Families must be at or below 75% of state median income, and the family or child must have a qualifying need—such as employment, training, seeking and employment. Early education centers usually operate 6:00 AM to 6:00 PM Monday through Friday.<sup>27</sup>

#### *Civic/Community Centers*

In compliance with Education Code 38131 (b) Civic Center Act, every school in the District makes facilities available for various nonprofit community organizations and members of the public to use for supervised recreational activities, meetings, and public discussions. Schools are available during designated hours when regular school activities will not be disrupted. School facilities that can be used are gymnasiums, play fields, stadiums, auditoriums, multipurpose rooms, cafeterias, and classrooms. Designated year-round hours for civic center use start two hours after the close of school, and are typically 6:00 PM until 9:30 PM on weekdays, 8:00 AM until 9:30 PM on Saturday, and 12:00 PM until 5:00 PM on Sundays. No civic center use is allowed at elementary schools on Sundays. A permit from the LAUSD is required to use school facilities.<sup>28</sup>

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<sup>24</sup> LAUSD. May 1, 2023. About Charter Schools. <https://achieve.lausd.net/Page/1814>.

<sup>25</sup> LAUSD. About DACE. <https://achieve.lausd.net/dace-hr>. Accessed April 28, 2023.

<sup>26</sup> LAUSD. Career Technical Education (CTE). <https://ctelinkedlearning-lausd-ca.schoolloop.com/>. Accessed April 28, 2023.

<sup>27</sup> LAUSD. Early Education. <https://achieve.lausd.net/eccd>. Accessed April 28, 2023.

<sup>28</sup> LAUSD. Civic Center Permits. <https://achieve.lausd.net/Page/2792>. Accessed April 28, 2023.

### 3. Environmental Setting

#### School Calendar

The LAUSD operates on a single-track calendar, which runs from mid-August to early June. The traditional single-track school schedule is used by all schools but one. Summer sessions generally runs from June through July. Standard LAUSD holidays include Labor Day, Veterans Day, Thanksgiving holiday, winter recess, Dr. Martin Luther King Jr. Birthday, President's Day, spring break, and Memorial Day.<sup>29</sup>

#### Staff

The District's staff in the 2022-2023 school year includes 23,553 K–12 teachers, 24,769 total teachers, 3,025 administrators, 6,305 other certificated support personnel, 30,459 classified personnel, and 2,199 teacher assistants for a total of 74,000 employees.<sup>30</sup>

#### 3.3.3 General Plan and Zoning

General Plan and zoning designations on parcels not owned by the District varies by jurisdiction and by location. Although most school property is owned by the District, the underlying city or county land use designations can be residential, industrial, commercial, or other. The LAUSD Board of Education has, by resolution, exempted many schools from otherwise applicable local zoning regulations, as allowed under State law under Government Code Section 53094.

### 3.4 ASSUMPTIONS REGARDING CUMULATIVE IMPACTS

Cumulative impacts are defined as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.”<sup>31</sup> Cumulative impacts are the change caused by the incremental impact of the project evaluated in the EIR together with the incremental impacts from closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

Section 15130 of the CEQA Guidelines states that cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable.<sup>32</sup> It further states that this discussion shall reflect the level and severity of the impact and the likelihood of occurrence, but not in as great a level of detail as that necessary for the project alone.

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<sup>29</sup> LAUSD. Single Track Instructional School Calendar 2022-2023. <https://achieve.lausd.net/site/default.aspx?PageType=3&ModuleInstanceID=67213&ViewID=C9E0416E-F0E7-4626-AA7B-C14D59F72F85&RenderLoc=0&FlexDataID=112212&PageID=17824>. Accessed April 28, 2023.

<sup>30</sup> Los Angeles Unified School District (LAUSD). 2023, October 9. Los Angeles Unified School District Fingertip Facts 2022-2023: [https://achieve.lausd.net/site/handlers/filedownload.ashx?moduleinstanceid=73040&dataid=121695&FileName=Fingertip\\_Facts\\_2022\\_2023\\_ENG\\_Final\\_032323.pdf](https://achieve.lausd.net/site/handlers/filedownload.ashx?moduleinstanceid=73040&dataid=121695&FileName=Fingertip_Facts_2022_2023_ENG_Final_032323.pdf).

<sup>31</sup> 14 CCR Section 15355.

<sup>32</sup> 14 CCR Section 15065 (a)(3) “Cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

### 3. Environmental Setting

The information utilized in an analysis of cumulative impacts comes from one of two sources:<sup>33</sup>

- A. A list of past, present, and probable future projects producing related cumulative impacts, including, if necessary, those projects outside the control of the agency.
- B. A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

The cumulative impact analysis contained in this EIR uses Method B. The proposed project consists of a District-wide program that covers individual projects that would be implemented well into the future. This EIR has a District-wide program-level analysis for the SUP and no project locations or specific projects have been identified. Consistent with 14 CCR Section 15130(b)(1)(B), this EIR analyzes the environmental impacts associated with cumulative development pursuant to future development that would be planned, constructed, and operated under the SUP. As a result, this EIR addresses the cumulative impacts of school-related development within the entire 710-square-mile school district. District-generated student projections are based on the projections of the County and city housing and employment.

In most cases, such as traffic and historic resources, the potential for cumulative impacts would be contiguous with the District boundary, since all schools and students attending those schools reside within the District. Other impacts are site-specific, such as aesthetics, and geology and soils; and still others may have impacts outside the district boundaries, such as air quality. Each of the environmental topics in this EIR assess the types of projects that may be implemented under the SUP and assumes that more than one may take place at the same time.

Please refer to sections in Chapter 5, *Environmental Analysis*, for a discussion of the environmental impacts associated with cumulative development pursuant to implementation of the SUP.

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<sup>33</sup> 14 CCR Section 15130 [b][1]

## 4. Program Description

# 4. Program Description

## 4.1 LOCATION

The School Upgrade Program (SUP or proposed program) covers school projects within the entire LAUSD, which is the largest public school system in California and the second largest (in terms of student enrollment) in the United States. The District covers 710 square miles and encompasses most of the County of Los Angeles, along with all or portions of 31 cities and unincorporated areas of Los Angeles County (refer to Chapter 3 for detailed description of the project location).

## 4.2 BACKGROUND

LAUSD currently has a K-12 enrollment of approximately 502,850 students, including charter school students. The District also serves approximately 11,795 pre-K and early education students, 23,094 in special education and other programs, and 27,740 adult education students. To serve all these students, the District operates or funds 1,424 primary, elementary, middle, and high schools, along with special education, charter, magnet and other specialized schools and work centers.<sup>34</sup>

Since 1997, LAUSD has embarked on an unprecedented capital improvement program that has grown to a total budget of over \$32 billion—the largest new school construction and modernization program in the history of the United States. Six local school construction and repair bond measures (Proposition BB and Measures K, R, Y, Q, and RR) passed by the voters within LAUSD boundaries provide the majority of the funds for the Facilities Services Division (FSD) bond program. State bonds approved through ballot initiatives (Propositions 1 A, 47, 55, 1 D, and 51), federal funding, grants, and various local matching funds comprise the balance of program funding. The primary funding sources for the bond program, valued at approximately \$32.96 billion, are local bonds and matching funds from State bonds. These two sources provide approximately \$30.66 billion, or 93%, of total program funding. Other sources include developer fees, Certificates of Participation, and special funding sources such as Federal Emergency Management Agency (FEMA) grants, local sources of matching funds, Proposition BB (1997)<sup>35</sup> and subsequently Measures K (2002),<sup>36</sup> R (2004),<sup>37</sup>

<sup>34</sup> LAUSD Fingertip Facts 2022-23, LAUSD Net, November 17, 2022. <https://achieve.lausd.net/facts>.

<sup>35</sup> Proposition BB is a school bond measure that authorizes LAUSD to use \$2.4 billion in bonds for the construction of new schools and the repair and modernization of existing schools through the district to improve local schools and relieve classroom overcrowding. The ballot measure was approved in April 1997 by 71% of voters.

<sup>36</sup> Measure K “Safe Healthy Neighborhood Schools Act” is a school bond measure that authorizes LAUSD to issue \$3.35 billion in bonds for repair and renovation of existing schools and to build neighborhood schools to improve local schools and relieve classroom overcrowding. The measure was passed in November 2002 by 64% of voters.

<sup>37</sup> Measure R “Safe and Healthy Neighborhood Schools Improvement Act of 2004” is a school bond measure that authorizes LAUSD to issue \$3.87 billion in bonds to continue repair/upgrade of aging classrooms and build neighborhood schools. The measure was passed in March 2004 by 63% of voters. <http://www.laschools.org/bond/faq>.

## 4. Program Description

and Y (2005).<sup>38</sup> Proposition BB, Measures K, R, and Y focused on addressing deteriorated and overcrowded conditions at schools and on providing students with the opportunity to attend a neighborhood school on a traditional two-semester calendar by constructing new schools and adding permanent seats to existing schools. Known as the “New School Construction Program”, projects under it began in 1997 and officially concluded in 2017. Accomplishments of the District during this period include 131 new schools and 65 campus expansions.

Under State law, bond program funds cannot be used for school operations or administrative support tasks such as general administration, teachers' salaries, materials, and/or supplies for general or instructional use. Allowable uses include:

- Modernization
- Renovation
- Construction
- Increase of capacity in classrooms or specialized facilities such as libraries
- Land purchase and relocation to enable school use
- Other purposes as designated in the local bond language that complies with state laws and constitutional provisions

Each project budget may include several or all the following major components depending on the scope of work: land acquisition, design, construction, testing, inspection, and other costs such as project management and environmental remediation. Projects can be funded with one source, or in many cases, using multiple funding sources.

### School Upgrade Program

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 eight 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, over 20,000 repair and modernization projects have been funded by the SUP and completed by FSD, and additional projects valued at approximately \$5.8 billion are underway. Comprehensive modernization projects are currently underway for 22 school sites and major modernization planning has started for seven school sites. With the adoption of Los Angeles City Board of Education

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<sup>38</sup> Measure Y “Safe and Healthy Neighborhood Schools Repair and Construction Measure of 2005” is a school bond measure that authorizes LAUSD to issue \$3.985 billion in bonds to continue repair/upgrade of aging classrooms and to build new neighborhood schools. The measure was passed in November 2005 by 66% of the voters. <http://www.laschools.org/bond/faq>.



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Resolution (Res-002-22/23)<sup>39</sup>, the District is committed to a long-term effort to ensure all school facilities have adequate nature-based, climate-appropriate green spaces where students recreate, play, and spend time.

Under the major modernizations, upgrades, and reconfigurations category, the Measure RR implementation plan targets funds to upgrade approximately 2,300 classrooms at 50 schools and create outdoor learning environments. Classroom upgrade projects could include projectors and smart/white boards, flexible furniture, electrical upgrades and additional outlets, window blinds, interior paint, removal of asbestos floor tiling, and accessibility upgrades, but will not include moving walls or replacing ceilings or lighting. Half of the funds for classroom upgrades will be immediately available for prioritization by the Region, and the remaining half will be distributed in subsequent years based on student and facilities equity indices at that time. New projects for outdoor learning environments could include the removal of relocatable buildings and the addition of landscaping, shaded seating areas, internet connectivity, plumbing upgrades for existing infrastructure, and accessibility improvements.

For the second largest spending target within SUP, critical replacements and upgrades of school building/site systems and components, the Facilities team identifies projects based on a variety of considerations. Projects are defined through an assessment of the following: urgent/emergency conditions, critical health and safety concerns/code compliance issues, facility condition index (FCI) scores and assessment surveys, service call records, backlog of known critical repair needs, and the impact on the learning environment. Within this SUP category, approximately 550 approved projects include improving playgrounds and athletic spaces; addressing critical school building components such as roofing, HVAC, paving, and plumbing; seismically retrofitting buildings to improve structural integrity; sustainability initiatives such as water and energy conservation; new secure entrances at elementary schools; and tackling specific facilities needs at numerous schools throughout the District as described in the Districtwide Facilities Initiatives exhibit. The Measure RR implementation plan increased the spending target for this category.

The critical replacements category of capital need also includes investments in energy and water efficiency projects, education and awareness programs, and pilot projects that test new technologies which could help reduce rising utility costs. These stem from the latest Memorandum of Understanding (MOU) between the District and the Los Angeles Department of Water and Power (LADWP) which covers five years, starting in 2021, with annual contributions from both agencies. Per the MOU, LADWP agrees to fund approximately \$72.5 million in school upgrades and programs and the District agrees to contribute approximately \$15 million toward costs associated with these conservation measures. It is anticipated that the continued implementation of energy and water efficiency programs can decrease the District's utilities consumption and help meet its goal of a 20% reduction over the 2014 baseline by 2024.

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<sup>39</sup> Los Angeles City Board of Education Resolution: Green Schools for All: Equitable Funding and Expansion of Green Spaces across District Campuses (Res-002-22/23). September 27, 2022.

## 4. Program Description

### 4.3 STUDENT DEMOGRAPHIC TRENDS

#### 4.3.1 State

California experienced the fifth consecutive decrease in total Public K-12 enrollment in the 2021–2022 school year (-110,000 students), enrolling 5,892,000 students. Over the next 10 years, if current trends in live births and migration hold, a further decline of 524,000 in total enrollment is projected, resulting in total enrollment of 5,368,000 by 2030–2031<sup>40</sup>.

#### 4.3.2 County

The largest increases in county enrollment between 2010 and 2021 in the State of California were in Kern (13% growth, 21,654 students), Sutter (15% growth, 3,043 students), and San Joaquin (11%) counties. Enrollment is projected to continue to decline Statewide, and in the District. From 2010 to 2017, enrollment declined steadily in LAUSD, but the rate of decline increased in 2017 and overall total student population in Los Angeles County schools is projected to decline another 24% by 2032–2033.<sup>41</sup> Birth rates continue to decline in Los Angeles County from prior to the onset of the recession in 2007. In fact, births in Los Angeles County in 2022 are 35% lower than in their peak year of 1990.<sup>42</sup> The population of school aged children (5-19 age group) declined by the most of all age categories between 2010 and 2021, with a 4.1% drop. Over the next 10 years, from 2023-2033, Los Angeles County student populations grade TK-5 is projected to decline by 16%; students in grades 6-8 are expected to decrease by 19%; student populations in grades 9-12 are projected to decline by 17%; while ungraded student enrollment is projected to decline by 6% (see graph below; data can be found in Appendix C of this EIR).<sup>43</sup>

The decline in LAUSD student enrollment over the past decade due to several factors, including the declining birth rates and the increasing cost of living and housing. During the 2021–2022 school year, 519,586 K-12 students were enrolled in the District—down 13% from the District’s peak in 2002. Enrollment at the District has been steadily declining for the past two decades, with a steeper decline during the pandemic. The District has lost 25% of the student population it had at its peak in 2004. Over the next 10 years, LAUSD projections show that total student enrollment will decrease by 18% by 2033 (see graph as follows; data can be found in Appendix C of this EIR). This trend coincides with the Department of Finance projection for Los Angeles County, which is expected to see an overall decline of over 18% by 2033.

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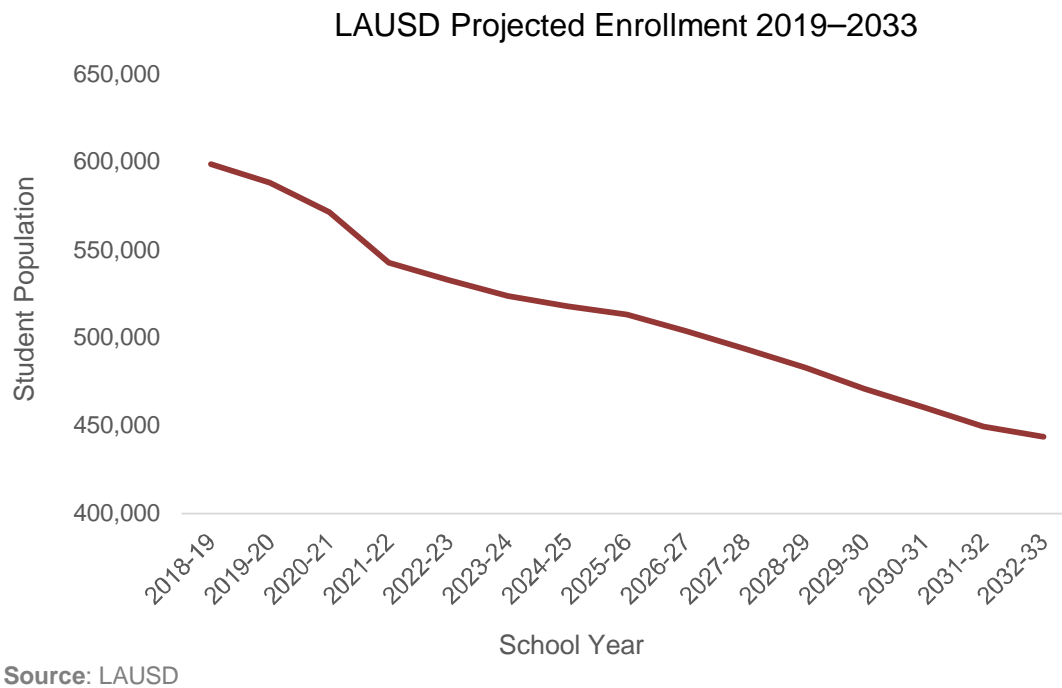
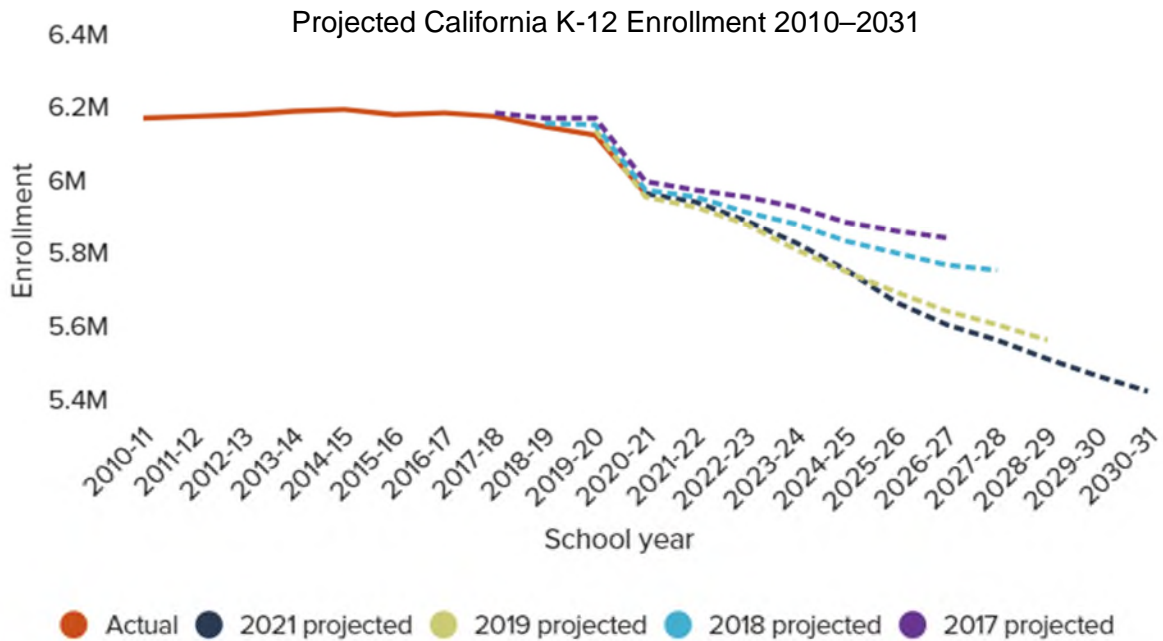
<sup>40</sup> State of California, Department of Finance, California Public K-12 Graded Enrollment and High School Graduate Projections by County, 2022 Series. Sacramento, California, September 2022.

<sup>41</sup> LAUSD Enrollment Projections 2018-2033.

<sup>42</sup> Dowell Myers and John Pitkin. 2013. The Generational Future of Los Angeles: Projections to 2030 and Comparisons to Recent Decades. Produced by the Population Dynamics Research Group, Sol Price School of Public Policy, University of Southern California. Text and supporting materials are published at: <http://www.usc.edu/schools/price/research/popdynamics>.

<sup>43</sup> Los Angeles Unified School District Enrollment Projections 2018-2033.

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## 4. Program Description

### 4.4 BOND HISTORY

This brief history of the bonds' passage includes the total funds approved for LAUSD in the case of local bonds, some of which are managed by departments outside of FSD, and the total funds approved for school districts throughout the state in the case of state bonds. The bond programs managed by FSD are largely funded with local and state bonds that were approved by voters over the course of several years. State bonds approved through ballot initiatives (Propositions 1 A, 47, 55, 1 D, and 51), federal funding, grants, and various local matching funds comprise the balance of program funding. Six local school construction and repair bond measures (Proposition BB and Measures K, R, Y, Q, and RR) passed by the voters within LAUSD boundaries provide most of the funds for the Facilities Services Division bond program.

#### **April 1997, Local Proposition BB**

Voters approved the first local bond in 34 years, Proposition BB, which allocated \$2.4 billion for the modernization of facilities and the addition of classroom space.

#### **November 1998, State Proposition 1A**

A state bond with \$6.7 billion for K-12 public school facilities was approved by voters and provided the first funding for the new Statewide School Facility Program. At the time, Proposition 1A was the largest school bond in the state's history.

#### **November 2002, Local Measure K and State Proposition 47**

Voters approved Measure K with \$3.35 billion in local funding and Proposition 47 with \$13.05 billion in state funding, of which \$11.4 billion was designated for the new construction and modernization of K-12 facilities, as well as funding for charter school facilities, critically overcrowded schools, and joint use projects.

#### **March 2004, Local Measure R and State Proposition 55**

Local bond Measure R was approved by voters to provide \$3.87 billion for new school construction, modernization and repair. Statewide, Proposition 55 was approved with \$10 billion out of the \$12.3 billion total allocated as matching funds for K-12 school projects that focus on overcrowding, enrollment growth, and the repair and modernization of older facilities.

#### **November 2005, Local Measure Y**

Voters approved local bond Measure Y, which provided \$3.985 billion for new school construction, modernization, and repair.

#### **November 2006, State Proposition 1 D**

Proposition 1 D was approved by the voters with \$10.416 billion in state funding, of which \$7.329 billion was earmarked for K-12 projects that continue to address the goals of the earlier state bonds, as well as funding for career technical education and high performance schools that promote energy efficiency.

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### **November 2008, Local Measure Q**

Voters approved local bond Measure Q, which provided \$7 billion for repairing aging schools, upgrading schools to modern technology, creating additional capacity, promoting a healthier environment, and ensuring transparency and accountability.

### **November 2016, State Proposition 51**

Proposition 51 was approved by voters for \$9 billion in state-matching funds, of which \$7 billion is designated for K-12 projects including bond funding for new school construction, school modernization, and facilities for career technical education and charter schools.

### **November 2020, Local Measure RR**

Voters approved local bond Measure RR, providing \$7 billion to upgrade and modernize campuses for 21st century learning and COVID-19 safety standards, address inequities in public school facilities, and improve accessibility, environmental efficiency, safety, and security.

#### **4.4.1 Measure RR**

Measure RR was passed in 2020 to help address the significant and unfunded needs of Los Angeles public school facilities. Measure RR was 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. Los Angeles Measure RR provides the District with the authority to issue an additional \$7 billion of general obligation bonds to support the continuation of the District's successful bond program. Measure RR proceeds may be used when necessary to complete projects initiated with funds from Measure K, R, Y, and/or Q as long as the project appears on the Measure RR Bond Project List, as authorized by voters. Bond proceeds may only be used for the construction, reconstruction, rehabilitation, or replacement of school facilities, including furnishing and equipping of school facilities. It does not allow for teacher, administrative salaries, or other school operating expenses. Measure RR does not provide sufficient funding to undertake all projects identified in the Bond Project List, nor guarantee that a project will be implemented at every campus. Not including Measure RR funds, approximately \$156 million remains available for new projects.

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 Regional leadership. Projects designed to achieve the objectives of Measure RR will be incorporated into the SUP based on a prioritization methodology adopted through the solicitation of input from Community of Schools Administrators (CoSA) and Region<sup>44</sup> leadership to help inform priorities, scoping and project development.

The integration of Measure RR funding and priorities into the updated SUP operational framework will support the continuation of the District's successful capital school facilities program, funding flexibility and efficiency, and the effective operation of the bond program. Priorities for future investments in school facilities and school

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<sup>44</sup> Starting in the 2022 school year, the District transitioned from seven Local Districts to four Regions (North, East, South, West).

## 4. Program Description

technology were identified through an engagement process. The key findings of the CoSA and Region engagement identified the following priorities and gaps by school level:

### **The highest priorities for all schools**

- 21st century classrooms
- Latest computing devices
- Updated IT infrastructure and network, including high speed internet.
- Building systems that are not failing
- A welcoming and attractive environment
- A campus that is safe and secure

### **Additional priorities for elementary schools**

- A secure front entry
- Addressing broken playground pavement
- Providing green space

### **Additional priorities for middle schools**

- Science labs
- Arts/music facilities

### **Additional priorities for high schools**

- Competitive athletic amenities
- Science labs
- CTE/shop spaces
- Arts/music facilities

The key findings of the CoSA and Region engagement also found that regardless of school type, the following deficiencies were the most concerning when broken/poorly functioning:

- HVAC
- Restroom
- Roof
- Pavement (pathways, playgrounds, parking, and quad areas)

## 4. Program Description

The key findings of the CoSA and Region engagement also identified the Technology infrastructure, systems, and equipment most concerning when unreliable/failing:

- Internet
- Computing devices
- Phone and PA/intercom system

The key findings of the CoSA and Region engagement also identified the elements that provide for a physically safer and more secure environment:

- Camera and buzzer system in main office to provide a secure entrance
- Controlled visitor entry directly into main office
- Modernized high-definition security cameras throughout the site
- Modernized smart intrusion alarm systems with video analytics for crime and risk prevention

### 4.5 FACILITIES SERVICES DIVISION

FSD is responsible for the overall planning, design, construction, and maintenance of school facilities in the District. The OEHS is responsible for implementing environmental and site assessment reviews for construction projects, including those as defined by CEQA. All bond funds are managed through FSD.

#### 4.5.1 FSD Mission

The mission of the FSD is to provide safe and healthy learning environments that support educational achievement throughout the LAUSD. FSD accomplishes this mission by building new school projects, repairing and modernizing school facilities, and promoting joint planning with local communities.

#### 4.5.2 FSD Vision

The FSD vision is to build new schools and modernize existing schools that:

- Are educationally and environmentally sound
- Reflect the efficient use of limited land and resources
- Enhance their neighborhoods as centers of their communities
- Are flexible and well-built to remain useful for decades
- Encourage community use projects

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### 4.5.3 Guiding Principles

The Strategic Execution Plan (SEP) establishes guiding principles for the Facilities Services Division's programs:

- Sustainable school projects driven by educational objectives and opportunities to increase instructional resources.
- Integration of Districtwide goals in the planning, design, and delivery of projects.
- Schools designed to operate as centers of their communities including community use of school facilities after school hours and joint use partnerships.
- District facilities that are safe and secure as well as efficient to operate.
- Meaningful community engagement with various constituencies including the school community, non-profit organizations, neighborhood councils, faith-based groups, city and state agencies, and elected officials through all project stages.
- Good client relationships with our business partners to position FSD as an “owner of choice” for contractors and small businesses who help us achieve our goals.
- Individual accountability at all levels of the organization to meet program goals with measurable results and always maintain safe project sites.
- Program management guided by the measurement of actual versus planned targets.
- Quality assurance and quality control at all project stages including identification of best practices.
- Comprehensive, timely, and accurate information through easy-to-read and focused reporting.

### 4.5.4 Strategic Execution Plan

The SEP, which is published annually by FSD, includes a summary of all projects being implemented by the District. These include projects that are funded by federal, state, and local funds.

With the active participation of the community—including the continued supervision of the independent LAUSD School Construction Bond Citizens' Oversight Committee—and with the expertise of architectural, engineering, and urban-planning professionals, the Board annually develops and routinely revises the SEP. The SEP outlines individual projects for building new schools and rebuilding, repairing, replacing, upgrading, and modernizing District facilities, and it constitutes the plan for delivering modern classrooms and support facilities. It describes the District's goals of creating clean, safe, and inspired learning environments and new school buildings throughout neighborhoods of Los Angeles County.<sup>45</sup>

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<sup>45</sup> LAUSD, 2022 Facilities Services Division (FSD) Strategic Execution Plan (SEP).



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### 4.5.5 Facilities Condition Assessments

In August 2012, LAUSD's Maintenance and Operations branch began performing Facilities Condition Assessments (FCAs). These assessments are performed by teams of skilled trades personnel to determine the remaining service life of over 1,200 different types of school building components. The Facilities Condition Assessments take about two years.

As condition assessments are completed, the information is used in conjunction with master planning surveys. The combined efforts are used to formulate solutions to major school deficiencies, instructional needs, and enrollment projections. The conceptual planning process considers removing temporary or underutilized buildings, replacing obsolete structures, modernizing existing facilities, and recapturing open space. In addition, planning takes into account possible reductions in energy and water consumption, opportunities for joint use development, and input from key stakeholders in the school community. The facilities master plans pave the way for the development and execution of future capital projects that will modernize the District's aging and deteriorating existing campuses and further reduce school overcrowding.

### 4.5.6 Cost Management

Cost management efforts are an integral part of the culture for the team executing and managing the bond program. FSD's systems, policies and procedures, and highly qualified staff provide proper controls, approvals, and reporting of project execution status, costs, and funding sources. While industry best practices are used to deliver projects within budget, cost forecasts require diligent revision due to unforeseen conditions, changes to scope, inclement weather, economic forces, and the availability of qualified contractors. FSD has established reserve accounts to meet such unanticipated costs and to ensure completion of the program.

### 4.5.7 Funds Management

FSD proactively works to maximize available program funds. Projects are designed not only to comply with school needs, state mandates and District guidelines, but also to take full advantage of eligibility for state matching funds or other available funds. Applications for projects that meet the required state eligibility are submitted to the state in accordance with guidelines for up to a 50% funding match on new construction projects and up to a 60% funding match for the majority of repair and modernization projects based on the state's current formula.

Successful completion of the bond program can only be achieved through active funds management of a financially unified program. FSD staff manages the use of all funding sources, including state bond fund apportionments, declared state savings, and reimbursements in a manner that enables its full utilization and ensures compliance with applicable laws, regulations, and policies. Specific funding sources are allocated and managed to meet the requirements of individual projects and managed programs. Additionally, when a project requires funding, but the intended source is not available, projects are sometimes funded with an interim source until the permanent source of funds is available. Once the permanent funding source is received, the initial funding source is returned.

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Furthermore, FSD recommended an alternative approach to defining and allocating funds to new projects that enables the District to continue addressing unfunded school facilities needs going forward. Traditionally projects are initially presented to the BOC and Board to authorize funding for all the activities required to complete a project. Another option is to request initial funding for only preconstruction activities, such as planning, due diligence, and design through Division of the State Architect (DSA) approval, which may include the placement of interim housing as well as environmental analysis. This alternate strategy allows more immediate facilities needs to be addressed sooner, allocates significantly less funding, and prepares projects to be ready to start construction when funding becomes available in the future. This type of project proposal requires staff to return to the BOC and Board at a later date for authorization and funding for construction-related activities. In instances where a significant design is not required or other factors necessitate the commitment of the full project budget, FSD pursues the traditional method of defining new projects that requests authorization to fund and execute all activities.

Utilizing this alternative funding approach, projects that replace portable buildings and those that address critical repairs or instructional needs with a significant period required for the design process, were initially approved by the Board of Education for preconstruction activities. These projects have subsequently been approved for full construction activities with their scopes, budgets, and schedules updated to reflect the projects' anticipated completion. This funding approach has also been applied to the seven schools identified for major modernizations under the Measure RR implementation plan which can be found in the Region exhibits. However, the budgets for these projects refer to funding for preconstruction activities such as site due diligence, planning, and feasibility studies, and dates for substantial completion cannot be provided until the scope is defined and additional funding is allocated for construction.

Although the sources of funds for the bond program includes all of the local bonds approved by voters, significant portions of Measure Q and Measure RR have not yet been issued. During the most recent issuance in November 2021, the District sold approximately \$124 million of Measure R, \$70 million of Measure Y, and \$300 million of Measure RR bonds. With this sale, all Measure Rand Y bonds have now been issued.

### 4.6 FSD BOND PROGRAMS GOALS, SCOPE & SUP UPDATE

The FSD bond programs have evolved over several years to include various programmatic goals and corresponding scopes of work. The respective goals and scope for the School Upgrade Program, Capital Improvement Program, Charter School Facilities Upgrades & Expansions Program, New School Construction Program, Repair & Modernization Program, and Joint Use/Innovation Fund are detailed in this section. Now that the District has successfully reduced overcrowding, the goals and scope of the bond programs are focusing on providing significant and long-lasting investments in aging and deteriorating legacy campuses. In addition, Districtwide initiatives have been developed to address specific facilities needs at numerous schools throughout the District.

#### 4.6.1 School Upgrade Program

In January 2014, the School Upgrade Program (SUP) was created to develop projects that modernize, build, and upgrade school facilities to improve student health, safety, and educational quality. Over the course of the

## 4. Program Description

last several years, new sources of funds were allocated to SUP by the Board of Education as new requirements and priorities emerged and facilities needs continued to grow. These additional funds allowed further improvements to ADA accessibility, gymnasium air conditioning, technology infrastructure and systems, new and expanded wellness centers, as well as other pressing school facilities needs related to safety, compliance, and instructional requirements.

In 2021, the program was updated to integrate funding and priorities for Measure RR, the most recent local bond approved by voters in November 2020, providing an additional \$7 billion. The changes approved for the SUP by the Board, along with an implementation plan for Measure RR that will guide the development of project proposals, were the result of input gathered from engagement with local leadership. This collaborative effort sought to identify the types of facilities and technology improvements that would be most important to school communities at all schools as well as at each grade level.

The District is currently implementing FSD capital projects with funding from Measures R, Y, and Q,<sup>46</sup> the previously established program reserve, and interest earned on state bond cash balances. Measure RR funding will be allocated for future projects to continue facility improvements and is the primary source of funding for the SUP Update.<sup>47</sup> The Subsequent Program EIR for the SUP Update is being prepared at this time because Measure RR funds are becoming available through the District's bond sales program and the prioritization methodology and project planning are nearly complete. Since 2020, when Measure RR was adopted by the Board and approved by voters, new information about the condition of school facilities has become available. The SUP serves as an updated and restructured version of the "2020 Bond Funding Priorities Package" for capital planning purposes.

With the adoption of Los Angeles City Board of Education Resolution (Res-002-22/23), the District is committed to a long-term effort to ensure all school facilities have adequate nature-based, climate-appropriate green spaces where students recreate, play, and spend time, such as square-footage of grass, appropriate shade via tree-canopies, learning gardens, developmentally appropriate outdoor classrooms (e.g., Nature Explore Classrooms), and naturescapes. All district schools have a minimum standard of 30 percent (%) green/natural space on campuses, and/or must ensure at least 30% of the existing hard-surface schoolyard is converted into safe and sustainable green space by 2035. The Green Schools for All program prioritizes schools based on a Greening Index, which compares need for green spaces across district campuses and allocates resources for future "greening" projects at schools with more need. All other future District projects must also include minimum standards of green space (to the extent feasible based on the physical constraints of individual campuses).

### 4.6.2 SUP Project Categories

The School Upgrade Program is divided into categories of capital need and associated spending targets, some of which are managed by other groups in the District. Within each category, there are several project types to address various facilities needs and new projects will be prioritized through coordination between FSD staff and relevant stakeholders before going to the BOC and Board for approval. The revised SUP has 11 categories

<sup>46</sup> Proposition BB and Measure K funds have been exhausted.

<sup>47</sup> LAUSD Facilities Services Division, 2022, Strategic Execution Plan.

## 4. Program Description

managed by FSD, with their spending targets totaling approximately \$14 billion, that are included in this Strategic Execution Plan:

- **Major Modernizations, Upgrades & Reconfigurations to School Campuses.** Prior to Measure RR, project types included comprehensive modernizations, classroom replacements, seismic modernizations, and school additions. Additional project types under the Measure RR implementation plan include major modernizations at seven schools, classroom replacements at approximately 12 schools, classroom upgrades for about 2,300 classrooms at approximately 50 schools, construction activities for classroom replacements at eight schools that were previously funded only for preconstruction activities, outdoor learning spaces, and campus upgrades and alterations to support academic reconfigurations of schools/programs.
- **Critical Replacements & Upgrades of School Building/Site Systems & Components.** Prior to Measure RR, project types included replacements and upgrades to systems such as electrical, plumbing, and heating, ventilation, and air conditioning (HVAC), as well as roofs, paving, synthetic turf, lighting, and high school classroom furniture. Additional project types under the Measure RR implementation plan include more replacements of building systems and components such as those previously undertaken, playground and campus exterior upgrades at approximately 30 elementary schools, and secure entrances at approximately 300 elementary schools.
- **School Cafeteria Upgrades.** Prior to Measure RR, project types included providing school cafeterias with updated equipment, upgrading walk-in freezers, and constructing new food service facilities. Additional project types under the Measure RR implementation plan include cooling relief for kitchens throughout the District, upgrades to the cafeteria management system used in all cafeterias, modernizing serving lines, and exploring the possibility of constructing a central food production facility.
- **School Upgrades & Reconfigurations to Support Wellness, Health, Athletics, Learning & Efficiency.** Prior to Measure RR, project types included an addition to unify instructional programs on one site, new specialized facilities for visual and performing arts, school reconfigurations for new academies and pilot schools approved by the Board, upgrades to modernize outdated science labs, new or expanded wellness clinics, SEEDS projects, and urban greening partnerships. Additional project types under the Measure RR implementation plan include upgrades to high school competitive athletic facilities, construction activities for new specialized facilities at two high schools that were previously funded only for preconstruction activities, projects to support partner-funded programs which require funding assistance, and additional projects for wellness clinics and SEEDS.
- **Early Childhood Education Facilities Upgrades & Expansions.** Prior to Measure RR, project types included new outdoor classrooms, replacement, and upgrade of failing building systems, and upgrades to closed centers to enable their reopening. Additional project types under the Measure RR implementation plan include replacements of building systems and components, upgrades, or expansions/additions to existing early education centers and/or elementary schools, and more outdoor classrooms.

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- **Adult & Career Education Facilities Upgrades.** Prior to Measure RR, project types included replacement and upgrade of failing building systems, paving projects, and technology upgrades. Additional project types under the Measure RR implementation plan include upgrades to school technology systems and equipment, replacements of building systems and components, and upgrades or expansions/ additions to existing adult education centers.
- **Americans with Disabilities Act (ADA) Transition Plan Implementation.** Prior to Measure RR, project types included accessibility enhancements, critical barrier removals, and projects responding to immediate needs under the Rapid Access Program (RAP). Additional project types under the Measure RR implementation plan include more accessibility enhancements and RAP projects to address immediate needs.
- **Charter School Facilities Upgrades & Expansions.** Prior to Measure RR, project types included augmentation grants, Proposition 39 co-location renovations, and shared facilities improvements. Additional project types under the Measure RR implementation plan include long-term charter facilities solutions, such as replacements of building systems and components, upgrades to school technology systems and equipment, modernizations of District school facilities operated by charter schools, as well as more augmentation grants, Proposition 39 co-location renovations, and shared facilities improvements.
- **Board Member Priority and Regional Priority Projects.** Prior to Measure RR, project types included equipping schools with technology equipment and furniture, upgrading athletic and playground equipment, providing secure entrances and intrusion alarm systems, and installing surveillance systems, school marquees, and water filling stations. Additional project types under the Measure RR implementation plan include projects to address needs identified by Board Member offices or Region offices such as those previously undertaken.
- **IT School Network Infrastructure Upgrades Executed by FSD.** Projects to provide all K-12 schools with network infrastructure upgrades including Wi-Fi access were primarily executed by the Information Technology Division, however in an effort to provide schools with Wi-Fi capability sooner, a portion of the work was executed by FSD. Projects managed by FSD were completed prior to Measure RR and this category is not part of the Measure RR implementation plan, although categories of need managed by the Information Technology Division have adjusted spending targets.

### 4.6.2.1 ANTICIPATED PROJECT TYPES

The type of projects that are anticipated to be undertaken as part of the SUP project categories are grouped and listed below:

#### Type 1: New Construction on New Property

- Property acquisition adjacent to existing campus for campus expansion. These projects may include, but are not limited to, new building construction for classrooms, library/media center, performing arts,

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gymnasium, administration offices and other construction, such as a stadium, athletic fields, restrooms, drop-off zones, parking, and driveways.

### **Type 2: New Construction on Existing Campus**

- New classrooms; net increase in student capacity greater than 25% or 10 classrooms, whichever is greater.
- New facilities including, but not limited to, library/media center, performing arts, auditorium, gymnasium, food services, outdoor classrooms, and other construction such as athletic venue lights (for field or outdoor pool), stadiums, outdoor pools, athletic fields.
- New specialized facilities for visual and performing arts, school reconfigurations for new academies and pilot schools.
- SEEDS projects and urban greening partnerships.
- Demolition and new building construction on existing campus.
- Installation of temporary structures.
- Construction of new wellness clinics, parent and family center, other community uses, including joint use on existing campus.
- Construction of restrooms, drop-off zones, new parking lots, new driveways.
- Expansions and/or additions to existing early education centers and/or elementary schools and existing adult education centers.

### **Type 3: Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation**

- Upgrade and/or retrofit old and outdated school campuses to create 21st century learning environments while upgrading earthquake safety and environmental sustainability.
- Upgrade deteriorating and outdated school building systems, grounds, furniture, and equipment to reduce safety hazards, complete necessary updates in schools, and provide clean, renewable energy improvements.
- Upgrade, modernize and/or construct charter school facilities.
- Replacement/upgrade of aging, undersized, and inadequate school cafeterias.
- Improve school safety, security, network, and emergency communications systems.
- Furnish and equip schools with 21st century learning technologies, and upgrade/install technology infrastructure, information systems, hardware, and software.
- Replacement of outdated and inefficient school buses to meet 21st century environmental and safety standards.

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- Installation of modular units, portable classrooms, or bungalows; net increase in student capacity is greater than 25% or 10 classrooms, whichever is greater.
- Installation of modular units, portable classrooms, or bungalows; net increase in student capacity less than 25% or 10 classrooms, whichever is greater.
- Improvements and/or expansions to existing health clinic, parent and family center, or other community uses on existing campus.
- Demolition and removal of permanent buildings or structures.
- Upgrade school buildings to full ADA compliance.
- Installation at existing schools such as play equipment, fencing, and ADA compliance.
- Outdoor repair, modernization, replacement, expansion, or upgrade of athletic fields (natural grass to synthetic turf), play equipment, fencing, parking, replace shade shelter, asphalt/concrete paths, driveways, ADA compliance, and seismic retrofits.
- Sustainability energy conservation installations such as new photovoltaic panels on rooftops and parking lot shade structures or wind arrays.
- Repair and replacement of building systems such as flooring, windows, and roofing.
- New or replacement of furniture or other interior equipment.
- Replacement existing diesel buses with higher efficiency buses.
- Sustainability energy conservation changes, such as replacement, upgrade, or retrofit of inefficient lighting, electrical transformers, building insulation, and installation of irrigation smart controllers.
- Construction and/or upgrade renewable, sustainable and efficient water systems, equipment, and features.
- Structural upgrades of modular units or portable classrooms, relocation of portables on campus.
- Exterior cosmetic improvements such as Facelift Program, painting, and site cleanup.
- Interior remodeling and renovations, painting, installation, repair, and upgrades to fire/life-safety/security/emergency systems, ADA, plumbing, lighting, electrical, HVAC, computer systems, low-flow restroom fixtures, and food service equipment.
- Replacement of lead water pipes.
- Abatement of lead-based paint and asbestos in buildings.

### **Type 4: Operational and Other Campus Changes**

- Removal of modular units, portable classrooms, bungalows, or other temporary structures at existing school facilities.

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- Change in student capacity (student classroom loading).
- Change in grade structure (e.g., change grades from 4–6 to 7–8 or other).
- Change in use or occupancy of existing facilities (charter school, co-locations, joint use).
- Co-location or land lease agreements for charter school facilities.
- Closure of existing school or transfer of students to another school.
- Reopening closed schools.
- Lease or use of non-District property for student classrooms.

### 4.7 PROJECT PRIORITIZATION METHODOLOGY

District's Board of Education will adopt a prioritization methodology for site-specific projects proposed under the SUP. This Subsequent Program EIR would be applicable to all capital project activities currently in planning or design, and all future projects developed and added to the District's SEP.

#### 4.7.1 Framework for Individual Projects

The Subsequent SUP EIR is prepared on a series of actions that can be characterized as one large project and are 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. All projects will be analyzed with any Project Design Features (if proposed), all Standard Conditions of Approval (as appropriate), and all feasible Mitigation Measures (if required). The Measure RR Implementation Plan outlines project types, and prioritization. Appendix E shows standard conditions (SC). Nearly 2,000 projects have been funded by the SUP and completed by Facilities, and nearly 690 additional projects are underway throughout the District. There is also funding targeted for charter school facilities, special education facilities, school food services facilities, early education facilities, adult education facilities, afterschool/partnership facilities, school buses, Inspector General oversight, technology upgrades and for other priority projects.<sup>48</sup>

#### 4.7.2 Capital Improvement Program

Since 1997, the District's capital improvement program has been comprised of multiple sub-programs organized by project type, funding source, urgency or other policy initiative or implementation strategy. All of the programs are described in the District's FSD SEP. Most recently, the FSD's largest programs have been organized into four categories:

- New School Construction Program
- Repair and Modernization Program

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<sup>48</sup> "Prioritization Methodology for Identifying and Defining Major Renovation, Modernization, and/or Reconfiguration Projects" Memorandum from Superintendent Ramon C. Cortines to Members, Board of Education, November 3, 2014.



## 4. Program Description

- Joint Use/Innovation Fund and Charter Facilities Upgrades and Expansions Program
- Capital Improvement Program

The Capital Improvement Program (CIPR) was established by the Board in April 2010 to allocate local bond funds for priority projects and to assess the future capital needs of our schools. Additional Board actions related to this program include the allocation of CIPR funds to the priority projects and programs detailed below as well as previously unfunded District priorities. CIPR funds were also allocated to reduce encroachment on the General Fund from capital projects/programs and a portion of debt service for projects previously funded by Certificates of Participation. CIPR includes a variety of projects and programs:

- **New Construction:** Included new school and comprehensive modernization projects that were not necessary to meet the goal of providing neighborhood schools that operate on a traditional two-semester calendar, but further relieved overcrowding, reduced reliance on portable classrooms, and improved school facilities through campus redevelopments.
- **Repair & Modernization:** Campus improvements, communications/technology upgrades, core facility renovations, and shade shelters at selected campuses.
- **Parent & Family Center Improvements:** \$20 million was allocated to provide schools with new or enhanced centers that welcome parents and families as well as reflect their central role in our schools' success. More than 320 projects have been defined through a collaborative effort led by the Parent Community Services Branch and FSD with support from school site personnel, parents, and Instructional Superintendent offices.
- **Photovoltaic Installations:** All 61 projects to install solar panels on rooftops and parking shade structures throughout the District were completed and are anticipated to generate approximately 20.9 megawatts of solar energy and avoid General Fund utilities costs by an estimated \$112 million over a 20-year period. These projects were funded with a combination of local bond funds and LADWP settlement and incentive funds.
- **Sustainability:** All 18 energy conservation projects were completed to further reduce the District's utility bills.
- **Facelift Program:** All 236 projects to improve the visual conditions of District-owned secondary schools and high need elementary schools were completed.

### 4.7.3 Capital Needs Assessment Program

The capital needs for the District are determined and opportunities for future investments are identified through the FCA. The FCA is an ongoing effort by teams of skilled-trades personnel in Maintenance & Operations whose expertise is used to examine the remaining service life of approximately 1,100 different types of school-site building components. This assessment continuously collects information as facilities projects are completed and intends to maintain data on all school sites to facilitate new project planning. Data from the FCA is used to support the development of projects throughout the Facilities Services Division as well as

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minimize costs, increase efficiency, and address deficient building components by incorporating scope into approved projects prior to construction. Along with the FCA, survey staff support Districtwide initiatives related to upgrading inefficient lighting and improving drinking water quality.

### 4.7.4 Charter Facilities Upgrades and Expansions Program

The Charter Facilities Upgrades & Expansions Program partners with charter schools to address their facilities needs on District property. As expressed in the most recent District bond language, the primary purposes of local bond funds for charter school facilities are to develop District-owned facilities for charter schools and to help meet the District's obligations under State Proposition 39 to offer available space on District campuses to charter schools. To facilitate these goals, the program includes:

- Augmentation Grants
- Proposition 39 Co-Location Renovations
- Proposition 39 Shared Facilities Improvements
- Long-Term Charter Facilities Solutions

These initiatives utilize local charter bond funds to meet the program's goals. One portion of this program upgrades and modernizes campuses or develops new sites through augmentation grants. These provide local bond funds to leverage with State grants and/or third-party funding sources. The augmentation grant projects developed in response to significant increases in the annual demand for facilities under Proposition 39 and as an opportunity for partnerships that benefit LAUSD and charter schools. In defining new projects, charter schools are selected through the Charter Augmentation Grant Program to identify those that need additional funding to finance long-term, capital improvement projects.

Another key facet of the Charter Facilities Upgrades & Expansions Program involves working with charter schools applying annually for space on District campuses under Proposition 39. The co-location projects typically require the renovation of LAUSD facilities to provide contiguous, furnished, and equipped facilities to charter schools in compliance with Proposition 39. In addition, the shared facilities improvements initiative was created to support new Proposition 39 co-locations by providing facilities projects that jointly improve the learning conditions for students in all schools on a District campus. This initiative began as a pilot program for co-locations during the 2019–2020 school year and was subsequently approved by the Board in September 2021 as a yearly program. The shared facilities improvements provide up to \$100,000 for each District campus with a new charter school co-location for projects agreed upon through a collaborative effort between the co-located District and charter school principals. These Proposition 39 shared facilities projects fund improvements such as safety and security, technology, sustainability and greening, playgrounds and athletics, and furnishings.

Going forward, the implementation of Measure RR includes the development of long-term charter facilities solutions within the program. These project proposals will replace and upgrade building systems and components, update school technology systems and equipment, and upgrade/modernize buildings and campuses of District facilities operated by charter schools. District staff will develop an implementation plan

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once the conditions and needs of facilities are assessed, along with input from the charter school community. Examples of long-term charter facilities solutions include addressing facilities that create safety concerns and are disruptive to school operations such as paving, plumbing, HVAC, roofing, and security systems, as well as technology updates, and playground and athletic facilities upgrades.

All projects within this program are brought to the BOC for review and Board for approval. The exhibit for Charter Schools includes detailed information on active projects under the augmentation grants and Proposition 39 shared facilities improvements as well as the projects completed for the prior academic year under the Proposition 39 co-location renovations. The deliverables summary in the exhibit references the status of each of the program priorities above as well as finalized Furniture/Fixtures/Equipment projects, an earlier part of the program that provided independent charter schools with furniture, equipment, and portable buildings.

### 4.7.5 New School Construction Program

The New School Construction Program was developed to relieve overcrowding and address facilities needs through the construction of new classrooms. The primary goal of the program was to provide all LAUSD students with the opportunity to attend a school in their neighborhood that operates on a traditional two-semester calendar. To achieve this goal, the following objectives were established:

- Build new schools where the overcrowding need was greatest
- Fulfill District obligations resulting from the Williams case settlement by eliminating the use of the Concept 6 calendar
- Eliminate involuntary busing and multi-track calendars
- Implement Full-Day Kindergarten
- Integrate small schools/small learning communities into the design concept of new secondary schools

FSD built new school projects throughout the District in accordance with these goals. New classrooms were delivered through developments on new land, construction on existing property, additions of modular units or portable classrooms, reopening closed schools, and the expansion/redevelopment of school sites including athletic and play spaces. This program also addressed the District's obligation under the Statewide Williams settlement agreement to discontinue the Concept 6 calendar that operated with 17 fewer days of instruction by July 1, 2012. Along with operational changes, the success of the New School Construction Program enabled the District to eliminate the Concept 6 calendar, as required.

### 4.7.6 Future Projects

This program is effectively complete. As part of the SUP, no new stand-alone schools are planned. Small expansions to existing schools may occur or small learning centers adjacent to existing schools may occur. The New School Construction Program will remain in place so future funding may be allocated when new schools are required.

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### 4.8 REPAIR AND MODERNIZATION PROGRAM

The principal goal of the Repair & Modernization Program is to improve deteriorating, aging, and outdated conditions on campuses built prior to the bond program. Through the years, this program has tackled the accumulated backlog of repairs, executed major improvement projects, and upgraded inadequate and aging facilities. The program includes projects as varied as improving the efficiency of lighting and electrical systems, replacing paving and equipment on playgrounds, installing new lunch and shade shelters, renovating campuses to meet state and federal accessibility requirements, repairing building components such as roofs and floors, upgrading information technology networks, transforming athletic facilities, and numerous other school improvements.

#### 4.8.1 Goals and Objectives

While the majority of projects within this program are part of the overall repair and modernization effort, projects are also developed to address specific needs under the following specialized programs:

- Access Compliance in accordance with the Modified Consent Decree including the Rapid Access Program
- Adult & Career Education
- Asbestos Abatement
- Board Member Priorities
- Career Academy Programs including Career Technical Education and Qualified Zone Academy Bond
- Core Facilities Renovations for Auditoriums, Food Services, Gyms/ Athletic Facilities, and Libraries/Wonder of Reading
- Early Childhood Education
- Fire Alarm Systems
- HVAC
- Joint Use Development
- Region Priorities
- Major Repairs
- Portable Buildings including the Portable Removal Plan
- Science Lab Renovations including Science Labs 2012 and Proficiency Plus for All
- Seismic Programs including Life Safety & Seismic and Seismically Repair & Upgrade Portable
- Small Learning Communities
- Other Initiatives

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In order to succeed with a diverse range of programs, the Repair & Modernization Program has coordinated outreach with community stakeholders, school and local administrators, and the Board of Education. Due to the nature of working on active school sites, the program has sought to minimize disruptions to educational programs and other activities in the operating school environment.

The principle goal of the Repair and Modernization Program is to improve deteriorating, aging, and outdated conditions at existing schools.<sup>49</sup> Another goal is to minimize disruptions to educational programs and other activities in the operating school environment while completing repair and modernization projects needed to improve the educational environment. The program includes projects as varied as improving the efficiency of lighting and electrical systems, replacing paving and equipment on playgrounds, installing new lunch and shade shelters, renovating campuses to meet state and federal accessibility requirements, repairing building components such as roofs and floors, upgrading information technology networks, transforming athletic facilities, and numerous other school improvements.

### 4.8.2 Achievements

Under the Repair and Modernization Program, the District has addressed an accumulated backlog of repairs and made major improvements in inadequate and aging facilities.

The largest allocation of funding is associated with major modernizations, upgrades, and reconfigurations with the initial focus on comprehensively modernizing schools. The schools selected for comprehensive modernizations were identified through a data-driven and needs-based assessment of 10 weighted datasets that generate a score to express a school's physical condition. Comprehensive modernization projects are currently underway for 22 school sites within two groups and major modernization planning has started for 7 school sites:

**Comprehensive Modernization Projects**

Group 1	Group 2	Major Modernization Planning
Burroughs MS	92nd St. ES	32nd St./USC Performing Arts
Cleveland Charter HS	Ascot ES	Magnet ES
Grant HS	Belvedere MS	49th St. ES
Huntington Park HS	Elizabeth Learning Center	Canoga Park HS
Jefferson HS	Hamilton HS	Fairfax HS
North Hollywood HS	Kennedy HS	Garfield HS
Polytechnic HS	Lincoln HS	Irving STEAM Magnet MS
Roosevelt HS	McKinley ES	Sylmar Charter HS
San Pedro HS	Reseda Charter HS	
Sherman Oaks Center for Enriched Studies	Shenandoah ES	
Venice HS	Taft Charter HS	

<sup>49</sup> LAUSD Facilities Services Division, 2013, Strategic Execution Plan, Page 8.

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In addition to these modernizations, this category of capital need includes projects to build school additions that relieve neighborhood overcrowding, retrofit or replace facilities with seismic deficiencies, and replace temporary portable classrooms with permanent classroom buildings as well as infrastructure to support these new facilities, accessibility improvements, and various site upgrades. Eight of these classroom replacement projects were previously authorized only for preconstruction activities and as part of the Measure RR implementation plan, the Board approved additional funds for full construction activities. This plan also anticipates investing in approximately 12 additional classroom replacement projects to be prioritized through an assessment of school sites' reliance on portable buildings and the selection of sites in collaboration with stakeholders.

In addition to major modernizations, the Repair and Modernization Program has included projects such as:

- Electrical systems upgrades
- Damaged concrete repairs
- New lockers installation
- Restroom renovations to meet state and federal accessibility codes
- Roof replacements
- Code-compliant fire alarm installations
- Safety and technology upgrades
- Construction or modernization of athletic facilities
- Lighting upgrades in classrooms
- New exterior and interior paint
- Auditorium renovations
- Library and science lab renovations
- New food services additions and improvements

Though the majority of projects have been completed as part of the overall Repair and Modernization Program, projects were also included to address specific needs under the following managed programs:

- Adult and Career Education
- Air-Conditioning Programs
- Asbestos Abatement
- Board Member Priorities
- Career Academies Programs, including Career Technical Education and Qualified Zone Academy Bond (QZAB) Core Facilities Programs, including food services, grandstands, libraries, and sanitary buildings

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- Early Childhood Education
- Region Alterations and Improvements
- Fire Alarms
- Joint Use Development
- Major Repairs
- Modified Consent Decree, including the Rapid Access Program
- Portable Programs, including the Relocatable Housing Unit and Portables Removal Program
- Science Lab & Library Renovation Programs, including Science Labs 2012, Proficiency Plus For All, and Wonder of Reading
- Seismic Programs, including the following: Life Safety & Seismic, Seismically Repair and Upgrade Portables, and FEMA
- Small Learning Communities
- Other Initiatives and Legacy Programs

In order to coordinate and plan for the diverse range of managed programs, the Repair and Modernization Program staff has conducted significant outreach with community stakeholders, school and local administrators, and the Board of Education.

Construction has been completed on more than 20,000 repair and modernization projects.

### 4.8.3 Future Projects

This is an ongoing program with projects being completed and added over time. In the next year, the District anticipates the completion of more than 487 projects at existing campuses as part of the Repair and Modernization Program.

## 4.9 JOINT USE/INNOVATION FUND

The Joint Use/Innovation Fund promotes joint planning with local communities, non-profit organizations, community-based groups, and public agencies that enhances school facilities and maximizes community use. The program seeks to improve District facilities and leverage partnerships in order to provide students, teachers, and the community with needed resources such as:

- Enhanced school facilities for multiple uses to encourage civic and community engagement.
- Improved recreational facilities, athletic fields, gymnasiums, aquatic facilities, and “green” campuses by partnering with organizations that provide capital, in-kind materials, and/or needed programming to school sites.

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- Expanded classrooms and other facilities to provide space for outdoor learning environments, youth development centers and supplementary enrichment programs.
- Expansion and development of school-based health clinics to allow health care providers to co-locate on school campuses to serve students, families, and the community.

### 4.9.1 Achievements

Seventeen joint use projects within the New School Construction Program and Capital Improvement Program, as well as nearly 150 joint use projects within the Repair & Modernization Program, utilize joint use/innovation bond funds. Through a Request for Proposals process, community partners that are able to provide viable and sustainable contributions which benefit students and the community have the opportunity to work with LAUSD to develop facilities and leverage resources. In addition to capital contributions, partners can make program contributions that typically include direct student program facilitation, auxiliary instructional or recreational programming, staff/supervision services, maintenance and operations, utilities, and liability coverage. More than 60 partners have collaborated with the District through this program.

### 4.10 LAUSD STANDARD CONDITIONS

The LAUSD Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects (SCs) are uniformly applied development standards. The SCs are compiled from established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs, as well as typically applied mitigation measures. The SCs are divided into the LAUSD CEQA environmental topics (Appendix G of the CEQA Guidelines plus Pedestrian Safety). For each SC, compliance is triggered by factors such as the project type, existing conditions, and type of environmental impact. Compliance with every condition is not required. The LAUSD School Design Guidelines and Design Standards referenced in the SCs are routinely updated, and the most recently adopted version would apply to future projects. The SCs have been updated since the original Board-adopted Standard Conditions of Approval in 2015 and have been updated as part of this Subsequent Program EIR. This 2023 update incorporates new and revised laws, regulations, guidelines, and LAUSD's standard policies, practices, and specifications. If the Design Guidelines and Design Standards conflict with the current SCs, the Design Guidelines and Design Standards shall be followed. In instances where the District is the Lead Agency but not the project proponent or implementing party (e.g., non-profit, charter school, etc.), the project proponent or implementing party will act as the District's agency (or designee) to implement the applicable SCs.

### 4.11 ZONING OVERRIDE

The California legislature granted school districts the authority to exempt school property from county and city zoning requirements, provided the school district complies with the terms of Government Code Section 53094.<sup>50</sup> As lead agency, the District will comply with the criteria for implementation of the land use

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<sup>50</sup> Government Code Section 53094.



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overrides to render the county and city zoning ordinance inapplicable to existing school properties. All existing schools not already exempt from local zoning would become exempt following a two-thirds vote of the Board. Within 10 days of this action, the Board will provide the county and cities with notice of this action.

On February 19, 2019, in accordance with Government Code Section 53094, the LAUSD Board of Education adopted a Resolution to exempt all LAUSD school sites from local land use regulations.<sup>51</sup> LAUSD school sites are exempt from all local ordinances, such as those pertaining to building height, parking, preservation and replacement of trees, construction permits (except those in the public right of way), recordation of parcel maps, signage, site plan review, and inspection. Within 10 days of this action, notices were sent to the county and cities within the District's boundaries.

### 4.12 CEQA COMPLIANCE

This SPEIR updates the 2015 PEIR which allows adjustments to individual projects under the SUP without preparing a new environmental document for every change. For this SPEIR, the preparation of an Initial Study can lead to either the finding that the SUP-related project is within the scope of the SUP EIR and no additional or increased impacts would occur (see Section D-1.2.1) or that compared to the finding in the SUP EIR additional or increased impacts would occur (see Section D-1.2.3 and Section D-1.2.5).

CEQA does not require an additional, site-specific environmental document if the District determines the site-specific impacts were sufficiently addressed in a program-level EIR. Additionally, CEQA does not require a public process unless the OEHS identifies new or greater impacts. In that case, an MND or EIR would be required under CEQA Guidelines Section 15168(c). All projects will be analyzed with any Project Design Features (if proposed), all Standard Conditions of Approval (as appropriate), and all feasible Mitigation Measures (if required). OEHS has specific guidelines in place to determine CEQA requirements for site-specific projects that involve new construction, modernization, repair, and upgrades. This ensures that the appropriate environmental analysis is performed for each site-specific project. Applicable LAUSD guidance for CEQA procedures include:

- Board of Education Report No. 12902/03, *LAUSD Procedures for Implementing the California Environmental Quality Act*, April 8, 2003

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<sup>(a)</sup> Notwithstanding any other provision of this article, this article does not require a school district to comply with the zoning ordinances of a county or city unless the zoning ordinance makes provision for the location of public schools and unless the city or county has adopted a general plan.

<sup>(b)</sup> Notwithstanding subdivision (a), the governing board of a school district, which has complied with the requirements of Section 65352.2 of this code and Section 21151.2 of the Public Resources Code, by a vote of two-thirds of its members, may render a city or county zoning ordinance inapplicable to a proposed use of property by the school district. The governing board of the school district may not take this action when the proposed use of the property by the school district is for non-classroom facilities, including, but not limited to, warehouses, administrative buildings, and automotive storage and repair buildings.

<sup>(c)</sup> The governing board of the school district shall, within 10 days, notify the city or county concerned of any action taken pursuant to subdivision (b).

<sup>51</sup> LAUSD Board of Education Report Rep-256-18/19.

## 4. Program Description

- LAUSD New School Construction Program, *Program Environmental Impact Report Exemptions*, Chattel, September 2005
- LAUSD Facilities Services Division, *Central Design Management – CEQA Procedures*, May 8, 2006 (preliminary draft)
- LAUSD-OEHS Memorandum: *Activities Not Requiring OEHS Review*, July 27, 2006
- LAUSD-OEHS Reference Guide REF5314.2: *Procedures for Environmental Review of Proposed Projects*, June 12, 2017

Further environmental analysis guidance for future SUP-related projects can be found in Appendix D (CEQA Analysis), Appendix B-3 (Historic Resource Exemptions 2023) of this Subsequent Program EIR.

OEHS review of proposed school sites or improvements to existing District facilities is required to ensure the health and safety of students and staff. OEHS review is required for the following types of projects, regardless of funding source:<sup>52</sup>

- Proposed new school site
- Expansion, major repair, or modernization of existing school facilities
- Proposed placement of bungalows or other temporary structures at existing schools
- Change in or occupancy of existing facilities
- Proposed lease or use of non-District property for District purposes
- Other CEQA projects as listed in Table 4-2

The types of projects anticipated to be undertaken as part of the SUP, along with anticipated CEQA compliance, are shown in Table 4-2.

**Table 4-2 Environmental Compliance for SUP-Related Projects**

Projects	Anticipated CEQA Compliance			Possible CEQA Exemption Class
	CEQA “Project”?	Statutory Exemption?	Categorical Exemption?	
Type 1. New Construction on New Property				
Adjacent property acquisition for existing campus expansion. These projects may include, but are not limited to, new building construction for classrooms (to replace portables), library/media center, performing arts, gymnasium, administration offices and other construction such as a stadium, athletic fields, restrooms, drop-off zones, parking, and driveways.	Yes	No	Maybe	<ul style="list-style-type: none"><li>• Class 3: New Construction or Conversion of Small Structures (14 CCR § 15303)</li><li>• Class 4: Minor Alterations to Land (14 CCR § 15304)</li><li>• Class 11: Accessory Structures (14 CCR § 15311)</li></ul>

<sup>52</sup> LAUSD Reference Guide No. REF-5314.2. *Procedures for Environmental Review of Proposed Projects*. June 12, 2017.

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Projects	Anticipated CEQA Compliance			Possible CEQA Exemption Class
	CEQA "Project"?	Statutory Exemption?	Categorical Exemption?	
				<ul style="list-style-type: none"> <li>Class 14: Minor Additions to Schools (14 CCR § 15314)</li> <li>Class 32: Infill Development Projects (14 CCR § 15332)</li> </ul>
<b>Type 2. New Construction on Existing Campus</b>				
New classroom building; net increase in student capacity <b>greater than</b> 25%, or 10 classrooms whichever is greater.	Yes	No	No	–Initial Study Required
New classroom building; net increase in student capacity <b>less than</b> 25% or 10 classrooms whichever is greater.	Yes	No	Maybe	<ul style="list-style-type: none"> <li>Class 1: Existing Facilities (14 CCR § 15301)</li> <li>Class 2: Replacement or Reconstruction (14 CCR § 15302)</li> <li>Class 3: New Construction or Conversion of Small Structures (14 CCR § 15303)</li> <li>Class 4: Minor Alterations to Land (14 CCR § 15304)</li> <li>Class 11: Accessory Structures (14 CCR § 15311)</li> <li>Class 14: Minor Additions to Schools (14 CCR § 15314)</li> <li>Class 32: Infill Development Projects (14 CCR § 15332)</li> </ul>
New building including, but not limited to, library/media center, performing arts, auditorium, gymnasium, and other construction such as athletic venue lights (for field or outdoor pool), stadiums, outdoor pools, athletic fields.	Yes	No	Maybe	<ul style="list-style-type: none"> <li>Class 14: Minor Additions to Schools (14 CCR § 15314)</li> </ul>
Demolition and new building construction on existing campus (replace school building on same location).	Yes	No	Maybe	<ul style="list-style-type: none"> <li>Class 2: Replacement or Reconstruction (14 CCR § 15302)</li> </ul>
Installation of temporary structures	Yes	No	Maybe	<ul style="list-style-type: none"> <li>Class 14: Minor Additions to Schools (14 CCR § 15314)</li> </ul>
Construction of new health clinic, Parent and Family Center, other community uses, including joint use on existing campus	Yes	No	Maybe	<ul style="list-style-type: none"> <li>Class 1: Existing Facilities (14 CCR § 15301)</li> <li>Class 2: Replacement or Reconstruction (14 CCR § 15302)</li> <li>Class 3: New Construction or Conversion of Small Structures (14 CCR § 15303)</li> <li>Class 4: Minor Alterations to Land (14 CCR § 15304)</li> </ul>

## 4. Program Description

Projects	Anticipated CEQA Compliance			Possible CEQA Exemption Class
	CEQA "Project"?	Statutory Exemption?	Categorical Exemption?	
				<ul style="list-style-type: none"> <li>• Class 11: Accessory Structures (14 CCR § 15311)</li> <li>• Class 14: Minor Additions to Schools (14 CCR § 15314)</li> <li>• Class 32: Infill Development Projects (14 CCR § 15332)</li> </ul>
Construction of restrooms, drop-off zones, new parking lots, new driveways.	Yes	No	Maybe	
<b>Type 3. Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation</b>				
Upgrade and/or retrofit old and outdated school campuses to create 21st century learning environments while upgrading earthquake safety and environmental sustainability.	Yes	No	Maybe	<ul style="list-style-type: none"> <li>• Class 1: Existing Facilities (14 CCR § 15301)</li> <li>• Class 2: Replacement or Reconstruction (14 CCR § 15302)</li> </ul>
Upgrade deteriorating and outdated school building systems, grounds, furniture, and equipment to reduce safety hazards, complete necessary updates in schools, and provide clean, renewable energy improvements.	Yes	Maybe	Maybe	<ul style="list-style-type: none"> <li>• Class 1: Existing Facilities (14 CCR § 15301)</li> <li>• Class 2: Replacement or Reconstruction (14 CCR § 15302)</li> <li>• Solar arrays placed in parking lots, and on rooftops are statutorily exempt (PRC§21080.35)<sup>53</sup></li> </ul>
Upgrade, modernize and/or construct charter school facilities	Yes	No	Maybe	<ul style="list-style-type: none"> <li>• Class 1: Existing Facilities (14 CCR § 15301)</li> <li>• Class 2: Replacement or Reconstruction (14 CCR § 15302)</li> <li>• Class 14: Minor Additions to Schools (14 CCR § 15314)</li> </ul>
Replace/upgrade aging, undersized, and inadequate school cafeterias	Yes	No	Maybe	<ul style="list-style-type: none"> <li>• Class 1: Existing Facilities (14 CCR § 15301)</li> <li>• Class 2: Replacement or Reconstruction (14 CCR § 15302)</li> <li>• Class 14: Minor Additions to Schools (14 CCR § 15314)</li> </ul>
Improve school safety, security, network, and emergency communications systems	Yes	No	Maybe	<ul style="list-style-type: none"> <li>• Class 1: Existing Facilities (14 CCR § 15301)</li> <li>• Class 2: Replacement or Reconstruction (14 CCR § 15302)</li> </ul>

<sup>53</sup> PRC Section 21080.35(a) Under this section rooftop and parking lot solar installations under 500 square feet are statutorily exempt under CEQA. However, since these structures are arguably already categorically exempt under CEQA as either additions to existing structures (Class 14), construction of small structures, or accessory structures (Class 11), depending on the nature of the installation, this is likely to benefit only a small set of projects.

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Projects	Anticipated CEQA Compliance			Possible CEQA Exemption Class
	CEQA "Project"?	Statutory Exemption?	Categorical Exemption?	
Furnish and equip schools with 21st century learning technologies, and upgrade/install technology infrastructure, information systems, hardware, and software	Yes	No	Maybe	<ul style="list-style-type: none"> <li>• Class 1: Existing Facilities (14 CCR § 15301)</li> <li>• Class 2: Replacement or Reconstruction (14 CCR § 15302)</li> </ul>
Installation of modular units, portable classrooms, or bungalows; net increase in student capacity is <b>greater than 25%</b> , or 10 classrooms whichever is greater	Yes	No	No	–Initial Study Required
Installation of modular units, portable classrooms, or bungalows; net increase in student capacity <b>less than 25%</b> or 10 classrooms, whichever is greater	Yes	No	Yes	<ul style="list-style-type: none"> <li>• Class 14: Minor Additions to Schools (14 CCR § 15314)</li> </ul>
Improvements and/or expansions to existing health clinic, Parent and Family Center, or other community uses on existing campus	Yes	No	Maybe	<ul style="list-style-type: none"> <li>• Class 1: Existing Facilities (14 CCR § 15301)</li> <li>• Class 2: Replacement or Reconstruction (14 CCR § 15302)</li> </ul>
Demolition and removal of permanent buildings or structures	Yes	No	Maybe	<ul style="list-style-type: none"> <li>• Class 1: Existing Facilities (14 CCR § 15301)</li> </ul>
Upgrade school buildings to full ADA compliance	Yes	No	Maybe	<ul style="list-style-type: none"> <li>• Class 1: Existing Facilities (14 CCR § 15301)</li> <li>• Class 2: Replacement or Reconstruction (14 CCR § 15302)</li> </ul>
Outdoor repair, modernization, replacement, expansion, or upgrade of athletic fields [natural grass to synthetic turf], play equipment, fencing, parking, replace shade shelter, asphalt/concrete paths, driveways, ADA compliance, seismic retrofits	Yes	No	Maybe	<ul style="list-style-type: none"> <li>• Class 1: Existing Facilities (14 CCR § 15301)</li> <li>• Class 2: Replacement or Reconstruction (14 CCR § 15302)</li> <li>• Class 4: Minor Alterations to Land (14 CCR § 15304)</li> <li>• Class 11: Accessory Structures (14 CCR § 15311)</li> </ul>
Sustainability energy conservation installations such as new photovoltaic panels on rooftops and parking lot shade structures or wind arrays	Yes	Yes	Maybe	<ul style="list-style-type: none"> <li>• Solar arrays placed in parking lots, and on rooftops are statutorily exempt (PRC§21080.35)<sup>54</sup></li> <li>• Class 3: New Construction or Conversion of Small Structures (14 CCR § 15303)</li> </ul>

<sup>54</sup> PRC Section 21080.35(a) Under this section rooftop and parking lot solar installations under 500 square feet are statutorily exempt under CEQA. However, since these structures are arguably already categorically exempt under CEQA as either additions to existing structures (Class 14), construction of small structures, or accessory structures (Class 11), depending on the nature of the installation, this is likely to benefit only a small set of projects.

## 4. Program Description

Projects	Anticipated CEQA Compliance			Possible CEQA Exemption Class
	CEQA "Project"?	Statutory Exemption?	Categorical Exemption?	
				<ul style="list-style-type: none"> <li>Class 14: Minor Additions to Schools (14 CCR § 15314)</li> </ul>
Outdoor learning/ greening projects	No	-	-	-
Construct and/or upgrade renewable, sustainable and efficient water systems, equipment, and features	Yes	No	Maybe	<ul style="list-style-type: none"> <li>Class 1: Existing Facilities (14 CCR § 15301)</li> <li>Class 2: Replacement or Reconstruction (14 CCR § 15302)</li> </ul>
Repair and replacement of building systems such as flooring, windows, and roofing of historic resources	Yes	No	Maybe	Class 31: Historical Resource Restoration/Rehabilitation (14 CCR § 15331)
<b>Interior routine activities that involve installation, repair, replacement and maintenance<sup>1</sup></b>				
<b>Carpentry</b> <ul style="list-style-type: none"> <li>• Wood trim, metal or plastic trim</li> <li>• Wood and metal door systems</li> <li>• Windows, including sash, transforms, wooden window frames, blinds</li> <li>• Wood framing and paneling</li> <li>• Cabinets and bookshelves</li> <li>• Wood ramps</li> <li>• Restroom partitions and hardware</li> <li>• Room partition walls and doors</li> <li>• Flooring, including ceramic tiles, linoleum, carpet, hardwood floors (Historic Resources:<sup>2</sup> repair of floors, floor refinishing)</li> <li>• Interior plaster (Historic Resources:<sup>2</sup> repair of interior walls)</li> <li>• Drywall (Historic Resources:<sup>2</sup> repair of interior walls)</li> <li>• Historic Resources:<sup>2</sup> removal of loose and flaking paint</li> <li>• Historic Resources:<sup>2</sup> repair of interior stairs</li> <li>• Historic Resources:<sup>2</sup> repair or replacement of interior suspended ceiling tiles</li> <li>• Historic Resources:<sup>2</sup> repair of interior doors, frames, and thresholds</li> <li>• Structural upgrades of modular units or portable classrooms, relocation of portables on campus<sup>3</sup></li> </ul>	No	-	-	-
<b>Electrical</b> <ul style="list-style-type: none"> <li>• Electrical conveyances</li> <li>• Debit Card Systems</li> <li>• Fuses</li> <li>• Wiring</li> <li>• Light ballasts</li> <li>• Electrical short circuits</li> <li>• Exposed wires</li> </ul>	No	-	-	-

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Projects	Anticipated CEQA Compliance			Possible CEQA Exemption Class
	CEQA "Project"?	Statutory Exemption?	Categorical Exemption?	
<ul style="list-style-type: none"> <li>• Broken or loose conduits</li> <li>• Lenses on lights</li> <li>• Clocks</li> <li>• Battery backup systems</li> <li>• Electrical panels</li> <li>• Old lighting/lamp fixtures, emergency egress lighting</li> <li>• Permanent and Temporary emergency lighting</li> <li>• Bells Systems</li> <li>• Emergency egress lighting</li> <li>• Circuit breakers</li> <li>• Key switch</li> <li>• Timed switches</li> <li>• Light switches</li> <li>• Stage dimmer boards</li> <li>• Chandeliers</li> <li>• Stage lighting</li> <li>• Inefficient lighting<sup>3</sup></li> <li>• Fire alarm systems (Historic Resources:<sup>2</sup> replace or install fire or smoke detectors)</li> <li>• Remote power supplies</li> <li>• Historic Resources:<sup>2</sup> upgrade or replace wiring and utilitarian components</li> </ul>				
<b>Heating, Ventilating and Air Conditioning (HVAC)</b> <ul style="list-style-type: none"> <li>• Steam boilers</li> <li>• Hot water heating boilers</li> <li>• Wall heaters</li> <li>• Heating furnace</li> <li>• Split air conditioning system</li> <li>• Window A/C</li> <li>• HVAC systems</li> <li>• Gas heating, electrical cooling rooftop unit (3 to 10 tons)</li> <li>• Chiller</li> <li>• Chilled and hot water heating lines</li> <li>• Multi-zone A/C unit (15 to 60 tons)</li> <li>• Gas heating or hot water heating</li> <li>• Pneumatic controls (HVAC System)</li> <li>• Electronic/electric controls (HVAC Systems)</li> <li>• Energy Management Control Systems (HVAC)</li> <li>• Shell and Tube condensers</li> <li>• Steam convectors</li> <li>• Plate heat exchangers</li> <li>• Heat Pumps A/C units</li> <li>• Wall mount A/C units</li> <li>• Air and water balance A/C units</li> <li>• Steam coils and traps</li> </ul>	No	—	—	—

## 4. Program Description

Projects	Anticipated CEQA Compliance			Possible CEQA Exemption Class
	CEQA "Project"?	Statutory Exemption?	Categorical Exemption?	
<ul style="list-style-type: none"> <li>Chilled and hot water coils</li> <li>Boiler fuel trains</li> <li>Boiler controls</li> <li>Steam radiators and convectors</li> </ul>				
<b>Plumbing</b> <ul style="list-style-type: none"> <li>Bathroom fixtures (toilets, urinals, lavatories/sinks, and floor drains)</li> <li>Hose bibs</li> <li>Sumps and pumps</li> <li>Shut off valves</li> <li>Gas pressure regulators</li> <li>Water pressure regulators</li> <li>Eye washers</li> <li>Storm drain and clarifiers</li> <li>Hydraulic hoists</li> <li>Hazardous waste drains and clarifiers</li> <li>Showers</li> <li>Sinks, faucets, drinking fountains</li> <li>Replacement of lead water pipes<sup>3</sup></li> <li>Piping (Historic Resources:<sup>2</sup> upgrade or in kind replacement of pipes and other utilitarian components)</li> <li>Earthquake valves</li> <li>Seismic strapping</li> </ul>	No	–	–	–
<b>Miscellaneous</b> <ul style="list-style-type: none"> <li>Auto shop hydraulic hoists</li> <li>Surface sump pumps</li> <li>Compressors for shop classes</li> <li>Dust collection equipment in shop classes</li> <li>Dust collection systems</li> <li>Exhaust systems and hoods</li> <li>AIC ducting systems</li> <li>Ventilation louvers</li> <li>Gravity vents</li> <li>Lockers</li> <li>AIC curb covers</li> <li>Bathroom mirror frames</li> <li>Hardware cloth for pest control</li> <li>Metal shelving</li> <li>ADA compliance<sup>3</sup></li> <li>Abatement of lead-based paint and asbestos in buildings<sup>3</sup></li> <li>Historic Resources:<sup>2</sup> replacement of damaged security devices or installation of new security.</li> <li>Repair or replace free-standing furniture and equipment<sup>3</sup> (includes Historic Resources<sup>2</sup>)</li> </ul>	No	–	–	–



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Projects	Anticipated CEQA Compliance			Possible CEQA Exemption Class
	CEQA "Project"?	Statutory Exemption?	Categorical Exemption?	
<ul style="list-style-type: none"> <li>• Historic Resources:<sup>2</sup> installation of grab bars and minor interior modification for ADA accessibility</li> <li>• Historic Resources:<sup>2</sup> replacement or installation of insulation</li> </ul>				
<b>Exterior routine activities that involve installation, repair, replacement and maintenance<sup>1</sup></b>				
<b>Building Façade</b> <ul style="list-style-type: none"> <li>• Weather stripping on exterior doors</li> <li>• Wood yard boxes</li> <li>• Vandalized structures (repair or replacement)</li> <li>• Porch overhangs</li> <li>• Skirting on portable buildings</li> <li>• Window security grills</li> <li>• Emergency exit grills</li> <li>• Metal window frames</li> <li>• Coiling counter doors</li> <li>• Roof access hatches</li> <li>• Sliding glass doors</li> <li>• Skylights</li> <li>• Handicap ramps and stairs</li> <li>• Hand rails</li> <li>• Rain gutters and downspouts</li> <li>• Exterior stucco</li> <li>• Paint</li> <li>• Exterior cosmetic improvements such as Facelift Program, painting, site cleanup<sup>3</sup></li> <li>• Historic Resources:<sup>2</sup> repair or partial replacement of porch components including cornices, exterior siding, doors, balustrades, stairs, or other trim</li> <li>• Historic Resources:<sup>2</sup> repair of exterior doors, frames, and thresholds</li> <li>• Historic Resources:<sup>2</sup> caulking and weather-stripping, replacement of clear window panes, repair of window sash, frames and sills, repair of roofing, gutters, and downspouts.</li> <li>• Historic Resources:<sup>2</sup> Exterior. install mechanical equipment within perimeter walls and beneath the roof.</li> </ul>	No	–	–	–
<b>Recreational Facilities</b> <ul style="list-style-type: none"> <li>• Kick boards along fences and backstops</li> <li>• Wood seating and foot rests on permanent interior or exterior bleachers</li> <li>• Swimming pool resurfacing</li> <li>• Metal stadium bleachers (replacement must not increase existing capacity)</li> <li>• Folding gymnasium bleachers</li> <li>• Football training equipment</li> <li>• Baseball back stops</li> </ul>	Maybe	–	–	–

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Projects	Anticipated CEQA Compliance			Possible CEQA Exemption Class
	CEQA "Project"?	Statutory Exemption?	Categorical Exemption?	
<ul style="list-style-type: none"> <li>Playground matting</li> <li>Gymnasium basketball goals</li> <li>Drain covers</li> </ul>				
<b>Recreational Facilities</b> (new installation) <ul style="list-style-type: none"> <li>Athletic Field lighting</li> <li>Tennis/basketball court lighting</li> <li>Scoreboards</li> </ul>	Maybe		Maybe	<ul style="list-style-type: none"> <li>Class 1: Existing Facilities</li> <li>(14 CCR § 15301)</li> <li>Class 3: New Construction or Conversion of Small Structures</li> <li>(14 CCR § 15303)</li> <li>Class 4: Minor Alterations to Land</li> <li>(14 CCR § 15304)</li> </ul>
<b>Landscaping</b> <ul style="list-style-type: none"> <li>Irrigation systems including lawn sprinklers and sprinkler controls</li> <li>Trees, shrubs, and other vegetation.</li> <li>Historic Resources:<sup>2</sup> replacement in kind of landscaping plant material, repair or replacement of utilitarian landscape components, such as sprinkler piping, repair of fencing and freestanding exterior walls, installation of temporary reversible barriers such as chain link fences and polyethylene sheeting or tarps, repair of roadways, driveways and walkways, repair or replacement of running track surfaces within existing curbs.</li> </ul>	No	—	—	—
<b>Paving</b> <i>(Repair or resurface existing paved areas)</i> <ul style="list-style-type: none"> <li>Asphalt Parking lots</li> <li>Walkways</li> <li>Asphalt Playgrounds</li> <li>Flagpole footing</li> <li>Drainage facilities</li> </ul>	Maybe	—	Yes	Class 1 Class 2 Class 4
<b>Miscellaneous</b> <ul style="list-style-type: none"> <li>Chain link fences and gates, wrought iron fences and gates</li> <li>Installation at existing schools such as play equipment, fencing, ADA compliance.<sup>3</sup></li> <li>Building signs<sup>2</sup> (repair or replacement of signs or awnings)</li> <li>Replacement of damaged security devices or installation of new security.<sup>2</sup></li> <li>Seismic Repair and Upgrade: anchoring of masonry walls to floor and roof systems, grout injection of unreinforced masonry walls, repair of parapets, chimneys and cornices, brick or masonry repainting, stabilization of structural foundations and addition of foundation bolts,</li> </ul>	No	—	—	—

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Projects	Anticipated CEQA Compliance			Possible CEQA Exemption Class
	CEQA "Project"?	Statutory Exemption?	Categorical Exemption?	
temporary bracing or shoring as part of emergency stabilization, installation of seismic upgrades <sup>2</sup> • Replace existing diesel buses with higher efficiency buses				
<b>Type 4. Operational and Other Campus Changes</b>				
Removal of modular units, portable classrooms, bungalows, or other temporary structures at existing school facilities	Yes	No	Maybe	• Class 1: Existing Facilities (14 CCR § 15301)
Change in student capacity (student classroom loading).	Yes	No	Yes	• Class 22: Educational or Training Programs Involving No Physical Changes (14 CCR § 15322)
Change in grade structure (e.g., change grades from elementary to middle school or other)	Yes	No	Maybe	• Class 22: Educational or Training Programs Involving No Physical Changes (14 CCR § 15322)
Change in use or occupancy of existing facilities (charter school, co-locations, joint use)	Yes	No	Maybe	• Class 22: Educational or Training Programs Involving No Physical Changes (14 CCR § 15322)
Co-location or land lease agreements for charter school facilities	Yes	No	Maybe	• Class 22: Educational or Training Programs Involving No Physical Changes (14 CCR § 15322)
Closure of existing school or transfer of students to another school	Yes	Yes	Yes	• Qualifies when closing of any kindergarten through 12th grade public school and/or the transfer of students from that public school to another school if the only physical changes involved are categorically exempt (PRC §21080.18)
Reopening closed schools	Yes	No	No	–
Lease or use of non-District property for student classroom purposes	Yes	No	Maybe	• Class 1: Existing Facilities (14 CCR § 15301)
Replace outdated and inefficient school buses to meet 21st century environmental and safety standards.	Maybe	Yes	No	• 15275 Specific Mass Transit Projects • 15276 Transportation Improvement and congestion management programs

<sup>1</sup> These activities do not require OEHS notification or review. However, FSD must notify OEHS and obtain an OEHS CEQA determination if 1) an activity will result in an expansion of use of a facility that is more than negligible, or 2) one or more exceptions apply. Source: LAUSD Internal Memorandum, RE: *Activities Not Requiring OEHS Review*, July 27, 2006. All activities under this heading are listed in the Internal Memorandum unless otherwise noted.

<sup>2</sup> These activities are not listed in LAUSD Internal Memorandum; however, they are listed *Chattel Architecture* exemption document related to projects on historically significant campuses, September 2005 (see Appendix B-3 of this EIR). These repair, replacement, maintenance, and other alteration activities on a campus with historic resources and/or directly to a historic building are not considered a "project" under CEQA but would require OEHS notification or review or review by a qualified architectural historian only in strict compliance with procedures and documentation outlined in the *Chattel Architecture* exemption document, September 2005 (see Appendix B-3 of this EIR).

<sup>3</sup> These activities are not listed in LAUSD Internal Memorandum; however, they would not be a "project" under CEQA and would therefore, not require OEHS review.

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### 4.12.1 Projects Found to Be Categorically Exempt

Pursuant to State CEQA Guidelines Sections 15022(a)(1)(C) and 15061(c) LAUSD has adopted a list of specific types of projects that have been found to be categorically exempt from CEQA as listed below.<sup>55</sup> Citations in parentheses are references to the State CEQA Guidelines. Under the State CEQA Guidelines, the District may only rely on Categorical Exemptions as long as none of the exceptions set forth in State CEQA Guidelines Section 15300.2 apply (see “Exceptions to Exemptions” following this section<sup>56</sup>).

- **Class 1: Existing Facilities** (14 CCR Section 15301). There are a wide variety of operational, maintenance, repair, and alteration activities at existing facilities that the District has found to be categorically exempt from CEQA, because the activities involved no or negligible expansion of use, for example:
  - minor interior and exterior alterations;
  - restoration of damaged structures and equipment to meet current standards;
  - small additions to existing structures;
  - addition of new copy on existing on- and off-premise signs;
  - maintenance of existing landscaping; and
  - demolition of small structures such as accessory structures like fences.
- **Class 2: Replacement or Reconstruction** (14 CCR Section 15302). The District has replaced and reconstructed existing structures and facilities where a new structure was located on the same site as a replaced structure, and the new structure had substantially the same purpose and capacity as the replace structure. Under this category, for example:
  - replacement of a portable classroom with another portable classroom of substantially the same purpose and capacity; and
  - replacement of aging, undersized, and inadequate school cafeterias.
- **Class 3: New Construction or Conversion of Small Structures** (14 CCR Section 15303). The District has constructed new small structures and converted other small structures, not involving use of significant amounts of hazardous substances, and found these projects to be exempt from CEQA. Under this category, for example:
  - construction of small warehouses, multipurpose rooms, and gyms on existing campus.
- **Class 4: Minor Alterations to Land** (14 CCR Section 15304). The District has implemented various minor alterations to land and determined them to be exempt from CEQA. Under this category, for example:
  - new landscaping;
  - campus greening;

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<sup>55</sup> *Los Angeles Unified School District Procedures for Implementing the California Environmental Quality Act*. December 2002.

<sup>56</sup> “Activities” that do not require OEHS review do not meet the definition of a “project” under CEQA.

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- filling of earth into previously excavated land with compatible material;
  - minor trenching and backfilling where the surface was restored; and
  - construction of athletic fields.
- **Class 9: Inspections** (14 CCR Section 15309). The District has conducted inspection activities at existing and proposed facilities and has determined that these inspections are exempt from CEQA.
- **Class 11: Accessory Structures** (14 CCR Section 15311). The District has constructed minor structures ancillary to existing facilities and found these projects to be exempt from CEQA. Under this category, for example:
  - small parking lots; and
  - restroom facilities.
- **Class 12: Surplus Government Property Sales** (14 CCR Section 15312). The District has disposed of surplus property and determined that such disposal is exempt from CEQA in particular cases.
- **Class 14: Minor Additions to Schools** (14 CCR Section 15314). The District has constructed a wide variety of minor additions to existing schools where the addition does not increase the original student capacity by more than 25% or ten classrooms, whichever is less, and found these projects to be exempt from CEQA. Under this category, for example:
  - installation of portable classrooms;
  - installation of outdoor education
  - expansion of playgrounds;
- **Class 22: Educational or Training Programs Involving No Physical Changes** (14 CCR Section 15322). The District has implemented educational and training programs that involve no physical changes to the environment and determined that the programs are exempt from CEQA. Under this category, for example:
  - development of curriculum and training methods;
  - changes to curriculum and training methods; and
  - changes in grade structure which do not result in changes in student transportation.
- **Class 23: Normal Operations of Facilities for Public Gatherings** (14 CCR Section 15323). At existing schools, the District operates venues for public gatherings such as athletic fields and auditoriums. The District has determined that the normal operations of such venues are exempt from CEQA.
- **Class 30: Minor Actions to Prevent, Minimize, Stabilize, Mitigate or Eliminate the Release or Threat of Release of Hazardous Waste or Hazardous Substances (14 CCR Section 15330)**. The District has conducted minor cleanup of hazardous waste and/or hazardous substances at various facilities. Where the requirements of State CEQA Guidelines Section 15330 are met, the District has determined that such minor cleanups are exempt from CEQA.
- **Class 31: Historical Resource Restoration/Rehabilitation** (14 CCR Section 15331). The District has completed projects that involved maintenance, repair, stabilization, rehabilitation,

## 4. Program Description

restoration, preservation, conservation, or reconstruction of historical resources in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995). Alteration activities at historical resources that are not considered a "project" under CEQA and that can be accomplished without review by a qualified architectural historian or OEHS are shown in Table 4-1 and fully described in Appendix B-3.

This list is intended to be representative only and is not an exhaustive listing of the categorical exemptions that the District has relied on, or that may be available in the future, under the State CEQA Guidelines.

### 4.12.2 Exceptions to Exemptions

Exceptions apply when a project has the potential to have significant effects on the environment due to unusual circumstances, type of impact or specific location. There are certain exceptions to the projects that qualify for a CEQA Exemption and activities that do not require OEHS review. Where an exception applies, FSD staff must notify OEHS, and obtain an OEHS CEQA determination before proceeding with the activity. The exceptions are discussed below.<sup>57</sup>

**Table 4-3 CEQA and OEHS Exceptions**

	Exceptions
A.	<b>Historic Resources.</b> Any construction activity at a school campus that has or may have historic resources. OEHS is currently updating the list of existing school campuses that have historical resources (see "Historic Resource Exempt Activities" for a list of activities that are generally exempt from review by OEHS and a qualified architectural historian).
B.	<b>Sensitive Biological Resources.</b> Removal or alteration of the following natural resources, either direct or indirect through habitat modification: <ul style="list-style-type: none"> <li>- Oak trees</li> <li>- Undisturbed areas containing native vegetation</li> <li>- Water courses such as lakes, rivers, vernal pools, seasonal streams, or marshy areas</li> <li>- Species identified as a candidate, sensitive, or special status pursuant to federal, state or local plans, policies or regulations.</li> </ul>
C.	<b>Adjacent Noise Sensitive Uses.</b> Any exterior construction activity within 500 feet of an offsite noise sensitive land use, such as a residence or a hospital.
D.	<b>Hazardous Waste Sites.</b> Any activity that may disturb soil on a site included on any list compiled pursuant to Government Code Section 65962.5.
E.	<b>Significant Interior Modernization.</b> Any modernization project that will affect 20% or more of the total building square footage of an existing campus.
F.	<b>Activities Requiring State Funding.</b> The District may not be able to recover state funds unless OEHS has reviewed the activity and prepared a Notice of Exemption under CEQA.
G.	<b>Cumulative Impact.</b> Successive projects of the same type in the same place that over time would have a significant cumulative impact.
H.	<b>Significant Effect.</b> Any activity where there is a reasonable possibility that it will have a significant effect on the environment due to unusual circumstances.
I.	<b>Scenic Highways.</b> Any activity that may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway.

<sup>57</sup> Items A through F are based on CEQA Guidelines Section 15300.2; *Los Angeles Unified School District Procedures for Implementing the California Environmental Quality Act*. December 2002; and Exhibit B of the memorandum titled "Activities Not Requiring OEHS Review" from Angelo Bellomo to James McConnell, July 27, 2006. Items G through I are based on CEQA Guidelines Section 15300.2.

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### 4.13 INTENDED USES OF THIS PROGRAM EIR

This is a Subsequent program-level EIR that examines the potential environmental impacts of the proposed SUP. This Subsequent Program EIR is also being prepared to address various actions by the Board of Education to adopt and implement the SUP.

This Subsequent Program EIR serves the following purposes:

- To inform the general public, interested public agencies, and the Board of the potential environmental effects, LAUSD Standard Conditions, and alternatives to the proposed SUP.
- To provide the Board of Education with information that enables them to make project decisions that take account of environmental consequences.
- To provide project-level review for individual projects where sufficient detail exists to reduce the need for subsequent environmental documents.
- To provide a basis for tiering subsequent environmental documents pursuant to the CEQA Guidelines Section 15152 (see Appendix D).
- To facilitate the opportunity for SUP-related site-specific projects to utilize CEQA infill streamlining provisions.<sup>58</sup>
- To develop LAUSD SCs from compiled and updated existing LAUSD standards, guidelines, specifications, practices, plans, policies, programs, and project design features (see Appendix E)
- To provide a template for a Monitoring and Reporting Program that ensures compliance with the LAUSD SCs (see Appendix D).

#### 4.13.1 Anticipated Agency Actions

It is the intent of this Subsequent Program EIR to enable the Board and responsible agencies to evaluate the environmental impacts of the proposed program, thereby enabling them to make informed decisions with respect to the requested entitlements, permits, or approvals. There are no agency approvals, other than LAUSD, required for the SUP; however, depending on the type of project and location, future site-specific projects may require permits, approvals, review, coordination, or other action from federal, state, regional, and/or local agencies as shown in Table 4-4.

**Table 4-4 Anticipated Agency Actions**

Lead Agency	Discretionary Action
LAUSD Board of Education	Certification of the Final EIR
	Adoption of LAUSD Standard Conditions of Approval
	Adoption of Findings and Statement of Overriding Considerations
	Approval of School Upgrade Program

<sup>58</sup> CEQA Guidelines 15183.3 along with Appendix M and N streamline CEQA processing for urban infill school projects.

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**Table 4-4 Anticipated Agency Actions**

Agency <sup>59,60</sup>	Typical Action
<b>FEDERAL*</b>	
US Army Corps of Engineers (Corps)	Permit - Clean Water Act, Section 404 permit for discharges of dredge or fill material into "waters of the US"
<b>STATE*</b>	
California Department of Fish and Wildlife (CDFW)	Issuance of No Effect Determination; Agreement - Fish and Game Code section 1600 et seq. (Section 1602 Lake or Streambed Alteration Agreement); Permit - Fish and Game Code section 2050 et seq. (California Endangered Species Act protocol species surveys and take permits)
California Department of Toxic Substances Control (DTSC)	Approval of Phase I Environmental Site Assessment (ESA); Preliminary Environmental Assessment (PEA)/Supplemental Site Investigation (SSI); Removal Action Workplan (RAW)/Remedial Action Plan (RAP); Removal Action Completion Report (RACR); Remedial Design Document (RDD); and/or Operation & Maintenance (O&M) Plan; and ultimately issuance of a "No Further Action" determination
State Allocation Board (SAB)**	Approval of Funding
California Department of Education (CDE), School Facilities Planning Division**	Approval of final site and school design for educational appropriateness
California Department of General Services, Office of Public School Construction (OPSC)**	Approval of Funding
California Department of General Services, Division of State Architect (DSA)**	Plan review and construction oversight for new school construction and alteration projects, including structural safety, fire and life safety, and access compliance. DSA approval is required for any project seeking state funding and must be completed before the project begins construction.
State Office of Historic Preservation (OHP)	Approval of historic building preservation and renovation plans
California Department of Transportation (Caltrans)	Review of analysis methodology for school traffic on freeways and ramps
California Department of Conservation (DOC)	Agriculture preservation agreement
California Department of Parks and Recreation (DPR)	Joint Use Agreement for state parkland
Native American Heritage Commission (NAHC)	Issuance of current Native American tribal representative contact list and known resources
California Coastal Commission (CCC)	Coastal Development Permit for development within the Coastal Zone boundary
State Water Resources Control Board (SWRCB)	Review of Notice of Intent (NOI) to obtain permit coverage; Issuance of General Permit for Discharges of Stormwater Associated with Construction Activity; Review of Stormwater Pollution Prevention Plan (SWPPP)
<b>REGIONAL*</b>	
Local Native American Tribes	Coordination and assistance with preparation of Tribal and Cultural Resources Section and Native American tribal monitoring program
Los Angeles Regional Water Quality Control Board (RWQCB)	Issue National Pollution Discharge Elimination System (NPDES) permit; Issuance of waste discharge requirement (Dewater Permit); Clean Water Act Section 401 Water Quality Certification

<sup>59</sup> 14 CCR Section 15381. "Responsible Agency" means a public agency which proposes to carry out or approve a project, for which a Lead Agency is preparing or has prepared an EIR or Negative Declaration. For the purposes of CEQA, the term "Responsible Agency" includes all public agencies other than the Lead Agency which have discretionary approval power over the project.

<sup>60</sup> Reviewing Agencies include those agencies that do not have discretionary powers over the proposed project, but that may 1) review the EIR for adequacy and accuracy; 2) issue ministerial approvals or permits.



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**Table 4-4 Anticipated Agency Actions**

South Coast Air Quality Management District (SCAQMD)	Review and file LAUSD submittals for Rule 403 Fugitive Dust; Rule 1403 Asbestos Emissions from Demolition/Renovation Activities; Rule 201 Permit to Construct; Rule 203 Permit to Operate (boilers and generators); Rule 1166 Volatile Organic Compound Emissions from Decontamination of Soil, and site-specific Soil Mitigation Plan; site monitoring
<b>LOCAL * (County and/or City)</b>	
Parks and Recreation	Joint Use Agreement for parkland
Fire Department	DSA approval of the Fire/Life Safety portion of a project requires Local Fire Authority (LFA) review of: 1. elevator/stair access for emergency rescue and patient transport; 2. access roads, fire lane markings, pavers and gate entrances; 3. fire hydrant location and distribution; 4. fire flow (location of post indicator valve, fire department connection, and detector check valve assembly)
Public Works Department	Approval of drainage improvements and grading plans as they relate to drainage; Approval of offsite improvements permit or "B-Permit" <sup>61</sup>
Planning Department	Approval of fire hydrant locations and specifications; Approval of street vacation, and roadway classification changes
Traffic Engineering Department	Approval of Memorandum of Understanding (MOU for methodology used for traffic study); Approval of changes to parking restrictions; installation of crosswalks, advance school zone warning signs, school parking signage, traffic controls, crossing guards, and traffic management/control and vehicle enforcement; Approval of engineering designs for project driveways at roadways, and other intersection improvements (traffic lights, changes to turn lanes, road widening, etc.)
Sheriff / Police Department	Site plan review for fire, life, safety hazards, access and visibility.
<p>* These agencies would have no role in approval process for the SUP; however, future site-specific projects may require permits, approvals, review, or coordination.</p> <p>** Per Education Code Section 17070.46, the approvals from CDE, DSA, SAB and OPSC are considered ministerial actions and as such, these agencies are not "responsible agencies" under the CEQA.</p>	

<sup>61</sup> A "B" Permit is typically issued for extensive public works improvements including the widening of streets and alleys, the changing of existing street grade, construction of bridges, retaining walls, and the installation of sewer, storm drains, street lighting, and traffic signals.

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## 5. Environmental Analysis

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## 5.1 AESTHETICS

This section of the Subsequent Program EIR evaluates the potential for implementation of the SUP Update and Measure RR Implementation, to impact aesthetic resources in the District in light of changing information and conditions since the 2015 Program EIR. This section discusses and updates the regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions) and physical setting (existing aesthetics throughout the SUP area with examples of scenic vistas and other significant aesthetic features) used in the 2015 EIR, along with possible new view, neighborhood character, light, glare, and shadow impacts that may occur as the SUP Update-related site-specific projects are implemented.

### TERMINOLOGY

**Aesthetic impact assessment** generally deals with the issue of contrast, or the degree to which elements of the environment differ visually. Aesthetic features occur in a diverse array of environments, ranging in character from urban centers to rural regions and wildlands. **Adverse visual effects** can include the loss of natural features or areas, the removal of urban features with aesthetic value, or the introduction of contrasting urban features into natural areas or urban settings.

**Natural features** include, but are not limited to, the following: open space; native or ornamental vegetation/landscaping; topographic or geologic features; and natural water sources. The loss of natural aesthetic features or the introduction of contrasting urban features may have a local impact, or, if part of a larger landscape, may contribute to a cumulative decline in overall visual character.

**Urban features** include, but are not limited to, the following: structures of architectural or historic significance or visual prominence; public plazas, art or gardens; heritage oaks or other protected trees or plants; consistent design elements (such as setbacks, massing, height, and signage) along a street or district; pedestrian amenities; landscaped medians or parks.

**Aesthetics** generally refer to the identification of visual resources and the quality of what can be seen, or overall visual perception of the environment.

**Views** refer to visual access and obstruction, or whether it is possible to see a focal point or panoramic view from an area.

**Shading** issues are concerned with effects of shadows cast by existing or proposed structures on adjacent land uses.

**Nighttime illumination** addresses the effects of a proposed project's exterior lighting upon adjoining uses.

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**Luminaire.** The complete lighting unit (fixture), consisting of a lamp, or lamps and ballast(s) (when applicable), together with the parts designed to distribute the light (reflector, lens, diffuser), to position and protect the lamps, and to connect the lamps to the power supply.

**Footcandle.** The unit of measure expressing the quantity of light received on a surface. One footcandle is the illuminance produced by a candle on a surface one foot square from a distance of one foot.

**Glare.** Lighting entering the eye directly from luminaires or indirectly from reflective surfaces that causes visual discomfort or reduced visibility.

**Light Trespass or Light Spill.** Light that falls beyond the property it is intended to illuminate.

**Fully Shielded Luminaire.** A luminaire constructed and installed in such a manner that all light emitted by the luminaire, either directly from the lamp or a diffusing element, or indirectly by reflection or refraction from any part of the luminaire, is projected below the horizontal plane through the luminaire's lowest light-emitting part.<sup>62</sup>

### 5.1.1 Environmental Setting

#### 5.1.1.1 REGULATORY FRAMEWORK

State and local laws, regulations, plans, and guidelines are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to aesthetics in the District. Many site-specific projects have not been identified, and there may be local jurisdictional plans and policies that are applicable depending on the project site. Specific requirements of these laws, regulations, plans, and guidelines might not be up to date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. Some of these are not directly applicable to the SUP or site-specific projects implemented under the SUP; however, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standard Conditions of Approval are also listed. See *Applicable Regulations and Standard Conditions* at the end of this chapter for those that require District compliance.

#### Federal Laws, Regulations, and Policies

Department of Transportation Act of 1966, Section 4(f)

Historic Preservation Act of 1966

National Environmental Policy Act of 1969.

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<sup>62</sup> International Dark-Sky Association (IDA). Model Lighting Ordinance, June 15, 2011. <https://www.darksky.org/our-work/lighting/public-policy/mlo/>. IDA is the recognized authority on light pollution. Founded in 1988, IDA is the first organization to call attention to the hazards of light pollution.

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## State Laws, Regulations, and Policies

*California Streets and Highways Code, Sections 260 through 263*

The **California Scenic Highway Program**, which was adopted by the Legislature in 1963, seeks to preserve and protect areas of outstanding natural beauty that are visible from State highways. A highway may be designated as scenic depending on how much of the natural landscape can be readily observed, the scenic quality of that landscape, and the extent to which development may intrude on view enjoyment.<sup>63</sup> Within the District, a number of highways are considered eligible for scenic highway designation or are so designated (see Table 5.1-1).

**Table 5.1-1 Selected Scenic Highways and Corridors**

Scenic Highway, Byway, Route, or Corridor	Caltrans Status (Eligible or Officially Designated)	Los Angeles County General Plan Scenic Priority	Other Designations
State Route (SR) 1 (Pacific Coast Highway (PCH)) – between SR 187 and SR 101	Eligible	1st Priority Scenic Highway	–
SR 2 (Angeles Crest Highway) – between La Canada-Flintridge and Wrightwood	Officially Designated	–	–
SR 27 (Topanga Canyon Boulevard.) – between SR 1 and Mulholland Dr.	Eligible	1st Priority Scenic Highway	–
SR 27 (Topanga Canyon State Scenic Highway)	Officially Designated	2nd Priority Scenic Highway	–
SR 110 (Arroyo Seco Historic Parkway)	–	–	National Scenic Byway Historic Parkway; CA Historic Parkway
SR 118 (Ronald Reagan Freeway) – between SR 23 and Desoto Avenue	Eligible	2nd Priority Scenic Highway	–
Interstate 5 (I-5) (Golden State Freeway) – between I-210 and Castaic	Eligible	1st Priority Scenic Highway	–
I-5 (Golden State Freeway) – between I-210 and I-405	Eligible	2nd Priority Scenic Highway	–
I-210 (Foothill Freeway)	Eligible	1st Priority Scenic Highway	–
I-405 (San Diego Freeway) – between I-5 and SR 118 and between Mulholland Drive and Wilshire Boulevard	–	2nd Priority Scenic Highway	–
US Route 101 (Ventura Freeway) – west of Valley Circle Boulevard	–	2nd Priority Scenic Highway	–
Malibu Canyon – between Las Virgenes Highway from Route 1 to Lost Hills Road	Officially Designated	–	–
Mulholland Drive – between PCH and Kanan Dume Road, and from Cornell Road to Las Virgenes Road	Officially Designated	1st Priority Scenic Highway	–
Santa Monica Boulevard (SR 2)	Officially Designated	–	–

Sources: California Department of Transportation (Caltrans), Website California Scenic Highway Program. 2023. <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>. Accessed April 16, 2023.

Los Angeles County General Plan, 1980. Updated July 14, 2022. <https://planning.lacounty.gov/long-range-planning/general-plan/general-plan/>. Accessed April 26, 2023.

<sup>63</sup> Caltrans, 2023. California Scenic Highway Program, updated September 7, 2011. <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>.

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Highways considered eligible for designation have substantial value as scenic resources. In order for a highway to be officially designated as a scenic resource, the local city or county must adopt a scenic Corridor Protection Program and apply to Caltrans for official designation. Without official designation and the accompanying scenic corridor protection, nearby development could degrade the highway's scenic value, even if it is considered eligible for designation.

The sponsoring city or county must also adopt ordinances, zoning, and/or planning policies to preserve the scenic quality of the corridor or prove that such regulations already exist in local codes and ordinances. The corridor protection requirements should be sufficiently detailed and must present a workable strategy to protect the scenic character of the corridor. These ordinances and/or policies form the Corridor Protection Program of the California Scenic Highway Program.

### *California Public Resources Code, Division 20*

Portions of the District are located in the Coastal Zone, where proposed projects may be subject to the requirements of the **California Coastal Act**.<sup>64</sup> Section 30251 of the Coastal Act discusses the act's aesthetic requirements, wherein the scenic qualities of coastal areas must be considered and protected in the development process. This section states "The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas."

Permitted development must be located and designed so as to protect the scenic and visual qualities of coastal areas. This includes protecting views to and along the ocean and scenic coastal areas, matching the visual character of surrounding areas, and, where feasible, restoring and enhancing visual quality in visually degraded areas. Pursuant to the Coastal Act, cities and counties within the Coastal Zone must develop Local Coastal Plans and certain projects may require acquisition of a Coastal Development Permit.

### *California Code of Regulations, Title 24, Part 2*

Current law states that every local agency enforcing building regulations, such as cities and counties, must adopt the provisions of the **California Building Code** (CBC) within 180 days of its publication. The publication date of the CBC is established by the California Building Standards Commission. The most recent building standard adopted by the legislature and used throughout the state is the 2013 version, often with local, more restrictive amendments that are based on local geographic, topographic, or climatic conditions. These codes provide minimum standards to protect property and public safety by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC contains standards for outdoor lighting that are

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<sup>64</sup> California Public Resources Code, Division 20, California Coastal Act (2023). <https://www.coastal.ca.gov/coastact.pdf>. Accessed April 17, 2023.

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intended to improve energy efficiency and reduce light pollution and glare by regulating light power and brightness, shielding, and sensor controls.<sup>65</sup>

### *California Code of Regulations, Title 5, Section 14010*

The function of the **California Department of Education School Facilities Planning Division** (SFPD) is to review and approve school district sites and construction plans. Prior to approving a site for school purposes, the SFPD, in accordance with their design standards, reviews many factors, including environmental hazards, proximity to airports, freeways, and power transmission lines, as well as scenic resources and aesthetics. CCR Title 5, Section 14010 specifically requires the consideration of aesthetics: “The district shall consider environmental factors of light, wind, noise, aesthetics, and air pollution in its site selection process.”

In many instances, the District needs to complete the process of identifying the site and to have SFPD approval for the site prior to applying for site acquisition funding. As previously discussed, the CDE is given the authority in law to develop standards for school site acquisition. The CDE uses these standards to review a site and determine if it is an appropriate location for a new or expanded school facility. In the CDE SFPD’s current Initial School Site Evaluation process, the criteria include scenic resources and aesthetics as one of many factors to be considered.<sup>66</sup> This information is typically provided in SFPD 4.0, Initial School Site Evaluation and SFPD 4.02, School Site Report.

### **Regional Laws, Regulations, and Policies**

There are no regional laws, regulations, and/or policies that are specifically applicable to aesthetics. See below for a discussion of the local laws, regulations, and policies.

### **Local Laws, Regulations and Policies**

Cities and communities within the District attendance boundaries have General Plans or community plans that guide development. Where a proposed LAUSD school project is inconsistent with a local General Plan policy or zoning ordinance, LAUSD school sites are exempt under Government Code Section 53094<sup>1</sup>, pending a two-thirds vote of the Board of Education. On February 19, 2019, the LAUSD Board of Education Adopted a Resolution (Res 256-18/19)<sup>2</sup> to exempt all LAUSD school sites from local land use regulations under Government Code Section 53094. Although LAUSD school sites are exempt from local land use regulations, many of these general plans or community plans establish goals and policies providing applicable references for discussion.

### *Los Angeles County General Plan*

The Conservation and Natural Resources Element of the Los Angeles County General Plan provides goals and policies relevant to aesthetic resources in Section VII. Scenic Resources, which include the following:

**Goal C/NR-4:** Conserved and sustainably managed woodlands

<sup>65</sup> California Building Standards Commission, <https://www.dgs.ca.gov/BSC/Codes>. Accessed March April, 2023.

<sup>66</sup> California Code of Regulations, Title 5, Section 14010 et seq.; Education Code Sections 17070.50, 17251[a].

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**Policy C/NR 4.1:** Preserve and restore oak woodlands and other native woodlands that are conserved in perpetuity with a goal of no net loss of existing woodlands.

**Goal C/NR 13:** Protected visual and scenic resources

Policy C/NR 13.1: Protect scenic resources through land use regulations that mitigate development impacts.

Policy C/NR 13.2: Protect ridgelines from incompatible development that diminishes their scenic value.

Policy C/NR 13.3: Reduce light trespass, light pollution and other threats to scenic resources.

Policy C/NR 13.4: Encourage developments to be designed to create a consistent visual relationship with the natural terrain and vegetation.

Policy C/NR 13.5: Encourage required grading to be compatible with the existing terrain.

Policy C/NR 13.6: Prohibit outdoor advertising and billboards along scenic routes, corridors, waterways, and other scenic areas.

Policy C/NR 13.7: Encourage the incorporation of roadside rest stops, vista points, and interpretive displays into projects in scenic areas.

Policy C/NR 13.8: Manage development in HMAs to protect their natural and scenic character and minimize risks from natural hazards, such as fire, flood, erosion, and landslides.

Policy C/NR 13.9: Consider the following in the design of a project that is located within an HMA, to the greatest extent feasible:

- Public safety and the protection of hillside resources through the application of safety and conservation design standards.
- Maintenance of large contiguous open areas that limit exposure to landslide, liquefaction and fire hazards and protect natural features, such as significant ridgelines, watercourses and SEAs.

Policy C/NR 13.10: To identify significant ridgelines, the following criteria must be considered:

- Topographic complexity.
- Uniqueness of character and location.
- Presence of cultural or historical landmarks.
- Visual dominance on the skyline or viewshed, such as the height and elevation of a ridgeline.



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- Environmental significance to natural ecosystems, parks, and trail systems.

### *Zoning Ordinance*

Title 22 (Zoning Ordinance) describes the development standards that apply to each zone (e.g., height limits, setbacks, etc.). Subsections of Title 22 that are substantially relevant to visual resources include the following:

- Chapter 22.04.030 (Yards, Highway Lines, and Highways) contains provisions that pertain to the regulation of, and development standards for highways and parkways;
- Chapter 22.06.040 (Supplemental Districts) Part 9 (Rural Outdoor Lighting District) allows for the establishment of rural outdoor lighting districts, which promote and maintain dark skies for the health and enjoyment of individuals and wildlife;
- Chapter 22.06.040 includes regulations that, in addition to other provisions in the Zoning Ordinance, regulate light and glare;
- Chapter 22.06.040 (Supplemental Districts) contains development regulations which supersede the countywide standards in the Zoning Ordinance for a list of communities that form districts for this purpose; and
- Chapter 22.44 (General Regulations) contains a number of general regulations, including Part 10 (Signs), which regulates the design and siting of all signs in the unincorporated County. Part 10 is discussed further as follows.

### *Oak Tree Ordinance*

Contained in Part 16 (Oak Tree Permits) of Section 22.56 (Conditional Use Permits, Variances, Nonconforming Uses, Temporary Uses and Director's Review) of the Zoning Ordinance, the Oak Tree Ordinance was established to recognize oak trees as significant aesthetic, historical, and ecological resources. The ordinance establishes permitting requirements for removal of protected oak trees.

### *Signs*

Part 10 (Signs) of Chapter 22.52 (General Provisions) of the Los Angeles County Code regulates the design, siting, and maintenance of signs in the Project Area. These regulations are intended to provide standards for the protection of property values, visual aesthetics, and the public health, safety and general welfare of citizens, while still providing ample opportunities for businesses and the visual advertising industry to operate successfully and effectively.

### *City General Plans*

The City of Los Angeles General Plan contains two elements that regulate the protection of aesthetics and views and identification of scenic highways in the SUP area. The Conservation Element confirms that one plan objective is to “protect and reinforce natural and scenic vistas as irreplaceable resources and for the aesthetic

## 5. Environmental Analysis

enjoyment of present and future generations.”<sup>67</sup> One policy that seeks to attain this objective is to encourage or require property developers to retain significant existing landforms (e.g., ridgelines, bluffs, unique geologic features) and unique scenic features (e.g., mountains) and to protect the public’s ability to view these scenic features.

Mobility Plan 2035, the current Mobility Element of the City General Plan, is also pertinent to aesthetic resources in the Program area. It addresses motorized and non-motorized transportation, along with scenic highways and bikeways citywide. The Green Streets initiative seeks to enhance aesthetics, which can increase pedestrian use of sidewalks and encourage the use of bicycles.<sup>68</sup>

LAUSD

### *Standard Conditions of Approval*

This table lists the aesthetic related standard conditions that will be included as part of each SUP-related project, as appropriate.

Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
SC-AE-1	Degradation of neighborhood character	Demolition of historic building or construction of a new building, the majority of which can be viewed from public right-of-way	During project design (Planning)	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.  <b>School Design Guide<sup>69</sup></b> 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	Degradation of neighborhood character	Provide a surface for graffiti and/or opportunity for the accumulation of rubbish and debris along new walls adjacent to public right-of-way	During project design, construction, and operation (Planning, Construction, Post-Construction)	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.  <b>School Design Guide</b> 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.

<sup>67</sup> City of Los Angeles Department of City Planning, 2001. Conservation Element, City of Los Angeles General Plan, adopted September 2001. [https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation\\_Element.pdf](https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf). Accessed April 27, 2023.

<sup>68</sup> City of Los Angeles Department of City Planning. Mobility Plan 2035, City of Los Angeles General Plan, adopted September 7, 2016. <https://planning.lacity.org/plans-policies/initiatives-policies/mobility>. Accessed May 2, 2023.

<sup>69</sup> 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.

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
SC-AE-3	Degradation of neighborhood character and viewshed obstruction	Increase density, height, bulk, or decrease setback compared to the surrounding development	During project design (Planning)	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	Outdoor electronic message display signs	Install a new or change an existing school marquee	During project design and installation (Planning, Construction)	<p>LAUSD shall review all designs to ensure that the installation of a school marquee complies with Marquee Signs Bulletin BUL 5004.1.</p> <p><b>Marquee Signs Bulletin BUL-5004.1</b></p> <p>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.</p>
SC-AE-5	Light and glare	Increase light and/or glare	Prior to building occupation, first stadium event, or first use of lights (Planning, Construction)	<p>LAUSD shall review all designs and test new lights following installation to ensure that adverse light trespass and glare impacts are avoided.</p> <p><b>School Design Guide</b></p> <p>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.</p>
SC-AE-6	Light and glare	Generate additional light and/or glare	Prior to building occupation, first stadium event, or first use of lights (Planning, Construction)	<p>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:</p> <ul style="list-style-type: none"> <li>• Limit the amount of light that can be used.</li> <li>• Minimize glare by controlling the amount of light that tends to create glare.</li> <li>• Minimize sky glow by controlling the amount of uplight.</li> <li>• Minimize the amount of off-site impacts or light trespass.</li> </ul>

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### 5.10.1.1 EXISTING CONDITIONS

The consideration of aesthetics in environmental impact evaluations dates to the passage of the National Environmental Policy Act of 1969. Since that time, the concept of aesthetics in environmental analysis has generally been construed as a suite of key visual resources that embrace both the natural (i.e., landscape) and built environments. In the context of school-related projects or programs, aesthetics often include:

- Undisturbed and/or unique viewsapes or vistas
- Natural or undisturbed areas (i.e., open space)
- Unique natural and manmade landscapes, buildings/structures, or features
- Areas that have been formally recognized as a significant visual resource by a local, state, or federal agency.

The sensitivity of an aesthetic or visual resource generally depends on its unique qualities as well as the visual access afforded to a typical prospective viewer (i.e., is it readily viewed or are there impediments to viewing). Consistent with its predominantly urban character, the District possesses many man-made aesthetic resources. These resources can include individual buildings or groups of buildings or structures that possess a distinctive appearance, history, and/or societal or cultural importance. Such resources can also include locations that are judged important to a region's history and sense of place.

### Visual Character

The overall visual character in the District is highly diverse, reflecting a wide range of landforms, as well as variations in the built environment. Urban and suburban residential and commercial land uses are predominate, and the area is heavily populated, constituting the most densely populated metropolitan region in the nation, and the second most populous.<sup>70</sup> The Los Angeles area is generally bound by the San Gabriel and Santa Susana Mountains to the north and northwest, the Santa Monica Mountains to the west, and the Pacific Ocean to the west and south. Because of this unique setting, these natural geographic barriers have both constrained and shaped urban development over the years.

As noted above, the visual character throughout the District does vary, depending on the location within the Los Angeles metropolitan region. For example, much of the inland valleys such as the San Fernando, San Gabriel, and Santa Clarita Valleys are largely suburban regions situated in a flat sedimentary basins flanked by mountains. These areas experienced substantial growth (i.e., “booms”) following World War II, after which single and multiple-family residences were built on the remaining undeveloped land. With local exceptions due to intervening topographic features such as the Verdugo Mountains, San Rafael Hills, etc., the visual character of these valleys is relatively flat with a pattern of roadways and development that is regular, and often, orthogonal.

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<sup>70</sup> United States Census Bureau: Nation's Urban and Rural Populations Shift Following 2020 Census. December 29, 2022. <https://www.census.gov/newsroom/press-releases/2022/urban-rural-populations.html#:~:text=The%20nation%27s%20most%20densely%20populated%20urban%20areas%20of,5%20Honolulu%2C%20HI%20%285%2C886%20people%20per%20square%20mile%29.> Accessed April 17, 2023.

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Buildings in the valley areas tend to be low in height, predominantly one- to three-story structures. Major arterials are often flanked by low- to medium-density commercial development interspersed with multi-family apartments. In the areas between arterial streets, narrower residential streets allow for low- to medium-density neighborhoods generally composed of detached, single-family residences. Pockets of industrial land use in these valley areas range from small, light industrial properties such as gas stations, auto body shops, and small machining/manufacturing operations, to large-scale plants such as the Warner Brothers and Disney film and animation studios in the San Fernando Valley.

Unlike the suburban valleys described, there is no single predominant development pattern in the area extending south and west from downtown Los Angeles. The area's land uses are historically diverse, with heavy manufacturing plants that were once operated by large companies such as Alcoa Aluminum, Goodyear Tire and Rubber, and Bethlehem Steel. While some of the manufacturing base has moved away, Los Angeles is currently home to The Aerospace Corporation, SpaceX, and three Fortune 500 companies: AECOM, CBRE Group, and Reliance Steel & Aluminum Company. This area also includes large tracts of medium-density housing, and, like the valleys, much of the housing stock was built in the aftermath of World War II.

Downtown Los Angeles is highly urbanized, featuring a blend of commercial, light and heavy industry, and skyscraper/office land uses. Home to the tallest building in the western U.S., the urban nature of downtown Los Angeles represents a regional aesthetic resource, with a distinctive skyline that is widely visible throughout the region. Transportation infrastructure also influences the visual character of this area. Los Angeles International Airport (LAX) is readily recognized due to its distinctive architecture and heavy air traffic (i.e., reportedly the sixth-busiest airport in the world)<sup>71</sup>.

The visual character of the southernmost part of the District is heavily influenced by the Long Beach and Los Angeles Harbors, the busiest port of entry in the U.S. Similarly, this area also houses more than a dozen oil refineries and terminals. Urban single- and multi-family land use is also widespread, and it is generally interspersed with these industrial and shipping land uses.

### Visual Resources

Historically, development in the City of Los Angeles and surrounding urban and suburban areas has encroached on many natural aesthetic resources, such as undeveloped open space. Such development notwithstanding, the area still possesses many widely recognized visual resources, also referred to as scenic vistas and aesthetic features. Table 5.1-2 lists some of the most noteworthy vistas and features throughout the area. They include natural visual resources, such as nearby beaches, parks, national forests, and recreation areas, as well as distinctive resources in the built environment, such as the downtown Los Angeles skyline, Los Angeles City Hall, Griffith Park Observatory, and Point Fermin Lighthouse.

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<sup>71</sup> [https://www.lawa.org/history/lax-history/just-the-facts#:~:text=Los%20Angeles%20International%20Airport%20\(LAX,based%20on%20number%20of%20passengers](https://www.lawa.org/history/lax-history/just-the-facts#:~:text=Los%20Angeles%20International%20Airport%20(LAX,based%20on%20number%20of%20passengers). Accessed June 9, 2023.

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### Landforms

The natural landforms that are found in the District are almost unmatched for diversity in an urban setting, including rugged mountains whose elevations locally exceed 10,000 feet; expansive, sandy beaches; coastal headlands; sediment-filled inland valleys, some of which are more than 25 miles long; and a broad coastal plain that is typified by low elevations and nearly flat topography.

#### *Mountain Ranges*

Los Angeles County includes several mountain ranges, the most prominent of which are the San Gabriel Mountains, Santa Monica Mountains, Santa Susana Mountains, and the Verdugo Mountains. The largest of these ranges, the San Gabriel Mountains, includes Mount San Antonio, commonly referred to as Mt. Baldy, which tops out at just over 10,000 feet and can be seen from much of the southern part of the county.

#### *Inland Valleys*

The District includes several prominent inland valleys, all of which are underlain by sedimentary basins. Sediment sources are tied to regional tectonic deformation and uplift that results in sediment erosion in mountain areas, followed by alluvial transport and ultimate deposition in the neighboring valleys.

#### *The Los Angeles Coastal Plain*

The Los Angeles Basin is a sedimentary basin flanked by mountains to the north and northeast, and the Pacific Ocean to the west and south. Topographically, the basin is manifest as a broad coastal plain marked by low elevations and nearly flat relief. Such a setting is amenable to many types of development, which contributed to the City of Los Angeles' current role as a commercial, governmental, and visual focal point of the region.

#### *Coastline*

The coastline of Los Angeles is widely recognized, comprising a distinctive part of the area's visual landscape. Moreover, there is a significant variety in the coastal landforms, ranging from expansive, sandy beaches to rugged, cliff-bound headlands.

### Scenic Vistas and Corridors

The District is traversed by a number of scenic highways and corridors that are judged to possess substantial aesthetic value. A few of the highways within the area have been officially designated as scenic under the California Scenic Highway Program, although several are considered eligible for such designation.<sup>72</sup> Table 5.1-1 lists scenic highways, byways, routes, and corridors within the SUP area. In designating scenic highways, Caltrans considers the following criteria: 1) the scenic highway should be part of a memorable landscape that showcases the natural scenic beauty or agriculture of California; 2) visual intrusions do not significantly impact the scenic corridor; 3) evidence of strong local support for the proposed designation; and 4) length not less than a mile

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<sup>72</sup> California Department of Transportation (Caltrans), 2014. California Scenic Highway Program. <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>. Accessed May 2, 2023.

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and not segmented.<sup>73</sup> Los Angeles County addresses scenic vistas and corridors in the Conservation and Natural Resources Element of the Los Angeles County General Plan. The County lists its scenic highways and outlines scenic resources protection and hillside management strategies, including the Goal C/NR 13: Protected Visual and Scenic Resources.<sup>74</sup>

In addition to the scenic highways and corridors previously discussed, the District also embraces many other scenic vistas and aesthetic features, some of which are man-made, such as distinctive or historic buildings like Los Angeles City Hall, Union Station, or the Watts Towers, and some of which reflect natural, largely undisturbed settings such as Griffith Park, the Angeles National Forest, or the Santa Monica Mountains National Recreational Area. Table 5.1-2 lists some of the most distinctive and well-known scenic vistas and aesthetic features in the District.

**Table 5.1-2 Select Scenic Vistas and Aesthetic Features**

<b>Aesthetic Resource</b>	<b>Description</b>
Angel's Gate Lighthouse	Architecturally unique among California lighthouses, Angel's Gate is at the entrance to Los Angeles Harbor.
Angeles National Forest	This 650,000-acre National Forest provides aesthetic value, recreational opportunities, and watershed protection.
Baldwin Hills	Nearly 450 acres of protected park, including the Kenneth Hahn State Recreation Area.
Beaches	Beaches flank the west side of the District, including the Los Angeles communities of Pacific Palisades, Venice, Playa del Rey, and Westchester.
City Hall	Once the tallest building in the City, its distinctive architecture was designed by John C. Austin in 1928.
Dodger Stadium	The famous baseball stadium features well-known views of downtown Los Angeles and the San Gabriel Mountains.
Downtown Los Angeles Skyline	Visible from many parts of the Valley area, this cityscape combines urban skyscrapers, mountains, and palm trees.
El Pueblo de Los Angeles (Olvera Street)	Historical site preserving the origins of Los Angeles and containing Olvera Street, Los Angeles's first street, and the Avila Adobe, the oldest remaining residence in Los Angeles.
Elysian Park	At 600 acres, the second largest city park in the city, including hiking trails, picnic areas, a man-made lake, and children's play area.
Griffith Park and Observatory	Covering more than 4,107 acres, Griffith Park is the largest municipal park and urban wilderness area in the US. The Observatory, recently renovated in 2005, is located on Mount Hollywood, with panoramic views of the Los Angeles Basin and the Hollywood Hills.
Hollywood Sign	Famous sign atop Mount Lee in the Hollywood Hills, northwest of downtown Los Angeles.
J. Paul Getty Center	Art museum renowned for its architecture as well as collections.
Korean Bell of Friendship	The Korean Bell of Friendship was given to LA in 1976 as a gift from Korea. The area features pristine views of the Los Angeles Harbor and the Catalina Channel.
La Brea Tar Pits (G. Page Museum)	Contain fossils of Pleistocene mammals, including dire wolves, saber-toothed cats, and mammoths.
Los Encinos State Historic Park	Historic site with archeological significance, including over one million artifacts. The park also contains exhibits on early California ranch life.
Marina del Rey Marina	Marina del Rey is the largest manmade small-boat harbor in the world and home to over 6,000 pleasure boats and yachts.

<sup>73</sup> Caltrans, 2008. Scenic Highway Guidelines, Landscape Architecture Program, October 2008: <https://dot.ca.gov/-/media/dot-media/programs/design/documents/scenic-hwy-guidelines-04-12-2012.pdf>.

<sup>74</sup> County of Los Angeles, 1980. Adopted General Plan, Scenic Highway Element.

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Aesthetic Resource	Description
Mulholland Drive viewpoint	Mulholland Drive winds from the Hollywood Hills, across the spine of the Santa Monica Mountains, and west towards the Pacific Ocean. The drive affords views of San Fernando Valley, Beverly Hills, Century City, Hollywood and Downtown Los Angeles.
Point Fermin Lighthouse	One of San Pedro's most recognized landmarks, with a Victorian-style building and flower gardens.
Port of Los Angeles	One of the largest and busiest seaports in the world; 20 miles south of downtown Los Angeles, it occupies 7,500 acres along 43 miles of coast.
Runyon Canyon	Runyon Canyon Park is a 160-acre park at the eastern end of the Santa Monica Mountains, managed by the Los Angeles Department of Recreation and Parks. Hiking trails afford views of the Hollywood sign, the Sunset Strip and the LA Basin.
San Gabriel Mountains	In addition to numerous recreational opportunities, this mountain range provides the Valley with a strong visual backdrop to the north, with elevations locally exceeding 10,000 feet above sea level.
Santa Monica Mountains National Recreational Area	This 150,000-acre National Recreation Area includes a number of aesthetic features visible along the south side of the San Fernando Valley. Other areas of scenic value include Stunt Ranch, Topanga Canyon, Stone Canyon Reservoir, and Will Rogers State Historic Park.
Sepulveda Basin Recreation Area	This relatively flat, open space in the San Fernando Valley provides a sharp visual break from the surrounding developed commercial/residential areas.
Topanga State Park	This park in the Santa Monica Mountains features 36 miles of trails through open grassland, live oaks, and spectacular views of the Pacific Ocean. Considered the world's largest wildland within the boundaries of a major city. Also a geological resource, since the park contains earthquake faults, marine fossils, volcanic intrusions, and various sedimentary formations.
Union Station	Los Angeles' first train depot remains a vital, multi-modal transportation hub. Architecturally distinctive design by Parkinson and Parkinson, the building is on the National Register of Historic Places.
Watts Towers	Distinctive pair of steel towers built by Simon Rodia and decorated with scrap metal, bed frames, bottles, ceramic tiles, and seashells. The towers are on the National Register of Historic Places.
Wilacre Park, Mountains Recreation & Conservation Authority	Located in the Eastern Santa Monica Mountains above Studio City, Wilacre Park has 128 acres of wooded trails and canyons.
Wilson Canyon Park	Located at the northern edge of the San Fernando Valley, this 242-acre park includes oak groves and woodlands, a year-round stream, scenic vistas, and extensive trails leading into the Angeles National Forest.
Note: This table is not all-inclusive. It lists some of the most distinctive scenic vistas/aesthetic features in the District.	

### Unique Aesthetic Resources

LAUSD is the second largest public school system in the United States and encompasses nearly 800 campuses distributed across more than 700 miles. Since its founding in 1872, the district has commissioned, designed, and acquired a remarkable collection of buildings, campuses, and facilities. These properties reflect more than a century of social, architectural, and technological advances, as well as ongoing educational and curricular reform. Properties range from a few late-19th-century, wood-framed schoolhouses to mid-20th-century superblock campuses exemplary of modernist architectural design. Unique aesthetic features can be found on District schools with the following architectural styles.

- Late-19th-Century Victorian Era Styles
- Early 20th Century: Beaux-Arts Classicism and Neo-Classical Revival
- Early 20th Century: Indigenous Revival Styles and Historic Eclecticism



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- Mission Revival and Spanish Colonial Revival
- Renaissance Revival Style
- Gothic Revival / Collegiate Gothic
- Art Deco
- Streamline Moderne / Moderne
- PWA Moderne
- Early Modernism / International Style
- Mid-Century Modernism / Regional Modernism

Many schools are considered historically significant, meeting the listing criteria for the National Register of Historic Places or the California Register of Historical Resources. A number of the schools are directly associated with the distinguished southern California architects, who include but are not limited to: John C. Austin, George Edwin Bergstrom, Stiles O. Clements, Myron Hunt, Gordon Kaufmann, Richard Neutra, Charles F. Plummer, and Alfred Rosenheim.<sup>75</sup>

Based on the 2014 Historic Resources Survey, a list of the most historically and architecturally significant school buildings was developed (refer to Chapter 5.5, *Cultural Resources*).

### Light and Glare

#### *Lighting*

Nighttime lighting can provide and maintain safe, secure, and attractive environments. However, all lights have the potential to produce spillover light and glare, and if designed incorrectly, could be considered unattractive. Nighttime light is a common feature of urban areas, however, spillover light can adversely affect light-sensitive uses, such as residential units at nighttime. Most areas within the communities that make up LAUSD have a relatively high level of ambient nighttime lighting and illumination, particularly along active transportation corridors. High levels of nighttime lighting along these roadways are generated by streetlights, vehicle headlights, illuminated signage, lighted outdoor advertising displays, security lighting from commercial and industrial uses and parking lots, and interior building illumination. Further away from the active transportation corridors, lower density residential areas exhibit less intensive lighting, though some nighttime lighting is provided by street lighting, vehicle headlights, security lighting, and interior illumination from residences. Lighting in residential communities is generally consistent with the development density of those communities, with lower-density residential neighborhoods exhibiting less intensive street lighting and security lighting.

#### *Glare*

Glare results when a light source directly within an observer's field of vision is brighter than the eye can comfortably accept. Squinting or turning away from a light source is an indication of glare. The presence of a

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<sup>75</sup> Los Angeles Unified School District: Historic Context Statement: 1870 to 1969. 2014. [https://achieve.lausd.net/cms/lib/CA01000043/Centricity/domain/135/pdf%20files/Historic\\_Context\\_Statement\\_1870-1969.pdf](https://achieve.lausd.net/cms/lib/CA01000043/Centricity/domain/135/pdf%20files/Historic_Context_Statement_1870-1969.pdf). Accessed April 24, 2023.

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bright light in an otherwise dark setting may be distracting or annoying, referred to as discomfort glare, or it may diminish the ability to see other objects in the darkened environment, referred to as disability glare. Reflective glare, such as the reflected view of the sun from a window or mirrored surface, can be distracting during the day. Most glare in the communities that make up LAUSD's plan area is generated by reflective materials on existing buildings and glare from vehicles passing on major street corridors.

### 5.1.2 Environmental Impacts

#### 5.1.2.1 THRESHOLDS OF SIGNIFICANCE

In accordance with CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project would:

- AE-1 Have a substantial adverse effect on a scenic vista.
- AE-2 Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
- AE-3 In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. In urbanized areas, would conflict with applicable zoning and other regulations governing scenic quality.
- AE-4 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

#### 5.1.2.2 METHODOLOGY

Consistent with a programmatic scope, this discussion generally characterizes aesthetic resources within the District. Many site-specific school upgrade projects have not been scoped at this time, and an evaluation of site-specific aesthetic resources is not feasible. Each future school project would require a site-specific aesthetic analysis during CEQA review. Moreover, because the SUP will be implemented over the course of several years, a detailed description of aesthetic resources could become obsolete over time as resources are added and deleted.

The LAUSD Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects will be applied on a project specific level to ensure consideration of aesthetics resources during design and development. The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.1-1: Updated SUP-related projects would not have a substantial adverse effect on scenic vistas. [Threshold AE-1]**

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#### All SUP Projects

As a rule, existing, established public schools tend to be aesthetically compatible with the neighborhoods in which they are located, and their scope, height, and mass are unlikely to block, obscure, or degrade surrounding

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views. This pattern notwithstanding, the potential for SUP implementation to adversely impact one or more of the scenic vistas and aesthetic features in Table 5.1-2 deserves consideration. From the perspective of natural views, such as views of surrounding mountains, parks, and shorelines in the greater Los Angeles area, most of existing and newly built schools are one or two-stories in height. Additions to or modifications of these school buildings may add another story or a side addition that may block existing scenic views. Each SUP-related project would be assessed on a case-by-case basis. LAUSD's site-specific review process for upgraded or new school construction projects would incorporate LAUSD SC-AE-1, SC-AE-2, and SC-AE-3, which require analysis of views and how the project would affect existing historic campuses and neighborhood views. The District is required to consider whether a proposed project is consistent with the general character of the surrounding neighborhood, including any proposed changes to the density, height, bulk, and setback of new or updated buildings. The District is also required to make sure all designs conform to the methods of the current School Design Guide and to ensure compatibility with the existing historic campuses and/or neighborhood character.

Furthermore, the District is required to include unique vistas, natural areas, or scenic areas that have been formally recognized in the project vicinity and to consider whether the project would have an adverse aesthetic effect on these resources. School construction in neighborhoods that exhibit cohesive and pervasive aesthetic qualities, such as a distinctive architectural style, would be designed to comply with those aesthetic values. In some instances, school upgrade/modernization projects could enhance the view amenities and aesthetic properties of a given neighborhood, especially where the neighboring properties do not meet building codes and/or are dilapidated.

For SUP-related site-specific projects that may be in a state-recognized Coastal Zone, protection of scenic vistas is required by various provisions of the California Coastal Act. The act states, "The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas."

For any site-specific projects implemented under the SUP that requires site grading or new building construction or exterior modification, the District will incorporate California Coastal Act requirements along with LAUSD SC-AE-1, SC-AE-2, and SC-AE-3 into the site design and construction for protection of unique scenic features and designated scenic vistas. Scenic vista impacts would be less than significant.

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**Impact 5.1-2: SUP-related projects would not alter scenic resources within a state scenic highway. [Threshold AE-2]**

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### All SUP Projects

State-designated scenic highways, highways with scenic priority identified in the L.A. County General Plan, nationally designated Scenic Byway Historic Parkways, and California Historic Parkway or those highways that could be so designated are listed in Table 5.1-1. Very few existing schools are near these scenic highways

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(specifically along the I-210, I-5, and Pacific Coast Highway, among others), and opportunities for new school construction and/or significant school building expansion are limited in most instances.

Many of the listed highways are high-volume, limited-access freeways with well-established and demarked landscaped or engineered margins (including sound walls/barriers), or scenic highways in sparsely populated mountain areas where the surrounding terrain is often typified by very steep slopes. CDE Title 5 criteria governing school project siting within 500 feet of a major transportation thoroughfare would also reduce the likelihood of a school upgrade or modernization project being undertaken near a scenic highway.

Additional protection of scenic resources near a state scenic highway are included in the California Scenic Highway Program, where the sponsoring city or county must also adopt ordinances, zoning, and/or planning policies to preserve the scenic quality of the corridor. Such ordinances and policies often constitute a formal Corridor Protection Program.

For any site-specific projects implemented under the SUP that requires site grading or building construction or exterior modification, the District will incorporate LAUSD SC-AE-1, SC-AE-2, and SC-AE-3 into the site design and construction for protection of scenic resources. Impacts to scenic resources within a state scenic highway would be less than significant.

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**Impact 5.1-3: SUP-related projects would not substantially degrade the existing visual character or quality of the site and its surroundings. Nor would they conflict with applicable zoning and other regulations governing scenic quality. [Threshold AE-3]**

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### All SUP Projects

In some cases, implementation of the SUP could potentially bring about adverse impacts on the existing visual character or quality of the site and its surroundings. For example, the architecture associated with a school construction project might be incompatible with a neighborhood that possessed a distinctive, widely appreciated architectural style or visual quality. Similarly, where an existing school building or buildings possess unique visual qualities, as in the case of certain older LAUSD school buildings designed by leading architects of their era, poorly conceived building additions or new structures could have an adverse impact on the visual character or quality of the site. Where a proposed LAUSD school project is inconsistent with a local General Plan policy or zoning ordinance, LAUSD school sites are exempt under Government Code Section 53094[1], pending a two-thirds vote of the Board of Education. On February 19, 2019, the LAUSD Board of Education Adopted a Resolution (Res 256-18/19)[2] to exempt all LAUSD school sites from local land use regulations under Government Code Section 53094. Although LAUSD school sites are exempt from local land use regulations, many of these general plans or community plans establish goals and policies providing applicable references for discussion.

LAUSD SC-AE-1 requires the consideration of architectural appearance/consistency and other aesthetic factors during the preliminary design review for a proposed school upgrade project. For construction of new buildings SC-AE-1 requires that architectural quality consider compatibility with the surrounding community. Under SC-AE-1 for historic resources, reuse rather than destruction is the preferred method, with the multiple goals of: 1) retaining and preserving the historic character of a building, structure, or site; treating distinctive architectural features or examples of skilled craftsmanship with sensitivity; concealing reinforcement required

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for structural stability or life, safety, or mechanical systems; and conducting surface cleaning of historic structures by the gentlest means possible.

LAUSD SC-AE-3 would also help minimize the likelihood of degraded visual character or quality during SUP implementation. SC-AE-3 requires appropriate design changes to reduce or eliminate significant adverse aesthetic impacts resulting from a proposed school project's building or site design. These design changes could include, but are not necessarily limited to, changes to campus layout, height of buildings, and/or architectural style of buildings.

Compliance with LAUSD SC-AE-5 would ensure shade and shadow impacts are analyzed and mitigated. A shadow analysis is required to determine whether a proposed project "would substantially degrade the existing visual character of the site or its surroundings."

For any site-specific projects implemented under the SUP, the District will incorporate LAUSD SC-AE-1, SC-AE-2, SC-AE-3, SC-AE-4, SC-AE-5 and SC-AE-6 into site-specific projects for protection of character and quality of site surroundings, and scenic quality. Impacts to visual character or quality of the site and its surroundings would be less than significant.

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**Impact 5.1-4: SUP-related projects would not generate substantial light or glare which would adversely affect day or nighttime views. [Threshold AE-4]**

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### All SUP Projects

Depending on site-specific factors and conditions, new light sources could be associated with a future school upgrade project. Examples of such new light sources include campus marquees, parking lot or pedestrian walkway lights, crosswalk lights, building and courtyard lighting, and lighting associated with athletic fields or related athletic infrastructure (tennis courts, outdoor pools, etc.). The construction and operation of new features like these could result in adverse light and glare impacts on nearby land uses, most notably, single- or multi-family residences. During site-specific environmental review of future proposed school upgrade or modernization projects, the District will be obliged to consider whether the project will result in significant adverse light and glare impacts or not. Similarly, these new projects would be required to conform to existing District policies concerning school marquees and related potential for light and glare impacts.

LAUSD SC-AE-4 includes requirements that are intended to minimize adverse light and glare impacts on nearby properties. The SC-AE-4 Marquee Signs Bulletin BUL 5004.1, which was adopted in May 2010, includes detailed criteria for the design, approval, placement, and operation and maintenance of electronic light boards (i.e. marquees) proposed for any LAUSD school site. The LAUSD SC-AE-5 and SC-AE-6 provides measures such as eliminate direct-beam projection off-site or glare off buildings into adjoining residential areas, install lighting to minimize glare for pedestrians and drivers, and to avoid light spilling onto adjacent properties.

SC-AE-5 references quantitative performance standards for light and glare impacts from the School Design Guide, which limits light and glare impacts to no more than two foot-candles, as measured at the property line of an affected nearby residence. The use of light hoods, filtering louvers, glare shields, and/or landscaping is discussed, as is painting of lamp enclosures and poles to reduce reflection. SC-AE-6 includes site lighting

## 5. Environmental Analysis

standards that would have minimal impact off-site and minimal contribution to sky glow, glare, and light trespass.

The California Building Code also contains standards for outdoor lighting that are intended to reduce light pollution and glare by regulating light power and brightness, shielding, and sensor controls.

With implementation of SC-AE-5 and SC-AE-6, impacts from substantial light and glare would be less than significant.

### 5.1.3 Applicable Regulations and Standard Conditions

#### State

- California Streets and Highways Code, Sections 260 through 263
- California Public Resources Code, Division 20
- California Code of Regulations, Title 24, Part 2
- California Code of Regulations, Title 5, Section 14010

#### Local

- City and County of Los Angeles General Plan: scenic corridors

#### LAUSD Standard Conditions of Approval

- SC-AE-1 through SC-AE-6

### 5.1.4 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standard Conditions, the following impacts would be less than significant: 5.1-1, 5.1-2, 5.1-3, and 5.1-4.

### 5.1.5 Mitigation Measures

No mitigation measures are required.

### 5.1.6 Level of Significance After Mitigation

Impacts would be less than significant.

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### 5.2 AGRICULTURE AND FORESTRY RESOURCES

This section of the Subsequent Program EIR evaluates the potential for implementation of the updated SUP to impact agriculture and forestry resources in the District. The section discusses plans and policies from several jurisdictional agencies, the existing agricultural resources throughout the District area, and possible environmental impacts that may occur during future phases of the updated SUP and site-specific projects implemented under Measure RR.

#### TERMINOLOGY

California Department of Conservation Farmland Mapping and Monitoring Program (FMMP):<sup>76</sup>

**Prime Farmland (P).** Farmland with the best combination of physical and chemical features and able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

**Farmland of Statewide Importance (S).** Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

**Unique Farmland (U).** Farmland of lesser-quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards, as found in some climatic zones in California. Land must have been cultivated at some time during the four years prior to the mapping date.

**Farmland of Local Importance (L).** Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee. In some counties, Confined Animal Agriculture facilities are part of Farmland of Local Importance, but they are shown separately.

**Grazing Land (G).** Land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities.

**Other Land (X).** Land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry, or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

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<sup>76</sup> Department of Conservation. Important Farmland Categories. <https://www.conservation.ca.gov/dlrp/fmmp/Pages/Important-Farmland-Categories.aspx>. Accessed April 18, 2023.

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The [Rural Land Mapping Project](#) provides more detail on the distribution of various land uses within the Other Land category in nine FMMP counties, including all eight San Joaquin Valley counties. The project may be expanded to the entire FMMP survey area as funding becomes available. The Rural Land categories include:

- Rural Residential Land (R)
- Semi-Agricultural and Rural Commercial Land (sAC)
- Vacant or Disturbed Land (V)
- Confined Animal Agriculture (CI): [status of this land use relative to Farmland of Local Importance](#).
- Nonagricultural or Natural Vegetation (nv)

**Water (W).** Perennial water bodies with an extent of at least 40 acres.

**Optional Designation. Land Committed to Nonagricultural Use.** This category was developed in cooperation with local government planning departments and county boards of supervisors during the public workshop phase of the FMMP's development in 1982. Land Committed to Nonagricultural Use information is available both statistically and as an overlay to the important farmland information. Land Committed to Nonagricultural Use is defined as existing farmland, grazing land, and vacant areas which have a permanent commitment for development.

**Forest land** is defined as "land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits".<sup>77</sup>

**Timberland** is defined as "land...which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees".<sup>78</sup>

**Timberland production zone** is defined as an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses. Compatible uses include management for watershed; management for fish and wildlife habitat or hunting and fishing; a use integrally related to the growing, harvesting and processing of forest products, including but not limited to roads, log landings, and log storage areas; the erection, construction, alteration, or maintenance of gas, electric, water, or communication transmission facilities; grazing; and a residence or other structure necessary for the management of land zoned as timberland production.<sup>79</sup>

**Timber** is trees grown for forest products requiring the harvesting of trees, such as wood for construction and carpentry, and wood pulp used in making paper and corrugated board (cardboard).

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<sup>77</sup> California Public Resources Code Section 12220(g).

<sup>78</sup> California Public Resources Code Section 4526.

<sup>79</sup> California Government Code Sections 51104(g) and 51104(h).



## 5. Environmental Analysis

### 5.2.1 Environmental Setting

#### 5.2.1.1 REGULATORY FRAMEWORK

Laws, regulations, and policies are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to agriculture and forestry resources in the District. Although some of these may not be directly applicable to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. See *Applicable Regulations and Standard Conditions* at the end of this chapter for those that require District compliance.

#### Federal Laws, Regulations, and Policies

##### *Farmland Protection Policy Act*

The U.S. Department of Agriculture administers the Farmland Protection Policy Act of 1981. The act discourages federal activities that would convert farmland to nonagricultural purposes and assures to the extent possible that federal programs are administered to be compatible with state, local government, and private programs and policies to protect farmland. For purposes of the act, farmland includes land defined as prime, unique, or farmlands of statewide or local importance as well as forest land, pastureland, or cropland; it does not include water or urban built-up land. Projects are subject to Farmland Protection Policy Act requirements if they could irreversibly convert farmland (directly or indirectly) to nonagricultural use and are completed by a federal agency or with assistance from a federal agency.<sup>80</sup>

Federal agency representatives of projects that have the potential to convert farmland to non-farm use coordinate with their local office of the Natural Resources Conservation Service (NRCS) or U.S. Department of Agriculture Service Center. The NRCS uses a land evaluation and site assessment (LESA) system to establish a farmland conversion impact rating score on proposed sites of federally funded and assisted projects. The resulting score is used as an indicator for the project sponsor to consider alternative sites if the potential adverse impacts on the farmland exceed the recommended allowable level. The LESA system, as adopted for use in California, is described further below.

##### *California Public Resources Code*

Section 4526 of the California Public Resources Code defines timberland as land (other than land owned by the federal government and land designated by the county board of supervisors as experimental forest land) that is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species are determined by the county board of supervisors on a district basis after consultation with district committees and others. According to Section 12220(g) of the California Public Resources Code, forest land refers to “land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of

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<sup>80</sup> United States Natural Resources Conservation Service. 2023. Farmland Protection Policy Act. <https://www.nrcs.usda.gov/conservation-basics/natural-resource-concerns/land/cropland/farmland-protection-policy-act> Accessed April 19, 2023.

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one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.”

### *California Civil Code*

Section 3482.5 (Right to Farm Act) The Right to Farm Act is designed to protect commercial agricultural operations from nuisance complaints that may arise when an agricultural operation is conducting business in a “manner consistent with proper and accepted customs.” The law specifies that established operations that have been in business for three or more years that were not nuisances at the time they began shall not be considered a nuisance as a result of a new land use.

### *California Land Conservation Act (Williamson Act)*

The Williamson Act of 1965 provides tax incentives to retain prime agricultural land and open space in agricultural use, thereby slowing its conversion to urban and suburban development. The program requires a 10-year contract between the county where the subject land is located and the landowner. While subject to contract, the land is taxed based on its agricultural use rather than its market value. The land becomes subject to certain enforceable restrictions, and certain conditions need to be met prior to approval of an agreement. The goal of the Williamson Act is to protect agriculture and open space. There are no Williamson Act contracts within the District.

### *California Government Code, Section 65570*

The California DOC established the FMMP in 1982 to identify critical agricultural lands and track the conversion of these lands to other uses. The FMMP is a nonregulatory program and provides a consistent and impartial analysis of agricultural land use and land use changes throughout California.

County, state, and federal agencies have established several classifications of important agricultural land based on factors such as soil characteristics, climate, and water supply (see “Terminology”); categories of mapped agricultural land are set forth in California Public Resources Code Section 21060.1.<sup>81</sup>

Through the Important Farmland maps and related databases, DOC maintains an ongoing inventory of farmland and projects that convert farmland to urban and other uses.<sup>82,83</sup> DOC tracks the status of farmlands through the following procedures:

- Maps and statistics are produced biannually using a process that integrates infrared aerial photos provided by NASA, standard aerial photos, field mapping, a computerized mapping system, and public review.

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<sup>81</sup> Department of Conservation 2004. A Guide to the Farmland Mapping and Monitoring Program. [https://www.conservation.ca.gov/dlrp/fmmp/Documents/fmmp/Archive/fmmp\\_guide\\_2004.pdf](https://www.conservation.ca.gov/dlrp/fmmp/Documents/fmmp/Archive/fmmp_guide_2004.pdf). Accessed April 20, 2023.

<sup>82</sup> Department of Conservation 2023. Farmland Mapping and Monitoring Program. <https://www.conservation.ca.gov/dlrp/fmmp>. Accessed April 20, 2023

<sup>83</sup> 2014-2016 California Farmland Conversion Report. [https://www.conservation.ca.gov/dlrp/fmmp/Pages/2014-2016\\_Farmland\\_Conversion\\_Report.aspx](https://www.conservation.ca.gov/dlrp/fmmp/Pages/2014-2016_Farmland_Conversion_Report.aspx).

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- Maps compile soil survey and current land use information from the USDA and Natural Resource Conservation Service to represent an inventory of agricultural resources within each county.
- Based on these maps, DOC evaluates land to determine its farmland designation, and flags fallow parcels.
- In order to qualify as Prime Farmland rather than just prime soil, the land must have irrigation as well as prime soil attributes.
- DOC has a minimum mapping unit of 10 acres, with parcels smaller than 10 acres being absorbed into the surrounding classifications.

Once DOC designates land as prime farmland, local governments may limit the use of this land to agriculture or similar types of open space.

### *Land Evaluation and Site Assessment Law (LESA)*

The LESA is an approach for rating the relative quality of land resources based on specific measurable features. The formulation of a California Agricultural LESA Model is the result of Senate Bill 850 (Chapter 812/1993), which charges the Resources Agency, in consultation with the Governor's Office of Planning and Research, with developing an amendment to Appendix G of the California Environmental Quality Act (CEQA) Guidelines concerning agricultural lands.<sup>84</sup> Such an amendment is intended "to provide lead agencies with an optional methodology to ensure that significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process." Appendix G of the CEQA Guidelines states that "in determining whether impacts to agricultural resources are significant, lead agencies may refer to the California LESA Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland."

The California LESA Model is based on a 100-point scale. The LESA score has two parts, the Land Evaluation (LE) Factors score, which rates the soil in relation to agriculture, and the Site Assessment (SA) Factors score, which rates all remaining factors as they pertain to agriculture. A detailed LESA analysis is not practicable at the scale of the District. However, methods and criteria from the LESA Model are used where applicable, and discussed qualitatively, in the impacts analysis in this Section.

### *California Government Code Sections 51200 et seq.*

The **California Land Conservation Act**—commonly referred to as the **Williamson Act**—was adopted initially by the State of California in 1965.<sup>85</sup> The act was established to encourage the preservation of agricultural lands in view of the increasing trend toward their "premature and unnecessary" urbanization. The act enables counties and cities to designate agricultural preserves (Williamson Act lands) and offer preferential taxation to agricultural landowners based on the income-producing value. In return for the preferential tax rate, the landowner is required to sign a contract with the county or city, agreeing not to develop the land for a

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<sup>84</sup> Chapter 812, Statutes of 1993; California Public Resources Code, Section 21095.

<sup>85</sup> California Government Code Sections 51200 et seq.

## 5. Environmental Analysis

minimum of 10 years. The contract is renewed automatically on its anniversary date unless a notice of nonrenewal or petition for cancellation is filed.<sup>86</sup>

### *California Government Code Sections 53094(b) and 65402(b)*

Even where schools are not permitted or are conditionally permitted under local land use law, school districts ultimately have the authority to render general plan and zoning requirements inapplicable.<sup>87</sup> If the local agency disapproves the location, purpose, or extent of the school use as being not in conformity with the general plan, the school district may nonetheless overrule the disapproval.<sup>88</sup> A school district's governing body may render a local agency's general plan or zoning ordinance inapplicable by a two-thirds vote.<sup>89</sup> The school district's governing body must notify the affected city or county of such an action within 10 days of the action. This vote may be taken at any point in the process. Thus, under state law, the fact that a proposed LAUSD school project is inconsistent with a local general plan or zoning ordinance will not necessarily prevent LAUSD from proceeding with that project.

### **Local Laws, Regulations, and Policies**

Cities and communities within the District attendance boundaries have General Plans or community plans that guide development. Where a proposed LAUSD school project is inconsistent with a local General Plan policy or zoning ordinance, LAUSD school sites are exempt under Government Code Section 53094[1], pending a two-thirds vote of the Board of Education. On February 19, 2019, the LAUSD Board of Education Adopted a Resolution (Res 256-18/19)[2] to exempt all LAUSD school sites from local land use regulations under Government Code Section 53094. Although LAUSD school sites are exempt from local land use regulations, many of these general plans or community plans establish goals and policies providing applicable references for discussion.

### *Los Angeles County General Plan 2035*

The General Plan includes an implementing program to adopt an Agricultural Resources Areas Ordinance. The intent of this ordinance is to encourage the retention and sustainable use of agricultural land for agricultural uses. The ordinance effort would also include analyzing the feasibility of offering incentives such as density bonuses and/or conservation subdivisions that deed-restrict a certain percentage of a project site for open space and agricultural uses only. The County also anticipates that this future ordinance would ensure compatibility between agricultural and nonagricultural land uses through buffering, development standards, and design requirements. Relevant agricultural resources policies set forth in the General Plan include protection of ARAs and other land identified as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and

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<sup>86</sup> Division of Land Resource Protection (DLRP). 2022, May. The California Land Conservation Act 2020 Status Report. [https://www.conservation.ca.gov/dlrp/wa/Documents/stats\\_reports/2022%20WA%20Status%20Report.pdf](https://www.conservation.ca.gov/dlrp/wa/Documents/stats_reports/2022%20WA%20Status%20Report.pdf). Accessed April 20, 2023.

<sup>87</sup> Government Code Sections 53094 and 65402

<sup>88</sup> Government Code Section 65402 (c)

<sup>89</sup> Government Code Section 53094; 82 Op. Atty. Gen. 135 (1999)

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Farmland of Local Importance from encroaching development. These policies also discourage incompatible land uses in areas adjacent to or within these farmland areas and encourage agricultural activity within ARAs<sup>90</sup>.

The following County General Plan policies from the Land Use and Conservation and Natural Resources Elements, are relevant to LAUSD:

### ***Land Use Element***

Goal LU 1: A General Plan that serves as the constitution for development, and a Land Use Policy Map that implements the General Plan's Goals, Policies and Guiding Principles.

Policy LU 1.7: In the review of a project-specific amendment(s) to convert lands within the ARAs, ensure that the project-specific amendment(s):

Is located on a parcel that adjoins another parcel with a comparable use, at a comparable scale and intensity; and

Will not negatively impact the productivity of neighboring agricultural activities.

### ***Conservation and Natural Resources Element***

Goal C/NR-8: Productive farmland that is protected for local food production, open space, public health, and the local economy.

Policy C/NR 8.1: Protect ARAs, and other land identified as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance by the California Department of Conservation, from encroaching development and discourage incompatible adjacent land uses.

Policy C/NR 8.2: Discourage land uses in the ARAs, and other land identified as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance by the California Department of Conservation, that are incompatible with agricultural activities.

Policy C/NR 8.3: Encourage agricultural activities within ARAs.

Goal C/NR-9: Sustainable agricultural practices.

Policy C/NR 9.1: Support agricultural practices that minimize and reduce soil loss and prevent water runoff from affecting water quality.

Policy C/NR 9.2: Support innovative agricultural practices that conserve resources and promote sustainability, such as drip irrigation, hydroponics, and organic farming.

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<sup>90</sup> County of Los Angeles. Agricultural Resource Areas. <https://egis-lacounty.hub.arcgis.com/datasets/lacounty::agricultural-resource-area-ara/explore?location=34.620576%2C-118.194100%2C9.94/> Accessed April 26, 2023.

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Policy C/NR 9.3: Support farmers' markets throughout the county.

Policy C/NR 9.4: Support countywide community garden and urban farming programs.

Policy C/NR 9.5: Discourage the conversion of native vegetation to agricultural uses<sup>91</sup>

### *Los Angeles County Code*

#### ***Agricultural Zoning***

County Code Title 22, Chapter 22.24, Parts 1–4 regulate uses within the county's agricultural zones, which include A-1, A-2, A-2-H, and Residential Agricultural (R-A). Chapter 22.24 of the County Code contains a list of allowable uses for each of these zones, allowable uses with director's review and approval, and allowable uses with the appropriate permits, and a list of development standards (County Code, Chapter 22.24). The county has two agricultural zones: Light Agricultural (A-1) and Heavy Agricultural (A-2). Within the A-2 zone, some areas are designated as Heavy Agriculture including Hog Ranches (A 2-H), which indicates that hog ranches and fertilizer plants are allowed on those parcels. The agricultural zones allow for variety of uses, including single-family residences and small group homes, community gardens, livestock, and agricultural uses. The A-2 zone allows for a wider variety of agricultural and nonagricultural uses than allowed by the A-1 zone. Fruit and vegetable packing plants and oil wells are examples of heavier land uses that are allowed in A-2 but not in A-1. With a conditional use permit, the types of uses for agriculturally zoned land broaden, and can include uses such as airports, universities, and golf courses. Electric-generating plants are a conditionally allowed use in the A-2 zone with a conditional use permit.

#### ***Watershed Zone***

County Code Title 22, Chapter 22.20, Part 6 contains regulations for the W zone, one of two zones used for forest lands within the county. The purpose of the W zone, as defined in the County Code, is to “provide for conservation of water and other natural resources within a watershed area and to protect areas subject to fire, flood, erosion or similar hazards” (County Code Section 22.40.240). This zone allows for limited recreational development of the land and necessary public facilities. Chapter 22.40, Part 6 contains a list of allowable uses for the W zone, allowable uses with director's review and approval, and allowable uses with the appropriate permits, as well as a list of development standards.

#### ***Open Space Zone***

County Code, Title 22, Chapter 22.40, Part 9 contains regulations for the O-S zone, one of two zones used for forest lands within the county. The purpose of the O-S zone is to provide for the “preservation, maintenance and enhancement of the recreational, natural and environmental resources of this county as defined in the general plan” (County Code Section 22.40.440). Chapter 22.40, Part 9 contains a list of allowable uses for the O-S zone, allowable uses with director's review and approval, and allowable uses with the appropriate permits, as well as a list of development standards.

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<sup>91</sup> Los Angeles County General Plan 2035. <https://planning.lacounty.gov/long-range-planning/general-plan/general-plan/>. Accessed April 20, 2023.

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### *Agricultural Resource Areas*

Agricultural Resource Areas (ARAs) are identified in the General Plan. A key purpose of this designation is to encourage preservation and sustainable uses of agricultural land, agricultural activities, and compatible uses within these areas. The following land types are ARAs:

- Prime Farmland
- Farmland of Statewide Importance
- Farmland of Local Importance
- Unique Farmland
- Lands that have received permits from the County Agricultural Commissioner/Weights and Measures.

The following land uses and County land use designations are not considered for the ARA designation and are not part of any existing ARAs:

- Significant Ecological Areas (SEAs)
- Approved specific plans
- Approved large-scale renewable energy facilities
- Land outside of the Santa Clarita Valley and Antelope Valley Planning Areas
- Lands designated as Public and Semi-Public land uses

ARAs within the LAUSD Plan Area (including both incorporated and unincorporated communities) are shown on Figure 5.2-1, Mapped Farmland.

### *Forest Resources*

Forest land is defined in the California Public Resources Code as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetic, fish and wildlife, biodiversity, water quality, recreation, and other public benefits (Public Resources Code Section 12220[g]). Timberland is considered land that is available for and capable of growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees (Public Resources Code Section 4526). Within the unincorporated areas of the county, Angeles National Forest, coupled with a small portion of Los Padres National Forest, encompasses 650,000 acres. Angeles National Forest extends along the San Gabriel Mountains and is divided into two sections totaling 1,018 square miles, which equates to approximately 25% of the county's land area. The U.S. Forest Service is responsible for managing public forest lands, however, nearly 40,000 acres of the national forests are privately owned. These privately owned areas are commonly referred to as in holdings, and the County retains responsibility for their land use regulation. The county also includes small areas of forest outside of the National Forests. These consist primarily of small areas in the Santa Monica Mountains, the Sierra Pelona, and areas of the San Gabriel Mountains adjacent to Angeles National Forest. Forest lands within the

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county are generally zoned Open Space (O-S) and Watershed (W) zones. The majority of Angeles National Forest is composed of chaparral, rather than forest. The forests in the county are limited and generally consist of small stands of trees growing in riparian areas and in the higher elevations of the San Gabriel Mountains. Because of the limited amount of forest resources, there is no timberland in the county, nor in the LAUSD area.

### *Significant Ecological Area (SEA)*

The County's SEA Program began in 1980 with the adoption of SEAs as Special Management Areas in the Los Angeles County General Plan (Existing General Plan). The objective of the SEA Program is to preserve the genetic and physical ecological diversity of Los Angeles County by designating biological resource areas capable of sustaining themselves into the future. The SEA designation is given to land that contains irreplaceable biological resources and includes undisturbed or lightly disturbed habitats that support valuable and threatened species and linkages and corridors to promote species movement. SEAs are not wilderness preserves, and much of the land within SEAs is privately held, used for public recreation or abuts developed areas. The SEA Program is intended to ensure that privately held lands within the SEAs retain the right of reasonable use, while avoiding activities and developments that are incompatible with the long-term survival of the SEAs. The County has regulated development within the SEAs with the SEA Conditional Use Permit.

### *Community Standards Districts*

Community Standards Districts (CSDs) are established as supplemental districts to provide a means of implementing special development standards contained in adopted neighborhood, community, area, specific and local coastal plans within the unincorporated areas of Los Angeles County, or to provide a means of addressing special problems which are unique to certain geographic areas within the unincorporated areas of Los Angeles County. CSD regulations supplement the countywide zoning and subdivision regulations.

### *Equestrian Districts*

Per County Code 22.44, Part 3, equestrian districts (EDs) establish a supplemental district in order to recognize particular areas where the keeping or maintaining of horses and other large domestic animals for the personal use of members of the family residing on the premises has become or is intended to become an integral part of the character of the area. This is within unincorporated areas of Los Angeles County only.

## **5.2.1.2 EXISTING CONDITIONS**

### **Regional Setting**

#### *Agriculture in Los Angeles County*

The total dollar value of agricultural production in Los Angeles County in 2019 was \$177.6 million. The top five agricultural commodities by dollar value in 2019 were nursery production, vegetable crops, dairy and livestock, field crops, and apiary products. In early 2019, there were great losses in grape and avocado acreage and production resulting from the late-2018 Woolsey Fire in the Santa Monica mountains and greater Malibu



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area. The total acreage in agricultural production was 21,298 acres, or about 33.3 square miles.<sup>92</sup> Most mapped important farmland in Los Angeles County is outside of the District in the northern part of the county—in the Antelope Valley, part of the Mojave Desert.<sup>93</sup> Los Angeles County produced the greatest agricultural production of any county in the United States from 1910 to about 1955.<sup>94</sup>

### District Setting

#### *Mapped Farmland*

Most of the District is urbanized and is not mapped on the California Important Farmland Finder (CIFF) maintained by the FMMP.<sup>95</sup> However, the west half of the San Fernando Valley, and part of the northern San Fernando Valley, are mapped on the CIFF. Several small areas of prime farmland are scattered around the San Fernando Valley. The total amount of mapped important farmland in the District is approximately 561.58 acres (234.81 acres of Prime Farmland, 326.53 acres of Unique Farmland and 0.24 acres of Farmland of Statewide Importance; see Figure 5.2-1, *Farmland Map*), is less than 0.1% of the District's total area.

Nearly all of the Prime Farmland in the District is in five areas: Sepulveda Dam Recreation Area; the campus of Los Angeles Pierce College, a community college; the north end of the Van Nuys Airport property; Orcutt Ranch Horticultural Center, a Los Angeles City Park; and Forneris Farms, a fruit and vegetable growing operation. All five locations are in the City of Los Angeles in the San Fernando Valley. Most of the Unique Farmland in the District is in transmission line easements in the City of Los Angeles in the San Fernando Valley.<sup>96</sup>

#### *Williamson Act Contracts*

There are no Williamson Act contracts that affect land in the District; the only Williamson Act contracts in Los Angeles County are on Santa Catalina Island.

#### *Agricultural Uses*

Mapped important farmland in the District was checked using Google Earth satellite view in April 2023. Some of the areas showed parallel rows appearing to be row crop agriculture; some were bright green but without distinct rows, suggesting grass crop agriculture; and some appeared to be vacant land.

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<sup>92</sup> Agricultural Commissioner/Weights and Measures (ACWM), Los Angeles County. 2019. Los Angeles County Crop and Livestock Report: 2019 <https://acwm.lacounty.gov/crop-reports/>.

<sup>93</sup> Department of Conservation (DOC). California Important Farmland Finder. <https://maps.conservation.ca.gov/DLRP/CIFF/>.

<sup>94</sup> Surls, Rachel (Sustainable Food Systems Advisor). 2011, February 11. University of California Cooperative Extension Los Angeles County. Social Focus. Kcet.org. [http://www.kcet.org/updaily/socal\\_focus/history/bringing-back-urban-agriculture-to-la-communities-30290.html](http://www.kcet.org/updaily/socal_focus/history/bringing-back-urban-agriculture-to-la-communities-30290.html).

<sup>95</sup> DOC. California Important Farmland Finder. <https://maps.conservation.ca.gov/DLRP/CIFF/>.

<sup>96</sup> DOC. California Important Farmland Finder. [DLRP Important Farmland Finder \(ca.gov\)](https://maps.conservation.ca.gov/DLRP/CIFF/). The Sepulveda Dam Recreation Area is at the northwest corner of the junction of the I-405 and US 101 freeways. Los Angeles Pierce College is along the south side of Victory Boulevard from Winnetka Avenue on the east to De Soto Avenue on the west. The referenced part of the Van Nuys Airport property is at the northeast corner of Roscoe Boulevard and Havenhurst Avenue. Orcutt Ranch Horticultural Center is at the southeast corner of Roscoe Boulevard and March Avenue. Forneris Farms is on the south side of Rinaldi Street straddling Alemany Way.

## 5. Environmental Analysis

Some commercial agricultural uses may exist in the District outside of mapped important farmland. However, most of the District is in intensely urbanized areas, and it is thus unlikely that there are substantial areas in agricultural use in the District apart from mapped important farmland.

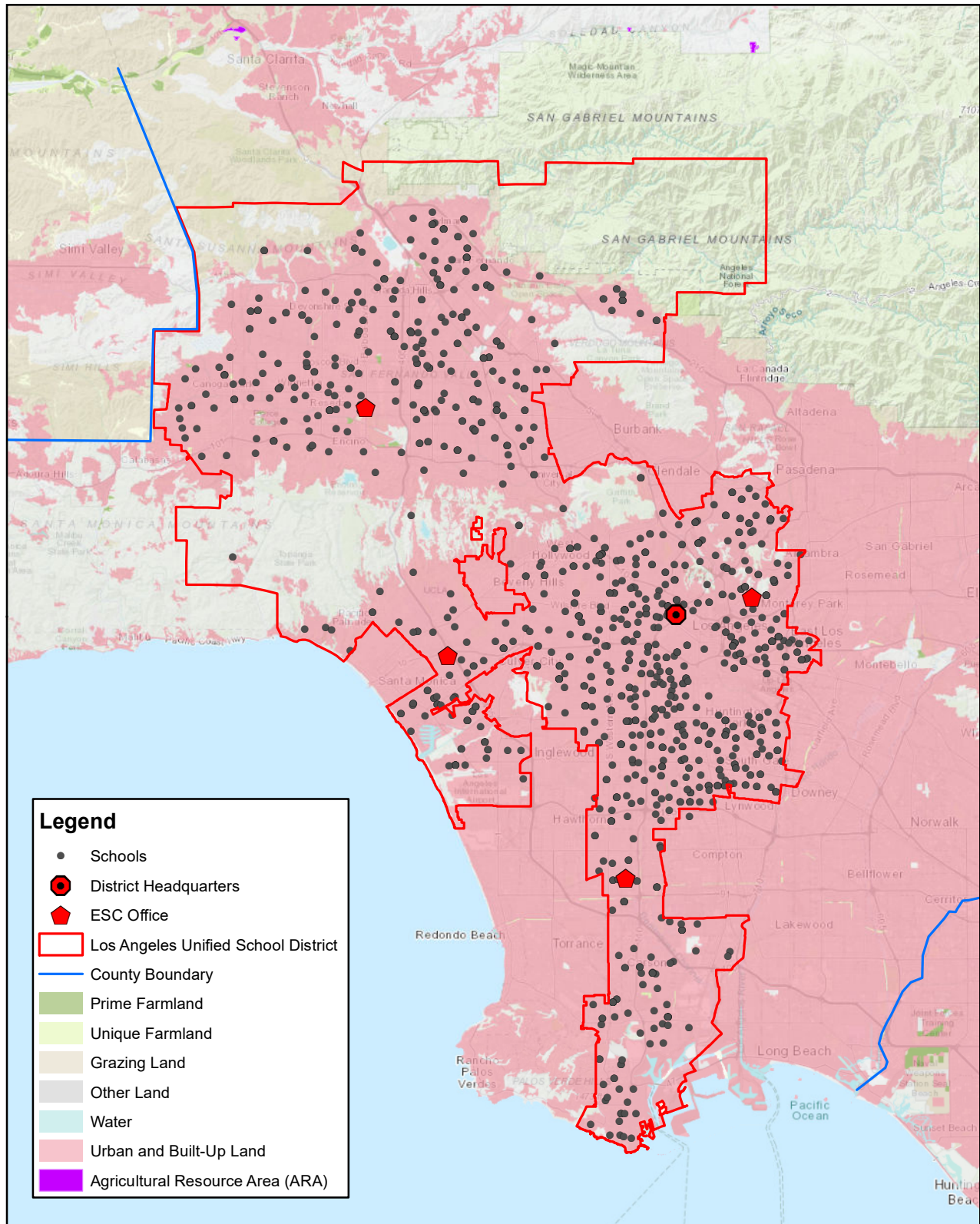
All LAUSD schools are developed as schools, even schools that are presently closed. Analysis of agricultural uses under CEQA focuses on impacts to commercial agricultural operations.<sup>97</sup> Thus, while substantial numbers of LAUSD schools may contain small school gardens for educational purposes—comparable to community gardens—such school gardens are not considered agricultural uses for the purpose of CEQA analysis.

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<sup>97</sup> California Department of Conservation (CDC). 1997. California Agricultural Land Evaluation and Site Assessment Model: Instruction Manual. [https://www.conservation.ca.gov/dlrp/Pages/qh\\_lesaa.aspx](https://www.conservation.ca.gov/dlrp/Pages/qh_lesaa.aspx).

## 5. Environmental Analysis

### Figure 5.2-1 Mapped Farmland



Source: California Department of Conservation, 2022

0 3 6 Miles



## 5. Environmental Analysis

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## 5. Environmental Analysis

### *Forest Land*

There is no forest land on or next to existing LAUSD schools. Montane hardwood forest and/or woodland vegetation occurs in the San Gabriel Mountains. At lower elevations, montane hardwood overstory species typically include oaks, white alder, bigleaf maple, bigcone Douglas fir, and California laurel. Understory vegetation usually is dominated by chaparral species such as coffeeberry, manzanita, and ceanothus. A wide variety of wildlife relies on this habitat, including jays, woodpeckers, squirrel, black bear, mule deer, and various reptiles and amphibians.<sup>98</sup> Coastal oak woodland occurs next to the north side of Topanga Elementary Charter School in the Community of Topanga in unincorporated Los Angeles County. Coastal oak woodland occurs on flat to steep slopes that often face northwest at low elevations—between 105 to 2,851 feet. It is dominated by coast live oak in the tree layer, with various species of shrubs and annual grassland in the understory.<sup>99</sup>

### 5.2.2 Thresholds of Significance

According to CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project would:

- AG-1 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.
- AG-2 Conflict with existing zoning for agricultural use, or a Williamson Act contract.
- AG-3 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)).
- AG-4 Result in the loss of forest land or conversion of forest land to non-forest use.
- AG-5 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.

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<sup>98</sup> National Park Service (NPS). 2012, February. San Gabriel Watershed and Mountains: Special Resource Study and Environmental Assessment. <https://parkplanning.nps.gov/document.cfm?documentID=43639>.

<sup>99</sup> California State Parks. 2012, October. Topanga State Park General Plan and Environmental Impact Report. Chapter Two: Existing Conditions and Issues. [https://www.parks.ca.gov/?page\\_id=25956](https://www.parks.ca.gov/?page_id=25956).

## 5. Environmental Analysis

### 5.2.3 Environmental Impacts

#### ANALYTIC METHODOLOGY

Locations of mapped important farmland were identified using the California Important Farmland Finder mapped by the Division of Land Resource Protection. Existing conditions on and surrounding mapped farmland were identified using Google Maps and Google Earth. Existing schools near mapped important farmland were identified using a geographic information systems (GIS) data layer from the District.

The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.2-1: The SUP would not result in conversion of mapped farmland to nonagricultural uses. [Threshold AG-1]**

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#### New Construction on New Properties

Potential future new construction on new properties is not likely to convert mapped important farmland to school use. Four of the five locations of Prime Farmland are unavailable for development as a school: one is in a flood control basin (Sepulveda Basin Recreation Area); one is on a college campus (Los Angeles Pierce College); one is on an airport property and within the airport influence area for Van Nuys Airport; and the fourth, Orcutt Ranch Horticultural Center, in a Los Angeles city park. The fifth, Forneris Farms, is unsuitable for use as a school because an overhead electric transmission line passes over the east part of that site. Unique Farmland in the District is unsuitable for school use because most of it is both under electric transmission lines and in narrow strips, with length-to-width ratios impracticable for school use.

Therefore, any potential impact contributing to conversion of mapped important farmland to nonagricultural use would be an indirect impact of new or expanded schools being located near mapped farmland. All of the areas of mapped farmland described above are surrounded by intensively developed urbanized land uses. Existing agricultural operations in the District are already surrounded by land uses—residential, park, and school uses—that are sensitive to impacts from agricultural operations, such as pesticide use, dust, and noise. Development of any new or expanded school would require demolition and redevelopment of existing land uses. Considering the existing surroundings of important mapped farmland in the District, it is unlikely that development of a new or expanded school near such farmland would create new incompatibilities between agricultural use and future school use so severe as to force conversion of mapped farmland to nonagricultural uses. Conversion of farmland impacts would be less than significant.

#### New Construction and Modernization on Existing Campus

No farmland of statewide importance was identified within the District. Although there are areas designated prime farmland and unique farmland as mapped by the FMMP, these areas are not within existing LAUSD school campuses. Where existing schools are near mapped important farmland—for instance, three charter high schools, Birmingham Community Charter High School, High Tech Los Angeles Charter High School, and Magnolia Science Academy 2 are about 300 feet north of Prime Farmland in the Sepulveda Basin Recreation Area—the analysis of indirect impacts to mapped farmland above would apply to projects on existing schools.

## 5. Environmental Analysis

### Operational and Other Campus Changes

Analysis of agricultural uses under CEQA focuses on impacts to commercial agricultural operations.<sup>100</sup> Operations associated with the implementation of the SUP Update and Measure RR are anticipated to be located within the existing campuses infrastructure and are considered educational uses. There are few isolated pockets of important farmland within the District boundary, however, none are located on campuses. No agricultural zoning for school sites exists within the District. All LAUSD schools are developed as schools, even schools that are presently closed. Thus, while substantial numbers of LAUSD schools may contain small school gardens for educational purposes—comparable to community gardens—such school gardens are not considered agricultural uses for the purpose of CEQA analysis. No operational effects resulting in the loss of agricultural lands would occur.

Conversion of farmland impacts would be less than significant.

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**Impact 5.2-2: The SUP would not conflict with existing zoning for agricultural use or with land covered by an existing Williamson Act contract. [Threshold AG-2]**

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### ZONING FOR AGRICULTURAL USE

#### New Construction on New Properties

Currently, there are no new construction projects planned. However, it is possible that some future new construction projects could be proposed for sites that are zoned agricultural but not in production. California school districts can exempt sites for schools including classrooms from local land use regulations pursuant to California Government Code Section 53094(b). Hazards from previously farmed land are discussed in Chapter 5.9, *Hazards and Hazardous Materials*. New or expanded school uses on new properties would not conflict with any existing agricultural zoning. Impacts would be less than significant.

#### New Construction and Modernization on Existing Campus

As all campuses where these types of projects would occur are existing educational uses, potential conflicts between zoning for those school sites and the existing school uses are not considered an adverse environmental impact. The California legislature granted school districts the power to exempt school property from county and city zoning requirements, provided the school district complies with the terms of Government Code Section 53094.<sup>101</sup> The District has exempted all existing schools from local jurisdiction zoning regulations.

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<sup>100</sup> California Department of Conservation (CDC). 1997. California Agricultural Land Evaluation and Site Assessment Model: Instruction Manual. [https://www.conservation.ca.gov/dlrp/Pages/qh\\_lesa.aspx](https://www.conservation.ca.gov/dlrp/Pages/qh_lesa.aspx).

<sup>101</sup> Government Code Section 53094.

(a) Notwithstanding any other provision of this article, this article does not require a school district to comply with the zoning ordinances of a county or city unless the zoning ordinance makes provision for the location of public schools and unless the city or county has adopted a general plan.

(b) Notwithstanding subdivision (a), the governing board of a school district, that has complied with the requirements of Section 65352.2 of this code and Section 21151.2 of the Public Resources Code, by a vote of two-thirds of its members, may render a city or county zoning ordinance inapplicable to a proposed use of property by the school district. The governing board of the school district may not take this action when the proposed use of the property by the school district is for non-classroom facilities, including, but not limited to, warehouses, administrative buildings, and automotive storage and repair buildings.



## 5. Environmental Analysis

Although most school property is owned by the District, the underlying city or county zoning can be residential, industrial, commercial, or agricultural. As lead agency, the District will comply with the criteria for implementation of the land use overrides to render the county and city zoning ordinance inapplicable to the properties. All existing schools not already exempt from local zoning would become exempt as part of the Subsequent Program EIR.

### Williamson Act Land

A school district is permitted to acquire Williamson Act land if requirements for public acquisition of the land are met and the contract is terminated.<sup>102</sup> A “farmland security zone” contract is a different more restrictive type of Williamson Act contract. School districts are prohibited from taking farmland security zone lands for school facilities.<sup>103</sup> No Williamson Act or farmland security zone contracts are in effect for land within the District. Therefore, any project constructed under the SUP would not conflict with farmland preservation under a Williamson Act contract. No impact would occur.

### Operational and Other Campus Changes

No school sites are zoned for agriculture and no school sites contain Williamson Act Lands.

Impacts associated with a change in zoning or removal of Williamson Act Lands would not occur.

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#### **Impact 5.2-3     The SUP would not conflict with zoning for forest land or timberland. [Thresholds AG-3]**

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### New Construction on New Properties

The majority of school sites are located within urban and suburban areas and along commercial corridors. As shown, the Project would concentrate any potential development efforts in urban and suburban areas, at or near existing school sites serving urban and suburban communities. However, as shown in Figure 5.21-1, 45 school sites are within the Fire Hazard Severity Zones (FHSZs). Additionally, the two outdoor education centers, Clear Creek and Canyon Creek outdoor education centers, are in areas of higher wildfire risk, and within FHSZs. The schools within FHSZs are clustered near the foothills of the San Gabriel Mountains, the Santa Susanna Mountains, and the Santa Monica Mountains, or WUI zones within or abutting the Angeles National Forest. Topanga Elementary School is located between Topanga State Park and the Santa Mountains National Recreation Area and is the only school within a SRA. However, there are no forest lands on LAUSD campus sites or adjacent. Thus, it is unlikely that expansions of existing schools would convert forest land to school use. Forest land and timberland would not provide ideal locations for neighborhood schools. Therefore, the District would not propose to acquire those lands. No forest land and timberland impact would occur.

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(c) The governing board of the school district shall, within 10 days, notify the city or county concerned of any action taken pursuant to subdivision (b).

<sup>102</sup> Department of Conservation (Government Code §51291(b)).  
[https://california.public.law/codes/ca\\_gov't\\_code\\_section\\_51291#:~:text=Except%20as%20provided%20in%20Section%2051291.5%2C%20whenever%20it,location%20of%20a%20public%20improvement%20within%20the%20preserve.](https://california.public.law/codes/ca_gov't_code_section_51291#:~:text=Except%20as%20provided%20in%20Section%2051291.5%2C%20whenever%20it,location%20of%20a%20public%20improvement%20within%20the%20preserve.)

<sup>103</sup> Department of Conservation. Farmland Security Zones. [http://www.conservation.ca.gov/dlrp/lca/farmland\\_security\\_zones/Pages/index.aspx](http://www.conservation.ca.gov/dlrp/lca/farmland_security_zones/Pages/index.aspx)



## 5. Environmental Analysis

### New Construction and Modernization on Existing Campus

Existing District schools do not support forest land or timberland uses, and no impact would occur.

### Operational and Other Campus Changes

Existing District schools do not support forest land or timberland uses, and no impact would occur.

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**Impact 5.2-4     The SUP would not result in the loss of forest land or conversion of forest land to non-forest use. [Thresholds AG-4].**

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### New Construction on New Properties

It is very unlikely that the District would choose to develop a school on forest land. Montane hardwood vegetation in the District is in the northeast corner of the District in the San Gabriel Mountains, several miles from the nearest residential neighborhoods generating demand for schools. Two outdoor education centers run by LAUSD do not plan on expansion or conversion of forest land to non-forest use. No impact would occur.

### New Construction and Modernization on Existing Campus

There are no existing District schools in parts of the District where forest land occurs. These projects would occur on existing schools and would not impact forest land. No impact would occur.

### Operational and Other Campus Changes

There are no existing District schools in parts of the District where forest land occurs. These projects would occur on existing schools and would not impact forest land. No impact would occur.

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**Impact 5.2-5:     SUP implementation would not involve other changes in the existing environment which could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use. [Threshold AG-5]**

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### New Construction on New Properties or Existing Campus

New construction projects could increase water demands through site-specific net increases in student capacity and other changes, such as developing additional landscaped areas or acquisition of school-adjacent parcels and new classroom construction. Implementation of the SUP would not increase District-wide enrollment. The SUP would accommodate forecast increases in enrollment due to projected increasing numbers of school-aged children as well as higher graduation rates; forecast trends in District enrollment are discussed in Chapter 4, *Program Description*. SUP implementation would therefore not increase total water consumption within the District beyond existing regional forecasts. Impacts would be less than significant.

### Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation

Operation of most types of improvements and repairs would not use water. The project would add new food service facilities to some campuses and improve existing food service facilities on some other campuses. As

## 5. Environmental Analysis

with new construction projects, the SUP would not expand District enrollment and therefore would not increase water use in the region. Impacts would be less than significant.

### **Operational and Other Campus Changes**

Increasing water demands in a region can reduce the practicality and/or economic feasibility of commercial agriculture. There are no projected increases in water demand because of SUP Update-related projects.

### **Indirect Impacts**

Indirect impacts to mapped important farmland arising from land use incompatibilities would be less than significant, as substantiated above under Impact 5.2-1.

### **5.2.4 Applicable Regulations and Standard Conditions**

- None.

### **5.2.5 Level of Significance Before Mitigation**

The following impacts would be less than significant: 5.2-1, 5.2-2, 5.2-3, 5.2-4, and 5.2-5.

### **5.2.6 Mitigation Measures**

No mitigation measures are required.

### **5.2.7 Level of Significance After Mitigation**

Impacts would be less than significant.

## 5. Environmental Analysis

### 5.3 AIR QUALITY

This section of the Subsequent Program EIR evaluates the potential for implementation of the SUP to impact air quality in the District in light of changing information and conditions since the 2015 Program EIR. This section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions), along with the existing air quality conditions throughout the SUP area, and possible environmental impacts that may occur as the SUP Update-related site-specific projects are implemented.

#### TERMINOLOGY

**Air basin.** California is divided into 15 air basins to better manage air pollution. Air basin boundaries were determined by grouping together areas with similar geographical and meteorological features. While air pollution can move freely within an air basin, it can also sometimes be transported from one basin to another.<sup>104</sup> The LAUSD is entirely within the South Coast Air Basin (SoCAB).

**Ambient air quality standards (AAQS).** The levels of air quality set for air pollutants that are considered to provide a reasonable margin of safety in the protection of the public health and welfare. There are both state and federally established AAQS.

**Criteria air pollutants.** These are air pollutants for which federal and state AAQS have been established and are identified and regulated under Title I in the Federal Clean Air Act of 1970. These pollutants are ozone (O<sub>3</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), nitrogen dioxide (NO<sub>2</sub>), respirable particulate matter less than 10 microns in diameter (PM<sub>10</sub>), respirable particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>), and lead (Pb).

**Toxic air contaminants.** These are other air pollutants not identified as criteria air pollutants, but may cause or contribute to an increase in mortality or in serious illness, or may pose a present or potential hazard to human health. There are currently 188 toxic air contaminants (TACs) identified and regulated under Title III of the Federal Clean Air Act Amendments of 1990.<sup>105</sup> The California Code of Regulations Title 17 Sections 93000 identifies 19 TACs and Section 93001 identifies 189 hazardous air pollutants as TACs.<sup>106</sup>

**Attainment/Nonattainment.** These are designations for the air basins signifying whether air pollutants meet the National and California AAQS. An attainment status signifies that an air pollutant meets the AAQS within a specified air basin. A nonattainment status signifies that an air pollutant does not meet the AAQS within a specified air basin.

<sup>104</sup> California Air Resources Board. California Air Basins. April 2023. <https://www.arb.ca.gov/ci/maps/statemap/abmap.htm>.

<sup>105</sup> United States Environmental Protection Agency. April 2023. <https://www.epa.gov/haps>.

<sup>106</sup> CCR. Title 17, Sections 93000 and 93001.

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### 5.10.1 Environmental Setting

#### 5.3.1.2 REGULATORY FRAMEWORK

National, state, regional and local laws, regulations, plans, and guidelines are summarized as follows. The following regulatory framework discussion does not include all plans and policies that relate to air quality in the District. Many site-specific projects have not been identified, and there may be local jurisdictional plans and policies that are applicable depending on the project site. Specific requirements of these laws, regulations, plans, and guidelines might not be up to date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. Although some of these may not directly applicable to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standards are also listed. See *Applicable Regulations and Standard Conditions* at the end of this chapter for those that require District compliance.

#### **Federal**

##### *Clean Air Act*

The Clean Air Act (CAA) was passed in 1963 by the U.S. Congress and has been amended several times. The 1970 Clean Air Act amendments strengthened previous legislation and laid the foundation for the regulatory scheme of the 1970s and 1980s. In 1977, Congress again added several provisions, including nonattainment requirements for areas not meeting National AAQS and the Prevention of Significant Deterioration program. The 1990 amendments represent the latest in a series of federal efforts to regulate the protection of air quality in the United States and overhauled the planning provisions for areas not meeting the National AAQS. Basic elements of the CAA include provisions for attainment and maintenance of the national AAQS for major air pollutants (Title I), motor vehicle emissions and fuel standards (Title II), hazardous air pollutant standards (Title III), and stratospheric ozone protection (Title VI). The CAA allows states to adopt more stringent standards or to include other pollution species.

#### **State**

##### *California Clean Air Act*

The California Clean Air Act (CCAA), signed into law in 1988, requires all areas of the State to achieve and maintain the California AAQS by the earliest practical date. The California AAQS tend to be more restrictive than the National AAQS. The CCAA mandates achieving the health-based California AAQS at the earliest practical date.

*California Code of Regulations, Title 13, Division 3, Chapter 9, Article 4.8, Section 2449.*

**California Air Resource Board (CARB) Rule 2449.** General Requirements for In-Use Off-Road Diesel-Fueled Fleets. Requires off-road diesel vehicles to limit nonessential idling to no more than 5 consecutive minutes.

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### *California Code of Regulations, Title 13, Division 3, Chapter 10, Article 1, Section 2480*

**CARB Rule 2480.** Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools. This Rule requires school busses, transit busses, and commercial vehicles (gross vehicle weight greater than 10,001 pounds except of pickup trucks and zero emission vehicles) to limit nonessential idling to no more than five consecutive minutes when in 100 feet of a school.

### *California Code of Regulations, Title 13, Division 3, Chapter 10, Article 1, Section 2485*

**CARB Rule 2485.** Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. This Rule requires commercial vehicles weighing more than 10,001 pounds to limit nonessential idling to no more than 5 consecutive minutes.

### *California Education Code, Section 17213(c)(2)(c) and Public Resources Code, Section 21151.8(a)(1)(D)*

These regulations require school districts to consider offsite sources of hazardous air emissions before acquiring property for a school site or approving an EIR or negative declaration for a school site acquisition or new school construction project. These sections require school districts to identify freeways and other busy traffic corridors where the edge of the roadway is within 500 feet of a proposed school site. A busy traffic corridor is defined as having 50,000 or more average daily vehicle trips in a rural area or 100,000 or more average daily trips in an urban area.<sup>107</sup>

### *California Education Code, Section 17213 and Public Resources Code, Section 21151.8(a)(1) and (2)*

These regulations require school districts to consider offsite sources of hazardous air emissions before acquiring property for a school site or approving an EIR or negative declaration for a school site acquisition or new school construction project. These sections require school districts to consult with appropriate agencies to identify facilities, including but not limited to freeways and other busy traffic corridors, large agricultural operations, and rail yards within one-fourth of a mile of a proposed school site that might reasonably be expected to emit hazardous air emissions.

### *California Code of Regulations, Title 24, Part 6*

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission in June 1977 and are updated tri-annually in the **California Building Code**. Title 24, Part 6 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.

On August 11, 2021, the California Energy Commission adopted the 2022 Building Energy Efficiency Standards (Energy Code), which went into effect on January 1, 2023. The 2022 Energy Code addresses various energy efficiency measures including promoting efficient electric heat pumps, establishes electric-ready

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<sup>107</sup> Education Code, Section 17213(d)(9)

## 5. Environmental Analysis

requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, etc.

### *California Code of Regulations, Title 24, Part 11*

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The **California Green Building Standards Code** (CALGreen) was adopted as part of the California Building Standards Code (Title 24). CALGreen established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.<sup>108</sup> The mandatory provisions of the CALGreen became effective January 1, 2011. The most up to date version of CALGreen is the 2022 version.

### *California Code of Regulations, Title 20, Sections 1601 through 1608*

The 2006 **Appliance Efficiency Regulations** were adopted by the California Energy Commission on October 11, 2006 and were approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non-federally regulated appliances.

### *California Code of Regulations, Title 13, Division 3, Chapter 1*

**Chapter 1 - Motor Vehicle Pollution Control Devices.** The California Advanced Clean Cars Program has regulations and standards for controlling air pollutants and GHG emissions in cars and the Low Emission Vehicle Program III Standards are for control of criteria air pollutant emissions from new light- and medium-duty vehicles.

## **Federal and State Standards**

### *Ambient Air Quality Standards*

The Clean Air Act requires EPA to set National AAQS for six common air pollutants, also referred to as criteria air pollutants. Pursuant to the Clean Air Act Amendments of 1990, the U.S. EPA has established National AAQS for pollutants considered harmful to public health and the environment. The National AAQS are classified as primary and secondary standards. Primary standards prescribe the maximum permissible concentration in the ambient air and are required to protect public health. Secondary standards specify levels of air quality required to protect public welfare, including materials, soils, vegetation, and wildlife, from any known or anticipated adverse effects. National AAQS are established for six pollutants (known as criteria pollutants): O<sub>3</sub>, particle pollution (i.e., PM<sub>10</sub> and PM<sub>2.5</sub>), CO, NO<sub>2</sub>, SO<sub>2</sub>, and Pb. CARB has also established its own air quality standards in the state of California, known as the California AAQS. The California AAQS are generally more stringent than the National AAQS and include air quality standards for all the criteria pollutants listed under the National AAQS plus sulfates (SO<sub>4</sub>), hydrogen sulfide (H<sub>2</sub>S), vinyl chloride, and visibility-reducing particulate matter. Table 5.3-1 provides a summary of National and California AAQS.

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<sup>108</sup> The green building standards became mandatory in the 2010 edition of the code.

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**Table 5.3-1 Ambient Air Quality Standards for Criteria Pollutants**

Pollutant	Averaging Time	California Standard	Federal Primary Standard	Major Pollutant Sources
Ozone (O <sub>3</sub> )	1 hour	0.09 ppm	*	Motor vehicles, paints, coatings, and solvents.
	8 hours	0.070 ppm	0.070 ppm	
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hours	9.0 ppm	9 ppm	
Nitrogen Dioxide (NO <sub>2</sub> )	Annual Average	0.030 ppm	0.053 ppm	Motor vehicles, petroleum-refining operations, industrial sources, aircraft, ships, and railroads.
	1 hour	0.18 ppm	0.100 ppm	
Sulfur Dioxide (SO <sub>2</sub> )	Annual Arithmetic Mean	*	0.030 ppm	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing. *
	1 hour	0.25 ppm	0.075 ppm	
	3 hour		*	
	24 hours	0.04 ppm	0.014 ppm <sup>a</sup>	
Respirable Particulate Matter (PM <sub>10</sub> )	Annual Arithmetic Mean	20 µg/m <sup>3</sup>	*	Dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	24 hours	50 µg/m <sup>3</sup>	150 µg/m <sup>3</sup>	
Fine Particulate Matter (PM <sub>2.5</sub> ) <sup>b</sup>	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	12 µg/m <sup>3</sup> . <sup>c</sup>	Dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	24 hours	*	35 µg/m <sup>3</sup>	
Lead (Pb)	30 Day Average	1.5 µg/m <sup>3</sup>	*	Present source: lead smelters, battery manufacturing & recycling facilities. Past source: combustion of leaded gasoline.
	Quarterly	*	1.5 µg/m <sup>3</sup>	
	3-Month Average	*	0.15 µg/m <sup>3</sup>	
Sulfates (SO <sub>4</sub> )	24 hours	25 µg/m <sup>3</sup>	*	Industrial processes.
Visibility-Reducing Particles	8 hours	Extinction of 0.23 per kilometer	No federal standard	Visibility-reducing particles consist of suspended particulate matter, which is a complex mixture of tiny particles that consists of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. These particles vary greatly in shape, size and chemical composition, and can be made up of many different materials such as metals, soot, soil, dust, and salt.

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Pollutant	Averaging Time	California Standard	Federal Primary Standard	Major Pollutant Sources
Hydrogen Sulfide	1 hour	0.03 ppm	No federal standard	Hydrogen sulfide (H <sub>2</sub> S) is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas and can be emitted as the result of geothermal energy exploitation.
Vinyl Chloride	24 hour	0.01 ppm	No federal standard	Vinyl chloride (chloroethene), a chlorinated hydrocarbon, is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products. Vinyl chloride has been detected near landfills, sewage plants, and hazardous waste sites, due to microbial breakdown of chlorinated solvents.

Source: California Air Resources Board. 2016, May 4. Ambient Air Quality Standards. <https://ww2.arb.ca.gov/sites/default/files/2020-07/aaqs2.pdf>

Notes: ppm: parts per million; µg/m<sup>3</sup>: micrograms per cubic meter

\* Standard has not been established for this pollutant/duration by this entity.

<sup>a</sup> On June 2, 2010, a new 1-hour SO<sub>2</sub> standard was established, and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99<sup>th</sup> percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO<sub>2</sub> national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

<sup>b</sup> On December 14, 2012, EPA lowered the federal primary PM<sub>2.5</sub> annual standard from 15.0 µg/m<sup>3</sup> to 12.0 µg/m<sup>3</sup>. EPA made no changes to the primary 24-hour PM<sub>2.5</sub> standard or to the secondary PM<sub>2.5</sub> standards.

### Air Pollutants of Concern

#### Criteria Air Pollutants

The National AAQS and California AAQS are the levels of air quality considered to provide a margin of safety in the protection of the public health and welfare. They are designed to protect “sensitive receptors” most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed.

Volatile organic compounds (VOCs) and nitrogen oxides (NO<sub>x</sub>) are air pollutant precursors that form O<sub>3</sub> and NO<sub>2</sub>, respectively, through chemical and photochemical reactions in the atmosphere. A description of each of the criteria air pollutants and their known health effects is presented below.

**Carbon Monoxide (CO)** is a colorless, odorless, toxic gas produced by incomplete combustion of carbon substances, such as gasoline or diesel fuel. CO is a primary criteria air pollutant. CO concentrations tend to be the highest during winter mornings with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion, engines and motor vehicles operating at slow speeds are the primary source of CO in the SoCAB. The highest ambient CO concentrations are generally found near traffic-congested corridors and intersections. The primary adverse health effect associated with CO is interference with normal oxygen transfer to the blood, which may result in tissue oxygen



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deprivation.<sup>109</sup> The SoCAB is designated under the California and National AAQS as being in attainment of CO criteria levels.<sup>110</sup>

**Volatile Organic Compounds (VOC)** are compounds composed primarily of atoms of hydrogen and carbon. Internal combustion associated with motor vehicle usage is the major source of hydrocarbons. Other sources of VOCs include evaporative emissions associated with the use of paints and solvents, the application of asphalt paving, and the use of household consumer products such as aerosols. There are no AAQS established for VOCs. However, because they contribute to the formation of O<sub>3</sub>, South Coast Air Quality Management District (SCAQMD) has established a significance threshold for this pollutant.<sup>111</sup>

**Nitrogen Oxides (NO<sub>x</sub>)** are a by-product of fuel combustion and contribute to the formation of ground-level O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. The two major forms of NO<sub>x</sub> are nitric oxide (NO) and NO<sub>2</sub>. NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. The principal form of NO<sub>2</sub> produced by combustion is NO. However, NO reacts with oxygen quickly to form NO<sub>2</sub>, creating the mixture of NO and NO<sub>2</sub> commonly called NO<sub>x</sub>. NO<sub>2</sub> acts as an acute irritant and is more injurious than NO in equal concentrations. At atmospheric concentrations, however, NO<sub>2</sub> is only potentially irritating. NO<sub>2</sub> absorbs blue light; the result is a brownish-red cast to the atmosphere and reduced visibility. NO<sub>2</sub> exposure concentrations near roadways are of particular concern for susceptible individuals, including people with asthma, asthmatics, children, and the elderly. Current scientific evidence links short-term NO<sub>2</sub> exposures, ranging from 30 minutes to 24 hours, with adverse respiratory effects, including airway inflammation in healthy people and increased respiratory symptoms in people with asthma. Also, studies show a connection between breathing elevated short-term NO<sub>2</sub> concentrations and increased visits to emergency departments and hospital admissions for respiratory issues, especially asthma.<sup>112</sup> The SoCAB is designated an attainment area for NO<sub>2</sub> under the National AAQS and the California AAQS.<sup>113</sup>

**Sulfur Dioxide (SO<sub>2</sub>)** is a colorless, pungent, irritating gas formed by the combustion of sulfurous fossil fuels. It enters the atmosphere as a result of burning high-sulfur-content fuel oils and coal and from chemical processes at chemical plants and refineries. Gasoline and natural gas have very low sulfur content and do not release significant quantities of SO<sub>2</sub>. When sulfur dioxide forms sulfates (SO<sub>4</sub>) in the atmosphere, together these pollutants are referred to as sulfur oxides (SO<sub>x</sub>). Adverse respiratory effects include acute respiratory symptoms and difficulty in breathing for children, bronchoconstriction and increased asthma symptoms. These effects are particularly important for asthmatics at elevated ventilation rates (e.g., while exercising or playing).

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<sup>109</sup> SCAQMD. 2005, May. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*.

<sup>110</sup> CARB. 2022, November. Area Designations Maps/State and National. <https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>.

<sup>111</sup> SCAQMD. 2023, March. *South Coast AQMD Air Quality Significance Thresholds*.

<sup>112</sup> SCAQMD. 2005, May. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*; U.S. EPA. 2012, April 20. What are the Six Common Air Pollutants? <http://www.epa.gov/airquality/urbanair>.

<sup>113</sup> CARB. 2022, November. Area Designations Maps/State and National. <http://www.arb.ca.gov/desig/adm/adm.htm>.

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At lower concentrations and when combined with particulates, SO<sub>2</sub> may do greater harm by injuring lung tissue.<sup>114</sup> The SoCAB is designated attainment under the California and National AAQS.<sup>115</sup>

**Suspended Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>)** consists of finely divided solids or liquids such as soot, dust, aerosols, fumes, and mists. PM<sub>10</sub> includes particulate matter with an aerodynamic diameter of 10 microns (i.e., 10 millionths of a meter or 0.0004 inch) or less. PM<sub>2.5</sub> have an aerodynamic diameter of 2.5 microns (i.e., 2.5 millionths of a meter or 0.0001 inch) or less. Particulate discharge into the atmosphere results primarily from industrial, agricultural, construction, and transportation activities. Both PM<sub>10</sub> and PM<sub>2.5</sub> may adversely affect the human respiratory system, especially in people who are naturally sensitive or susceptible to breathing problems. EPA scientific review concluded that PM<sub>2.5</sub>, which penetrates deeply into the lungs, is more likely than PM<sub>10</sub> to contribute to health effects and at concentrations that extend well below those allowed by the current PM<sub>10</sub> standards. These health effects include premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms (e.g., irritation of the airways, coughing, or difficulty breathing). Diesel particulate matter (DPM) is classified by the CARB as a carcinogen. Particulate matter can also cause environmental effects such as visibility impairment. The SoCAB is a nonattainment area for PM<sub>2.5</sub> under California and National AAQS, a nonattainment area for PM<sub>10</sub> under the California AAQS, and attainment area under the National AAQS.<sup>116</sup>

**Ozone (O<sub>3</sub>)** is commonly referred to as “smog” and is a gas that is formed when VOCs and NO<sub>x</sub>, both by-products of internal combustion engine exhaust, undergo photochemical reactions in sunlight. O<sub>3</sub> concentrations are generally highest during the summer months when direct sunlight, light winds, and warm temperatures create favorable conditions for its formation. O<sub>3</sub> poses a health threat to those who already suffer from respiratory diseases as well as to healthy people. Breathing O<sub>3</sub> can trigger a variety of health problems, including chest pain, coughing, throat irritation, and congestion. It can worsen bronchitis, emphysema, and asthma. Ground-level O<sub>3</sub> also can reduce lung function and inflame the linings of the lungs. Repeated exposure may permanently scar lung tissue. O<sub>3</sub> also affects sensitive vegetation and ecosystems, including forests, parks, wildlife refuges, and wilderness areas. In particular, O<sub>3</sub> harms sensitive vegetation, including forest trees and plants during the growing season.<sup>117</sup> The SoCAB is designated extreme nonattainment under the California AAQS (1-hour and 8-hour) and National AAQS (8-hour).<sup>118</sup>

**Lead (Pb)** is a metal found naturally in the environment as well as in manufactured products. The major sources of lead emissions have historically been mobile and industrial sources. As a result of the EPA's regulatory efforts to remove lead from on-road motor vehicle gasoline, emissions of lead from the transportation sector dramatically declined by 95% between 1980 and 1999, and levels of lead in the air decreased by 94% between

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<sup>114</sup> SCAQMD. 2005, May. Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.

<sup>115</sup> CARB. 2022, November. Area Designations Maps/State and National. <https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>.

<sup>116</sup> CARB. 2022, November. Area Designations Maps/State and National. <https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>.

<sup>117</sup> SCAQMD. 2005, May. Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.

<sup>118</sup> CARB. 2022, November. Area Designations Maps/State and National. <https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>.

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1980 and 1999. Today, the highest levels of lead in air are usually found near lead smelters. The major sources of lead emissions to the air today are ore and metals processing and piston-engine aircraft operating on leaded aviation gasoline. Once taken into the body, lead distributes throughout the body in the blood and is accumulated in the bones. Depending on the level of exposure, lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and the cardiovascular system. Lead exposure also affects the oxygen-carrying capacity of the blood. The lead effects most commonly encountered in current populations are neurological effects in children and cardiovascular effects in adults (e.g., high blood pressure and heart disease). Infants and young children are especially sensitive to even low levels of lead, which may contribute to behavioral problems, learning deficits, and lowered IQ.<sup>119</sup> In Los Angeles County, a portion of the SoCAB is designated as nonattainment under the National AAQS for lead.<sup>120, 121</sup> Because emissions of lead are found only in projects that are permitted by SCAQMD, lead is not an air quality of concern for SUP-related projects.

### *Toxic Air Contaminants*

The public's exposure to air pollutants classified as TACs is a significant environmental health issue in California. In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health. The California Health and Safety Code, Section 39655(a), defines a TAC as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health." A substance that is listed as a hazardous air pollutant (HAP) pursuant to Section 112(b) of the federal CAA (42 United States Code, Section 7412[b]) is a toxic air contaminant. Under state law, the California Environmental Protection Agency (Cal/EPA), acting through CARB, is authorized to identify a substance as a TAC if it determines that the substance is an air pollutant that may cause or contribute to an increase in mortality or to an increase in serious illness, or may pose a present or potential hazard to human health.

California regulates TACs primarily through Assembly Bill (AB) 1807 (Tanner Air Toxics Act) and AB 2588 (Air Toxics "Hot Spot" Information and Assessment Act of 1987). The Tanner Air Toxics Act sets forth a formal procedure for CARB to designate substances as TACs. Once a TAC is identified, CARB adopts an "airborne toxics control measure" for sources that emit designated TACs. If there is a safe threshold for a substance (i.e., a point below which there is no toxic effect), the control measure must reduce exposure to below that threshold. If there is no safe threshold, the measure must incorporate toxics best available control technology to minimize emissions.

Air toxics from stationary sources are also regulated in California under the Air Toxics "Hot Spot" Information and Assessment Act of 1987. Under AB 2588, toxic air contaminant emissions from individual facilities are quantified and prioritized by the air quality management district or air pollution control district. High priority

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<sup>119</sup> SCAQMD. 2005, May. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, U.S. Environmental Protection Agency (EPA). 2012, April 20. What are the Six Common Air Pollutants? <http://www.epa.gov/airquality/urbanair>.

<sup>120</sup> CARB. 2013-2022, April 1 November. Area Designations Maps/State and National. <https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designationsf>.

<sup>121</sup> CCR Title 17 Section 60207.

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facilities are required to perform a health risk assessment and, if specific thresholds are exceeded, are required to communicate the results to the public in the form of notices and public meetings.

CARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control. The majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being DPM.

In 1998, CARB identified diesel particulate matter as a TAC. Previously, the individual chemical compounds in diesel exhaust were considered TACs. Almost all diesel exhaust particle mass is 10 microns or less in diameter. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung.<sup>122</sup>

### Regional

#### *South Coast Air Quality Management District*

SCAQMD is the air pollution control agency for areas within the SoCAB. It is responsible for controlling emissions from permitted stationary sources ranging from large power plants to gas stations. It is also responsible for preparing the air quality management plan (AQMP) for the SoCAB in coordination with the Southern California Association of Governments (SCAG). Since 1979, a number of AQMPs have been prepared. In addition, SCAQMD also develops and adopts rules to control emissions generated from various sources ranging from equipment, industrial processes, paints, and solvents, to consumer products.

#### *Air Quality Management Plan*

**2022 AQMP.** On December 2, 2022, SCAQMD adopted the 2022 AQMP, which focused on attaining the 2015 8-hour ozone standard of 70 parts per billion (ppb) by 2037. The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NO<sub>x</sub> technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard.<sup>123</sup>

In 2008 EPA designated the Los Angeles County portion of the SoCAB as a nonattainment area under the federal lead classification due to the addition of source-specific monitoring under the new federal regulation. This designation was based on two source-specific monitors in Vernon and in the City of Industry exceeding the new standard in the 2007 to 2009 period of data used. The remainder of the SoCAB, outside the Los Angeles County nonattainment area, remains in attainment of the new standard. On May 24, 2012, CARB approved the State Implementation Plan (SIP) revision for the federal lead standard, which EPA revised in

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<sup>122</sup> CARB 2023, Summary: Diesel Particulate Matter Health Impacts. <https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts>.

<sup>123</sup> SCAQMD. 2022. *Final 2022 Air Quality Management Plan*. <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>.

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2008. Lead concentrations in this nonattainment area have been below the level of the federal standard since January of 2012.<sup>124</sup>

### *Applicable SCAQMD Rules*

The following is partial list of SCAQMD rules that are applicable to the construction and operation of new schools and school additions and modernizations.<sup>125</sup>

- **SCAQMD Rule 201:** Permit to Construct. Requires a permit for installation of any equipment which releases air pollutants.
- **SCAQMD Rule 402:** Nuisance. Prohibits the discharge of air contaminants that cause injury, detriment, nuisance, or annoyance to a considerable number of people.
- **SCAQMD Rule 403:** Fugitive Dust. Requires control measures to reduce fugitive dust from active operations, storage piles, or disturbed surfaces so as to not be visible beyond the property line or exceed 20% opacity.
- **SCAQMD Rule 1113:** Architectural Coatings. Limits VOC content by setting VOC standards for persons who supplies, sells, offers for sale, or manufactures any architectural coating for use in the SCAQMD.
- **SCAQMD Rule 1186:** PM<sub>10</sub> Emissions from Paved and Unpaved Roads, and Livestock Operations. Requires control measures to reduce fugitive dust from paved and unpaved roads in addition to livestock operations.
- **SCAQMD Rule 1403:** Asbestos Emissions from Demolition/Renovation Activities. Requires surveying for and asbestos-containing materials removal procedures and measures for handling and cleanup, storage, disposal, and landfilling of asbestos-containing materials.

## LAUSD

### *Standard Conditions of Approval*

This table lists the air quality standard conditions that will be included as part of each SUP-related project, as appropriate.

Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
SC-AQ-1	Air Toxics Health Risk	Place new classrooms or outdoor play areas: - Within ¼-mile of mobile and	During project design (Planning)	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

<sup>124</sup> CARB Exide Technologies. 2023. Ambient Monitoring and Source Tests. <https://www.aqmd.gov/home/news-events/community-investigations/exide-updates/ambient-monitoring-and-source-tests>.

<sup>125</sup> SCAQMD rules, <http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book>.

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
		stationary emission sources - On the LAUSD priority list of schools most at risk from air pollution - Near a high-risk facility previously identified by the OEHS.		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 Emissions	Diesel-Powered construction equipment	During construction	LAUSD's construction contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.
SC-AQ-3	Construction Emissions	Ground-disturbing activity, such as grading, site preparation, and/or removal action for soil contamination	During construction	LAUSD's construction contractor shall: <ul style="list-style-type: none"> <li>• Maintain speeds of 15 miles per hour or less with all vehicles.</li> <li>• Load impacted soil directly into transportation trucks to minimize soil handling.</li> <li>• Water/mist soil as it is being excavated and loaded onto the transportation trucks.</li> <li>• Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site.</li> <li>• Minimize soil drop height into transportation trucks or stockpiles during dumping.</li> <li>• During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks.</li> <li>• Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed.</li> <li>• Place stockpiled soil on polyethylene sheeting and cover with similar material.</li> <li>• Place stockpiled soil in areas shielded from prevailing winds.</li> </ul>
SC-AQ-4	Construction Emissions	Use of large, heavy or noisy construction equipment	During construction	LAUSD shall prepare an air quality assessment. If site-specific review of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds.  Construction bid contracts shall include protocols that reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
				<p>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.</p> <p><u>Exhaust Emissions</u></p> <ul style="list-style-type: none"> <li>• Schedule construction activities that affect traffic flow to off-peak hours (e.g., between 10:00 AM and 3:00 PM).</li> <li>• Consolidate truck deliveries and/or limit the number of haul trips per day.</li> <li>• Route construction trucks off congested streets, as permitted by local jurisdiction haul routes.</li> <li>• Employ high pressure fuel injection systems or engine timing retardation.</li> <li>• Utilize ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment.</li> <li>• Use construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower.</li> <li>• Restrict non-essential diesel engine idle time, to not more than five consecutive minutes.</li> <li>• Utilize electrical power rather than internal combustion engine power generators as soon as feasible during construction.</li> <li>• Utilize electric or alternatively fueled equipment, if feasible.</li> <li>• Utilize construction equipment with the minimum practical engine size.</li> <li>• Utilize low-emission on-road construction fleet vehicles.</li> <li>• Ensure construction equipment is properly serviced and maintained to the manufacturer's standards.</li> </ul> <p><u>Fugitive Dust</u></p> <ul style="list-style-type: none"> <li>• Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for ten days or more).</li> <li>• Replace ground cover in disturbed areas as quickly as possible.</li> <li>• Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).</li> <li>• Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip.</li> <li>• Pave construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles.</li> <li>• Pave all construction access roads for at least 100 feet from the main road to the project site.</li> <li>• Water the disturbed areas of the active construction site at least three times per day, except during periods of rainfall.</li> </ul>

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
				<ul style="list-style-type: none"> <li>• 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.</li> <li>• Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph).</li> <li>• Apply water at least three times daily, except during periods of rainfall, to all unpaved road surfaces.</li> <li>• Limit traffic speeds on unpaved road to 15 mph or less.</li> <li>• Prohibit high emission causing fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD.</li> <li>• Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.</li> <li>• Limit the amount of daily soil and/or demolition debris loaded and hauled per day.</li> </ul> <p><u>General Construction</u></p> <ul style="list-style-type: none"> <li>• Utilize ultra-low VOC or zero-VOC surface coatings.</li> <li>• Phase construction activities to minimize maximum daily emissions.</li> <li>• Configure construction parking to minimize traffic interference.</li> <li>• Provide temporary traffic control during construction activities to improve traffic flow (e.g., flag person).</li> <li>• Develop a trip reduction plan for construction employees.</li> <li>• Implement a shuttle service to and from retail services and food establishments during lunch hours.</li> <li>• Increase distance between emission sources to reduce near-field emission impacts.</li> <li>• Require construction contractors to document compliance with the identified mitigation measures.</li> </ul>

### 5.3.1.3 EXISTING CONDITIONS

#### Regional Setting

LAUSD lies within the SoCAB, which includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SoCAB is in a coastal plain with connecting broad valleys and low hills and is bounded by the Pacific Ocean in the southwest quadrant, with high mountains forming the remainder of the perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. This usually mild weather pattern is interrupted infrequently by periods of extremely hot weather, winter storms, and Santa Ana winds.<sup>126</sup>

<sup>126</sup> SCAQMD. 2005, May. Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.



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### *Temperature and Precipitation*

The annual average temperature varies little throughout the SoCAB, ranging from the low to middle 60s, measured in degrees Fahrenheit (°F). With a more pronounced oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas. In contrast to a very steady pattern of temperature, rainfall is seasonally and annually highly variable. Almost all rain falls from November through April. Summer rainfall is normally restricted to widely scattered thundershowers near the coast, with slightly heavier shower activity in the east and over the mountains.

The Northern area, based on data collected from the Woodland Hills Pierce College Monitoring Station (ID No. 041484), has average lows ranging from 38.8 °F to 57.3 °F and average highs from 67.9 °F to 95.4 °F. The area has an average annual precipitation of 16.86 inches.<sup>127</sup> The South area, based on data collected from the Torrance Monitoring Station (ID No. 048973), has average lows from 44.3°F to 61.1°F and average highs from 65.9 °F to 78.6 °F with average annual precipitation of 13.55 inches.<sup>128</sup> Average lows and highs for the West area, based on data collected from Culver City Monitoring Station (ID No. 042214), ranges from 45.3 °F to 61.9 °F and from 66.5 °F to 79.0 °F, respectively. Average annual precipitation for the area is 13.15 inches.<sup>129</sup> The East area, based on data collected from the Los Angeles Civic Center Monitoring Station (ID No. 045115), has average lows from 48.3 °F to 63.8 °F and average highs from 66.4 °F to 83.1 °F.<sup>130</sup>

### *Humidity*

Although the SoCAB has a semiarid climate, the air near the earth's surface is typically moist because of the presence of a shallow marine layer. Except for infrequent periods when dry, continental air is brought into the SoCAB by offshore winds, the “ocean effect” is dominant. Periods of heavy fog, especially along the coast, are frequent. Low clouds, often referred to as high fog, are a characteristic climatic feature. Annual average humidity is 70% at the coast and 57% in the eastern portions of the SoCAB.<sup>131</sup>

### *Wind*

Wind patterns across the south coastal region are characterized by westerly or southwesterly onshore winds during the day and by easterly or northeasterly breezes at night. Wind speed is somewhat greater during the dry summer months than during the rainy winter season.

Between periods of wind, periods of air stagnation may occur, both in the morning and evening hours. Air stagnation is one of the critical determinants of air quality conditions on any given day. During the winter and fall months, surface high-pressure systems over the SoCAB, combined with other meteorological conditions,

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<sup>127</sup> Western Regional Climate Center (WRCC). 2014. Western U.S. Historical Summaries – Woodland Hills Pierce College Monitoring Station (Station ID No. 01484). <https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca1484>. Accessed April 2023.

<sup>128</sup> WRCC. 2016. Western U.S. Historical Summaries – Torrance Monitoring Station (Station ID No. 048973). <http://www.wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca8973>. Accessed April 2023.

<sup>129</sup> WRCC. 2016. Western U.S. Historical Summaries – Culver City Monitoring Station (Station ID No. 042214). <http://www.wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca2214>. Accessed April 2023.

<sup>130</sup> WRCC. 2016. Western U.S. Historical Summaries – Los Angeles Civic Center Monitoring Station (Station ID No. 045115). <http://www.wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca5115>. Accessed April 2023.

<sup>131</sup> SCAQMD. 2005, May. Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.

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can result in very strong, downslope Santa Ana winds. These winds normally continue a few days before predominant meteorological conditions are reestablished.

The mountain ranges to the east affect the transport and diffusion of pollutants by inhibiting their eastward transport. Air quality in the SoCAB generally ranges from fair to poor and is similar to air quality in most of coastal southern California. The entire region experiences heavy concentrations of air pollutants during prolonged periods of stable atmospheric conditions.<sup>132</sup>

### *Inversions*

In conjunction with the two characteristic wind patterns that affect the rate and orientation of horizontal pollutant transport, there are two similarly distinct types of temperature inversions that control the vertical depth through which pollutants are mixed. These are the marine/subsidence inversion and the radiation inversion. The combination of winds and inversions are critical determinants in leading to the highly degraded air quality in summer and the generally good air quality in the winter in the project area.<sup>133</sup>

### *Nonattainment Areas*

The AQMP provides the framework for air quality basins to achieve attainment of the state and federal AAQS through the SIP. Areas are classified attainment or nonattainment for particular pollutants, depending on whether they meet AAQS. Classifications for ozone nonattainment range from marginal, moderate, and serious to severe and extreme.

Transportation conformity for nonattainment and maintenance areas is required under the federal CAA to ensure federally supported highway and transit projects conform to the SIP. The 2023 Federal Transportation Improvement Program is the most recently approved program. It was prepared to implement projects and programs listed in the Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS) and is developed in compliance with state and federal requirements.

The attainment status for the SoCAB is shown in Table 5.3-2.

**Table 5.3-2 Attainment Status of Criteria Pollutants in the South Coast Air Basin**

<b>Pollutant</b>	<b>State</b>	<b>Federal</b>
Ozone – 1-hour	Nonattainment	No Federal Standard
Ozone – 8-hour	Nonattainment	Extreme Nonattainment
PM <sub>10</sub>	Nonattainment	Attainment/Maintenance
PM <sub>2.5</sub>	Nonattainment	Serious Nonattainment
CO	Attainment	Attainment
NO <sub>2</sub>	Attainment	Attainment/Maintenance
SO <sub>2</sub>	Attainment	Attainment
Lead	Attainment	Nonattainment (Los Angeles County only)
Sulfates	Attainment	No Federal Standard

<sup>132</sup> SCAQMD. 2005, May. Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.

<sup>133</sup> SCAQMD. 2005, May. Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.

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Pollutant	State	Federal
Hydrogen Sulfide	Unclassified	No Federal Standard
Visibility Reducing Particles	Unclassified	No Federal Standard

Source: CARB. 2022, November. Maps of State and Federal Area Designations. <https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>.

### *Multiple Air Toxics Exposure Study*

In 2000, SCAQMD conducted a study on ambient concentrations of TACs and estimated the potential health risks from air toxics, Multiple Air Toxics Exposure Study (MATES) III. The results showed that the overall risk for excess cancer from a lifetime exposure to ambient levels of air toxics was about 1,400 in a million. The largest contributor to this risk was diesel exhaust, accounting for 71% of the air toxics risk. In 2008, SCAQMD conducted its third update to its study on ambient concentrations of TACs and estimated the potential health risks from air toxics. The results showed that the overall risk for excess cancer from a lifetime exposure to ambient levels of air toxics was about 1,200 in one million. The largest contributor to this risk was diesel exhaust, accounting for approximately 84% of the air toxics risk.<sup>134</sup> The most recent study is the MATES V, completed in 2021, with air toxics cancer risk at monitoring locations ranging from 585 to 842 per million.<sup>135</sup>

### **Existing Ambient Air Quality**

Existing levels of ambient air quality and historical trends and projections for the LAUSD jurisdictional area are best documented by measurements made by SCAQMD. The following describes the existing ambient air quality for each of the four Regions.

#### *North Region*

The air quality monitoring station available for these areas is the Reseda Monitoring Station. This station monitors O<sub>3</sub>, CO, NO<sub>2</sub>, and PM<sub>2.5</sub>. Data from this station is summarized in Table 5.3-3. The data show that the concentration levels of O<sub>3</sub> and PM<sub>2.5</sub> of the areas regularly exceed the state and federal one-hour and eight-hour O<sub>3</sub> standards as well as the state federal PM<sub>2.5</sub> standards. The CO and NO<sub>2</sub> standards have not been exceeded in the last five years for these general areas.

<sup>134</sup> SCAQMD. 2008, September. *Multiple Air Toxics Exposure Study in the South Coast Air Basin* (MATES III).

<sup>135</sup> SCAQMD. South Coast Air Quality Management District. 2021, August. MATES V Multiple Air Toxics Exposure Study in the South Coast AQMD.

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**Table 5.3-3 Ambient Air Quality Monitoring Summary (North Region)**

Pollutant Standard <sup>a</sup>	Number of Days Threshold Exceeded and Maximum Levels during Violations				
	2017	2018	2019	2020	2021
<b>Ozone (O<sub>3</sub>)</b>					
State 1-Hour $\geq$ 0.09 ppm	26	14	14	33	4
State 8-hour $\geq$ 0.07 ppm	67	50	37	65	33
Federal 8-Hour $>$ 0.070 ppm	64	49	34	62	31
Max. 1-Hour Conc. (ppm)	0.140	0.120	0.122	0.142	0.110
Max. 8-Hour Conc. (ppm)	0.114	0.101	0.094	0.115	0.083
<b>Carbon Monoxide (CO)</b>					
State 1-Hour $>$ 20.0 ppm	0	0	0	0	0
Federal 1-Hour $\geq$ 35 ppm	0	0	0	0	0
Max. 1-Hour Conc. (ppm)	3.05	3.37	2.60	2.04	2.60
<b>Nitrogen Dioxide (NO<sub>2</sub>)</b>					
State 1-Hour $\geq$ 0.18 ppm	0	0	0	0	0
Max. 1-Hour Conc. (ppm)	0.0625	0.0572	0.0644	0.0499	0.0542
<b>Sulfur Dioxide (SO<sub>2</sub>)<sup>b</sup></b>					
State 1-Hour $\geq$ 0.04 ppm	*	*	*	*	*
Max. 1-Hour Conc. (ppm)	*	*	*	*	*
<b>Coarse Particulates (PM<sub>10</sub>)<sup>b</sup></b>					
State 24-Hour $>$ 50 $\mu\text{g}/\text{m}^3$	*	*	*	*	*
Federal 24-Hour $>$ 150 $\mu\text{g}/\text{m}^3$	*	*	*	*	*
Max. 24-Hour Conc. ( $\mu\text{g}/\text{m}^3$ )	*	*	*	*	*
<b>Fine Particulates (PM<sub>2.5</sub>)</b>					
Federal 24-Hour $>$ 35 $\mu\text{g}/\text{m}^3$	0	*	0	9	9
Max. 24-Hour Conc. ( $\mu\text{g}/\text{m}^3$ )	35.2	38.9	30.0	73.8	55.5

Source: CARB. 2023. iADAM: Air Quality Data Statistics (2017, 2018, 2019, 2020, and 2021). <https://www.arb.ca.gov/adam/trends/trends1.php>. Accessed April 2023.

Ppm: parts per million;  $\mu\text{g}/\text{m}^3$ : micrograms per cubic meter.

<sup>a</sup> Data obtained from the Reseda Monitoring Station at 18330 Gault in the City of Reseda.

<sup>b</sup> Data not available at the Reseda Monitoring Station monitoring station.

### South Region

The air quality monitoring station available for South area is the North Long Beach Monitoring Station. This station monitors PM<sub>2.5</sub>. Data from this station is summarized in Table 5.3-4. The data show that the concentration levels of federal PM<sub>2.5</sub> standard has regularly been exceeded.

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**Table 5.3-4 Ambient Air Quality Monitoring Summary (South Region)**

Pollutant/Standard <sup>a</sup>	Number of Days Threshold Were Exceeded and Maximum Levels during Such Violations				
	2017	2018	2019	2020	2021
<b>Ozone (O<sub>3</sub>)<sup>b</sup></b>					
State 1-Hour $\geq$ 0.09 ppm	*	*	*	*	*
State 8-hour $\geq$ 0.07 ppm	*	*	*	*	*
Federal 8-Hour $>$ 0.070 ppm	*	*	*	**	*
Max. 1-Hour Conc. (ppm)	*	*	*	*	*
Max. 8-Hour Conc. (ppm)	*	*	*	*	*
<b>Carbon Monoxide (CO)<sup>b</sup></b>					
State 8-Hour $>$ 9.0 ppm	*	*	*	*	*
Federal 8-Hour $\geq$ 9.0 ppm	*	*	*	*	*
Max. 8-Hour Conc. (ppm)	*	*	*	*	*
<b>Nitrogen Dioxide (NO<sub>2</sub>)<sup>b</sup></b>					
State 1-Hour $\geq$ 0.18 ppm	*	*	*	*	*
Max. 1-Hour Conc. (ppm)	*	*	*	*	*
<b>Sulfur Dioxide (SO<sub>2</sub>)<sup>b</sup></b>					
State 1-Hour $\geq$ 0.04 ppm	*	*	*	*	*
Max. 1-Hour Conc. (ppm)	*	*	*	*	*
<b>Coarse Particulates (PM<sub>10</sub>)<sup>b</sup></b>					
State 24-Hour $>$ 50 $\mu\text{g}/\text{m}^3$	*	*	*	*	*
Federal 24-Hour $>$ 150 $\mu\text{g}/\text{m}^3$	*	*	*	*	*
Max. 24-Hour Conc. ( $\mu\text{g}/\text{m}^3$ )	*	*	*	*	*
<b>Fine Particulates (PM<sub>2.5</sub>)</b>					
Federal 24-Hour $>$ 35 $\mu\text{g}/\text{m}^3$	5	6	0	12	3
Max. 24-Hour Conc. ( $\mu\text{g}/\text{m}^3$ )	55.3	79.6	28.0	66.0	41.2

Source: CARB. 2023. iADAM: Air Quality Data Statistics (2017, 2018, 2019, 2020, and 2021). <https://www.arb.ca.gov/adam/trends/trends1.php>. Accessed April 2023.

Ppm: parts per million;  $\mu\text{g}/\text{m}^3$ : micrograms per cubic meter.

<sup>a</sup> Data obtained from the North Long Beach Monitoring Station at 3648 N. Long Beach Boulevard in the City of Long Beach.

**East Local Districts**

The air quality monitoring station available for the East Region is the Los Angeles – North Main Street Monitoring Station. This station monitors O<sub>3</sub>, CO, NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Data from this station is summarized in Table 5.3-5. The data show that the concentration levels of O<sub>3</sub> and PM<sub>10</sub> of these areas have regularly exceeded the state and federal one-hour and eight-hour O<sub>3</sub> standards, the state PM<sub>10</sub> standard and the federal PM<sub>2.5</sub> standard. The CO, NO<sub>2</sub>, and SO<sub>2</sub> standards have not been exceeded in the last five years for these general areas.

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**Table 5.3-5 Ambient Air Quality Monitoring Summary (East Region)**

Pollutant/Standard <sup>a</sup>	Number of Days Threshold Were Exceeded and Maximum Levels during Such Violations				
	2017	2018	2019	20120	2021
<b>Ozone (O<sub>3</sub>)</b>					
State 1-Hour $\geq$ 0.09 ppm	6	2	0	14	1
State 8-hour $\geq$ 0.07 ppm	16	4	2	22	2
Federal 8-Hour $>$ 0.070 ppm	14	4	2	22	2
Max. 1-Hour Conc. (ppm)	0.116	0.098	0.093	0.185	0.099
Max. 8-Hour Conc. (ppm)	0.086	0.073	0.080	0.118	0.085
<b>Carbon Monoxide (CO)</b>					
State 8-Hour $>$ 9.0 ppm	0	0	0	0	0
Federal 8-Hour $\geq$ 9.0 ppm	0	0	0	0	0
Max. 8-Hour Conc. (ppm)	1.30	1.22	1.09	1.28	1.41
<b>Nitrogen Dioxide (NO<sub>2</sub>)</b>					
State 1-Hour $\geq$ 0.18 ppm	0	0	0	0	0
Max. 1-Hour Conc. (ppm)	0.0806	0.0701	0.0697	0.0618	0.0778
<b>Sulfur Dioxide (SO<sub>2</sub>)</b>					
State 1-Hour $\geq$ 0.04 ppm	0	0	0	0	0
Max. 1-Hour Conc. (ppm)	0.002	0.001	0.001	0.001	0.001
<b>Coarse Particulates (PM<sub>10</sub>)</b>					
State 24-Hour $>$ 50 $\mu\text{g}/\text{m}^3$	*	32	15	34	14
Federal 24-Hour $>$ 150 $\mu\text{g}/\text{m}^3$	0	0	0	0	0
Max. 24-Hour Conc. ( $\mu\text{g}/\text{m}^3$ )	96.2	81.2	93.9	185.2	138.5
<b>Fine Particulates (PM<sub>2.5</sub>)</b>					
Federal 24-Hour $>$ 35 $\mu\text{g}/\text{m}^3$	6	6	1	12	13
Max. 24-Hour Conc. ( $\mu\text{g}/\text{m}^3$ )	54.9	61.4	43.5	175.0	61.0

Source: CARB. 2023. iADAM: Air Quality Data Statistics (2017, 2018, 2019, 2020, and 2021). <https://www.arb.ca.gov/adam/trends/trends1.php>. Accessed April 2023.

Note: ppm: parts per million;  $\mu\text{g}/\text{m}^3$ : micrograms per cubic meter.

<sup>a</sup> Data obtained from the Los Angeles – North Main Street Monitoring Station at 1630 North Main Street in the City of Los Angeles.

### West Region

The air quality monitoring station available for West Region is the Los Angeles – Westchester Parkway Monitoring Station. This station monitors O<sub>3</sub>, CO, NO<sub>2</sub>, SO<sub>2</sub>, and PM<sub>10</sub>. Data from this station is summarized in Table 5.3-6. The data show that within the past five recorded years, the concentration levels of O<sub>3</sub> of the area has exceeded the state and federal one-hour and eight-hour O<sub>3</sub> standards only during 2020. The PM<sub>10</sub>, CO, NO<sub>2</sub>, and SO<sub>2</sub> standards have not been exceeded in the five recorded years for this general area.

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**Table 5.3-6 Ambient Air Quality Monitoring Summary (West Region)**

Pollutant/Standard <sup>a</sup>	Number of Days Threshold Were Exceeded and Maximum Levels during Such Violations				
	2017	2018	2019	2020	2021
<b>Ozone (O<sub>3</sub>)</b>					
State 1-Hour $\geq$ 0.09 ppm	0	0	0	1	0
State 8-hour $\geq$ 0.07 ppm	0	0	0	2	0
Federal 8-Hour $>$ 0.070 ppm	0	0	0	2	0
Max. 1-Hour Conc. (ppm)	0.086	0.074	0.082	0.117	0.059
Max. 8-Hour Conc. (ppm)	0.070	0.065	0.067	0.075	0.050
<b>Carbon Monoxide (CO)</b>					
State 8-Hour $>$ 9.0 ppm	0	0	0	0	0
Federal 8-Hour $\geq$ 9.0 ppm	0	0	0	0	0
Max. 8-Hour Conc. (ppm)	0.94	0.86	0.87	0.94	0.82
<b>Nitrogen Dioxide (NO<sub>2</sub>)</b>					
State 1-Hour $\geq$ 0.18 ppm	0	0	0	0	0
Max. 1-Hour Conc. (ppm)	0.035	0.034	0.033	0.042	0.035
<b>Sulfur Dioxide (SO<sub>2</sub>)</b>					
State 1-Hour $\geq$ 0.04 ppm	0	0	0	0	b
Max. 1-Hour Conc. (ppm)	0.002	0.002	0.001	0.001	b
<b>Coarse Particulates (PM<sub>10</sub>)</b>					
State 24-Hour $>$ 50 $\mu\text{g}/\text{m}^3$	0	0	13	0	0
Federal 24-Hour $>$ 150 $\mu\text{g}/\text{m}^3$	0	0	0	0	0
Max. 24-Hour Conc. ( $\mu\text{g}/\text{m}^3$ )	46.5	45.3	62.1	55.5	33.3
<b>Fine Particulates (PM<sub>2.5</sub>)<sup>b</sup></b>					
Federal 24-Hour $>$ 35 $\mu\text{g}/\text{m}^3$	*	*	*	*	*
Max. 24-Hour Conc. ( $\mu\text{g}/\text{m}^3$ )	*	*	*	*	*

Source: CARB. 2023. iADAM :Air Quality Data Statistics (2017, 2018, 2019, 2020, and 2021).. <https://www.arb.ca.gov/adam/trends/trends1.php>. Accessed April 2023.

Note: ppm: parts per million;  $\mu\text{g}/\text{m}^3$ : micrograms per cubic meter.

<sup>a</sup> Data obtained from the Los Angeles – Westchester Parkway Monitoring Station at 7201 W. Westchester Parkway in the City of Los Angeles.

<sup>b</sup> Data not available at Los Angeles – Westchester Parkway Monitoring Station monitoring station.

**Sensitive Receptors**

Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiorespiratory diseases.

Residential areas are also considered sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Other sensitive receptors include retirement facilities, hospitals, and schools. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial, commercial, retail, and office areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent because the majority of the workers tend to stay indoors most of the time. In addition, the workforce is generally the

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healthiest segment of the population. All of these types of land uses are present within LAUSD's service boundaries.

### 5.3.2 Thresholds of Significance

#### 5.3.2.1 CEQA GUIDELINE THRESHOLDS

According to CEQA Guidelines Appendix G, a project would normally have a significant effect on the environment if it would:

- AQ-1 Conflict with or obstruct implementation of the applicable air quality plan.
- AQ-2 Violate any air quality standard or contribute substantially to an existing or projected air quality violation.
- AQ-3 Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).
- AQ-4 Expose sensitive receptors to substantial pollutant concentrations.
- AQ-5 Create objectionable odors affecting a substantial number of people.

#### 5.3.2.2 CEQA STATUTE THRESHOLDS

- AQ-6 Is the boundary of the proposed school site within 500 feet of the edge of the closest traffic lane of a freeway or busy traffic corridor? If yes, would the project create an air quality health risk due to the placement of the School?<sup>136</sup>
- AQ-7 Would the project create an air quality hazard due to the placement of a school within one-quarter mile of: (a) permitted and nonpermitted facilities identified by the jurisdictional air quality control board or air pollution control district; (b) freeways and other busy traffic corridors; (c) large agricultural operations; and/or (d) a rail yard, which might reasonably be anticipated to emit hazardous air emissions, or handle hazardous or acutely hazardous material, substances, or waste?<sup>137</sup>

#### 5.3.2.3 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT THRESHOLDS

The analysis of the proposed SUP's air quality impacts follows the guidance and methodologies recommended in SCAQMD's *CEQA Air Quality Handbook* and the significance thresholds on SCAQMD's website.<sup>138</sup> CEQA allows the significance criteria established by the applicable air quality management or air pollution control district to be used to assess impacts of a project on air quality. SCAQMD has established thresholds of

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<sup>136</sup> Public Resource Code (PRC) Section 21151.8(a)(1)(D).

<sup>137</sup> PRC Section 21151.8(a)(2).

<sup>138</sup> SCAQMD's Air Quality Significance Thresholds are current as of March 2023 and can be found at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25>.



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significance for regional air quality emissions for construction activities and project operation. In addition to the daily thresholds listed above, projects are also subject to the AAQS. These are addressed through an analysis of localized CO impacts and localized significance thresholds (LSTs).

### Significance Thresholds

Table 5.3-7 lists SCAQMD's air quality significance thresholds.

Table 5.3-7 SCAQMD Air Quality Significance Thresholds		
Air Pollutant	Construction Phase	Operational Phase
Reactive Organic Gases (ROGs)/ Volatile Organic Compounds (VOCs)	75 lbs/day	55 lbs/day
Carbon Monoxide (CO)	550 lbs/day	550 lbs/day
Nitrogen Oxides (NO <sub>x</sub> )	100 lbs/day	55 lbs/day
Sulfur Oxides (SO <sub>x</sub> )	150 lbs/day	150 lbs/day
Particulates (PM <sub>10</sub> )	150 lbs/day	150 lbs/day
Particulates (PM <sub>2.5</sub> )	55 lbs/day	55 lbs/day
Lead	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs), Odor, and GHG Thresholds		
TACs (including carcinogens and noncarcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to South Coast AQMD Rule 402	
GHG	10,000 MT/yr CO <sub>2</sub> eq for industrial facilities	
Source: SCAQMD. 2023, March. SCAQMD Air Quality Significance Thresholds. <a href="https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25">https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25</a> .		

### CO Hot Spots

Areas of vehicle congestion have the potential to create pockets of CO called hot spots, which have the potential to exceed the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to AAQS is typically demonstrated through an analysis of localized CO concentrations. Hot spots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds. Typically, for an intersection to exhibit a significant CO concentration, it would operate at level of service (LOS) E or worse without improvements.<sup>139</sup>

### Localized Significance Thresholds

SCAQMD developed Localized Significance Thresholds (LSTs) to determine if emissions of NO<sub>2</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> generated at a project site (offsite mobile-source emissions are not included in the LST analysis) would expose sensitive receptors to substantial concentrations of criteria air pollutants. Table 5.3-8 shows the localized significance thresholds for projects in the SoCAB.

<sup>139</sup> Caltrans. 1997, December. Transportation Project-Level Carbon Monoxide Protocol. UCD-ITS-RR-97-21. Prepared by Institute of Transportation Studies, University of California, Davis.

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**Table 5.3-8 SCAQMD LSTs**

Air Pollutant (Relevant AAQS)	Concentration
1-Hour CO Standard (CAAQS)	20 ppm
8-Hour CO Standard (CAAQS)	9.0 ppm
1-Hour NO <sub>2</sub> Standard (CAAQS)	0.18 ppm
Annual Arithmetic Mean NO <sub>2</sub> Standard CAAQS	0.03 ppm
24-Hour PM <sub>10</sub> Standard – Construction / Operation (SCAQMD) <sup>a</sup>	10.4 µg/m <sup>3</sup> / 2.5 µg/m <sup>3</sup>
Annual Average PM <sub>10</sub> Standard	1.0 µg/m <sup>3</sup>
24-Hour PM <sub>2.5</sub> Standard – Construction / Operation (SCAQMD) <sup>a</sup>	10.4 µg/m <sup>3</sup> 2.5 µg/m <sup>3</sup>

Source: SCAQMD. 2023, March. South Coast AQMD Air Quality Significance Thresholds. <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25>.  
Note: ppm – parts per million; µg/m<sup>3</sup> – micrograms per cubic meter

To assist lead agencies, SCAQMD developed screening-level LSTs to back-calculate the mass amount (lbs. per day) of emissions generated onsite that would trigger the levels shown in Table 5.3-8 for projects under five acres. LSTs represent the maximum emissions at a project site that are not expected to cause or contribute to an exceedance of the most stringent federal or state AAQS. LSTs are based on the ambient concentrations of that pollutant within the project SRA and the distance to the nearest sensitive receptor. However, an LST analysis can only be conducted at a project level, and quantification of LSTs is not applicable for this program-level environmental analysis.

### Health Risk Thresholds

Whenever a project would require 1) the use of chemical compounds that have been identified in SCAQMD Rule 1401, 2) the use of chemical compounds placed on CARB's air toxics list pursuant to Assembly Bill 1807 (AB 1807), Air Contaminant Identification and Control Act (1983), or 3) the use of chemical compounds placed on the EPA's National Emissions Standards for Hazardous Air Pollutants, an HRA is required by the SCAQMD. Table 5.3-9 lists the SCAQMD's TAC incremental risk thresholds for operation of a project. Residential, commercial, office, and institutional (e.g., schools, churches) uses do not use substantial quantities of TACs, and these thresholds are typically applicable for new industrial projects. Although not officially adopted by SCAQMD, these thresholds are also commonly used to determine air quality land use compatibility of a project with major sources of TACs. In addition, risk from criteria pollutants (CO, NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>) generated from non-construction-related sources are evaluated against the standards in Table 5.3-8, as required by the District's HRA Protocol.

**Table 5.3-9 SCAQMD Toxic Air Contaminants Risk Thresholds**

Maximum Incremental Cancer Risk	≥ 10 in 1 million (1 in 100,000)
Chronic and Acute Hazard Index (project increment)	≥ 1.0
Cancer Burden	>0.5 excess cancer cases (in areas ≥ 1 in 1 million)

Source: SCAQMD. 2023, March. South Coast AQMD Air Quality Significance Thresholds. <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25>.

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### 5.3.3 Environmental Impacts

#### ANALYTIC METHODOLOGY

This air quality evaluation was prepared in accordance with the requirements of CEQA to determine if significant air quality impacts are likely to occur in conjunction with implementation of the SUP. SCAQMD has published the *CEQA Air Quality Handbook* (Handbook) and updates on its website to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts. The Handbook provides standards, methodologies, and procedures for conducting air quality analyses in environmental impact reports and was used extensively in the preparation of this analysis. The SCAQMD has published additional guidance for LSTs—“Localized Significance Threshold Methodology for CEQA Evaluations” (2008)—that are intended to provide guidance in evaluating localized effects from emissions generated by a project. These documents were also used in the preparation of this analysis.

The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.3-1: SUP-related projects would be consistent with the applicable air quality management plan. [Threshold AQ-1]**

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#### All SUP Projects

Regional growth projections are used by SCAQMD to forecast future emission levels in the SoCAB. For southern California, these regional growth projections are provided by the Southern California Association of Governments (SCAG) and are partially based on land use designations included in city/county general plans. Typically, only large, regionally significant projects have the potential to affect the regional growth projections. The SUP is not a regionally significant project that would warrant Intergovernmental Review by SCAG. Any new facilities built under the SUP would be growth accommodating and would fulfill the educational needs of the existing local communities served by the District. Any new trip generating facilities would reduce vehicle miles traveled (VMT) by minimizing the need for the local residents to travel to farther schools. Additionally, it is anticipated that the regional emissions generated by operation of school improvements and/or new facilities would not exceed the SCAQMD regional significance emissions thresholds. Thus, the SUP would not be considered by SCAQMD to be a substantial source of air pollutant emissions and would not conflict or obstruct implementation of the AQMP. Impacts would be less than significant.

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**Impact 5.3-2: Construction activities may generate short-term emissions that exceed of the South Coast Air Quality Management District's regional significance thresholds and cumulatively contribute to the South Coast Air Basin nonattainment designations. [Thresholds AQ-2 and AQ-3]**

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Construction activities associated with the SUP would cause short-term emissions of criteria air pollutants. The primary source of NO<sub>x</sub>, CO, and SO<sub>x</sub> emissions is the operation of construction equipment. The primary sources of particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) emissions include activities that disturb the soil, such as grading and excavation, and building demolition and construction. The primary source of VOC emissions is the application of architectural coating and off-gas emissions associated with asphalt paving.

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### All SUP Projects

Many site-specific school projects have not been identified under the SUP. Information regarding specific projects, soil types, and the locations of receptors would be needed in order to quantify the level of impact associated with construction activity. However, all future projects would be subject to regulatory measures (e.g., SCAQMD Rule 201 for a permit to operate, Rule 403 for fugitive dust control, Rule 1113 for architectural coatings, Rule 1403 for new source review, and CARB's Airborne Toxic Control Measures). In addition, all future individual school projects (e.g., new school facilities on new property or existing campus, building additions, facility renovations, athletic facility improvements, etc.) would also be subject to the LAUSD Standards. LAUSD requires incorporation of applicable measures for all school projects to reduce emissions of construction-related criteria air pollutants that exceed the SCAQMD regional construction emissions thresholds.

Compliance with state and local regulations and LAUSD SC-AQ-2, SC-AQ-3, and SC-AQ-4 would reduce construction-related criteria air pollutant emissions. However, these measures may not reduce construction-related emissions to below the SCAQMD regional construction significance thresholds for some SUP-related projects such as construction of large buildings on adjacent developed parcels. Additionally, in accordance with the SCAQMD methodology, emissions that exceed the regional significance thresholds would cumulatively contribute to the nonattainment designations of the SoCAB. Emissions of VOC and NO<sub>x</sub> are precursors to the formation of O<sub>3</sub>. In addition, NO<sub>x</sub> is a precursor to the formation of particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>). Thus, a large project may cumulatively contribute to the nonattainment designations of the SoCAB for O<sub>3</sub> and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>). Therefore, construction-related air quality impacts are considered potentially significant and may not be feasibly mitigated to a level of insignificance.

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**Impact 5.3-3: SUP-related projects would not generate long-term emissions that would exceed the South Coast Air Quality Management District's regional significance thresholds and would not cumulatively contribute to the South Coast Air Basin nonattainment designations. [Thresholds AQ-2 and AQ-3]**

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Long-term air pollutant emissions are associated mobile sources (i.e., vehicle trips) and area sources (e.g., fuel use in landscaping equipment, aerosols, and off-gas emission from application of paints) and energy use (natural gas use, purchased energy). Typically, emissions from mobile sources are the largest contributor to the overall long-term emissions inventory associated with operation of a school.

### New Construction on New Property or Existing Campus

Operation of a new school on an existing campus or adjacent parcel would result in the generation of vehicle trips and new localized air pollutant emissions from non-mobile sources (i.e., area sources and energy use). Overall, however, it is not anticipated that operation of a new school would generate long-term air pollutant emissions that would exceed the SCAQMD regional operation significance thresholds. As schools are typically growth accommodating land uses built to serve the local community, a new school would reduce the overall vehicle miles traveled in the region and thereby reduce mobile-source air pollutant emissions. Furthermore, it is not anticipated that even new schools would generate a substantial amount of non-transportation sources of emissions. The SUP does not include any new school projects on stand-alone sites. Table 5.3-10 shows

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construction (short-term) and operation (long-term) air pollutant emissions generated from Rise Kohyang High School. This project consisted of the construction of high school facility on a 1.15-acre site, to house a maximum of 600 students and up to 75 staff.

**Table 5.3-10 Construction and Operational Phase Emissions of a Typical LAUSD School**

Sector	Criteria Air Pollutant Emissions (pounds per day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Rise Kohyang High School <sup>a</sup></b>						
Total Project Construction Emissions <sup>c</sup>	35	20	12	<1	1	<1
<b>SCAQMD Regional Significance Thresholds</b>	75	100	550	150	150	55
<b>Significant?</b>	No	No	No	No	No	No
Total Project Operation Emissions	3	3	31	<1	11	3
<b>SCAQMD Regional Significance Thresholds</b>	55	55	550	150	150	55
<b>Significant?</b>	No	No	No	No	No	No

Sources: Rise Kohyang High School: LAUSD, Mitigated Negative Declaration Rise Kohyang High School, pg. 54, June 2019.

Note:

<sup>a</sup> Based on 76,390 building square feet of school facilities with maximum capacity of 600 high school students.

As shown in the table, construction and operational emissions would not exceed the SCAQMD regional significance thresholds. For new school construction projects that would replace existing land uses, the resulting net emissions would be similar to or lower than the emissions shown in the table. Additionally, as part of SC-AQ-5, LAUSD shall encourage ride-sharing programs for students and teachers as well as maintain fleet vehicles such as school buses, maintenance vehicles, and other service fleet vehicles in good condition in order to prevent significant increases in air pollutant emissions created by operation of a new school. While individual projects under LAUSD's SUP would be less than SCAQMD's regional operational phase significance thresholds, it is unknown how many individual projects may occur under the SUP at the same time. However, the 10-year projection for the overall student population within the LAUSD jurisdiction indicates an overall 18% decrease from existing conditions (see Chapter 4 of this EIR). As new schools would generally be developed to accommodate growth and the overall student population would be on the decline, it is anticipated that development of new stand-alone schools or expansion of an existing campus to include a new school component (e.g., addition of an elementary school to an existing middle school campus) would be minimal. Thus, it is not anticipated that the overall operational phase emissions generated by cumulative projects under the SUP would exceed the SCAQMD thresholds of significance. Therefore, operational phase air pollutant emissions generated by the combination of the types of projects described in Chapter 4, *Program Description*, are considered less than significant.

### Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation

Small SUP-related projects involving repair, replacement, upgrades, remodeling, or renovation would not increase capacity to existing schools. Thus, no new vehicle trips would be generated and there would be no increase in mobile source emissions for these types of school project. Furthermore, building improvements could also result in increased energy efficiency thereby reducing emissions from energy usage (i.e., natural gas). Future modernization projects could potentially add new capacity to existing schools through the installation of portable classrooms (see Chapter 4, Table 4-2 of this EIR). However, as discussed, overall student

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enrollment for the LAUSD is projected to decline for the next 10 years. Thus, it is anticipated that any portables would primarily be installed to accommodate the existing enrolled student population. Additionally, if the installation of portables is to accommodate growth, it is anticipated that emissions would be nominal and less than the emissions shown in Table 5.3-10. Furthermore, it would also contribute to the reduction of overall vehicle miles traveled in the region and mobile-source air pollutant emissions. Therefore, operational phase regional air quality impacts for this type of project would be less than significant.

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**Impact 5.3-4: Site-specific SUP projects may generate short-term emissions that exceed South Coast Air Quality Management District's localized significance thresholds and expose sensitive receptors to substantial pollutant concentrations. [Threshold AQ-4]**

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Implementation of the SUP could expose sensitive receptors to elevated pollutant concentrations during construction activities if it would cause or contribute significantly to elevating those levels. Unlike the emissions shown in Table 5.3-10 above, described in pounds per day, localized concentrations refer to an amount of pollutant in a volume of air (ppm or  $\mu\text{g}/\text{m}^3$ ) and can be correlated to potential health effects. LSTs are the amount of project-related emissions generated at which localized concentrations (ppm or  $\mu\text{g}/\text{m}^3$ ) would exceed the AAQS for criteria air pollutants for which the SoCAB is designated a nonattainment area.

### All SUP Project

Concentrations of criteria air pollutant generated by a school project (i.e., New Construction on New Property/Existing Campus and Modernization, Repair, Replacement, Upgrade, Remodel, and Renovation) depend on the emissions generated onsite and the distance to the nearest sensitive receptor. Therefore, an LST analysis can only be conducted at a project-level, and quantification of LSTs is not applicable for this program-level environmental analysis. Future individual school projects of varying types could be built in proximity to existing sensitive receptors. Although application of LAUSD SC-AQ-2, SC-AQ-3, AND SC-AQ-4 would reduce localized air pollutant emissions construction equipment exhaust combined with fugitive dust particulate matter emissions generated from all types of school projects has the potential to expose sensitive receptors to substantial concentrations of criteria air pollutant emissions even after this reduction in impacts. Therefore, localized air quality impacts from short-term construction activities are considered potentially significant and may not be feasibly mitigated to a level of insignificance.

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**Impact 5.3-5: Operation of SUP projects would not expose sensitive receptors to substantial pollutant concentrations. [Threshold AQ-4]**

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### All SUP Projects

#### LSTs

Operation of schools would not generate substantial quantities of emission from onsite, stationary sources. Land uses that have the potential to generate substantial stationary sources of emissions that would require a permit from SCAQMD include industrial land uses, such as chemical processing, and warehousing operations where substantial truck idling could occur onsite. Schools do not fall within these categories of uses. While operation of schools would possibly result in the use of standard onsite mechanical equipment, air pollutant

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emissions generated from operation of this system would be nominal (see Table 5.3-10). Therefore, localized air pollution emissions from stationary sources would be less than significant.

### *CO Hotspot Analysis*

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the state one-hour standard of 20 ppm or the eight-hour standard of 9.0 ppm. At the time of the 1993 Handbook, the SoCAB was designated nonattainment under the California AAQS and National AAQS for CO. With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations in the SoCAB and in the state have steadily declined. Since 2007, the SCAQMD has been designated in attainment for CO under both the California AAQS and National AAQS. As identified in Tables 5.3-3, 5.3-4, 5.3-5, and 5.3-6 carbon monoxide concentrations in the SoCAB have not exceeded AAQS in recent years. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact.<sup>140</sup> As presented in Table 5.3-10 implementation of the SUP would not produce the volume of traffic at any one intersection required to generate a CO hotspot.<sup>141</sup> Therefore, SUP-related CO hotspots impacts would be less than significant.

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**Impact 5.3-6: Implementation of SUP-related projects would not create objectionable odors. [Threshold AQ-5]**

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Nuisance odors from land uses in the SoCAB are regulated under SCAQMD Rule 402, Nuisance, which states:

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

### **All SUP Projects**

The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. Schools do not fall within these types of land uses. While use of landscaping equipment to maintain school property can generate exhaust fumes, the odors would be temporary. Similarly, any construction-related odor emissions from construction equipment exhaust and application of asphalt and architectural coatings would be temporary and intermittent in nature. Short-term

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<sup>140</sup> Bay Area Air Quality Management District (BAAQMD). 2023, April. 2022 CEQA Guidelines.

<sup>141</sup> See Footnotes b and d of Table 5.3-10 in this chapter for representative average daily vehicle trips that would be generated for a high school and a K-8 school.

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construction-related odors are expected to cease upon the drying or hardening of the odor-producing materials. Therefore, odor impacts associated with implementation of the SUP are considered less than significant.

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**Impact 5.3-7: SUP-related projects would not expose sensitive receptors in proximity to freeways and major roadways to substantial pollutant concentrations. [Thresholds AQ-6 and AQ-7]**

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The majority of neighborhoods within the LAUSD boundaries can be characterized as urban communities. For these communities, emissions from mobile and stationary sources can contribute significantly to localized concentrations of air contaminants.

Carcinogenic toxic air contaminants that constitute the most of the known health risks from motor vehicle traffic include diesel particulate matter (DPM) from trucks, and benzene, formaldehyde, 1,3-butadiene, and acetaldehyde emissions from passenger vehicles. Most major sources of diesel emissions, such as ships, trains, and trucks operate in and around ports, rail yards, and heavily traveled roadways. These areas are often located near highly populated areas. Because of this, elevated DPM levels are mainly an urban problem, with large numbers of people exposed to higher DPM concentrations, resulting in greater health consequences compared to rural areas. A large fraction of personal exposure to DPM occurs during travel on roadways. Although Californians spend a relatively small proportion of their time in enclosed vehicles (about 7% for adults and teenagers, 4% for children under 12), 30 to 55% of total daily DPM exposure typically occurs during the time people spend in motor vehicles.<sup>142</sup>

Stationary sources that can generate large quantities of DPM and other air toxics include rail yards, ports, refineries, warehouse distribution centers, dry cleaners, gasoline stations, and chrome platers. Warehousing distribution centers can generate DPM from the trucking operations that occur at their facilities. DPM can be generated from the exhaust stack of trucks and from operation of transport refrigeration units. In addition to the onsite emissions, truck travel in and out of warehousing distribution centers can also contribute to the local pollution. Ports not only generate DPM, but also ozone and other particulate matter. Generators associated with ports include diesel-powered ships, harbor craft, cargo handling equipment, trucks, and locomotives.

### New Construction on New Property or Existing Campus

#### *State-Funded School Projects*

School projects under these categories that use state funds would be subject to Public Resources Code Section 21151.8 and Education Code Section 17213 pursuant to Title 5 requirements. These sections require the preparation of an HRA for state-funded school projects. The HRA would be prepared in accordance with the District's HRA Protocol. The assessment would identify stationary sources (permitted and nonpermitted) in addition to nearby freeways and major roadways within a quarter-mile radius of a proposed new school. Additionally, the assessment would also evaluate impacts from criteria air pollutants from roadways and other sources that are within 500 feet and may have a local impact. Under LAUSD SC-AQ-1, LAUSD will implement measures necessary to reduce the potential cancer and noncancer risks to an acceptable level (i.e., below 10 in 1 million or a hazard index of 1). These specified mandatory measures, which could include installation of

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<sup>142</sup> CARB. 2023. Overview: Diesel Exhaust & Health. <https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health>.



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MERV filters in HVAC systems, would be incorporated into the design and construction of the new school facility. Compliance with California Education Code, Section 17213 and Public Resources Code, Section 21151.8 regulations, and LAUSD SC-AQ-1 would ensure that the exposure levels for students and staff near stationary sources and freeways and major roadways would be within the acceptable levels and less than the incremental risk thresholds.

The LAUSD Air Toxics Health Risk Assessment guidance document (LAUSD SC-AQ-1) is applicable for all permitted, nonpermitted, and mobile sources within a quarter mile of a project site 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 presence of potentially toxic or hazardous conditions on or in the vicinity of a proposed or existing District facility must be addressed to ensure the health and safety of students and staff, as well as protection of the environment. Based upon the location and scope of the proposed project, the following studies may be required:

- School Safety Certification
- Site Screening including AQ HRA, methane assessment,
- Phase I Environmental Site Assessment

### *Non-State-Funded School Projects*

School projects that are not state funded and therefore not subject to Public Resources Code Section 21151.8 and Education Code 17213 could potentially expose students and staff to health risks beyond the acceptable limits. However, implementation of LAUSD SC-AQ-1 requires the preparation of an HRA and measures necessary to reduce the potential cancer and noncancer risks to an acceptable level. Therefore, health risk impacts for locally-funded school projects would be less than significant.

### **Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation**

School projects under this category would involve modernization of existing facilities only. These types of projects would not alter or change the footprint of an existing classroom building or intensify building or school uses. Thus, these modernization projects would not cause a change of the exposure levels at existing schools. Therefore, health risk impacts for project types under this category would be less than significant.

### **5.3.4 Applicable Regulations and Standard Conditions**

#### **State**

- Hazardous air emissions (Ed Code Section 17213 and PCR Section 21151.8)
- California Advanced Clean Cars CARB (13 CCR, Division 3, Chapter 1)
- Low-Emission Vehicle Program – LEV III (13 CCR, Division 3, Chapter 1)
- Airborne Toxics Control Measure to Limit School Bus Idling and Idling at Schools (13 CCR 2480)

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- Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (13 CCR 2485)
- In-Use Off-Road Diesel Fuel Fleets (13 CCR 2449)
- California Energy Code (Title 24, Part 6)
- California Green Building Standards Code (Title 24, Part 11)
- Public Utilities and Energy (Title 20)

### Regional

- SCAQMD Rule 201: Permit to Construct
- SCAQMD Rule 402: Nuisance Odors
- SCAQMD Rule 403: Fugitive Dust
- SCAQMD Rule 1113: Architectural Coatings
- SCAQMD Rule 1186: Street Sweeping
- SCAQMD Rule 1403: Asbestos Emissions from Demolition/Renovation Activities

### LAUSD Standard Conditions of Approval

- SC-AQ-1 through SC-AQ-5.

### 5.3.5 Level of Significance Before Mitigation

#### Impact 5.3-1, 5.3-3, 5.3-5, 5.3-6 and 5.3-7

Upon implementation of regulatory requirements and LAUSD Standards listed above, the following impacts would be less than significant: 5.3-1, 5.3-3, 5.3-5, 5.3-6 and 5.3-7.

Even with implementation of regulatory requirements and LAUSD Standards the following impacts would be **potentially significant**:

- **Impact 5.3-2** Construction activities could generate short-term emissions in exceedance of SCAQMD'S regional construction significance threshold criteria and cumulatively contribute to the nonattainment designations of the SoCAB.
- **Impact 5.3-4** Construction activities could generate short-term emissions in exceedance of SCAQMD'S localized significance threshold criteria and expose sensitive receptors to substantial pollutant concentrations.

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### 5.3.6 Mitigation Measures

#### Impact 5.3-1, 5.3-3, 5.3-5, 5.3-6 and 5.3-7

No mitigation measures are required.

#### Impact 5.3-2

No feasible mitigation measures are available that would further reduce short-term emissions and impacts to the regional air quality.

#### Impact 5.3-4

No feasible mitigation measures are available that would further reduce potentially significant short-term localized emission impacts.

### 5.3.7 Level of Significance After Mitigation

#### Impact 5.3-1, 5.3-3, 5.3-5, 5.3-6 and 5.3-7

Impacts would be less than significant.

#### Impact 5.3-2

Compliance with SCAQMD regulations and LAUSD Standard Conditions would reduce criteria air pollutant emissions from construction-related activities. However, short-term emissions generated from future individual projects could still exceed the SCAQMD regional significance threshold criteria. Therefore, Impact 5.3-2 is considered potentially **significant and unavoidable**.

#### Impact 5.3-4

Compliance with SCAQMD regulations and LAUSD Standard Conditions would reduce criteria air pollutant emissions from construction-related activities. However, short-term onsite emissions generated from future individual projects could still exceed the SCAQMD localized significance threshold criteria even after this reduction. Therefore, Impact 5.3-4 is considered potentially **significant and unavoidable**.

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### 5.4 BIOLOGICAL RESOURCES

This section of the Subsequent Program EIR evaluates the potential for implementation of the SUP to impact biological resources in the District in light of changing information and conditions since the 2015 Program EIR. This section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions), along with the existing biological resources throughout the SUP area (animal and plant species listed as endangered, threatened, or rare by the U.S. Fish and Wildlife Service (USFWS) or CDFW; plant species listed as rare by the California Native Plant Society (CNPS); natural communities that are considered rare and are known to provide habitat for sensitive animal or plant species, or are known to be important wildlife corridors; jurisdictional waters and wetlands; wildlife movement and migration corridors; used in the 2015 EIR and possible environmental impacts that may occur as the SUP Update-related site-specific projects are implemented.

#### TERMINOLOGY

*Italicized* words refer to other words defined in this list.

**Annual.** A plant that lives only one year or season.

**Bioregion.** A region defined by physical and biological features such as watershed, terrain, and the types of plants and animals living there.

**Herb.** A flowering plant without woody stems.

**Hydric soil.** Soil that is permanently or seasonally saturated with water, such as soil found in wetlands.

**Jurisdictional Waters.** Include *Waters of the United States*, *wetlands* protected under the federal Clean Water Act, and streambeds and *riparian habitats* protected under state law (see Section 5.4.1.1, *Regulatory Framework*, for further explanation).

**Mesic.** Characterized by a moderate amount of moisture; that is, it is intermediate between *hydric* (saturated) and *xeric* (dry).

**Natural Communities.** Recurring assemblages of plants and animals found in particular physical environments. Three characteristics distinguish natural communities: 1) plant species composition, 2) vegetation structure (e.g., forest, shrubland, or marsh), and 3) a specific combination of physical conditions (e.g., water, light, nutrient levels, and climate). Each natural community type occurs in specific settings in the landscape, such as wind-exposed rocky summits at high elevations, or muddy coastal river shores flooded daily by tides. Natural community types vary with changes in physical settings, resulting in predictable patterns across the landscape.

**Perennial.** Plants, especially *herbs*, with life cycles two years or longer.

**Pollutant.** The term pollutant is defined very broadly by the National Pollutant Discharge Elimination System (NPDES) regulations and litigation and includes any type of industrial, municipal, and agricultural waste

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discharged into water. Pollutant sources are generally categorized as either point sources or nonpoint sources under NPDES regulations. Pollutants can enter waters of the United States from a variety of pathways, including agricultural, domestic, and industrial sources. Typical point source discharges include discharges from publicly owned treatment works, discharges from industrial facilities, and discharges associated with urban runoff. The majority of agricultural facilities are defined as nonpoint sources and are exempt from NPDES regulation. Direct sources discharge wastewater directly into the receiving water body, whereas indirect sources discharge wastewater to a publicly owned treatment work, which in turn discharges into the receiving water body.

**Riparian Habitats.** Habitats along the banks of rivers and streams.

**Sensitive Natural Communities.** Considered rare in the region by regulatory agencies; known to provide habitat for sensitive animal or plant species; or known to be important wildlife corridors.

**Sensitive Species.** Include those listed as endangered or threatened under the federal Endangered Species Act or California Endangered Species Act; species otherwise given certain designations by the CDFW; and plant species listed as rare by the CNPS.

**Take.** Defined under the federal Endangered Species Act as “harass, harm, pursue, hunt, wound, kill, trap, capture, collect, or attempt to engage in any such conduct.”

**Waters of the United States.** Applies to the jurisdiction of the U.S. Army Corps of Engineers (Army Corps) under the Clean Water Act and includes: all waters that are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters that are subject to the ebb and flow of the tide; all interstate waters including interstate wetlands; all other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce; water impoundments; tributaries of waters; territorial seas; wetlands adjacent to waters.

**Wetlands.** Defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as swamps, marshes, and bogs.

**Xeric.** Dry soils and habitats.

### 5.4.1 Environmental Setting

#### 5.4.1.1 REGULATORY FRAMEWORK

National, state, regional and local laws, regulations, plans, and guidelines are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to biological resources in the District. Many site-specific projects have not been identified, and there may be local jurisdictional plans and policies that are applicable depending on the project site. Specific requirements of these laws, regulations, plans, and guidelines might not be up to date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to

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SUP-related projects. Although some of these may not directly applicable to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standard Conditions of Approval are also listed. See *Applicable Regulations and Standard Conditions* at the end of this chapter for those that require District compliance.

### Federal

#### *United States Code, Title 16, Sections 1531 et seq.*

The **Federal Endangered Species Act** (FESA) of 1973, as amended, was established to protect and conserve any species of plant or animal that is endangered or threatened with extinction and the habitats in which these species are found.<sup>143</sup>

The FESA is one of the dozens of United States environmental laws passed in the 1970s. Signed into law by President Richard Nixon on December 28, 1973, it was designed to protect critically imperiled species from extinction as a “consequence of economic growth and development un-tempered by adequate concern and conservation.” The U.S. Supreme Court found that “the plain intent of Congress in enacting” the FESA “was to halt and reverse the trend toward species extinction, whatever the cost.” The act is administered by two federal agencies, the USFWS and the National Oceanic and Atmospheric Administration.

**Section 4(a)** of the FESA requires that critical habitat be designated by the USFWS “to the maximum extent prudent and determinable, at the time a species is determined to be endangered or threatened.” Critical habitat is formally designated by USFWS to provide guidance for planners/managers and biologists with an indication of where suitable habitat may occur and where high priority of preservation for a particular species should be given.

**Section 7** of the FESA, called “Interagency Cooperation”, is the mechanism by which federal agencies ensure that the actions they take, including those they fund or authorize, do not jeopardize the existence of any listed species. Section 7 of the FESA requires federal agencies to consult with the USFWS on proposed federal actions that may affect endangered, threatened, or proposed (for listing) species or critical habitat that may support the species.

**Section 9** of the FESA prohibits “take” of endangered species.

**Section 10** of the FESA provides the regulatory mechanism that allows the incidental take of a listed species by private interests and nonfederal government agencies during lawful activities. Habitat conservation plans (HCPs) for the impacted species must be developed in support of incidental take permits for nonfederal projects to minimize impacts to the species and develop viable mitigation measures to offset the unavoidable impacts.

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<sup>143</sup> A list of titles and codes of regulations implementing FESA is available at <http://www.fws.gov/library/collections/endangered-species-act-policies-and-regulations>.

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### *United States Code, Title 16, Sections 703-712*

The **Migratory Bird Treaty Act of 1918** (MBTA) is the domestic law that implements the United States' commitment to conventions with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. Section 703 prohibits the take, possession, import, export, transport, sale, purchase, barter, or offering of these activities, except under a valid permit or as permitted in the implementing regulations. USFWS administers permits to take migratory birds in accordance with the regulations under the MBTA. The MBTA is implemented through regulations in the Code of Federal Regulations Title 50 Parts 20 through 22. MBTA typically does not prohibit otherwise lawful activities that result in unintended harm to birds. However, conduct "directed against wildlife", such as conduct by hunters and poachers, would be a direct violation of the act.

### *United States Code, Title 33, Sections 1251 et seq.*

The **Clean Water Act** (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was significantly reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. The CWA is the statutory basis for the NPDES permit program and the basic structure for regulating the discharge of pollutants from point sources to waters of the United States. Section 402 of the CWA specifically required the U.S. EPA to develop and implement the NPDES program. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters unless a permit was obtained. EPA's NPDES permit program controls discharges. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities such as schools must obtain permits if their discharges go directly to surface waters.

The CWA gives EPA the authority to set effluent limits on an industry-wide (technology-based) basis and on a water-quality basis that ensure protection of the receiving water. The CWA requires anyone who wants to discharge pollutants to first obtain an NPDES permit, or that discharge will be considered illegal.

The CWA allowed EPA to authorize state governments to perform many of the permitting, administrative, and enforcement aspects of the NPDES Program. In states that have been authorized to implement CWA programs, EPA retains oversight responsibilities. The key sections of the CWA that directly relate to the NPDES Permit Program include:

- Title I – Research and Related Programs
  - Section 101 – Declaration of Goals and Policy
- Title II – Grants for the Construction of Treatment Works
- Title III – Standards and Enforcement
  - Section 301 – Effluent Standards



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- Section 302 – Water Quality-Related Effluent Limitations
- Section 303 – Water Quality Standards and Implementation Plans
- Section 304 – Information and Guidelines [Effluent]
- Section 305 – Water Quality Inventory
- Section 307 – Toxic and Pretreatment Effluent Standards
- Title IV – Permits and Licenses
  - Section 401 – Certification
  - Section 402 – National Pollutant Discharge Elimination System
  - Section 405 – Disposal of Sewage Sludge
- Title V – General Provisions
  - Section 510 – State Authority
  - Section 518 – Indian Tribes

### ***Section 401(a)(1)***

CWA Section 401(a)(1) specifies that any applicant for a federal license or permit to conduct any activity that may result in any discharge into navigable waters shall provide the federal permitting agency a certification, issued by the State in which the discharge originates, that any such discharge will comply with the applicable provisions of the CWA. In California, the applicable RWQCB must certify that the project will comply with water quality standards. Permits requiring Section 401 certification include Army Corps Section 404 permits and NPDES permits issued by the EPA under Section 402 of the CWA.<sup>144</sup> NPDES permits are issued by the applicable RWQCB. The District is within the jurisdiction of the Los Angeles RWQCB (Region 4).<sup>145</sup>

### ***Section 402***

CWA Section 402 authorizes the Administrator of the EPA to issue permits for discharge of pollutants to Waters of the U.S. Section 402 is implemented through NPDES regulations in Code of Federal Regulations Title 40 Parts 122 et seq.

The NPDES permit program controls water pollution by regulating point sources that discharge pollutants into waters of the United States. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities that discharge to waters of the U.S. must obtain permits. There are two categories of NPDES permits: individual permits and general permits.

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<sup>144</sup> EPA. <http://water.epa.gov/lawsregs/rulesregs/>. Accessed May 10, 2023.

<sup>145</sup> California Water Boards, State and Regional Water Boards, [https://www.waterboards.ca.gov/waterboards\\_map.html/](https://www.waterboards.ca.gov/waterboards_map.html/). Accessed May 10, 2023.

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- Individual permits are issued to individual dischargers and are specifically tailored to the specific facility to regulate its discharge of pollutants.
- General permits cover several entities that have the same type of discharge and set forth requirements applicable to the entire category of covered dischargers. The Statewide General Construction Activity Permit issued by the State Water Resources Control Board (Order No. 2012-0006-DWQ) is an example of a General Permit.

### ***Section 404***

Pursuant to CWA Section 404, a permit is required for any filling or dredging within “waters of the U.S.” Responsibility for administering and enforcing Section 404 is shared by the Army Corps and EPA.<sup>146</sup> The Army Corps administers the day-to-day program, including individual permit decisions and jurisdictional determinations; develops policy and guidance; and enforces Section 404 provisions. EPA develops and interprets environmental criteria used in evaluating permit applications, identifies activities that are exempt from permitting, reviews/comments on individual permit applications, enforces Section 404 provisions, and has authority to veto Army Corps permit decisions.

The Army Corps regulates discharges of dredged or fill material into “waters of the U.S.,”<sup>147</sup> including wetlands and non-wetland bodies of water that meet specific criteria. The permit review process entails an assessment of potential adverse impacts to Army Corps wetlands and jurisdictional waters, wherein the Army Corps may require mitigation measures. Where a federally listed species may be affected, a Section 7 consultation with USFWS may be required. If there is potential for cultural resources to be present, Section 106 review may be required. Also, where a Section 404 permit is required, a Section 401 Water Quality Certification would also be required from the RWQCB.<sup>148</sup>

### ***Sections 301 and 502***

Under CWA Sections 301 and 502, any discharge of dredged or fill materials into “waters of the United States,” including wetlands, is forbidden unless authorized by a permit issued by the Army Corps pursuant to Section 404. Essentially, all discharges of fill or dredged material affecting the bottom elevation of a jurisdictional water of the U.S. require a permit from the Army Corps. These permits are an essential part of protecting wetlands, which are often filled by land developers. Wetlands are vital to the ecosystem in filtering streams and rivers and providing habitat for wildlife.

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<sup>146</sup> Section 404 of the Clean Water Act includes “navigable waters” which is defined in Section 502(7) of the Act as “waters of the United States including the territorial seas.”

<sup>147</sup> “Waters of the United States,” as it applies to the jurisdictional limits of the authority of the U.S. Army Corps of Engineers under the Clean Water Act, includes: all waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide; all interstate waters including interstate wetlands; all other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce; water impoundments; tributaries of waters; territorial seas; wetlands adjacent to waters.

<sup>148</sup> CWA Section 404 permit. <http://water.epa.gov/type/ocwb/habitat/cwa404.cfm>.

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### State

*Public Resources Code, Division 20 (<http://www.coastal.ca.gov/ccatc.html>)*

The California Coastal Act of 1976 (**Coastal Act**) includes specific policies that address issues such as shoreline public access and recreation, lower cost visitor accommodations, terrestrial and marine habitat protection, visual resources, landform alteration, agricultural lands, commercial fisheries, industrial uses, water quality, offshore oil and gas development, transportation, development design, power plants, ports, and public works.<sup>149</sup> The policies of the Coastal Act constitute the statutory standards applied to planning and regulatory decisions made by the California Coastal Commission (Coastal Commission) and by local governments.

The Coastal Commission was established by voter initiative in 1972 (Proposition 20) and later made permanent by the Legislature through its passage of the Coastal Act.

The Coastal Commission, in partnership with coastal cities and counties, plans and regulates the use of land and water in the coastal zone. Development activities, which are broadly defined by the Coastal Act to include (among others) construction of buildings, divisions of land, and activities that change the intensity of use of land or public access to coastal waters, generally require a coastal permit from either the Coastal Commission or the local government.<sup>150</sup>

### *California Fish and Game Code Section 1600*

The **Lake and Streambed Alteration Program** requires that a project proponent notify CDFW of any proposed alteration of streambeds, rivers, and lakes. The intent of the program is to protect habitats that are important to fish and wildlife. CDFW has regulatory authority over activities in streams and lakes that will:

- Substantially divert or obstruct the natural flow of any river, stream, or lake;
- Substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake;
- Deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake.

For such activities, LAUSD must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. Notification is required by any person, business, state, or local government agency or public utility that proposes an activity

The notification requirement applies to any work undertaken in or near a river, stream, or lake that flows at least intermittently through a bed or channel. This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water. Based on this notification and other information, CDFW will determine if a Lake and Streambed Alteration

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<sup>149</sup> Public Resources Code, Division 20 (Coastal Act) <http://www.coastal.ca.gov/ccatc.html>.

<sup>150</sup> Coastal Commission. <http://www.coastal.ca.gov/howweare.html>.

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Agreement (LSA) is required prior to construction. To minimize additional requirements pursuant to section 1600 et seq. the CEQA document should fully identify the potential impacts to streams or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.<sup>151</sup>

### *California Fish and Game Code Section 2080*

The **California Endangered Species Act** (CESA) generally parallels the main provisions of the FESA and is administered by the CDFW. Its intent is to restrict take and protect state-listed endangered and threatened species of fish, wildlife, and plants. Unlike its federal counterpart, CESA also applies the take prohibitions to species petitioned for listing (state candidates). At the discretion of the Fish and Game Commission candidate species can be given temporary protection similar to listed threatened or endangered species. Unlike the FESA, CESA does not include listing provisions for invertebrate species. Under certain conditions, CESA has provisions for take through an Incidental Take Permit under Section 2081 or Memorandum of Understanding (MOU). In addition, some sensitive mammals and birds are protected by the state as Fully Protected Species. California Species of Special Concern are species designated as vulnerable to extinction due to declining population levels, limited ranges, and/or continuing threats. This list is primarily a working document for the CDFW's California Natural Diversity Data Base (CNDDDB) project, which maintains a database of known and recorded occurrences of sensitive species. Informally listed species are not protected per se, but warrant consideration in the preparation of biological resources assessments. The CESA is implemented through regulations in California Code of Regulations Title 14 Sections 783-786.6.

### *California Fish and Game Code Section 3503 and 3503.5*

Fish and Game Code Section 3503 regulates the taking or destruction of bird nests and eggs. Under this section, "it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird," except as otherwise provided by the Fish and Game Code or any regulation implementing the Fish and Game Code.

Fish and Game Code Section 3503.5 prohibits the taking, possession, or destruction of any birds in the orders Falconiformes or Strigiformes (birds of prey) and the taking, possession, or destruction of the nests or eggs of any such birds except as otherwise provided by the Fish and Game Code or any regulation implementing the Fish and Game Code.

## Regional

### *Los Angeles County Code of Ordinances, Title 22, Division 8, Chapter 22.174 Oak Tree Permits, Section 22.174.030*

It is the intent of the oak tree permit, which the County of Los Angeles (County) issues to maintain and enhance the general health, safety, and welfare by assisting in counteracting air pollution and in minimizing soil erosion and other related environmental damage to oak trees. The oak tree permit is also intended to preserve and enhance property values by conserving and adding to the distinctive and unique aesthetic character of

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<sup>151</sup> CDFW Notice of Preparation of a Draft Subsequent Program EIR comment letter dated January 30, 2023.

## 5. Environmental Analysis

many areas of Los Angeles County in which oak trees are indigenous. The stated objective of the oak tree permit is to preserve and maintain healthy oak trees in the development process.<sup>152</sup>

A person shall not cut, destroy, remove, relocate, inflict damage or encroach into a protected zone of any tree of the oak genus which is (a) eight inches in diameter as measured four and one-half feet above mean natural grade; in the case of an oak with more than one trunk, whose combined circumference of any two trunks is at least 12 inches in diameter on any lot or parcel of land within the unincorporated area of Los Angeles County, or (b) any tree that has been provided as a replacement tree, pursuant to Section 22.174.070, on any lot or parcel of land within the unincorporated area of Los Angeles County, unless an oak tree permit is first obtained (22.174.030). Project applicants that want an oak tree permit are required to file an application with the County and submit a copy of an oak tree report to the County forester and fire warden. The County forester and fire warden will review the report for the accuracy and inspect the project site, then determine replacement or relocation oak tree requirement.

Exemptions from this ordinance include emergency or routine maintenance by a public utility or municipal Public Works department, or trees planted, grown, and/or held for sale by a licensed nursery.<sup>153</sup>

### *Los Angeles County Code of Ordinances, Chapter 16.76: Tree Trimming*

It is unlawful for any person, firm or corporation (other than the director of parks and recreation, with regard to public grounds or public property, or the road commissioner, with regard to public highways, or persons acting under their authority) to trim, prune, cut, break, deface, destroy, burn, or remove any shade or ornamental tree, hedge, plant, shrub or flower growing, or to grow upon any public highway, public ground or public property within the County of Los Angeles without the written permit of the director of parks and recreation, with regard to public grounds or public property, or the road commissioner, with regard to public highways. Replacement of removed trees is required as a condition of such permit.<sup>154</sup>

### *Los Angeles County Code of Ordinances, Chapter 12.28: Brush and Vegetation*

No person shall remove, destroy, or cause the removal or destruction of natural vegetation on sloping terrain within the unincorporated territory of the County of Los Angeles without first obtaining written approval from the County engineer. Sloping terrain is defined as having a grade of 8% or greater. Certain exceptions are provided, including brush removal within 150 feet of structures for human occupancy; removal of vegetation by work performed under a grading permit, and removal of a total of 2.5 acres or less of vegetation from land under one ownership or control if such removal is limited to an area not exceeding 2.5 acres within any 12-month period.<sup>155</sup>

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<sup>152</sup> Los Angeles County municipal code Section 22.174.010. <https://library.municode.com/index.aspx?clientId=16274>.

<sup>153</sup> Los Angeles County municipal code Section 22.174.030(B). <https://library.municode.com/index.aspx?clientId=16274>.

<sup>154</sup> <https://library.municode.com/index.aspx?clientId=16274>.

<sup>155</sup> <https://library.municode.com/index.aspx?clientId=16274>.

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### Local

#### *Zoning Exemption*

Cities and communities within the District attendance boundaries have General Plans or community plans that guide development. Where a proposed LAUSD school project is inconsistent with a local General Plan policy or zoning ordinance, LAUSD school sites are exempt under Government Code Section 53094[1], pending a two-thirds vote of the Board of Education. On February 19, 2019, the LAUSD Board of Education Adopted a Resolution (Res 256-18/19)[2] to exempt all LAUSD school sites from local land use regulations under Government Code Section 53094. Although LAUSD school sites are exempt from local land use regulations, many of these general plans or community plans establish goals and policies providing applicable references for discussion.

#### *City of Los Angeles Municipal Code, Sections 46.00 et seq.*

Article 6 Preservation of Protected Trees, of the City of Los Angeles Municipal Code protects oak trees (excluding scrub oak [*Quercus berberidifolia*]), southern California black walnut (*Juglans californica*) trees, western sycamore (*Platanus 5-84equire5-84*) trees, California bay (*Umbellularia californica*) trees, Mexican elderberry (*Sambucus 5-84equire5-84*) shrubs, and toyon (*Heteromeles arbutifolia*) shrubs four or more inches in diameter at 4.5 feet above ground level, without a permit from the City Board of Public Works. Trees grown or held for sale by a licensed nursery, or trees planted or grown as a part of a tree planting program, are not defined as Protected Trees under this ordinance.<sup>156</sup>

#### *Tree Protection Ordinances in Other Cities:*

Municipal ordinances in other cities in the District protect street trees and other trees on properties of the respective cities.

**Bell.** Injuring street trees is prohibited under Chapter 12.24 of the Bell Municipal Code; removal of street trees by a property owner requires approval of the city council.<sup>157</sup>

**Carson.** City parkway trees are protected under Sections 3900 et seq. of the Carson Municipal Code. Parkway trees may be removed only by the city public works division.<sup>158</sup>

**Gardena.** Cutting, removing, or injuring street trees or other trees on city property is prohibited except under permit from the city public works director under Gardena Municipal Code Chapter 13.60.<sup>159</sup>

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<sup>156</sup> [http://codelibrary.amlegal.com/codes/los\\_angeles/latest/lamc/0-0-0-132254](http://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-132254).

<sup>157</sup> <http://qcode.us/codes/bell/>.

<sup>158</sup> <http://www.codepublishing.com/ca/carson.html>.

<sup>159</sup> <http://www.codepublishing.com/CA/gardena/>.

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**Huntington Park.** Removing or destroying trees, shrubs, or plants on city property, including streets and parkways, is prohibited except under permit from the director of field services under Huntington Park Municipal Code Section 7-5.204.<sup>160</sup>

**Lomita.** Removal of city trees is prohibited except under permit from the city manager or their designee under Lomita Municipal Code Section 9-2.20.<sup>161</sup>

**Maywood.** Cutting, removing, or destroying street trees is prohibited, except under permit from the street superintendent, under Maywood Municipal Code Sections 10-2.01 et seq.<sup>162</sup>

**San Fernando.** Trees on city property, are protected under San Fernando Municipal Code Sections 98-26 et seq. Cutting, removing, or injuring city-owned trees is prohibited except by permit from the public works director.<sup>163</sup>

**South Gate.** Damage to a tree on or above city property is prohibited, except under permit from the director of public works, under Municipal Code Chapter 5.33.<sup>164</sup>

### *Palos Verdes Peninsula Natural Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP)*

Small parts of the southwest corner of the District are in the Palos Verdes Peninsula Natural Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP). Although no habitat reserves established under the NCCP/HCP are within the District; two reserves, Switchbacks and Shoreline Park, are next to the southwest corner of the District's South educational service area.<sup>165, 166</sup> No District schools are in the NCCP/HCP plan area. The NCCP/HCP allows third-party beneficiaries—such as landowners and developers—to obtain incidental take authorizations through the NCCP/HCP by approval of the City of Rancho Palos Verdes, and for projects approved by the City of Rancho Palos Verdes. No other habitat conservation plans are in the District.<sup>167</sup>

### *Los Angeles County Significant Ecological Areas (SEAs) Program*

SEAs are areas where the County deems it important to facilitate a balance between limited development and resource conservation. Development activities in SEAs are reviewed closely in order to conserve fragile resources such as streams, oak woodlands and threatened or endangered species and their habitat. Sixty-one

<sup>160</sup> <http://qcode.us/codes/huntingtonpark/>.

<sup>161</sup> <http://library.municode.com/index.aspx?clientId=14960&stateId=5&stateName=California>.

<sup>162</sup> <http://library.municode.com/index.aspx?clientId=16480>.

<sup>163</sup> <http://library.municode.com/index.aspx?clientId=11299>.

<sup>164</sup> <http://www.codepublishing.com/CA/SouthGate/#!/SouthGate05/SouthGate0533.html#5.33>.

<sup>165</sup> NCCPs and/or HCPs usually cover areas larger than the habitat reserves established under the respective plans. The entire area covered is referred to as the *Plan Area*. That is the case with the Palos Verdes Peninsula NCCP/HCP; although small parts of the District are in the plan area of the NCCP/HCP, no reserves established under the NCCP/HCP are in the District.

<sup>166</sup> City of Rancho Palos Verdes. NCCP Reserve Boundary Parcels. <http://www.rpvca.gov/DocumentCenter/View/3458/NCCP-Preserve-Design-Map-PDF?bidId=>.

<sup>167</sup> USFWS. Habitat Conservation Plans. <https://www.fws.gov/library/collections/habitat-conservation-plans>.



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SEAs were established as part of the 1980 Los Angeles County General Plan. When adopted, the 2014 County General Plan Update would consolidate the previous SEAs into 28 SEAs.<sup>168</sup> There are SEAs in all regions of the County. Some SEAs are in incorporated cities and are subject to the regulations of those cities. SEAs in the District are listed in Table 5.4-1 and shown in Figure 5.4-1, *Significant Ecological Areas*. Topanga Elementary School is in the Santa Monica Mountains SEA in the Coastal Resource Area (SEA No. 22b).<sup>169</sup>

**Table 5.4-1 Significant Ecological Areas Wholly or Partly in District**

SEA Name and Number	Regions	Portion of SEA in District
Santa Susana Mountains/Simi Hills – 23	N	partial
Tujunga Valley/Hansen Dam – 25	N	all
Verdugo Mountains – 27	N	partial
Santa Monica Mountains – 22a	N, W	partial
Santa Monica Mountains in Coastal Resource Area – 22b	W	partial
Griffith Park – 8	W	all
Ballona Wetlands – 4	W	all
El Segundo Dunes – 7	W	all
Harbor Lake Regional Park – 9	S	all

Source: Department of Regional Planning, Los Angeles County (DRP). April 2023. Significant Ecological Areas. <http://planning.lacounty.gov/sea/faqs>.

### LAUSD

#### *LAUSD Office of Environmental Health & Safety Tree Trimming & Removal Procedure*

LAUSD has developed the Tree Trimming & Removal Procedure (Procedure), which is a policy that defines a protected tree and outlines the procedure for tree trimming or removal on District property. This Procedure was developed to ensure that District activities do not conflict with locally adopted tree preservation policies or ordinances while ensuring the protection of nesting habitat of birds protected by the Fish and Game Code and Migratory Bird Treaty Act and bird species of special concern.

#### *Standard Conditions of Approval*

This table lists the biological related standard conditions that will be included as part of each SUP-related project, as appropriate.

Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
SC-BIO-1	Sensitive Species and Habitat	New construction in or potential impacts to adjacent to	Agency coordination prior to the start of construction; monitoring during construction	An LAUSD-qualified nesting bird Surveyor or Biologist shall identify plant and animal species and their habitat within and near proposed project site. LAUSD will conduct a literature search, which shall consider a one-mile radius beyond the project construction site and shall be performed by a qualified nesting bird Surveyor or Biologist with knowledge of local biological conditions as well as the use and

<sup>168</sup> Department of Regional Planning, Los Angeles County (DRP). 2014, February 26. Significant Ecological Area – SEAs & The General Plan.

<sup>169</sup> DRP. 2019, October. Significant Ecological Areas and Coastal Resource Areas Policy Map. Figure 9.3. [https://planning.lacounty.gov/assets/upl/project/gp\\_2035\\_2014-FIG\\_9-3\\_significant\\_ecological\\_areas.pdf](https://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf).



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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
		native habitat or waterways		<p>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:</p> <ul style="list-style-type: none"> <li>• USFWS</li> <li>• National Marine Fisheries Services (NMFS)</li> <li>• CDFW</li> <li>• CNPS</li> <li>• County and/or city planning or environmental offices for sensitive species, habitat, and/or heritage trees that may not exist on published databases.</li> <li>• CNDDDB</li> <li>• CNPS Rare Plant Inventory</li> <li>• Local Audubon Society</li> <li>• Los Angeles County Department of Regional Planning for information on Significant Ecological Areas</li> <li>• California Digital Conservation Atlas for district-wide location of reserves, plan areas, and land trusts that may overlap with project sites.</li> </ul> <p><b>Biological Resources Report.</b> 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.</p> <ul style="list-style-type: none"> <li>• Information on regional setting that is critical to the assessment of rare or unique resources</li> <li>• A thorough, recent floristic-based assessment of special status plants and natural communities, following the CDFW's <i>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities</i>. CDFW recommends that floristic, alliance- and/or association-based mapping and vegetation impact assessments be conducted at the 5-87 equiret site and neighboring vicinity. The <i>Manual of California Vegetation</i> (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.</li> <li>• A current inventory of the biological resources associated with each habitat type onsite and within the area of potential effect. CDFW's CNDDDB 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.</li> <li>• 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</li> </ul>

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
				<p>CEQA Guidelines Section 15380, including sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at appropriate time of year and time of day when sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the CDFW and USFWS.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• Plans for restoration and vegetation shall be prepared by qualified biologist with expertise in southern California ecosystems and native plant vegetation techniques. Plans shall include, at a minimum: <ul style="list-style-type: none"> <li>- location of the mitigation site</li> <li>- plant species to be used, container sizes, and seeding rates</li> <li>- schematic depicting the mitigation area</li> <li>- planting schedule</li> <li>- irrigation method</li> <li>- measures to control exotic vegetation</li> <li>- specific success criteria</li> <li>- detailed monitoring program</li> <li>- contingency measures should the success criteria not be met</li> <li>- identification of the party responsible for meeting the success criteria and providing for conservation of the site in perpetuity.</li> </ul> </li> </ul> <p>LAUSD shall consult with the U.S. Army Corps of Engineers, USFWS and/or the CDFW and comply with any permit conditions or</p>

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
				directives from those agencies regarding the protection, relocation, creation, and/or compensation.
SC-BIO-2	Light Impacts to Sensitive Species	New outdoor lighting	During lighting design, installation, and prior to first use of lights	LAUSD shall protect sensitive 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	Bird and Bat Nesting Sites	Construction activities within native habitat that has the potential to disturb birds or bats; or construction / demolition / removal of trees / vegetation during nesting season (February 1 through August 31; beginning January 1 for some raptors)	Prior to start of construction, demolition, or vegetation removal	<p>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) should occur outside of nesting season to avoid take of birds, bats, or their eggs:</p> <p>Bird Surveys – Construction Demolition or Vegetation Removal in or adjacent to Native Habitat</p> <ul style="list-style-type: none"> <li>• 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 1 through August 31, beginning January 1 for some raptors) to determine if protected birds occupy the area (e.g., project site is adjacent to areas with suitable habitat for Southwestern willow flycatcher).</li> <li>• If avoidance of the avian nesting season is not feasible, beginning 30 days prior to the initiation of the project activities (activities that will require vegetation removal or ground disturbance), 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 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• If the Surveyor/Biologist determines that a narrower buffer between the project activities and active nests is warranted, a</li> </ul>

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
				<p>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.</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul> <p>Bird Surveys – Construction, Demolition, or Vegetation Removal at Existing Campuses</p> <ul style="list-style-type: none"> <li>• If avoidance of the avian nesting 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager.</li> <li>• 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.</li> </ul> <p>Bat Surveys</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• If bats are found, the Surveyor/Biologist shall identify the species and evaluate the colony to determine potential impacts.</li> <li>• Mitigation measures shall be determined on a project-specific basis and may include: <ul style="list-style-type: none"> <li>○ Avoidance</li> <li>○ Humane exclusion prior to demolition <ul style="list-style-type: none"> <li>▪ Bats should not be evicted from roost sites during the reproductive period (May-September), or during winter hibernating periods to avoid direct mortality</li> <li>▪ Bats should be flushed from trees prior to felling or trimming.</li> </ul> </li> </ul> </li> </ul>

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
				<ul style="list-style-type: none"> <li>Off-site habitat improvements shall be conducted in coordination with the CDFW.</li> </ul>
SC-BIO-4	Protected Trees	Removal of protected trees or woodland habitat	Planning and construction	<p>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.</p> <p><b>New Construction in Native Habitat</b> 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:</p> <ul style="list-style-type: none"> <li><b>Translocation of rare plants is prohibited in most instances.</b> 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.</li> <li><b>Permanent conservation of habitat.</b> 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.</li> <li><b>Off-site acquisition of woodland habitat.</b> 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.</li> <li><b>Creation of woodlands.</b> 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. <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> </ul> </li> </ul>

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
				<p>LAUSD shall request CDFW review and comment on any translocation plans, habitat preservation, habitat creation and/or restoration plans.</p> <p><b>Removal of Protected Trees on Existing Campuses</b> 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.</p>
SC-BIO-5	Wetlands, Riparian Habitat, and other Sensitive Natural Community	Remove native vegetation or alter surface drainage near native habitat communities (e.g., wetlands, riparian habitat, and other sensitive natural communities)	During project design; agency coordination prior to construction; monitoring during and after construction	<p>LAUSD shall comply with CDFW recommendations:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• A jurisdictional delineation of creeks and their associated riparian habitats shall be conducted pursuant to the USFWS wetland definition.</li> <li>• Implementation of recommended measures shall compensate for affected mature riparian corridors and loss of function and value of wildlife corridors.</li> </ul>

### 5.4.1.2 EXISTING CONDITIONS

#### Regional Setting

California has been divided into 10 bioregions—that is, ecologically and geographically defined areas—by the California Resources Agency. Bioregions are defined based on geology, landforms, soils, climate, vegetation, land use, and wildlife. The District is in the South Coast Bioregion, which extends from the southern half of Ventura County to the Mexican Border and east to the edge of the Mojave Desert. The climate of most of the South Coast Bioregion is mild year-round with warm dry summers and wet winters. Habitat varies widely, from chaparral, juniper-pinyon woodland, and grasslands at lower elevations to mixed hardwood forest, southern oak, southern Jeffrey pine, and southern yellow pine at higher levels.<sup>170</sup> Much of the South Coast Bioregion is urbanized.

#### District Setting

##### *Plant Communities and Habitat*

LAUSD schools are developed with buildings; paved areas including parking lots, hardcourts, and walkways; and landscaped areas, including turf playfields and ornamental landscaping of trees, shrubs, and/or grass. Playfields and ornamental turf on school campuses are not suitable habitat for sensitive species due to frequent disturbances for athletic and recreational uses and for maintenance activities such as mowing. Some LAUSD

<sup>170</sup> California Resources Agency (CRA). 1998, December. South Coast Bioregion.

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campuses contain native gardens; however, these are instructional and ornamental gardens and are frequently disturbed by instructional and maintenance activities.

Vegetation types in the part of the District in the San Gabriel Mountains include mixed chaparral, montane hardwood, chamise-redshank chaparral, and coastal scrub.<sup>171</sup> However, there are no LAUSD schools in the part of the District in the San Gabriel Mountains.

**Mixed chaparral.** Associated shrubs including chamise, silk-tassel, toyon, yerba-santa, California fremontia, scrub oak, chaparral oak, and species of ceanothus and manzanita.

**Montane hardwood.** At lower elevations, montane hardwood overstory species typically include oaks, white alder, bigleaf maple, bigcone Douglas-fir, and California-laurel. Understory vegetation usually is dominated by chaparral species such as coffeeberry, manzanita, and ceanothus. A wide variety of wildlife relies on this habitat, including jays, woodpeckers, squirrel, black bear, mule deer, and various reptiles and amphibians.

**Chamise-redshank chaparral.** Nearly pure stands of chamise or redshank. Wildlife species associated with this chaparral are similar to those associated with sagebrush and coastal sage scrub.

**Coastal sage scrub.** Found at elevations below 2,500 feet in climates with mild temperatures and maritime influence. Shrubs are knee high with soft flexible leaves that are often drought deciduous (they lose their leaves during the summer dry season). Common species include California sagebrush, brittle-bush, California buckwheat, and various types of sage.

Topanga Elementary Charter School located at 22075 Topanga School Road is adjacent to Topanga State Park. Vegetation types in the state park immediately north of the school include coastal oak woodland and annual grassland.<sup>172</sup>

**Coastal oak woodland.** Occurs on flat to steep slopes that are often facing northwest at low elevations between 105 to 2,851 feet. It is dominated by coast live oak in the tree layer with various species of shrubs and annual grassland in the understory layer.

**Annual grassland.** Introduced annual grasses, including wild oats, soft chess, red brome, wild barley, true clovers, and many others. Remnants of native plants and grasses are also found in this habitat, including California poppy, purple needlegrass, and Idaho fescue. Characteristic wildlife associated with annual grassland include the western fence lizard, common garter snake, and western rattlesnake, California ground squirrel, California vole, badger, coyote, burrowing owl, short-eared owl, and western meadowlark.

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<sup>171</sup> NPS. 2013, April. San Gabriel Watershed and Mountains: Special Resource Study. <https://parkplanning.nps.gov/document.cfm?parkID=422&projectID=12203&documentID=53350>.

<sup>172</sup> California State Parks. 2012, September 28. Topanga State Park General Plan and Environmental Impact Report. Chapter Two: Existing Conditions and Issues. <http://www.parks.ca.gov/pages/21299/files/02finalgp-ch2.pdf>.

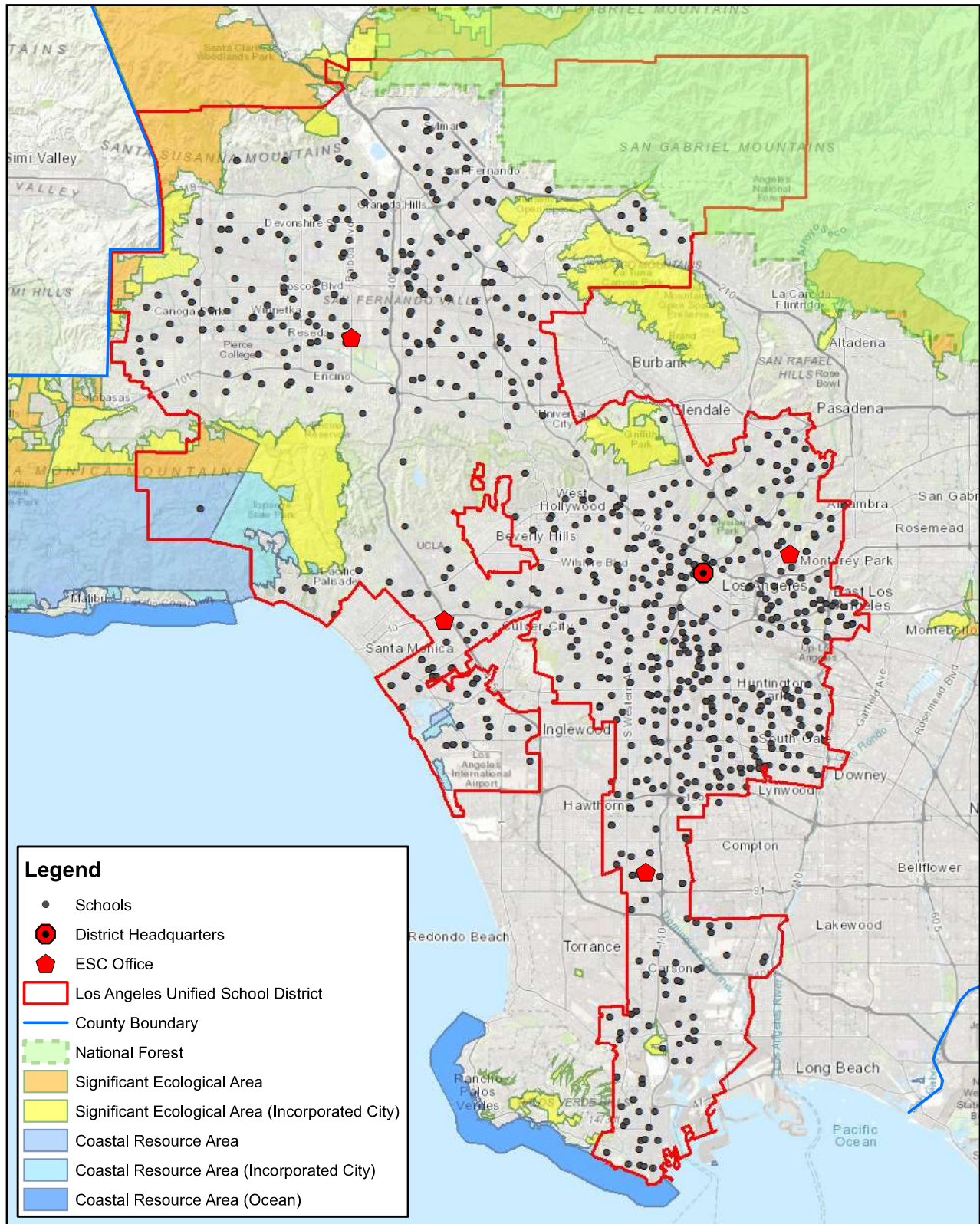
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## 5. Environmental Analysis

### Figure 5.4-1 Significant Ecological Areas



Source: LA County DRP, 2022; ESRI, 2023

0 3 6 Miles



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### *Sensitive Habitat*

The CNDDDB was searched for sensitive resources documented as occurring in the District region on April 21, 2023. The 7.5-minute topographic quadrangles searched were Beverly Hills, Burbank, Calabasas, Canoga Park, Hollywood, Inglewood, Long Beach, Los Angeles, Malibu Beach, Oat Mountain, Pasadena, San Fernando, San Pedro, Simi Valley East, South Gate, Sunland, Topanga, Torrance, Van Nuys, and Venice.<sup>173</sup>

Separate CNDDDB searches were run for each of the Regions on April 21, 2023. The quads searched each Regions are:

- North: Simi Valley East, Oat Mountain, San Fernando, Calabasas, Canoga Park, Van Nuys, Sunland, Condor Peak, Burbank
- West: Malibu Beach, Topanga, Beverly Hills, Hollywood, Burbank, Inglewood, Venice
- East: Pasadena, Los Angeles, South Gate
- South: South Gate, Long Beach, Torrance, San Pedro, Inglewood

Regions identified during a CNDDDB search are shown in Tables 5.4-2 and 5.4-3.

### *Sensitive Plants*

Sensitive plant species documented as occurring in or near the District are listed by Regions in Table 5.4-2; the habitat preference for each species is described in the table. Distribution maps from Calflora were checked to verify that each species occurs in the District region.<sup>174</sup>

Scientific Name Common Name	Listing Status			Habitat Preference <sup>1</sup>	Regions			
	Federal	State	CNPS		N	E	S	W
<i>Aphanisma blitoides</i> aphanisma (annual herb)	None	None	1B.2	Coastal bluff scrub, coastal dunes, coastal scrub. On bluffs and slopes near the ocean in sandy or clay soils. In steep decline on the islands and the mainland. 1-305m.			S	
<i>Arctostaphylos glandulosa</i> ssp. <i>Gabrielensis</i> San Gabriel manzanita (shrub)	None	None	1B.2	Chaparral. Rocky outcrops; can be dominant shrub where it occurs. 1500m.	N			

<sup>173</sup> A small part of the northeast corner of the District is in the Condor Peak quadrangle. The Condor Peak quadrangle was omitted from the CNDDDB search because the quadrangle is vacant land in the Angeles National Forest in the San Gabriel Mountains; there are no existing District schools in the quadrangle, and no existing or proposed urban residential uses that would create demand for new schools.

<sup>174</sup> Calflora is an internet database of California plants and the nonprofit organization that maintains the database.

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Scientific Name Common Name	Listing Status			Habitat Preference <sup>1</sup>	Regions			
	Federal	State	CNPS		N	E	S	W
<i>Arenaria paludicola</i> marsh sandwort (perennial herb)	E	E	1B.1	Marshes and swamps. Growing up through dense mats of typha, juncus, scirpus, etc. In freshwater marsh. 10-170m.				W
<i>Astragalus brauntonii</i> Braunton's milk-vetch (perennial herb)	E	None	1B.1	Closed-cone coniferous forest, chaparral, coastal scrub, valley and foothill grassland. Recent burns or disturbed areas. 4-640m.	N			W
<i>Astragalus pycnostachyus</i> var. <i>lanosissimus</i> Ventura Marsh milk-vetch (perennial herb)	E	E	1B.1	Coastal salt marsh. Within reach of high tide or protected by barrier beaches, more rarely near seeps on sandy bluffs. 1-35m.				W
<i>Astragalus tener</i> var. <i>titi</i> coastal dunes milk-vetch (perennial herb)	E	E	1B.1	Coastal bluff scrub, coastal dunes. Moist, sandy depressions of bluffs or dunes along and near the pacific ocean; one site on a clay terrace. 1-50m.			S	W
<i>Atriplex coulteri</i> Coulter's saltbush (perennial herb)	None	None	1B.2	Coastal bluff scrub, coastal dunes, coastal scrub, valley and foothill grassland. Ocean bluffs, ridgetops, as well as alkaline low places. 10-440m.			S	W
<i>Atriplex pacifica</i> south coast saltscale (perennial herb)	None	None	1B.2	Coastal scrub, coastal bluff scrub, playas, chenopod scrub. Alkali soils. 1-500m.			S	
<i>Atriplex parishii</i> Parish's brittle scale (perennial herb)	None	None	1B.1	Alkali meadows, vernal pools, chenopod scrub, playas. Usually on drying alkali flats with fine soils. 4-140m.	N		S	W
<i>Atriplex serenana</i> var. <i>davidsonii</i> Davidson's saltscale (perennial herb)	None	None	1B.2	Coastal bluff scrub, coastal scrub. Alkaline soil. 3-250m.		E	S	W
<i>Baccharis malibuensis</i>	None	None	1B.1	Coastal scrub, chaparral, cismontane				W

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Scientific Name Common Name	Listing Status			Habitat Preference <sup>1</sup>	Regions			
	Federal	State	CNPS		N	E	S	W
<i>Malibu baccharis</i> (shrub)				woodland. In conejo volcanic substrates, often on exposed roadcuts. Sometimes occupies oak Woodland habitat. 150-260m.				
<i>Berberis nevinii</i> Nevin's barberry (shrub)	E	E	1B.1	Chaparral, cismontane woodland, coastal scrub, riparian scrub. On steep, north-facing slopes or in low grade sandy washes. 290-1575m.	N	E		W
<i>Calochortus clavatus</i> var. <i>gracilis</i> slender mariposa-lily (perennial herb)	None	None	1B.2	Chaparral, coastal scrub. Shaded foothill canyons; often on grassy slopes within other habitat. 420-760m	N			W
<i>Calochortus plummerae</i> Plummer's mariposa-lily (perennial herb)	None	None	4.2	Coastal scrub, chaparral, valley and foothill grassland, cismontane woodland, lower montane coniferous forest. Occurs on rocky and sandy sites, usually of granitic or alluvial material. Can be very common after fire. 90-1610m.	N	E		W
<i>Calystegia felix</i> lucky morning-glory (annual herb)	None	None	1B.1	Meadows and seeps, riparian scrub. Sometimes alkaline, alluvial. 30-215m.				W
<i>Castilleja gleasoni</i> Mt. Gleason paintbrush (perennial herb)	None	Rare	1B.2	Lower montane coniferous forest, chaparral, pinyon and juniper woodland. On open flats or slopes in granitic soil. Restricted to the San Gabriel Mountains. 1160-2170m.	N			
<i>Centromadia parryi</i> ssp. <i>Australis</i> southern tarplant (annual herb)	None	None	1B.1	Marshes and swamps (margins), valley and foothill grassland. Often in disturbed sites near the coast at marsh edges; also in alkaline soils sometimes with saltgrass.	N	E	S	W

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Scientific Name Common Name	Listing Status			Habitat Preference <sup>1</sup>	Regions			
	Federal	State	CNPS		N	E	S	W
<i>Chaenactis glabriuscula</i> var. <i>orcuttiana</i> Orcutt's pincushion (annual herb)	None	None	1B.1	Coastal bluff scrub, coastal dunes. Sandy sites. 3-100m.				W
<i>Chenopodium littoreum</i> coastal goosefoot (annual herb)	None	None	1B.2	Coastal dunes. 10-30m.				W
<i>Chloropyron maritimum</i> ssp. <i>Maritimum</i> salt marsh bird's-beak (annual herb)	E	E	1B.2	Coastal salt marsh, coastal dunes. Limited to the higher zones of the salt marsh habitat. 0-30m.			S	W
<i>Chorizanthe parryi</i> var. <i>5-100equire5-1005-100a</i> San Fernando Valley spineflower (annual herb)	None	E	1B.1	Coastal scrub. Sandy soils. 3-1035m.	N			W
<i>Chorizanthe parryi</i> var. <i>parryi</i> Parry's spineflower (annual herb)	None	None	1B.1	Coastal scrub, chaparral. Dry slopes and flats; sometimes at interface of 2 vegetation types, such as chaparral and oak woodland; dry, sandy soils. 40-1705m.		E		
<i>Crossosoma californicum</i> Catalina crossosoma (shrub)	None	None	1B.2	Chaparral, coastal scrub. On rocky sea bluffs, wooded canyons, and dry, open sunny spots on rocky clay. 0-500m			S	
<i>Deinandra minthornii</i> Santa Susana tarplant (shrub)	None	Rare	1B.2	Chaparral, coastal scrub. On sandstone outcrops and crevices, in shrubland. 280-760m.	N			W
<i>Dithyrea maritima</i> beach spectaclepod (perennial herb)	None	T	1B.1	Coastal dunes, coastal scrub. Formerly more widespread in coastal habitats in So. Calif.  Sea shores, on sand dunes, and sandy places near the shore. 3-50m.				W
<i>Dodecahema leptoceras</i> slender-horned spineflower (annual herb)	E	E	1B.1	Chaparral, coastal scrub (alluvial fan sage scrub). Flood deposited terraces and washes; 200-760m.	N	E		W
<i>Dudleya blochmaniae</i> ssp. <i>Blochmaniae</i>	None	None	1B.1	Coastal scrub, coastal bluff scrub, valley and	N			W

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Scientific Name Common Name	Listing Status			Habitat Preference <sup>1</sup>	Regions			
	Federal	State	CNPS		N	E	S	W
Blochman's dudleya (perennial herb)				foothill grassland. Open, rocky slopes; often in shallow clays over serpentine or in rocky areas with little soil. 5-450m.				
<i>Dudleya 5-101equir</i> ssp. <i>Marcescens</i> marcescent dudleya (perennial herb)	T	Rare	1B.2	Chaparral. On sheer rock surfaces and rocky volcanic cliffs. 150-520m.				W
<i>Dudleya 5-101equir</i> ssp. <i>Ovatifolia</i> Santa Monica dudleya (perennial herb)	T	None	1B.1	Chaparral, coastal scrub. In canyons on sedimentary conglomerates; primarily north-facing slopes. 210-500m.				W
<i>Dudleya multicaulis</i> many-stemmed dudleya (perennial herb)	None	None	1B.2	Chaparral, coastal scrub, valley and foothill grassland. In heavy, often clayey soils or grassy slopes. 0-790m.	N			W
<i>Dudleya parva</i> Conejo dudleya (perennial herb)	T	None	1B.2	Coastal scrub, valley and foothill grassland. In clayey or volcanic soils on rocky slopes and grassy hillsides. 60-450m.	N			
<i>Dudleya virens</i> ssp. <i>Insularis</i> island green dudleya (perennial herb)	None	None	1B.2	Coastal bluff scrub, coastal scrub. Rocky soils. 5-300m.			S	
<i>Eryngium aristulatum</i> var. <i>parishii</i> San Diego button-celery (annual or perennial herb)	E	E	1B.1	Vernal pools, coastal scrub, valley and foothill grassland. San Diego mesa hardpan & claypan vernal pools & southern interior basalt flow vernal pools; usually surrounded by scrub. 20-620 m.				W
<i>Harpagonella palmeri</i> Palmer's grapplinghook (annual herb)	None	None	4.2	Chaparral, coastal scrub, valley and foothill grassland. Clay soils; open grassy areas w/in shrubland. 15-830m.	N			
<i>Helianthus nuttallii</i> ssp. <i>Parishii</i> Los Angeles sunflower (perennial herb)	None	None	1A	Marshes and swamps (coastal salt and freshwater). Historical from southern California. 5-1675m.		E		W

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Scientific Name Common Name	Listing Status			Habitat Preference <sup>1</sup>	Regions			
	Federal	State	CNPS		N	E	S	W
<i>Horkelia cuneata</i> var. <i>puberula</i> mesa horkelia (perennial herb)	None	None	1B.1	Chaparral, cismontane woodland, coastal scrub. Sandy or gravelly sites. 70-810m.	N	E		W
<i>Imperata brevifolia</i> California satintail (perennial grass)	None	None	2B.1	Coastal scrub, chaparral, riparian scrub, Mojavean scrub, meadows and seeps (alkali), Riparian scrub. Mesic sites, alkali seeps, riparian areas. 0-1215 m.	N			
<i>Isocoma menziesii</i> var. <i>decumbens</i> decumbent goldenbush (shrub)	None	None	1B.2	Coastal scrub. Sandy soils; often in disturbed sites. 10-910m.				W
<i>Lasthenia glabrata</i> ssp. <i>Coulteri</i> Coulter's goldfields (annual herb)	None	None	1B.1	Coastal salt marshes, playas, valley and foothill grassland, vernal pools. Usually found on alkaline soils in playas, sinks, and grasslands. 1-1400m.	N	E	S	W
<i>Lepidium virginicum</i> var. <i>robinsonii</i> Robinson's pepper-grass (annual herb)	None	None	4.3	Chaparral, coastal scrub. Dry soils, shrubland. 1-945m.	N	E		
<i>Lupinus paynei</i> Payne's bush lupine (shrub)	None	None	1B.1	Coastal scrub, riparian, mostly sandy soils. 0-1500m.	N			
<i>Lycium brevipes</i> var. <i>hassei</i> Santa Catalina Island desert-thorn (shrub)	None	None	3.1	Coastal bluff scrub, coastal scrub. Coastal bluffs and slopes. 10-300m			S	
<i>Malacothamnus davidsonii</i> Davidson's bush-mallow (shrub)	None	None	1B.2	Coastal scrub, riparian woodland, chaparral. Sandy washes. 180-855m.	N			W
<i>Monardella hypoleuca</i> ssp. <i>Hypoleuca</i> white-veined monardella (perennial herb)	None	None	1B.3	Chaparral, cismontane woodland. Dry slopes. 50-1525m.	N			W
<i>Nama stenocarpa</i> Mud nama (annual and perennial herb)	None	None	2B.2	Marshes and swamps. Lake shores, river banks, intermittently wet areas. 5-500m.			S	W
<i>Nasturtium gambelii</i> Gambel's water cress (perennial herb)	E	T	1B.1	Marshes and swamps. Freshwater and brackish marshes at the				W



## 5. Environmental Analysis

Scientific Name Common Name	Listing Status			Habitat Preference <sup>1</sup>	Regions			
	Federal	State	CNPS		N	E	S	W
				margins of lakes and along streams, in or just above the water level. 5-330m.				
<i>Navarretia fossalis</i> spreading navarretia (annual herb)	T	None	1B.1	Vernal pools, chenopod scrub, marshes and swamps, playas. San Diego hardpan & San Diego claypan vernal pools; in swales & vernal pools, often surrounded by other habitat types. 30-1300m.			S	W
<i>Navarretia ojaiensis</i> Ojai navarretia (annual herb)	None	None	1B.1	Chaparral, coastal scrub, and grassland. 300-1000m.	N			
<i>Navarretia prostrata</i> prostrate vernal pool navarretia (annual herb)	None	None	1B.2	Coastal scrub, valley and foothill grassland, vernal pools. Alkaline soils in grassland, or in vernal pools. Mesic, alkaline sites. 15-700m.		E	S	W
<i>Nemacaulis</i> 5-103equire5-103 var. 5-103equire5-103 coast woolly-heads (annual herb)	None	None	1B.2	Coastal dunes. 0-100m.			S	
<i>Nolina</i> 5-103equire5-1035-103a chaparral nolina (shrub)	None	None	1B.2	Chaparral, coastal scrub. Primarily on sandstone and shale substrates; also known from gabbro. 140-1275m.	N			
<i>Orcuttia californica</i> California Orcutt grass (annual herb)	E	E	1B.1	Vernal pools. 15-660m.	N	E	S	W
<i>Pentachaeta</i> 5-103equir Lyon's pentachaeta (annual herb)	E	E	1B.1	Chaparral, valley and foothill grassland. Edges of clearings in chaparral, usually at the margin between grassland and chaparral or edges of firebreaks. 30-630m.	N		S	W
<i>Phacelia stellaris</i> Brand's star phacelia (annual herb)	None	None	1B.1	Coastal scrub, coastal dunes. Open areas. 5-1515m.		E	S	W
<i>Potentilla multijuga</i> Ballona cinquefoil (perennial herb)	None	None	1A	Meadows and seeps. Brackish meadows. 0-2m.				W

## 5. Environmental Analysis

Scientific Name Common Name	Listing Status			Habitat Preference <sup>1</sup>	Regions			
	Federal	State	CNPS		N	E	S	W
<i>Pseudognaphalium leucocephalum</i> white rabbit-tobacco (perennial herb)	None	None	2B.2	Riparian woodland, cismontane woodland, coastal scrub, chaparral. Sandy, gravelly sites. 0-2100m.	N	E		W
<i>Quercus 5-104equir</i> Nuttall's scrub oak (shrub)	None	None	1B.1	Closed-cone coniferous forest, chaparral, coastal scrub. Generally on sandy soils near the coast; sometimes on clay loam. 15-400 m.				W
<i>Ribes divaricatum</i> var. <i>parishii</i> Parish's gooseberry (shrub)	None	None	1A	Riparian woodland. Salix swales in riparian habitats. 65-100m.		E		
<i>Sagittaria sanfordii</i> Sanford's arrowhead (perennial herb)	None	None	1B.2	Freshwater marshes, wetlands. 0-300m.	N			
<i>Sidalcea neomexicana</i> salt spring checkerbloom (perennial herb)	None	None	2B.2	Alkali playas, brackish marshes, chaparral, coastal scrub, lower montane coniferous Forest, mojavean desert scrub. Alkali springs and marshes. 0-1500m.				W
<i>Suaeda esteroa</i> estuary seablite (a perennial herb)	None	None	1B.2	Marshes and swamps. Coastal salt marshes in clay, silt, and sand substrates. 0-5m.			S	
<i>Symphyotrichum defoliatum</i> San Bernardino aster (perennial herb)	None	None	1B.2	Meadows and seeps, marshes and swamps, coastal scrub, cismontane woodland, lower. Montane coniferous forest, grassland. Vernal mesic grassland or near ditches, streams and springs; disturbed areas. 2-2040m.			S	W
<i>Symphyotrichum greatae</i> Greata's aster (perennial herb)	None	None	1B.3	Chaparral, cismontane woodland. Mesic canyons. 800-1500 m.	N	E		W

## 5. Environmental Analysis

Scientific Name Common Name	Listing Status			Habitat Preference <sup>1</sup>	Regions			
	Federal	State	CNPS		N	E	S	W
<u>Federal Status</u> E Listed as Endangered T Listed as Threatened C Candidate for listing								

No sensitive plants in native habitats are anticipated to occur on LAUSD campuses. Additionally protected native trees and/or shrubs grown or held for sale by a licensed nursery, or trees planted or grown as a part of a tree planting program are not included in this definition.

### Sensitive Wildlife

Sensitive species documented as occurring in or near the District, as identified in the CNDDDB searches described above, are listed in Table 5.4-3.

**Table 5.4-3 Sensitive Animal Species: Listing Status and Habitat Preference**

Scientific Name Common Name	Status		Habitat Preference	Regions			
	Federal	State		N	E	S	W
Invertebrates							
<i>Aglaothorax longipennis</i> Santa Monica shieldback katydid	None	None	Occur nocturnally in chaparral and canyon stream bottom vegetation, in the Santa Monica Mtns of southern California. Inhabit introduced iceplant and native chaparral plants.				W
<i>Bombus crotchii</i> Crotch bumble bee	None	CE	Occur in a variety of habitats, including open grasslands, shrublands, chaparral, and semi- urban settings.	N	E	S	W
<i>Brennania belkini</i> Belkin's dune tabanid fly	None	None	Coastal sand dunes of southern California				W
<i>Carollela busckana</i> Busck's gallmoth	None	None	None listed				W
<i>Cicindela hirticollis</i> <i>gravida</i> sandy beach tiger beetle	None	None	None listed			S	W
<i>Cicindela latesignata</i> western beach tiger beetle	None	None	Mudflats and beaches in coastal southern California			S	
<i>Cicindela senilis frosti</i> senile tiger beetle	None	None	Inhabits marine shoreline, from central California coast south to salt marshes of San Diego. Also found at Lake Elsinore Inhabits dark-colored mud in the lower zone and dried salt pans in the upper zone.				W
<i>Coelus globosus</i> globose dune beetle	None	None	Inhabitant of coastal sand dune habitat; erratically distributed from Ten Mile Creek in Mendocino County south to Ensenada, Mexico. Inhabits foredunes and sand hummocks; it burrows beneath the sand surface and is most common beneath dune vegetation.				W
<i>Danaus plexippus</i>	C	None	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico.	N		S	W

## 5. Environmental Analysis

Scientific Name Common Name	Status		Habitat Preference	Regions			
	Federal	State		N	E	S	W
monarch butterfly – California overwintering population			Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with Nectar and water sources nearby.				
<i>Eucosma hennei</i> Henne's eucosman moth	None	None	Endemic to the El Segundo dunes (type locality), Los Angeles County. Larval foodplant is phacelia ramosissima var austrolitoralis; larvae can be found on Woody stems and upper root parts.				W
<i>Euphilotes battoides allyni</i> El Segundo blue butterfly	E	None	Restricted to remnant coastal dune habitat in southern California. Hostplant is eriogonum parvifolium; larvae feed only on the flowers and seeds; used by adults as major nectar source.				W
<i>Glaucopsyche lygdamus palosverdesensis</i> Palos Verdes blue butterfly	E	None	Restricted to the cool, fog-shrouded, seaward side of Palos Verdes Hills, Los Angeles County. Host plant is Astragalus trichopodus var. Ionchus (locoweed).			S	
<i>Habroscelimorpha gabbii</i> western tidal-flat tiger beetle	None	None	Inhabits estuaries and mudflats along the coast of southern California. Generally found on dark-colored mud in the lower zone; occasionally found on dry saline Flats of estuaries.			S	
<i>Onychobaris langei</i> Lange's El Segundo Dune weevil	None	None	Known from El Segundo dunes.				W
<i>Panoquina errans</i> wandering (=saltmarsh) skipper	None	None	Southern California coastal salt marshes. Requires moist saltgrass for larval development.			S	W
<i>Socalchemmis gertschi</i> Gertsch's socalchemmis spider	None	None	Known from only 2 localities in Los Angeles County: Brentwood (type locality) and Topanga Canyon.	N			W
<i>Streptocephalus woottoni</i> Riverside fairy shrimp	E	None	Endemic to west. Riverside, Orange and San Diego counties in areas of tectonic swales/earth slump basins in grassland and coastal sage scrub. Inhabit seasonally astatic pools filled by winter/spring rains. Hatch in warm water later in the season.	N		S	
<i>Trigonoscuta</i> 5-106equire5-106 5-106equire5-106 Dorothy's El Segundo Dune weevil	None	None	Coastal sand dunes in Los Angeles County				W
<i>Tryonia imitator</i> mimic tryonia (California brackishwater snail)	None	None	Inhabits coastal lagoons, estuaries, and salt marshes, from Sonoma County south to San Diego County. Found only in permanently submerged areas in a variety of sediment types; able to Withstand a wide range of salinities.			S	W
<b>Fish</b>							
<i>Catostomus santaanae</i> Santa Ana sucker	T	None	Endemic to Los Angeles basin south coastal streams. Habitat generalists, but prefer sand-rubble-boulder bottoms, cool, clear water and algae.	N			

## 5. Environmental Analysis

Scientific Name Common Name	Status		Habitat Preference	Regions			
	Federal	State		N	E	S	W
<i>Eucyclogobius newberryi</i> tidewater goby	E	None	Brackish water habitats along the calif coast from Agua Hedionda lagoon, San Diego Co. to the mouth of the Smith River. Found in shallow lagoons and lower stream reaches, they need fairly still but not stagnant water and high oxygen levels.				W
<i>Gila orcutti</i> arroyo chub	None	SC	Los Angeles Basin south coastal streams. Slow water stream sections with mud or sand bottoms. Feeds heavily on aquatic vegetation and associated invertebrates.	N			W
<i>Oncorhynchus mykiss irideus</i> southern steelhead – southern California DPS	E	CE	Fed listing refers to pops from Santa Maria River south to southern extent of range (San Mateo creek in San Diego Co.)  Southern steelhead likely have greater physiological tolerances to warmer water and more variable conditions.				W
<i>Rhinichthys osculus</i> ssp. Santa Ana speckled dace	None	SC	Headwaters of the Santa Ana and San Gabriel rivers. May be extirpated from the Los Angeles River system. Requires permanent flowing streams with summer water temps of 17-20° C. Usually inhabits shallow cobble and gravel riffle	N			
<i>Siphateles bicolor mohavensis</i> Mohave tui chub	E	E	Endemic to the Mojave River Basin, adapted to alkaline, mineralized waters. Needs deep pools, ponds, or slough-like areas. Needs vegetation for spawning.			S	
<b>Amphibians</b>							
<i>Anaxyrus californicus</i> arroyo toad	E	SC	Semi-arid regions near washes or intermittent streams, including valley-foothill and desert riparian, desert wash, etc. Rivers with sandy banks, willows, cottonwoods, and sycamores; loose, gravelly areas of streams in drier parts of range.	N			
<i>Rana draytonii</i> California red-legged frog	T	SC	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby, or emergent riparian vegetation.  Requires 11-20 weeks of permanent water for larval development. Must have access to estivation habitat.	N			
<i>Rana muscosa</i> southern mountain yellow-legged frog	E	E	Federal listing refers to populations in the San Gabriel, San Jacinto and San Bernardino Mountains only.  Always encountered within a few feet of water. Tadpoles may require 2–4 yrs. To complete their aquatic development.	N	E		
<i>Spea hammondi</i> western spadefoot	None	SC	Occurs primarily in grassland habitats but can be found in valley-foothill hardwood woodlands.  Vernal pools are essential for breeding and egg-laying.	N			
<i>Taricha torosa</i> Coast Range newt	None	SC	Coastal drainages from Mendocino County to San Diego County.	N	E		

## 5. Environmental Analysis

Scientific Name Common Name	Status		Habitat Preference	Regions			
	Federal	State		N	E	S	W
			Lives in terrestrial habitats and will migrate over 1 km to breed in ponds, reservoirs and slow-moving streams.				
<b>Reptiles</b>							
<i>Anniella</i> spp. California legless lizard	None	SC	Sandy or loose loamy soils under sparse vegetation. Soil moisture is essential. They prefer soils with a high moisture content.	N	E	S	W
<i>Aspidoscelis tigris stejnegeri</i> coastal whiptail	None	SC	Found in deserts and semiarid areas with sparse vegetation and open areas. Also found in woodland and riparian areas. Ground may be firm soil, sandy, or rocky.	N			W
<i>Diadophis punctatus modestus</i> San Bernardino ringneck snake	None	None	Most common in open, relatively rocky areas. Often in somewhat moist microhabitats near intermittent streams. Avoids moving through open or barren areas by restricting movements to areas of surface litter or herbaceous veg.				W
<i>Emys marmorata</i> western pond turtle	None	SC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation.  Need basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.5 km from water for egg-laying.	N	E		W
<i>Lampropeltis zonata</i> California mountain kingsnake (San Diego population)	None	SC	Restricted to the San Gabriel and San Jacinto mountains of southern California. Inhabits a variety of habitats, including valley-foothill hardwood, coniferous, chaparral, riparian, and wet meadows.				W
<i>Phrynosoma blainvillii</i> coast horned lizard	None	SC	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes.  Open areas for sunning, bushes for cover, patches of loose soil for burial and abundant supply of ants and other insects.	N	E	S	W
<i>Thamnophis hammondi</i> two-striped gartersnake	None	SC	Coastal California from vicinity of Salinas to northwest Baja California. From sea to about 7,000 ft elevation.  Highly aquatic, found in or near permanent fresh water. Often along streams with rocky beds and riparian growth.	N			W
<b>Birds</b>							
<i>Agelaius tricolor</i> tricolored blackbird	None	T	Highly colonial species, most numerous in central valley and vicinity. Largely endemic to California. Requires open water, protected nesting substrate, and foraging area with insect prey within a few km of the colony.	N		S	
<i>Aimophila ruficeps canescens</i> southern California rufous-crowned sparrow	None	WL	Coastal lowland and foothills in sage scrub, broken or burned chaparral, and grassland with scattered shrubs.	N			W
<i>Aquila chrysaetos</i> golden eagle	None	FP/WL	Rolling foothills, mountain areas, sage-juniper flats, and desert. Cliff-walled canyons provide	N			W

## 5. Environmental Analysis

Scientific Name Common Name	Status		Habitat Preference	Regions			
	Federal	State		N	E	S	W
			nesting habitat in most parts of range; also, large trees in open areas.				
<i>Artemisospiza belli belli</i> Bell's sparrow	None	WL	Coastal sagebrush and chaparral on coastal slopes and foothills	N			
<i>Athene cucularia</i> burrowing owl	None	SC	Open, dry annual or perennial grasslands, deserts and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	N	E	S	W
<i>Buteo swainsoni</i> Swainson's hawk	None	T	Breeds in grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, and agricultural or ranch lands with groves or lines of trees. Requires adjacent suitable foraging areas such as grasslands, or alfalfa or grain fields supporting rodent populations.	N			W
<i>Charadrius</i> 5-109quire5-1095-109 a5-109s nivosus western snowy plover	T	SC	Sandy beaches, salt pond levees and shores of large alkali lakes				W
<i>Coccyzus americanus</i> <i>occidentalis</i> western yellow-billed cuckoo	T	E	Riparian forest nester, along the broad, lower flood-bottoms of larger river systems.  Nests in riparian jungles of willow, often mixed with cottonwoods, w/lower story of blackberry, nettles, or wild grape.	N	E		
<i>Elanus leucurus</i> white-tailed kite	None	FP	Rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland.  Open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching.	N			
<i>Empidonax traillii</i> <i>extimus</i> southwestern willow flycatcher	E	E	Riparian woodlands in southern California	N		S	W
<i>Falco peregrinus</i> <i>anatum</i> peregrine falcon	None	FP	Peregrine falcons have recently begun to colonize urban areas because tall buildings are suitable for nesting by this species, and because of the abundance of pigeons as prey. <sup>175</sup>		E		W
<i>Laterallus jamaicensis</i> <i>coturniculus</i> California black rail	None	T	Inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays. Needs water depths of about 1 inch that does not fluctuate during the year and dense vegetation for nesting habitat.				W
<i>Passerculus</i> <i>sandwichensis beldingi</i> Belding's savannah sparrow	None	E	Inhabits coastal salt marshes, from Santa Barbara south through San Diego County.  Nests in 5-109quire5-1095-109a on and about margins of tidal flats.				W
<i>Pelecanus occidentalis</i> <i>californicus</i>	None	FP	Colonial nester on coastal islands just outside the surf line. Nests on coastal islands of small to			S	W

<sup>175</sup> Potter, M. 2002. Falco peregrinus, Animal Diversity Web. [http://animaldiversity.ummz.umich.edu/accounts/Falco\\_peregrinus/](http://animaldiversity.ummz.umich.edu/accounts/Falco_peregrinus/).

## 5. Environmental Analysis

Scientific Name Common Name	Status		Habitat Preference	Regions			
	Federal	State		N	E	S	W
California brown pelican			moderate size which afford immunity from attack by ground-dwelling predators. Roosts communally.				
<i>Poliopitila californica</i> coastal California gnatcatcher	T	SC	Obligate, permanent resident of coastal sage scrub below 2500 ft in southern California.  Low, coastal sage scrub in arid washes, on mesas and slopes. Not all areas classified as coastal sage scrub are occupied.	N	E	S	W
<i>Sternula antillarum browni</i> California least tern	E	E	Nests along the coast from San Francisco Bay south to Northern Baja California.  Colonial breeder on bare or sparsely vegetated, flat substrates: sand beaches, alkali flats, landfills, or paved areas.			S	W
<i>Vireo bellii pusillus</i> least Bell's vireo	E	E	Summer resident of southern California in low riparian in vicinity of water or in dry river bottoms; below 2000 ft. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, baccharis, mesquite.	N	E		W
<b>Mammals</b>							
<i>Antrozous pallidus</i> pallid bat	None	SC	Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas for roosting.  Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	N	E		W
<i>Corynorhinus townsendii</i> Townsend's big-eared bat	None	SC	Throughout California in a wide variety of habitats. Most common in mesic sites. Roosts in the open, hanging from walls and ceilings. Roosting sites limiting. Extremely sensitive to human disturbance.	N			
<i>Euderma maculatum</i> spotted bat	None	SC	Occupies a wide variety of habitats from arid deserts and grasslands through mixed Conifer forests. Feeds over water and along washes. Feeds almost entirely on moths. Needs rock crevices in cliffs or caves for roosting.				W
<i>Eumops perotis californicus</i> western mastiff bat	None	SC	Many open, semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, grasslands, chaparral etc.  Roosts in crevices in cliff faces, high buildings, trees and tunnels.	N	E	S	W
<i>Lasionycteris noctivagans</i> silver-haired bat	None	None	Mainly a coastal and montane forest dweller feeding over streams, ponds and open brushy areas. Roosts in hollow trees, beneath exfoliating bark, abandoned woodpecker holes and rarely under rocks. Needs drinking water.	N	E	S	W
<i>Lasiurus blossevillei</i> western red bat	None	SC	Roosts primarily in trees, 2-40 ft above ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics; trees protected from above and open below.				W
<i>Lasiurus cinereus</i> hoary bat	None	None	Prefers open habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding.	N	E		W



## 5. Environmental Analysis

Scientific Name Common Name	Status		Habitat Preference	Regions			
	Federal	State		N	E	S	W
			Roosts in dense foliage of medium to large trees. Requires water.				
<i>Lasiurus xanthinus</i> western yellow bat	None	SC	Found in valley foothill riparian, desert riparian, desert wash, and palm oasis habitats. Roosts in trees, particularly palms. Forages over water and among trees.	N	E		W
<i>Lepus californicus bennettii</i> San Diego black-tailed jackrabbit	None	None	Intermediate canopy stages of shrub habitats and open shrub/herbaceous and tree/herbaceous edges. Coastal sage scrub habitats in southern California.	N			
<i>Macrotus californicus</i> California leaf-nosed bat	None	SC	Desert riparian, desert wash, desert scrub, desert succulent scrub, alkali scrub and palm oasis habitats. Needs rocky, rugged terrain with mines or caves for roosting.	N			
<i>Microtus californicus stephensi</i> south coast marsh vole	None	SC	Tidal marshes in Los Angeles, Orange and southern Ventura counties.			S	W
<i>Myotis ciliolabrum</i> western small-footed myotis a species of vesper bat	None	None	Wide range of habitats mostly arid wooded and brushy uplands near water. Seeks cover in Caves, buildings, mines and crevices. Prefers open stands in forests and woodlands. Requires drinking water. Feeds on a wide variety of small flying insects.				W
<i>Myotis yumanensis</i> Yuma myotis a species of vesper bat	None	None	Optimal habitats are open forests and woodlands with sources of water over which to feed. Distribution is closely tied to bodies of water.				W
<i>Neotoma lepida intermedia</i> San Diego desert woodrat	None	SC	Coastal scrub of southern California from San Diego County to San Luis Obispo County.  Moderate to dense canopies preferred. They are particularly abundant in rock outcrops, rocky cliffs and slopes.	N	E	S	W
<i>Nyctinomops femorosaccus</i> pocketed free-tailed bat	None	SC	Variety of arid areas in southern California; pine-juniper woodlands, desert scrub, palm oasis, desert wash, desert ripa Rocky areas with high cliffs.			S	W
<i>Nyctinomops macrotis</i> big free-tailed bat	None	SC	Low-lying arid areas in southern California.  Need high cliffs or rocky outcrops for roosting sites.	N	E	S	W
<i>Onychomys torridus ramona</i> southern grasshopper mouse	None	SC	Desert areas, especially scrub habitats with friable soils for digging. Prefers low to moderate shrub cover.	N	E		W
<i>Perognathus longimembris brevinasus</i> Los Angeles pocket mouse	None	SC	Lower elevation grasslands and coastal sage communities in and around the Los Angeles basin. Open ground with fine sandy soils.	N			
<i>Perognathus longimembris pacificus</i> Pacific pocket mouse	E	SC	Inhabits the narrow coastal plains from the Mexican Border north to El Segundo, Los Angeles Co.  Seems to prefer soils of fine alluvial sands near the ocean, but much remains to be learned.			S	W

## 5. Environmental Analysis

Scientific Name Common Name	Status		Habitat Preference	Regions			
	Federal	State		N	E	S	W
<i>Sorex ornatus</i> salicornicus southern California saltmarsh shrew	None	SC	Coastal marshes in Los Angeles, Orange, and Ventura Counties. Requires dense vegetation and woody debris for cover				W
<i>Taxidea taxus</i> American badger	None	SC	Most abundant in drier open stages of most shrub and forest habitats with crumbly soils. Needs sufficient food, friable soils and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	N	E	S	W

Source: CDFW. 2023, April 25. California Natural Diversity Database. <https://nrm.dfg.ca.gov/myaccount/login.aspx?ReturnUrl=%2fcnddb%2fview%2fquery.aspx>.

<b>Federal Status</b>	<b>State Status</b>
E Listed as Endangered	E Listed as Endangered
T Listed as Threatened	T Listed as Threatened
C Candidate for listing	SC State Species of Special Concern
	FP California Fully Protected Species
	WL Watch List

With the exception of incidental perching or roosting on vegetation and buildings by birds and bats, sensitive animal species that could occur on LAUSD campuses are limited to birds and bats that nest or roost on or in buildings (see Table 5.4-4). Use of existing campuses would be very limited; for instance, maintenance of turf precludes habitation by rodents that could be hunted by birds of prey.

**Table 5.4-4 Sensitive Animal Species That Could Occur on LAUSD Campuses**

Scientific name Common name	Status	Habitat Preference
<b>Species with moderate potential to occur on District campuses</b>		
<i>Falco peregrinus anatus</i> peregrine falcon	FP	Peregrine falcons have recently begun to colonize urban areas because tall buildings are suitable for nesting by this species, and because of the abundance of pigeons as prey. <sup>176</sup> This species' range includes the District. <sup>177</sup>
<i>Eumops perotis californicus</i> western mastiff bat	SC	Roosts in crevices in cliff faces, high buildings, trees, and tunnels. This species' range includes the District, and several colonies have been reported from buildings in the Los Angeles Basin. <sup>178,179</sup>
<i>Myotis ciliolabrum</i> western small-footed myotis	None	This bat seeks cover in caves, buildings, mines, crevices, and occasionally under bridges and under bark. <sup>180</sup> This species' range includes the District. <sup>181</sup>
<i>Myotis yumanensis</i> Yuma myotis	None	The Yuma myotis roosts in buildings, mines, caves, or crevices. <sup>182</sup> Yuma myotis' range includes the District. <sup>183</sup>

<sup>176</sup> Potter, M. 2002. Falco peregrinus, Animal Diversity Web. [http://animaldiversity.ummz.umich.edu/accounts/Falco\\_peregrinus/](http://animaldiversity.ummz.umich.edu/accounts/Falco_peregrinus/).

<sup>177</sup> CDFW. 2008, March 19. Peregrine Falcon: B129. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=1688&inline=1>.

<sup>178</sup> CDFW. 2008, February 26. Western mastiff bat life history account. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2357>.

<sup>179</sup> CDFW. 2008, March 13. Western mastiff bat: M042. <https://map.dfg.ca.gov/metadata/ds2501.html>.

<sup>180</sup> CDFW. 2008, February 26. Western small-footed myotis life history account. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2331&inline=1>.

<sup>181</sup> CDFW. 2008, March 13. Western small-footed myotis: M029. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2332&inline=1>.

<sup>182</sup> CDFW. 2008, February 26. Yuma myotis life history account. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2319&inline=1>.

<sup>183</sup> CDFW. 2008, March 13. Yuma myotis: M023. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2320&inline=1>.

Original Map 1988-1990; Revisions 195 & 2000. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2320&inline=1>.

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**Table 5.4-4 Sensitive Animal Species That Could Occur on LAUSD Campuses**

Scientific name Common name	Status	Habitat Preference
Source: CDFW, 2023, April 25. California Natural Diversity Database. <a href="https://nrm.dfg.ca.gov/myaccount/login.aspx?ReturnUrl=%2fcnddb%2fview%2fquery.aspx">https://nrm.dfg.ca.gov/myaccount/login.aspx?ReturnUrl=%2fcnddb%2fview%2fquery.aspx</a> .		

*Sensitive Natural Communities*

Sensitive natural communities documented on the CNDDDB as occurring in or near the District are described below in Table 5.4-5.

**Table 5.4-5 Sensitive Natural Communities In and Near the District**

Natural Community	Description	Regions			
		N	E	S	W
California Walnut Woodland	Open tree canopy locally dominated by California black walnut ( <i>Juglans californica</i> ). The open tree canopy allows development of a grassy understory which is comprised of introduced winter-active annuals in most sites. On relatively moist, fine-textured soils of valley slopes and bottoms, as well as encircling rocky outcrops.	N			W
Riversidian Alluvial Fan Sage Scrub	A type of coastal sage scrub on dry sites south of Point Conception. Typical stands are fairly open and dominated by California sagebrush ( <i>Artemisia californica</i> ), California buckwheat ( <i>Eriogonum fasciculatum</i> ), and foxtail brome ( <i>Bromus rubens</i> ). Typically on dry sites such as steep slopes, severely drained soils, or clays that release stored soil moisture only slowly	N			
Southern California Arroyo Chub/Santa Ana Sucker Stream	Small to medium sized streams that flow year-round and may vary in depth from a few inches to over three feet deep. They favor cool (<72°F) flowing water where gravel, rubble, and boulder substrates are present.	N			
Southern California Coastal Lagoon	Characterized by non-woody salt-tolerant plant species adapted to life in water and/or in saturated soils forming moderate to dense cover and up to three feet tall. Most species are active in summer, dormant in winter. Usually segregated horizontally with cordgrass ( <i>Spartina</i> sp.) nearer the open water, pickleweed ( <i>Salicornia</i> sp.) at mid-littoral elevations, and a richer mixture closer to high ground.  Usually found along sheltered inland margins of bays, lagoons, and estuaries. These soils are flooded by salt water for at least part of each year.				W
Southern California Steelhead Stream	Within a stream resident rainbows and freshwater phase steelhead have in-stream habitat preferences generally determined by size. The smallest fish are mostly found in riffles, medium sized fish in runs, and larger fish predominantly in pools.				W
Southern Coast Live Oak Riparian Forest	Open to locally dense evergreen riparian woodlands dominated by coast live oak ( <i>Quercus agrifolia</i> ). This type appears to be richer in herbs and poorer in understory shrubs than other riparian communities. Bottomlands and outer floodplains along larger streams, on fine-grained, rich alluvium.	N	E		W
Southern Coastal Bluff Scrub	Most plants woody and/or succulent, and up to 6.5 feet tall. Most growth and flowering occur from late winter through spring. Exposed to nearly constant winds with high salt content. Soil usually rocky and poorly developed.			S	
Southern Coastal Salt Marsh	See <i>Southern California Coastal Lagoon</i> above.				W

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Natural Community	Description	Regions			
		N	E	S	W
Southern Cottonwood Willow Riparian Forest	Tall, open, broadleaved winter-deciduous riparian forests dominated by Fremont cottonwood ( <i>Populus fremontii</i> ), black cottonwood ( <i>Populus trichocarpa</i> ), and several tree willows. Understories usually are shrubby willows. Frequently flooded lands along rivers and streams. The dominant species require moist, bare mineral soil for germination and establishment. This is provided after flood waters recede, leading to uniform-aged stands of trees.	N			W
Southern Dune Scrub	A dense, coastal scrub community of scattered shrubs and nonwoody flowering plants, generally less than three feet tall. Restricted to the coast on relatively stabilized backdune slopes, ridges, and flats. Only remaining area left in mainland southern California is El Segundo Dunes in Los Angeles County. <sup>184</sup>				W
Southern Mixed Riparian Forest	No description available. See <i>Southern Cottonwood Willow Riparian Forest</i> above.	N			
Southern Riparian Scrub	A scrubby streamside thicket, varying from open to impenetrable, dominated by any of several willows. Relatively fine-grained sand and gravel bars that are closed to river channels and therefore close to ground water.	N			
Southern Sycamore Alder Riparian Woodland	A tall, open, broadleaved, winter-deciduous streamside woodland dominated by California sycamore ( <i>Platanus 5-114equire5-114</i> ), and often also white alder ( <i>Alnus rhombifolia</i> ). These stands seldom form closed canopy forests, and even may appear as trees scattered in a shrubby thicket of deciduous species with thick leaves. Very rocky streambeds subject to seasonally high-intensity flooding.	N	E		W
Southern Willow Scrub	Dense, broadleaved, winter-deciduous riparian thickets dominated by several willow ( <i>Salix</i> ) species, with scattered emergent Fremont cottonwood and California sycamore. Most stands are too dense to allow much understory development. Loose, sandy or fine gravelly alluvium deposited near stream channels during flood flows.	N			
Valley Needlegrass Grassland	A midheight (to 2 feet) grassland dominated by perennial purple needlegrass ( <i>Stipa pulchra</i> ). Native and introduced annuals occur between the perennials. Usually on fine-textured (often clay) soils, moist or even waterlogged during winter, but very dry in summer.	N			
Valley Oak Woodland	Open, grassy-understoried savanna. Valley oak ( <i>Quercus lobata</i> ) is usually the only tree present. On deep, well-drained alluvial soils, usually in valley bottoms.	N			
Walnut Forest	No description available. See <i>California Walnut Woodland</i> above. Forests generally have denser tree cover than woodlands.		E		

Sources: California Gap Analysis Project, University of California Santa Barbara Biogeography Lab. 2012, December 9. Community Types Mapped for the California Gap Analysis Project. [http://www.biogeog.ucsb.edu/projects/gap/gap\\_home.html](http://www.biogeog.ucsb.edu/projects/gap/gap_home.html); University of California. 2023, April 26. California Fish Species. <http://calfish.ucdavis.edu/species/?ds=241&uid=69>; Holland, Robert F. 1986, October. Preliminary Descriptions of the Terrestrial Natural Communities of California. <http://www.cal-ipc.org/ip/inventory/pdf/HollandReport.pdf>.

No sensitive natural communities are present on District school campuses. Additionally protected native trees and/or shrubs grown or held for sale by a licensed nursery, or trees planted or grown as a part of a tree planting program are not included in this definition.

<sup>184</sup> The El Segundo Dunes Significant Ecological Area is in the Community of Playa Del Rey in the City of Los Angeles, in the west end of the Los Angeles International Airport property (see Figure 5.4-1).

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### *Wildlife Movement Corridors*

One regional habitat linkage in the District is identified in the Los Angeles County General Plan: a linkage along part of the north District boundary linking the San Gabriel Mountains and the Santa Susana Mountains; the linkage crosses the I-5 and SR-14 freeways just north of the junction of the two freeways.<sup>185</sup> Much of the area in and near the linkage is protected in the Angeles National Forest east of the two freeways, and Santa Clarita Woodlands Park west of the two freeways. No additional regional wildlife corridors in the District are identified in the City of Los Angeles General Plan.<sup>186</sup>

### *Riparian Habitats, Jurisdictional Waters, and Wetlands*

Riparian habitats occur along the banks of rivers and streams. Note that six of the sensitive natural communities described above in Table 5.4-5 are riparian communities: southern willow scrub and the five communities with “riparian” in the community name. Riparian habitats are mapped on the National Wetlands Mapper along numerous drainages in the District in the San Gabriel Mountains, Santa Susana Mountains, Simi Hills, Santa Monica Mountains, Hollywood Hills, and Palos Verdes Hills.<sup>187</sup>

Major wetland areas in the District are generally in 100-year flood zones, for instance, in Hansen Dam Park, Tujunga Wash, and Pacoima Wash in the San Fernando Valley; and in Ken Malloy Harbor Regional Park in Harbor City in the City of Los Angeles.<sup>188</sup> Many smaller wetland areas that would be identified by site-specific jurisdictional delineations are not mapped on the National Wetlands Mapper.

Existing District schools are generally fully developed with buildings, parking lots, hardscape including walkways and hardcourts, and landscaped areas including turf playfields; thus, existing campuses typically do not include jurisdictional waters and/or wetlands.

### *Major Conservation Areas*

#### *Angeles National Forest*

The northeast corner of the District is in the Angeles National Forest (5-115eq), which spans about 700,000 acres extending from the west edge of San Bernardino County in the eastern San Gabriel Mountains in the east to the east edge of Ventura County in the northern Transverse Ranges in the west. The 5-115eq provides habitat for more than 180 species identified as sensitive, of concern, or at risk.<sup>189</sup> No District schools are within the 5-115eq.

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<sup>185</sup> Department of Regional Planning, Los Angeles County. 2014, May. Regional Habitat Linkages: Figure 9.2. [https://planning.lacounty.gov/wp-content/uploads/2022/11/9.1\\_Chapter9\\_Figures.pdf](https://planning.lacounty.gov/wp-content/uploads/2022/11/9.1_Chapter9_Figures.pdf).

<sup>186</sup> City of Los Angeles. 2001, September 26. Conservation Element of the City of Los Angeles General Plan. [https://planning.lacity.org/odocument/513c3139-81df-4c82-9787-78f677da1561/Framework\\_Element.pdf](https://planning.lacity.org/odocument/513c3139-81df-4c82-9787-78f677da1561/Framework_Element.pdf).

<sup>187</sup> USFWS. 2023, April 26. National Wetlands Mapper. <http://www.fws.gov/wetlands/Data/Mapper.html>.

<sup>188</sup> USFWS. 2023, April 26. National Wetlands Mapper. <http://www.fws.gov/wetlands/Data/Mapper.html>.

<sup>189</sup> Center for Biological Diversity (CBD). 2010, July 10. Introduction to the Four Southern California National Forests. [http://www.biologicaldiversity.org/programs/public\\_lands/forests/southern\\_california\\_forests/pdfs/Intro-4-S-CA-National-Forests.pdf](http://www.biologicaldiversity.org/programs/public_lands/forests/southern_california_forests/pdfs/Intro-4-S-CA-National-Forests.pdf).

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### ***San Gabriel Mountains National Monument***

On Oct. 10, 2014, President Barack Obama designated 346,177 acres of existing federal lands as the San Gabriel Mountains National Monument: 342,177 acres of the 5-116eq, and 4,002 acres of the San Bernardino National Forest, which abuts the east side of the 5-116eq. The San Gabriel Mountains contains some of the greatest biodiversity in the country. Deep canyons, many with perennial streams, provide crucial habitat for rare and unique wildlife, including the California condor, spotted owl, bighorn sheep, and 1,000-year-old limber pines.<sup>190</sup>

<sup>191</sup> The San Gabriel Mountains National Monument is outside of the District; portions of the southwest Monument boundaries are near the northeast District boundaries.<sup>192</sup>

### ***Santa Monica Mountains National Recreation Area***

Much of the eastern part of the Santa Monica Mountains National Recreation Area (SMMNRA) is within the District. The SMMNRA spans over 153,000 acres, abutting U.S. 101 (Hollywood Freeway) at its east end and the Naval Base Ventura County at its west end. One District school, Topanga Elementary Charter School, is within the SMMNRA.

### ***Proposed Rim of the Valley Corridor Special Resource Study***

A Special Resource Study and Environmental Assessment for a 400,000-acre area including the Santa Monica Mountains, western San Gabriel Mountains, Santa Susana Mountains, and Simi Hills were prepared by the National Park Service in 2015.<sup>193</sup> The special resource study evaluated whether any portion of the Rim of the Valley Corridor study area is eligible to be designated as a unit of the national park system or added to the SMMNRA. The study also explored other ways that private and/or governmental entities can protect resources and provide more outdoor recreation opportunities.<sup>194</sup>

### ***Palos Verdes Peninsula NCCP/HCP***

The Palos Verdes Peninsula NCCP/HCP is described above.

## 5.4.2 Thresholds of Significance

According to CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project would:

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<sup>190</sup> US Forest Service (USFS). 2015, September 3. San Gabriel Mountains National Monument. <https://www.fs.usda.gov/visit/destination/san-gabriel-mountains-national-monument>.

<sup>191</sup> US Forest Service (USFS). 2014, October 8. San Gabriel Mountains National Monument Fact Sheet. <https://www.fs.usda.gov/sites/default/files/media/2014/41/san-gabriel-fact-sheet.pdf>.

<sup>192</sup> Ibid. USFS 2014.

<sup>193</sup> An Environmental Assessment is a type of environmental documentation prepared for compliance with the National Environmental Policy Act (NEPA).

<sup>194</sup> National Park Service (NPS). 2015, November. Rim of the Valley Corridor Special Resource Study. <https://parkplanning.nps.gov/projectHome.cfm?projectID=31945>.

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- BIO-1 Have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.
- BIO-2 Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.
- BIO-3 Have a substantial adverse effect on state or federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- BIO-4 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.
- BIO-5 Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- BIO-6 Conflict with the provisions of an adopted habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

### 5.4.3 Environmental Impacts

#### ANALYTIC METHODOLOGY

A search of the CNDDDB, maintained by CDFW was conducted for all of the topographic quads encompassing the District, except for the Condor Peak quad, which contains the northeast corner of the District in the Angeles National Forest, where no schools are located.<sup>195</sup> Evaluation of the potential for sensitive animal species listed to roost or forage on campuses was based on habitat information in the CNDDDB and in life history accounts and range maps from the CDFW.

The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.4-1: SUP-related projects are not anticipated to substantially affect sensitive species. [Threshold BIO-1]**

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#### All SUP Projects

New construction projects on new properties could impact sensitive species directly through harm to the animal, and indirectly through creation of significant light or noise, or habitat modification. A literature search was conducted; sensitive animal species and sensitive natural communities documented in or near the District

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<sup>195</sup> The quads searched are Beverly Hills, Burbank, Calabasas, Canoga Park, Hollywood, Inglewood, Long Beach, Los Angeles, Malibu Beach, Oat Mountain, Pasadena, San Fernando, San Pedro, Simi Valley East, South Gate, Sunland, Topanga, Torrance, Van Nuys, and Venice.

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are listed above in Tables 5.4-2, 5.4-3, and 5.4-4. A literature search using the CNDDDB generates a list of potential species occurrence; however, it would not be used as evidence of non-occurrence. CNDDDB data is limited to lands that have been surveyed and reported and a lack of records does not mean that rare plants or animals do not occur on or adjacent to the site-specific project. Field verification for the presence or absence of sensitive species by a qualified biologist would take place for projects on or adjacent to sensitive species or native habitat.

All types of SUP-related projects are required to comply with USFWS, CDFW and/or the Army Corps permitting and LAUSD SC-BIO-1 through SC-BIO-5. Impacts to sensitive species would be less than significant.

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**Impact 5.4-2: SUP-related projects are not anticipated to substantially affect riparian habitats or other sensitive natural communities. [Threshold BIO-2]**

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### New Construction on New Properties

Construction projects on new properties may in some cases affect sensitive natural communities. Currently documented sensitive natural communities occurring in or near the District boundary are listed above in Table 5.4-5.

For each future site-specific construction project on new property, biological resources that could be impacted by the project would be identified by a qualified biologist. CDFW requires “no net loss” of either riparian habitat values or acreage. Conversion or changes to subsurface drains, placement of fill or building of structures, and channelization or removal of materials from a streambed may affect riparian habitat. SUP-related projects are required to comply with USFWS, CDFW and/or the Army Corps permitting and LAUSD LAUSD SC-BIO-1 through SC-BIO-5. Impacts to sensitive natural communities and riparian habitats would be less than significant.

### New Construction and Modernization on Existing Campuses

New construction, modernization, repair, replacement, upgrade, remodel, renovation, and installation projects would not cause the loss of sensitive habitats since no sensitive habitats are present on existing District campuses. Some District campuses contain native gardens; however, these are instructional and ornamental gardens subject to frequent disturbances and thus do not provide substantial habitat value. SUP-related projects are required to comply with USFWS, CDFW and/or the Army Corps permitting and LAUSD SC-BIO-1 through SC-BIO-5. Impacts would be less than significant.

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**Impact 5.4-3: SUP-related projects would not have a substantial adverse on jurisdictional waters or wetlands. [Threshold BIO-3]**

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### New Construction on New Properties

New construction projects on new properties could impact jurisdictional waters and/or wetlands. Where the biological resources investigation required under LAUSD SC-BIO-1 and SC-BIO-5 for a project site determines



## 5. Environmental Analysis

that jurisdictional waters or wetlands could be present on the site, a preliminary jurisdictional delineation of the site would be required. Final jurisdictional delineations would be made by regulatory agencies: the Army Corps, the Los Angeles RWQCB, and the CDFW. CDFW requires “no net loss” of either wetland habitat values or acreage. Conversion or changes to subsurface drains, placement of fill or building of structures within a wetland, and channelization or removal of materials from a streambed may affect wetlands. The District would apply for permits from the three regulatory agencies for disturbances to waters and/or wetlands. Types and areas in acres of jurisdictional waters and wetlands that would be impacted and compensation for impacts would be identified in the permits. Implementation permit requirements would be required. Impacts would be less than significant.

### New Construction and Modernization on Existing Campuses

These new construction, modernization, repair, replacement, upgrade, remodel, renovation, and installation projects would occur on existing school campuses. Generally, an entire school campus is developed with buildings, parking lots, hardscape including walkways and hardcourts, and landscaped areas including turf playfields. Thus, existing campuses usually don’t include jurisdictional waters and/or wetlands, and the overwhelming majority of projects on existing campuses would not disturb jurisdictional waters and/or wetlands. Subsequent project-level CEQA review would include a survey of the impacted area, pursuant to LAUSD SC-BIO-1 and SC-BIO-5, to determine whether jurisdictional waters or wetlands could be present in the impacted area. Where potential jurisdictional waters or wetlands are identified and would be affected, the District would have a preliminary jurisdictional delineation conducted and would comply with regulatory permits. SUP-related projects are required to comply with USFWS, CDFW and/or the Army Corps permitting and LAUSD SC- BIO-1 through SC-BIO-5. Impacts would be less than significant.

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**Impact 5.4-4: SUP-related projects implementation would not interfere substantially with wildlife movement or nesting. [Threshold BIO-4]**

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## OVERLAND WILDLIFE MOVEMENT

### New Construction on New Properties

The only regional habitat linkage in the District is in mostly vacant land in hills connecting the San Gabriel and Santa Susana Mountains.<sup>196</sup> Much of the area in and near the linkage is protected in the Angeles National Forest and Santa Clarita Woodlands Park. No District schools or adjacent property cross this linkage. Impacts would be less than significant.

### New Construction and Modernization on Existing Campuses

Most District campuses are developed and are in urbanized settings next to urban land uses. Campuses are not available for overland wildlife movement or migration. No existing District schools are in a designated habitat linkage. No impact would occur.

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<sup>196</sup> County of Los Angeles General Plan, Conservation and Natural Resources Element.

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### NESTING BIRDS

#### All SUP Projects

Some SUP-related site-specific projects may require the removal of mature trees and shrubs. These could be used for nesting by migratory birds. Migratory nongame native bird species are protected by international treaty under the federal MBTA of 1918 (50 Code of Federal Regulations [CFR] Section 10.13). Additionally, the California Fish and Game Code, Sections 3503, 3503.5, and 3513, prohibit the take of all birds and their active nests, including raptor and other migratory nongame birds (as listed under the federal MBTA).

All projects that would remove trees would comply with the federal MBTA and Fish and Game Code and would implement LAUSD SC-BIO-3 that outlines required actions that would be implemented if the project site or construction staging are near and/or cause direct disturbances to native and nonnative vegetation, structures, and/or substrates during nesting season (February 1 through August 31; as early as January 1 for some raptors). With implementation of these laws, regulations, and conditions, nesting impacts would be less than significant.

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**Impact 5.4-5: SUP-related projects would not conflict with any local policies or ordinances protecting biological resources. [Threshold BIO-5]**

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#### All SUP Projects

Most of the land in designated SEAs is vacant; and much of the land is already protected, including Griffith Park and parts of the Santa Monica Mountains National Recreation Area and Angeles National Forest. No new schools would be proposed on land already protected as open space.

Some cities, including Los Angeles, have ordinances that protect native trees and shrubs such as individual oaks, sycamores, Mexican elderberry, and toyon, along with woodlands. Additionally, all tree trimming and removal conducted on District property is required to adhere to the procedures described in the LAUSD OEHS Tree Trimming and Removal Procedure. Compliance with this Procedure will ensure that District activities will not conflict with any tree preservation policies. Although it is not anticipated that SUP-related construction projects would affect mature native trees or woodlands, SC-BIO-4 outlines CDFW standards that would be implemented if native oaks or oak woodlands are affected.

SUP-related site-specific projects include LAUSD SCs that reduce impacts to native trees and shrubs, natural vegetation on slopes, birds, native plants, and other biological resources. Impacts would be less than significant.

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**Impact 5.4-6 SUP implementation would not conflict with an adopted Habitat Conservation Plan or Natural Community Conservation Plan. [Threshold BIO-6]**

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#### All SUP Projects

Small parts of the southwest corner of the District are in the Palos Verdes Peninsula NCCP/HCP; however, there are no habitat reserves within the District. No other habitat conservation plans are in the District.

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Program implementation would not conflict with the Palos Verdes Peninsula NCCP/HCP; therefore, no impact would occur.

### 5.4.4 Applicable Regulations and Standard Conditions

#### Federal

- United States Code, Title 16, Sections 1531 et seq.: Endangered Species Act
- United States Code, Title 33, Sections 1251 et seq.: Clean Water Act

#### State

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

#### LAUSD Standard Conditions of Approval

- SC-BIO-1 through SC-BIO-5

### 5.4.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standard Conditions listed above, the following impacts would be less than significant: 5.4-1, 5.4-2, 5.4-3, 5.4-4, 5.4-5, and 5.4-6.

### 5.4.6 Mitigation Measures

No mitigation measures are required.

### 5.4.7 Level of Significance After Mitigation

Impacts would be less than significant.

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### 5.5 CULTURAL RESOURCES

This section of the Subsequent Program EIR evaluates the potential for implementation of the SUP Update and Measure RR Implementation Plan to impact cultural resources in the District in light of changing information and conditions since the 2015 Program EIR. This section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions), along with the existing cultural resource conditions throughout the SUP area used in the 2015 EIR, and possible new environmental impacts that may occur as SUP-related site-specific projects are implemented.

#### TERMINOLOGY

**Cultural Resources** include places, objects, and settlements that reflect group or individual religious, archaeological, or architectural activities, or paleontological resources. Such resources provide information on scientific progress, environmental adaptations, group ideology, or human advancements. Cultural resources analyzed in this section include resources located within the project site and, for purposes of assessing potential cumulative impacts, resources located within a minimum of one-mile radius beyond the boundaries of the project site. Throughout this section, historical and archaeological resources are separated from paleontological resources due to the large difference in the types of resources they entail.

**Architectural Resources** include buildings, structures, objects, and sites of the built environment.

**Historical Resources** are buildings, structures, objects, sites, and districts that have been formally evaluated and found to meet one or more of the significance criteria identified in CEQA Section 15064.5 (a)(3). While most Historical Resources will be 50 years old or older, resources that have achieved significance in less than fifty years may also be considered historic, provided that a sufficient time has passed to understand their historical importance.<sup>197</sup>

A **Historic District** is a concentration of historic buildings, structures, objects, or sites within precise boundaries that share a common historical, cultural, or architectural background, and meet one of the criteria for significance set forth in CCR Title 14, Chapter 11.5, Section 4852(b).

**Historic Context** is “those patterns or trends in history by which a specific occurrence, property, or site is understood and its meaning (and ultimately its significance) is made clear.” A context may be organized by theme, geographic area, or chronology; regardless of the frame of reference, a historic context is associated with a defined area and an identified period of significance. A historic context, therefore, provides a framework for the evaluation of the significance of a potential historic resource.

**Property Types** are “a grouping of individual properties characterized by common physical and/or associative attributes.”

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<sup>197</sup> 14 CCR, Chapter 11.5, Section 4852(d)(2)

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**Archaeological Resources** are cultural resources of prehistoric or historic origin that reflect human activity. Archaeological Resources include both structural ruins and buried resources. The term Unique Archaeological Resources is defined in Public Resources Code (PRC) Section 21083.2(g) as follows:

... ‘unique archaeological resources’ means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- (1) Contains information need to answer important scientific research questions and there is a demonstrable public interest in that information;
- (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

A **Paleontological Resource** is a natural resource characterized as faunal or floral fossilized remains, but it may also include specimens of non-fossil material dating to any period preceding human occupation.

### 5.10.1 Environmental Setting

#### 5.5.1.2 REGULATORY FRAMEWORK

National, State, regional and local laws, regulations, plans, and guidelines are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to cultural resources in the District. Many site-specific projects have not been identified, and there may be local jurisdictional plans and policies that are applicable depending on the project site. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. Although some of these may not directly applicable to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standard Conditions of Approval are also listed. See *Applicable Regulations and Standard Conditions* at the end of this chapter for those that require District compliance.

#### Federal

*United States Code, Title 16, Sections 470 et seq.*

The **National Historic Preservation Act of 1966** (16 U.S.C. 470 et seq.) authorized the National Register of Historic Places and coordinates public and private efforts to identify, evaluate, and protect the nation’s historic and archaeological resources.

Section 106 (*Protection of Historic Properties*) of the National Historic Preservation Act of 1966 (NHPA) requires federal agencies to take into account the effects of their undertakings on historic properties. Section 106 Review refers to the federal review process designed to ensure that historic properties are considered during federal

## 5. Environmental Analysis

project planning and implementation. The Advisory Council on Historic Preservation, an independent federal agency, administers the review process with assistance from the state OHP.

### *United States Code, Title 16, Sections 470aa-mm*

The **Archaeological Resources Protection Act** became law on October 31, 1979 and has been amended four times. It regulates the protection of archaeological resources and sites that are on federal and Indian lands.

### *United States Code, Title 25, Sections 3001 et seq.*

The **Native American Graves Protection and Repatriation Act** (NAGPRA) is a federal law passed in 1990 that provides a process for museums and federal agencies to return certain Native American cultural items, such as human remains, funerary objects, sacred objects, or objects of cultural patrimony, to lineal descendants and culturally affiliated Indian tribes.

### *Code of Federal Regulations, Title 36, Chapter I, Part 60*

National Register Federal Program Regulations. Title 36–Parks, Forests, and Public Property, Chapter I–National Park Service, Department of the Interior, Part 60–National Register of Historic Places is authorized by National Historic Preservation Act of 1966, as amended, 16 U.S.C. 470 et seq., and E.O. 11593.

The **National Register of Historic Places** (NRHP) is the nation’s official list of buildings, structures, objects, sites, and districts worthy of preservation because of their significance in American history, architecture, archeology, engineering, and culture. The NRHP recognizes resources of local, state and national significance which have been documented and evaluated according to uniform standards and criteria.

The NRHP includes districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture. The NRHP is administered by the National Park Service. Currently there are more than 76,000 listings that make up the NRHP, including all historic areas in the National Park System, over 2,300 National Historic Landmarks, and properties that have been listed because they are significant to the nation, a state, or a community.

Properties are nominated to the NRHP by the State Historic Preservation Officer (SHPO) of the State in which the property is located, by the Federal Preservation Officer for properties under federal ownership or control, or by the Tribal Historic Preservation Officer if a property is on tribal lands.

Any individual or group may prepare a NRHP nomination. Thorough documentation of physical appearance and historic significance of the property is required. In California, completed nominations are submitted to the Office of Historic Preservation. After an application has been reviewed by Office of Historic Preservation staff, it is submitted to the State Historical Resources Commission (SHRC) to determine whether or not the property meets criteria for evaluation, and the SHRC makes a recommendation to the SHPO to approve or disapprove the designation. Nominations recommended by the SHRC and approved by the SHPO are forwarded for consideration to the Keeper of the National Register at the National Park Service in Washington, D.C.

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During the time the proposed nomination is reviewed by the SHPO, property owners and local officials are notified of the intent to nominate. Local officials and property owners are given the opportunity to comment on the nomination, and owners of private property are given an opportunity to object to or concur with the nomination. If the owner of a private property or the majority of owners objects to the nomination, the SHPO may forward the nomination to National Park Service only for a determination of eligibility. Without formally listing the property in the NRHP, the National Park Service then determines whether the property is eligible for listing.

Properties may qualify for the NRHP when they meet any of four basic criteria:

- Are associated with events that have made a significant contribution to the broad patterns of history.
- Are associated with the lives of persons significant in our past.
- Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction.
- Have yielded, or may be likely to yield, information important in prehistory or history.

A final critical component of eligibility is “integrity.” Integrity refers to the ability of a property to convey its significance and the degree to which the property retains the identity, including physical and visual attributes, for which it is significant under the four basic criteria. The NRHP criteria recognize seven aspects or qualities of integrity: location, design, setting, materials, workmanship, feeling, and association.

### State

#### *California Health and Safety Code, Section 7050.5*

This code requires that if human remains are discovered in the project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

#### *California Public Resources Code, Sections 5020–5029.5*

This code continued the former Historical Landmarks Advisory Committee as the **State Historical Resources Commission**. The commission oversees the administration of the California Register of Historical Resources and is responsible for the designation of State Historical Landmarks and Historical Points of Interest.



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### *California Public Resources Code, Sections 5079–5079.65*

This code defines the functions and duties of the **Office of Historic Preservation** (OHP). The OHP is responsible for the administration of federal- and state-mandated historic preservation programs in California and the California Heritage Fund.

### *California Public Resources Code, Sections 5097.9–5097.991*

This code provides protection to Native American historical and cultural resources and sacred sites and identifies the powers and duties of the **Native American Heritage Commission** (NAHC). It also requires notification to descendants of discoveries of Native American human remains and provides for treatment and disposition of human remains and associated grave goods.

### *California Public Resources Code, Section 5024.1*

The **California Register of Historical Resources** (CRHR) is the State version of the NRHP program. The CRHR was enacted in 1992 and became official January 1, 1993. The CRHR was established to serve as an authoritative guide to the state's significant historical and archaeological resources (PRC Section 5024.1). The program may involve resources listed or eligible for listing in the California Register. These resources may include properties already under the ownership of the district, and properties considered and acquired for implementation of the SUP.

Resources that may be eligible for listing include buildings, sites, structures, objects, and historic districts. CEQA identifies a historic resource as a property that is listed on—or eligible for listing on—the NRHP, CRHR, or local registers. NRHP-listed properties are automatically included on the CRHR. The criteria for both are similar and described below, with the NRHP letter (A, B, C, and D) followed by the corresponding CRHR number (1, 2, 3, and 4)

- **A/1:** For an association with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
- **B/2:** For an association with the lives of persons important to local, California, or national history;
- **C/3:** As an embodiment of the distinctive characteristics of a type, period, region, or method of construction, representative of the work of a master or high artistic values; or
- **D/4:** Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

Resources eligible for listing in the CRHR must retain enough of their historic character or appearance to be “recognizable as historic resources and to convey the reasons for their significance.” Under CRHR regulations, “it is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the NRHP, but they may still be eligible for listing in the California Register.”<sup>198</sup> OHP has consistently interpreted

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<sup>198</sup> 14 CCR Section 4852(c).

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this to mean that a California Register–eligible property must retain “substantial” integrity. Because CRHR regulations do not provide substantial written guidance on evaluating integrity, the NRHP bulletin, “How to Apply the National Register Criteria for Evaluation,” is used.

The CRHR also includes properties that: have been formally determined eligible for listing or are listed in the NRHP; are registered State Historical Landmark Number 770 and above; are points of historical interest that have been reviewed and recommended to the State Historical Resources Commission for listing; and are city- and county-designated landmarks or districts (if criteria for designation are determined by OHP to be consistent with CRHR criteria).

**California Historical Landmarks** are buildings, structures, sites, or places that have been determined to have statewide historical significance. The resource must be approved for designation by the County Board of Supervisors or the City/Town Council in whose jurisdiction it is located; be recommended by the State Historical Resources Commission; and be officially designated by the Director of California State Parks. A resource must meet at least one of these following criteria:

- Be the first, last, only, or most significant of its type in the state or within a large geographic region (Northern, Central, or Southern California).
- Be associated with an individual or group having a profound influence on the history of California.
- Be a prototype of, or an outstanding example of, a period, style, architectural movement, or construction or is one of the more notable works or the best surviving work in a region of a pioneer architect, designer or master builder.

**California Points of Historical Interest** are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific, or technical, religious, experimental, or other value. Points of Historical Interest designated after December 1997 and recommended by the State Historical Resources Commission are also listed in the CRHR. No historical resource may be designated as both a landmark and a point. If a point is subsequently granted status as a landmark, the point designation is retired.

To be eligible for designation as a Point of Historical Interest, a resource must meet at least one of the following criteria:

- The first, last, only, or most significant of its type within the local geographic region (city or county).
- Associated with an individual or group having a profound influence on the history of the local area.

A prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best surviving work in the local region of a pioneer architect, designer or master builder.

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### *California Code of Regulations, Title 24, Part 8*

The **2016 California Historic Building Code** provides regulations for the preservation, restoration, rehabilitation, relocation, or reconstruction of buildings or properties designated as qualified historical buildings or properties. The Code is intended to provide solutions for the preservation of qualified historical buildings or properties, to promote sustainability, to provide access for persons with disabilities, to provide a cost-effective approach to preservation, and to provide for the reasonable safety of the occupants or users.

### *California Government Code Sections 50280 et seq.*

Under the **Mills Act**, a city or county may contract with the owner of any qualified historical property to restrict the use of the property.

### *California Public Resources Code Sections 21000 et seq. and California Code of Regulations Title 14 Sections 15000 et seq.*

The **California Environmental Quality Act** (CEQA) and the **CEQA Guidelines** have specific provisions relating to the evaluation of a project's impact on historical and unique archaeological resources.

PRC Section 21084.1 of CEQA and Section 15064.5 of the CEQA Guidelines together establish the prevailing test for determining whether a resource can or must be considered a historical resource under CEQA. First, a resource is considered a historical resource for purposes of CEQA if it is listed or "deemed eligible for listing" in the CRHR by the State Historical Resources Commission.<sup>199</sup> Second, it will be considered a historical resource, based on a presumption of significance, if it is either (1) listed in a local register of historic resources as defined in PRC Section 5010.1,<sup>200</sup> or (2) identified in a local survey of historic resources meeting the criteria set forth in PRC Section 5024.1.<sup>201</sup> If a resource meets either of these criteria, the lead agency must treat the resource as historically significant unless the "preponderance of the evidence" indicates that the resource is not historically significant.

Third, a lead agency may find a resource to be a historical resource even though it is not formally listed in the California Register, listed in a local register, or identified in a local survey.<sup>202</sup> Any such determination must be based on substantial evidence in light of the whole record.<sup>203</sup>

CEQA also provides further guidance with respect to historical resources of an archeological nature and unique archaeological resources. A unique archeological resource is defined in PRC Section 21083.2(g) as:

[A]n archaeological artifact, object or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: (1) contains information needed to answer important

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<sup>199</sup> PRC Section 21084.1; 14 CCR Section 15064.5(a)(1).

<sup>200</sup> PRC Section 21084.1; 14 CCR Section 15064.5(a)(2).

<sup>201</sup> PRC Section 21084.1; 14 CCR Section 15064.5(a)(2).

<sup>202</sup> PRC Sections 21084.1 and 15064.5(a)(3)(4).

<sup>203</sup> 14 CCR Section 15064.5(a)(3).

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scientific research questions and that there is a demonstrable public interest in that information, (2) has a special and particular quality such as being the oldest of its type or best available example of its type, and (3) is directly associated with a scientifically recognized important prehistoric or historic event or person.

According to the CEQA Guidelines Section 15064.5(b): “A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” This section of the guidelines defines historical resources as including both the built environment and archaeological resources.

A substantial adverse change is defined in the CEQA Guidelines Section 15064.5(4)(b)(1), as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” The significance of an historical resource is materially impaired, according to the CEQA Guidelines Section 15064.5(4)(b)(2), when a project:

- (A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
- (B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of the evidence that the resource is not historically or culturally significant; or
- I Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

The CEQA Guidelines provide that “generally” a project that follows the Secretary’s Standards “shall be considered as mitigated to a level of less than a significant impact on the historical resource.”<sup>204</sup>

At the same time, however, a failure to precisely conform to the Secretary’s Standards in all respects does not necessarily mean that a project has a significant adverse impact on historical resources. There are circumstances where a project impacting historical resources may fail to conform to the Secretary’s Standards, and yet the lead agency can conclude based on substantial evidence that the overall impact is insignificant because the project does not “materially impair” the historical resource within the meaning of Section 15064.5(b).

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<sup>204</sup> 14 CCR Sections 15064.5(b)(3) and 15126.4(b).

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CEQA Guidelines Section 15064.5 subsection I(c) addresses impacts on archaeological sites. That section provides as follows:

- (1) When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subsection (a).
- (2) If a lead agency determines that the archaeological site is an historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.
- (3) If an archaeological site does not meet the criteria defined in subsection (a), but does meet the definition of a unique archaeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of Section 21083.2. The time and cost limitations described in Public Resources Code Section 21083.2 (c–f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.

For historical resources of an archaeological nature, “preservation in place is the preferred manner of mitigating impacts to archaeological sites.”<sup>205</sup> “When recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provisions for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken.” In practice, the OHP has consistently determined that excavation, coupled with implementation of a data recovery plan, does not result in a significant environmental impact on a historical resource of an archaeological nature.

A project that would cause “damage to a unique archaeological resource, may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state.” “To the extent that unique archaeological resources are not left in an undisturbed state, mitigation measures shall be required as provided in this subdivision.”<sup>206</sup> CEQA Guidelines Section 15064.5(f) provides that “a lead agency should make provisions for historical or unique archaeological resources accidentally discovered during construction.”

CEQA Guidelines Section 15064.5(d) specifies a process for evaluating human remains, and this issue is identified on the CEQA Checklist as an issue for evaluation in environmental documents. In addition, the CEQA Checklist identifies the presence of paleontological resources as an environmental concern that needs to be considered. Therefore, the issues of human remains and paleontological resources are included in the significance criteria and the evaluation of impacts at the program level.

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<sup>205</sup> 14 CCR Section 15126.4(b)(3)(A).

<sup>206</sup> PRC Section 210783.2(b) and (c).

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### Local

Cities and communities within the District attendance boundaries have General Plans or community plans that guide development. LAUSD school sites are exempt from local zoning requirements under Government Code Section 53094[1], pending a two-thirds vote of the Board of Education. On February 19, 2019, the LAUSD Board of Education Adopted a Resolution (Res 256-18/19) to exempt all LAUSD school sites from local land use regulations under Government Code Section 53094. Although LAUSD school sites are exempt from local land use regulations, many of these general plans or community plans establish goals and policies providing applicable references for discussion.

#### *City of Los Angeles Cultural Heritage Department*

The City of Los Angeles Cultural Heritage Department is authorized under Administrative Code Title 22 Chapter 7 (Sections 22.101 et seq.), and the City Cultural Heritage Commission is authorized under Administrative Code Title 22 Chapter 9 Article 1 (Sections 22.171 et seq.).

In the City of Los Angeles, properties may be designated Historic-Cultural Monuments and/or may be included in Historic Preservation Overlay Zones. The Historic-Cultural Monument designation is reserved for individual historically significant properties. Historic Preservation Overlay Zones apply to areas of historical or cultural significance.

#### *Los Angeles Historic-Cultural Monuments*

In the City of Los Angeles, an Historic-Cultural Monument (HCM) is defined in Cultural Heritage Ordinance Section 22.130 as “...any site (including significant trees or other plant life located thereon), building, or structure of particular historical or cultural significance to the City of Los Angeles, such as historic structures or sites in which broad cultural, political, economic, or social history of the nation, state, or community is reflected or exemplified or which are identified with historic personages or with important events within the main currents of national, State or history, or which embodies the distinguishing characteristics of an architectural-type specimen, inherently valuable for a study of a period, style or method of construction, or a notable work of a master builder, designer, or architect whose individual genius influenced his age.” Listing of a site as an HCM is subject to review by the Cultural Heritage Commission and the Arts, Health, and Humanities Committee of the city council, and requires approval by the city council. The city currently has over 1,200 historic-cultural monuments, providing official recognition and protection for Los Angeles’ most significant and cherished historic resources.<sup>207</sup>

#### *Historic Preservation Overlay Zone*

The Historic Preservation Overlay Zone (HPOZ) Ordinance was adopted by the City of Los Angeles in 1979 and revised in 1997. A Historic Preservation Overlay Zone, or HPOZ, is an area of the city which is designated as containing structures, landscaping, natural features or sites having historic, architectural, cultural or aesthetic significance. To receive such designation, an area must be adopted as an HPOZ by the City Planning

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<sup>207</sup> City of Los Angeles Office of Historic Resources. 2023. Historic Landmark Programs. <https://planning.lacity.org/preservation-design/historic-landmark-programs>. Accessed May 9, 2023.

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Commission and the City Council through a zone change procedure that includes notification of all affected and nearby property owners and public hearings. Once designated, areas have an HPOZ overlay added to their zoning, and are subject to special regulations under Section 12.20.3 of the Los Angeles Municipal Code.<sup>208</sup> As defined by the Los Angeles Conservancy, an HPOZ is "...zoning tool that protects and preserves neighborhoods composed of architecturally and historically significant structures. A type of historic district, HPOZs primarily protect single-family residential neighborhoods."<sup>209</sup> (LA Conservancy 2020) There are 35 designated historic preservation overlay zones in Los Angeles. The Cultural Heritage Masterplan identifies the criteria for evaluating HPOZ applications. Under those criteria, "structures, natural features, or sites within the involved area, or the area as a whole, shall meet one or more of the following:

- "Adds to the historic architectural qualities or historic associations for which a property is significant because it was present during the period of significance and possesses historic integrity reflecting its character at that time.
- "Owing to its unique location or singular physical characteristics, represents an established feature of the neighborhood, community, or City."
- "Retaining the structure would help preserve and protect an historic place or area of historic interest in the City."

Because HPOZs have "special character or special historical, cultural, architectural, archeological, community or aesthetic value," they are "presumed to be historically or culturally significant" and are therefore considered eligible for listing in the California Register.

### LAUSD

LAUSD maintains a Historic Resources Inventory that lists the most recent list of campuses or properties that were evaluated for their historic significance and eligibility determinations as eligible, ineligible or needing evaluation for listing in the NRHP, CRHR, or Los Angeles Historic Cultural Monument (LAHCM). The inventory is continually revised, and the list is modified as schools reach or exceed the 45-year threshold for evaluation. Findings are often revised and schools that do not appear on the inventory should not be considered ineligible for listing.

### Other Cities

Of the cities either entirely or partially within the district's boundaries, only the City of Los Angeles has a historic preservation element in its general plan. However, the following cities do have historic preservation ordinances or regulations governing historic properties: Bell Gardens, Carson, El Segundo, Gardena,

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<sup>208</sup> City of Los Angeles Office of Historic Resources 2023. Info Brief. HPOZ FAQs. <https://planning.lacity.org/odocument/1a885676-568b-40fb-b174-00730dd249bf/Info%20Brief%20HPOZ%20FAQs.pdf> Accessed May 9, 2023.

<sup>209</sup> Los Angeles Conservancy Historic Preservation Overlay Zone, 2020. <https://www.laconservancy.org/historic-preservation-overlay-zone-hpoz>. Accessed May 10, 2023.

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Huntington Park, Long Beach, Montebello, Monterey Park, Rancho Palos Verdes, San Fernando, Santa Monica, South Gate, Torrance, and West Hollywood.

### *Los Angeles County*

County of Los Angeles historic preservation policies include local designation processes, commissions, or boards established to review historic properties, and zoning or other variances or special provisions for historic properties. Los Angeles County programs for protections for historic properties include the county Mills Act Program, which provides incentives for owners of qualified historical properties within the unincorporated areas of the county to preserve, restore, and rehabilitate the historic character of such properties. The county Landmarks and Records Commission recommends to the county board of supervisors' local historical landmarks defined to be worthy of registration by the State of California Department of Parks and Recreation, either as "California Historical Landmarks" or as "Points of Historical Interest", and may consider and comment for the board on applications relating to the NRHP. The Mills Act Program is authorized under Los Angeles County Code of Ordinances Sections 22.168 et seq., and the Landmarks and Records Commission is authorized under Sections 3.30.010 et seq.<sup>210</sup>

### **LAUSD**

#### *Standard Conditions of Approval*

This table lists the cultural resource related standard conditions that will be included as part of each SUP-related project, as appropriate.

Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
SC-CUL-1	Historic Architect	Direct or indirect effect on historical resources (i.e., buildings, structures, historic districts, and contributing site plan and landscaping features that are either designated or eligible for local, state, or federal landmark listing)	During project design, pre-construction, and construction (Planning, Construction)	<ul style="list-style-type: none"> <li>• Historic Architect</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• Role of the Historic Architect</li> </ul>

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[https://library.municode.com/ca/los\\_angeles\\_county/codes/code\\_of\\_ordinances?nodeId=TTT22PLZO\\_DIV8PERELEAC\\_CH22\\_168LOANCOMIACPR](https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TTT22PLZO_DIV8PERELEAC_CH22_168LOANCOMIACPR). Accessed May 9, 2023.



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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
				<p>The tasks of the Historic Architect on the Design Team shall include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• The Historic Architect shall provide specifications for architectural features or materials requiring restoration or removal, maintenance and protection relevant features in place, or on-site storage. Specifications shall include detailed drawings or instructions where historic features may be impacted.</li> <li>• The Design Team and Historic Architect shall be responsible for incorporating LAUSD's recommended</li> </ul>

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
				updates and revisions during the design development and review process.
SC-CUL-2	Design Guidelines and Treatment Approaches	Direct or indirect effect on historical resources	During project design, design development, pre-construction and construction (Planning, Construction)	<p>LAUSD shall follow the guidelines outlined in these documents to the maximum extent practicable when planning and implementing projects and adjacent new construction involving historical resources.</p> <p>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.</p> <p>General guidelines include:</p> <ul style="list-style-type: none"> <li>• Retain and preserve the character of historic resources.</li> <li>• Repair rather than remove, replace, or destroy character-defining features; if replacement is necessary, replace in-kind to match materials, dimensions, and appearance.</li> <li>• Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity.</li> <li>• Where practical, conceal reinforcement required for structural stability or the installation of life safety or mechanical systems.</li> </ul> <p>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.</p>
SC-CUL-3	Temporary Protection Plan	Demolition near or potential damage to historic resources	Prior to demolition or major alteration (Planning, Pre-Construction, Construction)	<p>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:</p> <ul style="list-style-type: none"> <li>• Notation of the historic resource on construction plans.</li> <li>• Pre-construction survey to document the existing physical condition of the historic resource.</li> <li>• Procedures and timing for the placement and removal of temporary protection features, around the historic resource.</li> <li>• Monitoring of the installation and removal of temporary protection features by the Historic Architect, or designee.</li> <li>• Post-construction survey to document the condition of the historic resource after Project completion.</li> </ul>

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
				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	Documentation of Historic Resources	Demolition or potential damage to any historic resources	Prior to demolition or major alteration (Planning, Construction)	<p>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).</p> <p>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:</p> <ul style="list-style-type: none"> <li>• <b>Photographs:</b> 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.</li> <li>• <b>Descriptive and Historic Narrative:</b> 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.</li> <li>• <b>Historic Documentation Package Submittal:</b> 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.</li> </ul>
SC-CUL-5	Salvage and Reuse of	Demolition of historic resource	Prior to demolition or	LAUSD shall comply with Design Specification 01 3591, Historic Treatment Procedures, as applicable. This Specification requires the Construction Contractor to

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
	Historical Resources		alteration (Construction)	submit a Historic Treatment Plan to the District for the protection, repair, and replacement of historic materials and features.
SC-CUL-6	Archaeological Resource	Project area is deemed highly sensitive for archaeological resources or Phase I Archaeological Site Investigation shows a strong possibility that unique archeological resources are buried on the site	Prior to and during ground-disturbing activities (Construction)	<p>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.</p> <p>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.</p>
SC-CUL-7	Archaeological Resources	(1) Historic or unique archaeological resources are discovered, or (2) when unique archaeological resources have been identified on a site, but LAUSD does not implement a Phase III Data Recovery / Mitigation Program	During ground-disturbing activities (Construction)	<p>The Construction Contractor shall halt construction activities within a 30-foot radius of the find and shall notify the LAUSD.</p> <ul style="list-style-type: none"> <li>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.</li> <li>The archaeologist shall have the authority to halt any project-related construction activities that could impact potentially significant resources.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>Archaeological reports shall be submitted to the South Central Coastal Information Center at the California State University, Fullerton.</li> <li>The Archaeological Monitoring Plan shall include: <ul style="list-style-type: none"> <li>Extent and duration of the monitoring based on the grading plans</li> <li>At what soil depths monitoring of earthmoving activities shall be required</li> <li>Location of areas to be monitored</li> <li>Types of artifacts anticipated</li> </ul> </li> </ul>

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
				<ul style="list-style-type: none"> <li>○ 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</li> <li>○ Procedures for maintenance of monitoring logs, recovery, analysis, treatment, and curation of significant resources</li> <li>○ 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.</li> <li>○ Accommodation and procedures for Native American monitors, if required.</li> <li>○ Procedures for discovery of Native American cultural resources.</li> </ul> <ul style="list-style-type: none"> <li>● The construction manager shall adhere to the stipulations of the Archaeological Monitoring Plan.</li> </ul>
SC-CUL-8	Archaeological Resource Training	Project construction requires archaeological monitoring	Prior to the start grading, excavation, or other ground-disturbing activities (Construction)	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	Archaeological Resources Recovery / Mitigation Program	Archaeological resources are discovered, and it is determined not to avoid them by abandoning the site or redesigning the project	During ground-disturbing activities (Construction)	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	Native American Resources	Evidence of Native American resources is uncovered	During ground-disturbing activities (Construction)	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.

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### 5.5.1.3 EXISTING CONDITIONS

#### Cultural Setting

##### *Prehistoric Archaeological Setting*

The ancestors of the Gabrielino-Tongva Tribe occupied the entire Los Angeles Basin and were hunters and gatherers. Small encampments to large village sites have been identified throughout the area, some dating back over 5,000 years.

##### *Historical Setting*

The occupation of Los Angeles County by nonnatives began with the colonization of California, the expedition in 1769 to build a series of missions along the coast, and in 1781 when a group of 44 settlers founded the town of Our Lady the Queen of the Angels (El Pueblo de Nuestra Señora la Reina de Los Angeles de Prociuncula). This rich history has resulted in many significant archaeological and built-environment resources in the Los Angeles area. Table 3.5-1 provides a chronology of key events in history for the greater Los Angeles basin.

**Table 5.5-1 Chronology for the Los Angeles Area and LAUSD**

Date	Description
5000 BC–1769	Ancestors of the Gabrielino-Tongva occupied all of Los Angeles County
<b>Ca. 1500 A.D.</b>	
1500	Thousands of Gabrielino-Tongvas reside in the area that will become Southern California. The Chumash live along the coast from Malibu north; the Gabrielino-Tongva live along the coast from Malibu south to El Toro and inland to the San Gabriel Mountains; and the Tafaviam reside in and around the San Fernando Valley.
1542	First European contact when Spanish explorer Juan Rodriguez Cabrillo lands on Catalina Island; followed in the 1700s by numerous expeditions and the beginnings of the Mission Period (1769).
<b>1700 A.D.</b>	
1765	King Carlos of Spain executes orders to colonize California so that Spanish claim over the region would not be lost.
1769	Spanish land expedition into California led by Gaspar de Portola to scout El Camino Real, the series of Franciscan missions to be built along coast. Two Spanish soldiers, Juan Jose Dominguez and Francisco Xavier Sepulveda, and Spain's first mission padre, Father Juan Crespi, were part of the group.
August 5, 1769	Portola crossed the Santa Monica Mountains and came upon a valley they named El Valle de Santa Catalina de Bononia los Encinos, part of what is now San Fernando Valley.
1771	Mission San Gabriel Archangel (San Gabriel Mission) was founded in 1771. Spaniards referred to the Tongva as Gabrielinos, whom they sought to Christianize.
September 4, 1781	El Pueblo de Nuestra Señora la Reina de Los Angeles de Prociuncula, or the town of Our Lady the Queen of the Angels of the Prociuncula, was founded by Los Pobladores, a group of 44 settlers, and established as an official pueblo by Spanish Governor Felip de Neve.
1783	Francisco Xavier Sepulveda retired from Spanish army and made his home in Los Angeles.
1784	Juan Jose Dominguez received the first Spanish land grant of 75,000 acres, the land south of El Pueblo de Los Angeles. Rancho San Pedro consisted of 75,000 acres. Sepulveda's grandson Jose received permission to raise cattle in the southern part of the rancho.
1797	San Fernando Rey de España Mission (Mission San Fernando) established within the boundaries of the modern-day Los Angeles.
<b>1800 A.D.</b>	

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**Table 5.5-1 Chronology for the Los Angeles Area and LAUSD**

Date	Description
1809	Juan Jose Dominguez died and left Rancho San Pedro to Cristobal Dominguez, who later named his son Manuel Dominguez as executor.
1810	Beginning of Mexican War of Independence from Spain
1817	Ordered by Pablo Vicente de Salo, California's last Spanish governor, first primary school opened in Los Angeles.
1821	Spanish rule in California overthrown by Mexico.
1823	Mexican declaration of the Republic of Mexico.
1824	Jose Dolores Sepulveda was killed and ten years later, his heirs were awarded 32,000 acres of Rancho San Pedro, which they named Rancho de Los Palos Verdes.
1825	The Republic of Mexico claimed California as an official territory. During Mexican rule from 1825–1847, rancheros became wealthy from trade with labor provided by Native Americans.
1827	Under Mexican rule, a second school opened, admitting female pupils and teachers.
1831	Spanish Governor Manuel Victoria overthrown in "The Battle of Los Angeles." California divided into northern and southern provinces. Pio Pico became governor of southern province.
1835	Mexican Congress established Los Angeles a ciudad.
1836	Civil war broke out between northern and southern provinces of California.
1845	War ended with the battle at Cahuenga Pass. Spanish Governor Micheltorena was overthrown and replaced by Pio Pico, who was made governor of entire state.
1846	United States declared war on Mexico. Pio Pico sold almost the entire San Fernando Valley for \$14,000 to Eulogio de Celis.
1848	War ends with Treaty of Guadalupe Hildago, and California established an official U.S. territory.
April 4, 1850	Los Angeles incorporated as an American city, population 1,600.
1852	American public school system established in Los Angeles.
1854	Pio Pico's brother Andres acquired the southern portion of the Valley, which he then transferred back to Pico.
1856–57	Four schools open in Los Angeles County.
1850–1870	Los Angeles economy centered around agriculture of ranchos. As cash economy replaced Mexican barter economy, ranchos forced to mortgage land for money. By 1865, most ranchos transferred to American ownership. The Sepulvedas were forced to foreclose, losing their land to Anglo developers. A period of slow growth; school building in Los Angeles suffered due to lack of state resources, drought, and floods.
1858	Manuel Dominguez sold a portion of Rancho San Pedro to Phineas Banning, who founded Wilmington near San Pedro. The rest of Rancho San Pedro stayed in the Dominguez family until Manuel's daughter married Henry Carson, who assumed management of the rancho.
1860s	Construction of Los Angeles-San Pedro Railroad. Development of San Pedro Harbor increased trade and transportation, which allowed for creation of such communities as Compton and Carson.
1869	Southern Pacific Railroad completed transcontinental railroad to San Francisco. Pio Pico sold his share of the San Fernando Valley to investors led by Isaac B. Lankershim for \$2/acre. Lankershim acquired Valley's southern half and planted world's largest wheat-growing empire with partner Isaac Newton Van Nuys. Los Angeles Board of Education established.
1872	State legislature passed "Act to Enforce the Educational Rights of Children", making education compulsory.
1873	First high school opened in Los Angeles at Temple and Beaudry.
1874	Northern half of San Fernando Valley sold to Senator Charles MacLay and George K. Porter. MacLay founded Valley's first township, San Fernando.
1876	Southern Pacific Railroad reached Los Angeles, followed by the Santa Fe Railway, sparking the city's first real estate boom. By 1889 the boom was over, but Los Angeles had been put on the American map. First kindergarten opened.
1881	The Los Angeles State Normal School opened for the education of teachers, eventually becoming the University of California at Los Angeles.

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**Table 5.5-1 Chronology for the Los Angeles Area and LAUSD**

Date	Description
1882	MacLay divided northern portion of San Fernando Valley with partners George and Benjamin Porter.
Late 1800s	Major progress made in establishment of Los Angeles infrastructure. Water supplies increased. Discovery of oil stimulated economy. General prosperity reflected by growth in school system, with 40% increase in enrollment. Los Angeles City School District established.
1889	Los Angeles High School built.
1890	Population grows to 50,395 and doubles to 102,479 by 1900.
<b>1900 A.D.</b>	
Early 1900s	Arrival of the automobile and Henry E. Huntington's Pacific Electric Railway Company, which linked Los Angeles communities by network of rail cars. Los Angeles became primarily a tourist town. Movie business established its roots.
1904	Leslie C. Brand, founder of the City of Glendale, purchased portion of George Porter's land and later helped construct the line of Pacific Electric railway from downtown Los Angeles via Van Nuys to San Fernando.
1909	<i>Los Angeles Times</i> executives Harrison Gray Otis and Harry Chandler paid \$53/acre for 47,500 acres of the Valley's southern half in what was most significant subdivision in history of the city. The City of Los Angeles annexed a shoestring strip of land extending south to San Pedro. The towns of Wilmington and San Pedro were both annexed, and the port became Port of Los Angeles.
1910	Newly formed City School District encompassed over 85 square mile with enrollment of 46,500.
1911	Manuel Dominguez's grandson John Manuel Carson sold 2,800 acres to the Torrance-Marshall Company.
1913	Water brought into Los Angeles from Owens Valley via William Mulholland's Los Angeles Aqueduct, the largest municipal water system in the country, luring surrounding communities into annexation.
1915	San Fernando Valley annexed by City of Los Angeles.
1916	Los Angeles School District covered 400 square miles, with enrollment of 78,658.
1920s	Economy boosted by oil, movies, and aerospace. Wave of immigration to the region between 1920 and 1940 described as largest internal migration in history of United States. Construction of Hoover Dam brought electricity to area. By 1920, 100,000 automobiles registered in Los Angeles and 150 new miles of road built. Los Angeles City Planning Commission approved 40 new subdivisions a week. Oil refineries built in San Pedro, Carson, Torrance, and El Segundo. Los Angeles School District experienced rapid growth, regularly annexing new schools every year or two. By 1925, enrollment exceeded available school capacity.
1929	Establishment of first community college, Los Angeles Junior College, by Los Angeles School District.
1930	Throughout Depression, migration into area continued. Los Angeles fifth largest city in U.S. with population 1.3 million attracting immigrants from both inside and outside the country. Los Angeles School District covered 1,039 square miles, three times the size of the City of Los Angeles. Enrollment reached 404,351. School facilities totaled 350.
1933	Long Beach earthquake. 40 school buildings demolished. Los Angeles School District implemented a phased school building reconstruction program. Field Act was passed to protect school buildings from future earthquakes, leading to state oversight of school building activities.
1935	Los Angeles School District enrolled 300,000 housed in 384 schools, serving an area of over 1,095 square miles. District contracted in next decade as cities such as Beverly Hills, Torrance and Culver City split off into individual districts. Enrollment, however, continued to increase.
1940	First freeway in western United States, Arroyo Seco Parkway (the Pasadena Freeway) opened, followed by San Gabriel and Hollywood Freeways later that decade.
1941–1945	World War II brings modern industrial phase of Los Angeles. Spurt of population growth and war-related industrial expansion. San Fernando Valley continues to be dominated by agriculture.
1950s	After the war, economic development continued, predominantly in aerospace and electronics. Established industries such as agriculture, petroleum, and fishing became less important. As growth continued, developers built new communities for expanding work force. Valley was rapidly becoming fastest growing area in the country as agriculture in the area was replaced by manufacturing. The southern area also experienced rapid growth, and as a result of growing work force, large areas of tract housing were quickly built. Developing suburbs were to align themselves with existing Los Angeles School District. School building construction, which had slowed during the war, exploded.



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**Table 5.5-1 Chronology for the Los Angeles Area and LAUSD**

Date	Description
1960	Ethnically diverse population without a single majority grown to 2,479,015.
1970	Economy continued to diversify. With end of Cold War, decline in aerospace industry. Expansion of manufacturing, television and music recording, and service industries. Agriculture continued to give way to suburban subdivisions and retail centers. South area continued with development of industrial, office, recreational, and retail centers.
1984	Los Angeles displaced Chicago as America's second largest city.
1990s–2000s	Population growth continued with influx of immigrants from all over the world. Los Angeles still the second most populated city, rivaled only by New York, and spread out over the greatest municipal area in the country. LAUSD served more than 720,000 students in a 704-square-mile area.

Source: 2004 New School Construction Program EIR. Adopted June 2004.

*LAUSD 2004 Historic Resources Survey*

Of the over 700 campuses and administrative complexes operated by the District in 2002, 410 contain permanent buildings which are at least 45 years or older. The LAUSD conducted an inventory of existing schools to determine the age and historical significance.<sup>211</sup> The survey was performed in two phases. Phase 1 identified all LAUSD campuses and properties with buildings that were 45 years or older, in accordance with Office of Historic Preservation guidelines for local surveys. Previously completed documentation, including significance evaluations made by OHP in consensus with the Federal Emergency Management Agency following the 1994 Northridge Earthquake, was compiled and incorporated into the resulting database of 409 properties. A historical context statement was prepared, and approximately half of the 409 properties were evaluated and a quarter of these were recorded on standard California historic resources inventory forms (form DPR 523A Primary Record). Phase 2 evaluated and recorded the remaining properties.

*LAUSD 2014 Historic Resources Survey*

In July 2013, in anticipation of the SUP, LAUSD began the process of updating the survey of historic resources in the District.<sup>212</sup> This process included developing an updated Historic Context Statement, conducting historic resource surveys of 55 campuses that were not evaluated during the 2002 survey, and preparing design and procedural guidelines to help guide SUP planning efforts and CEQA analysis process potential eligibility of schools under Criteria A/1, as outstanding examples of LAUSD design ideals and principles. The history and context of Los Angeles public school design and educational architecture were the particular focus of the 2014 study. Because the postwar era largely fell outside the scope of the 2002 LAUSD historic context statement, this era was examined in detail in the 2014 study.

The study represents not a comprehensive history but rather a first step in better understanding the evolution of school design in the district. Project limitations precluded extensive research on additional aspects of LAUSD's history that might result in eligibility under Criteria A/1 and Criteria B/2. Campus-specific research

<sup>211</sup> LAUSD 2002 Survey.<sup>212</sup> See Appendix B-1 for the LAUSD 2014 Survey.

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was conducted on all pertinent topics for each of the schools surveyed. The study includes a section on the typical architectural styles of LAUSD schools to analyze Criteria C/3.

### *LAUSD 2023 Historic Resources Survey*

#### *Themes of Significance*

The following themes of significance were prepared for LAUSD school property types.

#### ***Founding Years, 1875–1894***

This theme is embodied in Los Angeles's remaining one- and two-story wood-frame schoolhouses that generally display Late Victorian or vernacular styles. Only three nineteenth-century schoolhouses are known to remain from LAUSD's founding years. Schools constructed during this period display traditional modes of school design, before the Progressive Education Movement and widespread reform changed national construction standards and before increased urbanization necessitated larger-capacity school plants.

#### ***Pre-1933 Long Beach Earthquake School Plants, 1910–1933***

This theme reflects an important period for Los Angeles schools. First, it occurred after the Progressive Education Movement had triggered widespread reform of school design throughout the United States. This resulted in a more differentiated, expansive school plant, with specialized facilities and program-specific buildings and classrooms; this ended the era of the monumental, big-block school. Second, this period occurred before a statewide overhaul of school building codes and practices after the 1933 Long Beach earthquake.

This period also began as the 1920s ushered in a school building boom and period-revival golden age in Southern Californian architecture. The importance placed on public education was expressed through beautifully designed school buildings, often created by the region's leading architects. Campus design became more unified, with elaborate approaches and entrances. The advent of more grand entrances, as well as the incorporation of separate auditoriums, sited for ease of public access, reflected a growing sense that public education was a community affair.

Replacing the big-block school, with internal corridors, was a generally lower-massed, spread-out campus. In some examples, designers replaced hallways with covered outdoor walkways. Building plans also evolved, as the traditional rectangular plan took on adjacent wings, in H-, T-, or U-shaped buildings that facilitated the creation of sheltered outdoor spaces and patios. Lower massing was particularly common for elementary schools.

Because most pre-1933 schools were substantially remodeled following the Long Beach earthquake, intact examples from this era are relatively rare. It is common to find 1920s-era schools that were remodeled following the earthquake; such schools might exhibit the building plans and configurations typical of the 1920s but with 1930s PWA Moderne and Streamline Moderne detailing.

#### ***Post-1933 Long Beach Earthquake Schools, 1933–1945***

Following the 1933 Long Beach earthquake, state and city legislation regarding school building codes and practices shifted the character of LAUSD schools and campuses. Requirements of the Field Act (1934), such as maintaining one-story massing for elementary schools and no more than two stories for junior and high

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schools, mirrored reforms already under way. Classroom wings continued to be designed for connections to the outdoors, with L-, H-, U-, and T-shaped buildings accommodating sheltered courtyard and patio spaces. Continuing another trend under way in the 1920s, campuses displayed an increasingly unified site design, with sheltered corridors linking campus buildings.

The advances of the Progressive Education Movement also continued to shift school plant design. Campuses were increasingly differentiated, with administration buildings, auditoriums and gymnasiums, separate classroom, shop, and specialty wings, and cafeterias. Adequate indirect lighting and ventilation were provided through the use of generous bands of windows, including multilight sashes, casements, and clerestories. Stylistically, these buildings were less ornamental than their 1920s period-revival counterparts. An emphasis was placed on traditional Southern Californian styles, such as the Spanish Colonial and Mission Revival. Other styles included Streamline Moderne, Art Deco, and Late Moderne. Much post-earthquake reconstruction was funded through the Public Works Administration (PWA), and many schools exhibit a range of PWA Moderne styles.

### ***Early Experiments in the Modern, Functionalist School, 1933–1945***

Although this category shares general characteristics with the preceding theme (Post–1933 Long Beach Earthquake Schools), it is distinguished by an experimental approach to school design that emerged during the Great Depression. Such schools reflect the most avant-garde ideas of the era and the beginning of modern, functionalist school design. Stylistically, the proto-modernist school need not be purely “modern” in the sense of lacking any ornamental detailing. The significant changes reflected a philosophy that went a step further than did the schools of the 1920s in designing for function and integrating school buildings with exterior spaces. During the postwar construction boom, many of the same ideas that characterized these experimental schools became the norm throughout Los Angeles and the United States.

The notable differences between the two themes (or periods) relate to scale, site plan, and functional, child-centered design. The proto-modernist school has an explicitly domestic scale, with low ceilings and a lack of monumental design or massing. These schools generally exhibit a decentralized, nonhierarchical campus, with a strong geometric patterning applied to the site plan. Classroom wings generally consist of one-room-deep rectilinear buildings, lined with adjacent patios and landscaping. Building plans clearly express their function, with (usually) one-story massing, generous expanses of glazing, window sizes and configurations tailored to sun patterns and doors opening directly onto patio areas and courtyards. The preferred typology was the early version of the “finger-plan” school, with rectilinear classroom wings extending from a central axis.

### ***Educating the Baby Boom: The Postwar modern Functionalist School Plant, 1945–1969***

By the 1950s, many of the design ideas considered experimental in the 1930s had matured and become the national standard for schools. Stylistically, schools might include some historicist detailing reflecting popular styles (such as Colonial Revival). But, overall, a unified campus design, building types and plans that accommodated a high degree of indoor-outdoor integration, ample outdoor spaces, and sheltered corridors marked the typology as the mature version of the functionalist school plant. The priority remained the creation of a domestic scale for schools. Campuses displayed a one-story massing for elementary schools, and up to two stories for middle and high schools. Site plans, which often featured a decentralized, pavilion-like layout, lacked the formality and monumentality that characterized earlier eras of school design.

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School types expressive of these ideals include the finger-plan (1940s–1950s) and cluster-plan (1950s), and variations on their basic themes. Combinations of these basic forms, which flexed according to available lot size and school enrollment, are also evident.

For LAUSD, the postwar years brought another round of reform as well as unprecedented expansion. Given the postwar classroom shortage, many campuses were constructed quickly, from standardized plans used district-wide, in designs that convey some of these ideas. The most intact and well-designed campuses among these, though, uniquely represent this era of reform and the midcentury modern school.

### ***LAUSD and the Civil Rights Movement, 1954–1980***

This theme of significance begins with the filing of the landmark U.S. Supreme Court case *Brown v. The Board of Education, Topeka, Kansas*. Although *Brown v. Board of Education* addressed state laws that did not exist in California—namely, laws allowing for racially segregated public schools—this case and the Civil Rights Movement helped generate and focus attention on related issues in Los Angeles. Issues touched on racial division and cultural identity, equal access, and how to create more balance and diversity in public schools. Signaling the end of this period of significance is the U.S. Supreme Court decision effectively ending mandatory school busing as a solution to racial imbalance in California’s public schools. Although this issue continued to form part of the social context for LAUSD, this period captures an era of intense debate and activism on the part of community members, parents, politicians, and jurists, as well as teachers and administrators.

A school eligible under this theme might be the site of significant integration initiatives, challenges, or community activities related to the Civil Rights Movement and school integration. This might include initiatives for equal access to schools and/or to employment opportunities in LAUSD schools.

In addition, a school might qualify under this theme for a long-term association with a figure who was significant in the Civil Rights Movement and school integration.

### ***Architectural Styles, late 1960s–1980***

New Formalism and Brutalism were the most important architectural styles of the 1960s and 1970s for Los Angeles schools. New Formalism developed in the mid-1950s as a reaction against the rigid austerity of earlier forms of Modernism, embracing ornament with stylized and simplified classical orders. Brutalism emerged at the same time, taking its name from its use of rough surfaces like raw concrete. Brutalism emphasized bold massing and expressed structure. Both styles were characterized by monumentalism, making them appropriate for institutional buildings like schools. For LAUSD projects during this era, the two styles could be combined.

### ***School Desegregation/Busing 1964–1989***

Unequal access to education for Black children in the United States was a legacy of slavery which persisted despite emancipation and subsequent passage of the 14th Amendment to the U.S. Constitution (guaranteeing equal protection under the law) in 1868. The Supreme Court decision in *Plessy v. Ferguson* (1896) protected legal segregation and inequality of schools and other public facilities by ruling in favor of “separate but equal” institutions. Educational facilities and opportunities were far from equal, however, and the struggle for equitable educational opportunities was an essential element of the decades-long struggle for Black civil rights. A major

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victory was achieved in 1954, when the U.S. Supreme Court ruled in *Brown v. The Board of Education* that racial segregation in education was unconstitutional. Southern states, where state law upheld school segregation, were ordered to integrate public schools. Change was gradual, and ongoing activism led to the Civil Rights Act (1964) and Voting Rights Act (1965).

Schools outside the South typically did not have legally enforced segregation, although segregated neighborhoods, school board policies, and discrimination led to a similar result. During the early twentieth century, minority populations in Los Angeles were low, and many schools were multiracial. As the diversity of the Los Angeles population increased after World War II, however, LAUSD became heavily segregated; the official race-blind policy was that all students were to attend their closest neighborhood school. In practice, however, white students who lived in diverse neighborhoods were able to attend more distant white-majority schools by obtaining waivers.<sup>213</sup> By the early 1960s, the civil rights movement, including activists in Los Angeles, was focused on ending the de facto educational segregation that prevailed throughout the North and West. In Los Angeles, this effort was intimately bound up with the push to end racial deed covenants that forced minorities to live in neighborhoods with overcrowded and/or substandard schools.<sup>214</sup> In 1963, the American Civil Liberties Union (ACLU) filed a school desegregation lawsuit against the Los Angeles City Board of Education on behalf of a Black student who was not allowed to enroll at the predominantly white high school nearest her home.

In 1964, LAUSD instituted a pilot program that appropriated \$17,000 to transport Black students from the 66th Street and Manchester elementary schools in South LA to the majority white Loyola and White Osage elementary schools in Westchester. The program was dismantled after a single semester in response to Black families leaving the program and vociferous opposition from white parents.<sup>215</sup> That same year, the District instituted its “open schools” policy, which allowed students to apply for transfers to any low-enrollment school, which included many schools in wealthy neighborhoods. Transportation was provided by individual families, and the number of participants was relatively low. In some cases, the open schools program backfired when white students used it to transfer out of majority minority schools.<sup>216</sup> White families were not universally opposed to public school integration, and in fact some enthusiastically supported it. Norma Lancaster (wife of movie star Burt Lancaster and an avid political activist) spearheaded a parent-funded effort called ‘Transport a Child’ beginning in 1963 to bring Black children to under enrolled schools in and around Westwood. In concert with a Black community organization called Parents for Better Educational Exchange, Transport a Child funded buses that integrated three formerly white schools.<sup>217</sup>

The modest scale of integration achieved by these programs was considered insufficient by civil rights advocates, and after years of unsuccessful negotiations with the school district, the ACLU partnered with the NAACP to demand desegregation for all LAUSD schools. A court ruling in 1970 found the district had engaged

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<sup>213</sup> Teresa Grimes, *Historic Resources Associated with African-Americans in Los Angeles*, 2008, 31.

<sup>214</sup> City of Los Angeles, *SurveyLA Citywide Historic Context Statement Context: African American History of Los Angeles*, February 2018, 85 – 86.

<sup>215</sup> Long Beach Independent, “LA Drops School Bus Program,” August 7, 1964, 25.

<sup>216</sup> Long Beach Independent, “Integration by Transfer Backfires,” February 5, 1964, 2.

<sup>217</sup> Art Seidenbaum, “‘Transport a Child’ Plan Proves Success,” *Los Angeles Times*, May 31, 1965, part II, 1, 3.

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in legally enforced racial segregation and ordered it to implement a desegregation plan.<sup>218</sup> LAUSD created the Permits With Transportation program in 1972 in response to the court order. Students from Central Los Angeles neighborhood traveled via bus to the San Fernando Valley to attend its schools, most of which were over 80% white in the early 1970s.<sup>219</sup> Magnet schools were also created to attract students to diverse campuses, as well as a system of clustering schools into “educational planning units” in which the member schools came up with their own desegregation plans.<sup>220</sup> By 1977, over 6,000 minority students were being bused to the Valley, and a new “reverse busing” program was proposed to bring white students to Central LA.<sup>221</sup> A court found the LAUSD efforts lacking in 1978 because the vast majority of the over 100,000 minority students in the public school system were not affected by these programs, and ordered a revised plan be developed that included mandatory student reassignment.

The first day of school in September 1978 was considered a success because although there were scattered protests and substantial white absenteeism, transportation proceeded smoothly and there was no violence.<sup>222</sup> The UCLA professor appointed by the court to regulate the desegregation process warned in October, however, that implementation had fallen far short of requirements.<sup>223</sup> The plan was challenged in court by a grassroots group opposing school desegregation named Bustop, Inc., and the California legislature passed an amendment in 1981 ending mandatory student reassignment.<sup>224</sup> The grassroots Los Angeles group was part of a nationwide effort to reframe school desegregation outside the South as “forced busing,” which academics and journalists have described as a successful effort to develop race-neutral terms to oppose school desegregation. As Matthew F. Delmont has argued in his work on the history of school desegregation, “This rhetorical shift allowed them to support white schools and neighborhoods without using explicitly racist language” and also allowed de facto segregation to be framed as innocent and accidental.<sup>225</sup>

The 1981 action of the California legislature effectively put an end to the use of busing as a tool for desegregation but did not end activists’ struggle for educational equity and diversity. LAUSD in the early 1980s spent roughly \$260 million a year on voluntary busing, magnet schools, and other integration programs. In 1981, the NAACP refiled its 1963 suit alleging unlawful discrimination against Black students. LAUSD continued efforts to integrate schools, but after years of white flight from urban neighborhoods and public schools, less than 20% of students in the district were white by the mid-1980s. In 1989, a federal judge dismissed LAUSD from the case, ending 26 years of desegregation litigation against the District.<sup>226</sup>

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<sup>218</sup> CSU Northridge University Library, A Look Back at School Desegregation and Busing in Los Angeles, February 27, 2018, accessed April 24, 2023, <https://library.csun.edu/SCA/Peek-in-the-Stacks/busing-desegregation-2>.

<sup>219</sup> Pamela Moreland, “Questions Still Ride With Buses After Years of PWT,” *Los Angeles Times*, January 6, 1985, accessed April 24, 2023, <https://www.latimes.com/archives/la-xpm-1985-01-06-me-7007-story.html>.

<sup>220</sup> William Trombley, “Voluntary Integration Unit Finds Friends,” *Los Angeles Times*, May 1, 1978, D1.

<sup>221</sup> Kevin Roderick, “Reverse Bus Plan Mulled by Schools,” *Los Angeles Times*, April 7, 1977 1, 6.

<sup>222</sup> William Trombley and Don Speich, “LA Calmly Begins School Busing,” *Los Angeles Times*, September 13, 1978, B1.

<sup>223</sup> Doyle McManus, Desegregation Plan Called Far Short of Goals, *Los Angeles Times*, October 11, 1978, D1.

<sup>224</sup> CSU Northridge University Library, A Look Back at School Desegregation and Busing in Los Angeles, February 27, 2018, accessed April 24, 2023, <https://library.csun.edu/SCA/Peek-in-the-Stacks/busing-desegregation-2>.

<sup>225</sup> Matthew F. Delmont, *Why Busing Failed: Race, Media, and the National Resistance to School Desegregation*, University Of California Press, Oakland: 2016, 3.

<sup>226</sup> Elaine Woo, “Court Action Ends 26-Year LA School Desegregation Case,” *Los Angeles Times*, March 28, 1989, Part II, 8.

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A school eligible under this theme might be the site of significant integration initiatives, challenges, protests, or community activities related to the Civil Rights Movement, busing, and school integration. This might include initiatives for equal access to schools and/or to employment opportunities in LAUSD schools. The specific schools associated with the Permits with Transportation program as well as the schools associated with the parent-led voluntary integration program in Westwood and Bel Air may be eligible.

In addition, a school might qualify under this theme for a long-term association with a figure who was significant in the Civil Rights Movement and school integration.

### *Advances in Building Technology*

Willis Carrier invented a primitive air conditioning system in 1902 in an attempt to improve the function of printing presses during hot, humid weather. In 1923, air conditioning came to Los Angeles with the opening of Grauman's Metropolitan theater. For decades, though, its use was limited to commercial buildings such as department stores and theaters. By the late 1930s, residential air conditioning was still so rare that newspapers reported on it when movie stars installed it in their houses.<sup>227</sup> It was not until after World War II that air conditioning became more widespread, but it was not used in LAUSD schools until the early 1960s, even in the San Fernando Valley and other areas where temperatures could be high during the school year.

Nobel Junior High in Chatsworth, which opened in 1962, was the first school plant to be developed with air-conditioned classrooms, which were cooled by a \$150,000 system.<sup>228</sup> The Germain Street elementary school (also in Chatsworth) which opened in 1963, was the second to include air conditioning in its original construction. All indoor spaces in both schools were air-conditioned, and administrators and teachers touted their benefits in terms of student learning. These two schools were experimental pilots, however, and did not signal a wholesale shift to mechanically cooled classrooms; Platt Ranch School in Woodland Hills, completed the same time as Germain Street, lacked air conditioning.<sup>229</sup> Nor were existing schools being retrofitted with cooling systems in the early 1960s. The issue was exacerbated by the fact that a 1962 bond campaign had been defeated and LAUSD student numbers were setting records in the mid-1960s, with 745,000 students at the start of the 1963-1964 academic year.<sup>230</sup> This meant that many schools were expanded with "bungalows," which were freestanding portable classrooms that typically were inexpensively constructed and lacked insulation.

By the early 1960s, education experts were promoting the benefits of air-conditioned classrooms, asserting that comfort allows students to learn better.<sup>231</sup> Although some additional new schools were constructed with air conditioning over the next few years, by 1967 the issue had become a major point of contention between teachers and LAUSD. Teachers' union representatives asserted that little learning took place in the Valley during the early fall and late spring, when classroom temperatures often exceeded 100 °F. LAUSD agreed that the

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<sup>227</sup> Patt Morrison, "Cold enough for you? Why air conditioning reigns supreme in Southern California," *Los Angeles Times*, August 10, 2021. <https://www.latimes.com/california/story/2021-08-10/why-air-conditioning-reigns-in-southern-california>. Accessed April 26, 2023.

<sup>228</sup> *Los Angeles Times*, "First Air-Conditioned School Will Be Opened," August 22, 1962, B9.

<sup>229</sup> *Los Angeles Times*, "Two New Elementary Schools to Be Ready for Use This September," *Los Angeles Times*, July 14, 1963, SF1.

<sup>230</sup> Dick Turpin, "745,000 Going Back to School," *Los Angeles Times*, September 15, 1963, G1.

<sup>231</sup> *Valley Times Today*, "Dry Study," January 19, 1963, 8.

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problem was serious, noting that there were 6,700 uninsulated portable classrooms in use, and estimating that air conditioning the 3,000 portable bungalows in the Valley would cost \$6 million.<sup>232</sup> Teachers in Van Nuys threatens to picket, calling for shortened school days and maximum allowable temperatures in the short term while air conditioning was being installed. The group suggested dramatizing the situation by inviting parents and media to classrooms on hot afternoons and encouraging casual dress including shorts and miniskirts for staff as well as students.<sup>233</sup>

The District eventually adopted a policy of installing air conditioning in all schools, but research has not revealed when this goal was set, and available historical information suggests it was never fully achieved. Over the years, air conditioning in LAUSD schools was an ongoing issue. A proposal to relieve facility overcrowding with year-round school in 1981, for example, met with stiff opposition because of inadequate cooling during the hottest part of the year. At that time, the District estimated installing air conditioning in all schools would cost \$100 million, and floated proposals such as a \$785,000 experiment with cheaper swamp coolers and a program to teach children to wear cooler clothes.<sup>234</sup>

The first examples of air conditioned schools are likely to be eligible under this theme. Schools that feature early examples of design elements intended to facilitate or improve air conditioning are also likely to be eligible in association with this theme.

### ***LAUSD Historic Resources Inventory, Updated 2023.***

LAUSD maintains a Historical Resources Inventory that is continually updated; the most recent update is April 2023. Appendix B-5 contains the Historic Resources Inventory which includes the most recent list of campuses that were evaluated for their historic significance and eligibility determinations as eligible, ineligible or that require evaluation for listing in the NRHP, CRHR, or LAHCM. Additional schools may be added to this list as more research is performed and as additional schools meet the criteria, therefore this list should not be considered exhaustive.

The April 2023 Historical Resources Inventory indicates that 207 LAUSD campuses as eligible for either the NRHP, CRHR, or LAHCM, 311 campuses are listed as ineligible for listing, 34 need evaluation, and 55 require re-evaluation. The table in Appendix B-4 provides information on these campuses.

### **5.5.2 Thresholds of Significance**

CEQA Guidelines Section 15064.5 provides direction on determining significance of impacts to archaeological and historical resources. Generally, a resource shall be considered “historically significant” if the resource meets the criteria for listing on the CRHR, including the following:

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<sup>232</sup> *Los Angeles Times*, “Union Demands Valley School Air Conditioning,” June 1, 1967, SF1.

<sup>233</sup> Gordon Grant, “Teachers in Valley May Picket for Air Conditioning,” *Los Angeles Times*, June 2, 1967, SF7.

<sup>234</sup> Patt Morrison and Gerald Faris, “Year Round School Sessions - A Crisis for the LA Board,” *Los Angeles Times*, Part II, 4.



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- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- Is associated the with lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Has yielded, or may be likely to yield, information important in prehistory or history.

The fact that a resource is not listed in, or determined to be eligible for, listing in the CRHR, or is not included in a local register of historical resources, does not preclude a lead agency from determining that the resource may be a historical resource.<sup>235</sup>

According to CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project would:

CUL-1 Cause a substantial adverse change in the significance of an historical resource pursuant to Section 15064.5.

CUL-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

CUL-3 Disturb any human remains, including those interred outside of formal cemeteries.

### 5.5.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.5-1: SUP-related projects may cause a substantial adverse change in the significance of historical resources. [Threshold CUL-1]**

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#### All Projects Involving Historic Resources

The SUP may result in demolition or destruction of historical resources; relocation, conversion, rehabilitation, or alteration of historical resources that substantially impairs the significance of the resources; and/or changes to the immediate surroundings of a historical resource that materially impairs the significance of the resource.

Potential new school sites, sites for expansions of existing schools, and existing schools throughout the District contain historical resources. The degree and kind of any impacts to historical resources under the SUP depends on the specific sites selected and the nature of the historical resources, if any, in or next to those sites.

LAUSD has not yet identified many of the site-specific projects to be constructed under the SUP; therefore, the nature and magnitude of any historical resource impacts, if any, cannot be determined. However, the

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<sup>235</sup> Public Resource Code, Section 5024.1; 14 CCR Section 4852.

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potential for significant impacts does exist. Based on this potential this analysis describes: (1) the methodology for site-specific determinations for presence or absence of historical resources; (2) project design features or other LAUSD procedures that apply performance standards to reduce impacts during site selection and design phase when a site is identified as containing historical resources.

As required by CEQA Guidelines Section 15168 I, once a new school site is identified for acquisition or an existing school campus is identified for modification, the LAUSD conducts a historic resource review pursuant to the LAUSD Cultural Resource Assessment Procedures.<sup>236</sup> These procedures ensure that any potential historical resources will be identified using qualified professionals and a consistent methodology. The method for identifying cultural resources includes site reconnaissance, an evaluation of CRHR eligibility, and, where required, an intensive survey.

When a historical resource is identified, LAUSD must consider: (1) whether the proposed project would result in potentially significant impacts on the historical resources, and (2) if so, whether project design alternations or other feasible measures or alternatives would avoid or substantially reduce the impacts. Each project that may impact an historic resource will include implementation of LAUSD SC-CUL-1 through SC-CUL-5 for measures that reduce impacts caused by relocation, conversion, rehabilitation, alteration, damage or demolition of an historical resource.

If, after consideration of all feasible measures and alternatives, that adverse historic resource impacts are unavoidable, then prior to project approval a CEQA Statement of Overriding Consideration (SOC) must be adopted by the Board of Education. The SOC must outline the benefits of the project and why they outweigh the significant historic resource impact. Because there are no measures available that would avoid, reduce, rectify, or minimize the possible demolition or permanent damage to an historic building or structure or the cumulative loss of historic resources in the District, this impact is considered potentially significant and may not be feasibly mitigated to a level of insignificance.

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**Impact 5.5-2: SUP implementation would not cause a substantial adverse change in the significance of archaeological resources. [Threshold CUL-2]**

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### All Projects Involving Grading, Excavation, or Other Ground-Disturbing Activities

Grading, excavation, or other ground-disturbing activities during construction could damage previously undiscovered archaeological resources. Site-specific impacts cannot be determined until a location is identified for a project. However, the potential for significant impacts does exist. Based on this potential this analysis describes: (1) the methodology for site-specific determinations for presence or absence of archeological resources; (2) project design features or other LAUSD procedures that apply performance standards to reduce impacts when a site is identified as having the potential to affect archeological resources.

Once a new school site is identified for acquisition or an existing school site is identified for modification, the LAUSD conducts an archeological resource review pursuant to the LAUSD Cultural Resource Assessment

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<sup>236</sup> LAUSD OEHS CEQA Specification Manual, Appendix H-Historical Resources Policy, (Appendix E.2) LAUSD *Cultural Resource Assessment Procedures*. December 2005, Revised June 2007.

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Procedures. The procedures ensure that unique archaeological resources would be identified through a phased investigation using qualified professional consultants and a consistent methodology. The Cultural Resource Assessment Procedures identify and define certain archaeological resource experts that will play key roles in identifying archaeological resources.

When a Phase I investigation (records check, background research, consultation, a field survey) identifies possible archaeological resources on a project site, the project site will be abandoned, or a Phase II investigation will proceed. When a Phase II evaluation (limited subsurface testing, inventorying and evaluation) identifies unique archaeological resources a Phase III Data Recovery/Mitigation Program is conducted if the site is still being considered. Once the site's archaeological resources are characterized through the assessment process, LAUSD considers (1) whether the proposed project with implementation of standard conditions would result in potentially significant impacts to unique archaeological resources, and (2) if so, whether feasible measures or alternatives would avoid or substantially reduce the impacts. Each project that may impact an archeological resource will include implementation of LAUSD SC-CUL-6 through SC-CUL-10 for assessment, monitoring, protection, and salvage of resources. Impacts would be less than significant.

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**Impact 5.5-3: Grading activities are not anticipated to disturb human remains. [Threshold CUL-3]**

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### All Projects Involving Grading, Excavation, or Other Ground-Disturbing Activities

The Los Angeles Basin has been inhabited by the Gabrielino-Tongva Tribe and their ancestors for over 5,000 years. Thus, human remains could be found in grading and/or excavation for construction projects.<sup>237</sup> Specific sites for many SUP projects have not been identified thus far, and therefore site-specific impacts will be evaluated at the project-level tiering off of this PEIR.

CEQA Guidelines Section 15064.5(d) outlines the required process for evaluating, treating, and mitigating impacts based on discovery of human remains. LAUSD would follow the measures specified in the CEQA Guidelines to determine early in the process of project review whether or not there is the potential for human remains.

In the event of accidental discovery of human remains the District and its construction contractors would comply with California Health and Safety Code Section 7050.5 and California Public Resources Code Sections 5097.9 et seq. California Health and Safety Code Section 7050.5 requires that construction activity stop until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommends treatment and disposition of the human remains. If the coroner determines that the remains are not subject to their authority and if the human remains are Native American, within 24 hours they will contact the Native American Heritage Commission. This process is discussed further in the TCR section.

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<sup>237</sup> "Construction projects" here means any project involving construction, including new construction, modernization, replacement, upgrade, remodel, renovation, and installation projects that would involve grading, excavation, or other ground-disturbing activities

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### 5.5.4 Applicable Regulations and Standard Conditions

#### Federal

- National Historic Preservation Act
- Archaeological Resources Protection Act
- National Register Federal Program Regulations: Qualifications for and nomination of properties to the NRHP

#### State

- California Public Resources Code Sections 5079–5079.65: Qualifications for and nomination of properties to the CRHR.
- California Health and Safety Code Section 7050.5: Procedures in the event of accidental discovery of human remains.

#### LAUSD Standard Conditions of Approval

- SC-CUL-1 through SC-CUL-11.

### 5.5.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standard Conditions listed above, the following impacts would be less than significant: 5.5-2, 5.5-3, and 5.5-4.

Even with implementation of regulatory requirements and LAUSD Standard Conditions the following impacts would be **potentially significant**:

- Impact 5.5 1: SUP-related project implementation may substantially degrade the significance of historical resources.

### 5.5.6 Mitigation Measures

#### Impact 5.5-1

There are no additional measures that would further reduce significant impacts to historic resources.

#### Impact 5.5-2, 5.5-3, and 5.5-4

No mitigation measures are required.

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### 5.5.7 Level of Significance After Mitigation

#### Impact 5.5-1

Each project that may impact an historic resource will include implementation of SC-CUL-1 through SC-CUL-11 to reduce impacts from relocation, conversion, rehabilitation, alteration, damage, or demolition of an historical resource. LAUSD Standard Conditions would reduce historic resource impacts to the extent feasible; however, no mechanism for the full mitigation has been established. Therefore, even with the federal, state regulatory compliance, and implementation of LAUSD Standard Conditions, impacts associated with the demolition or damage to a historic resource would remain **significant and unavoidable**.

#### Impact 5.5-2, 5.5-3, and 5.5-4

Impacts would be less than significant.

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### 5.6 ENERGY

Sustainment of day-to-day operations within communities relies significantly on the availability and use of energy which comes in many renewable and nonrenewable forms including electricity, natural gas, gasoline, diesel, jet fuel, solar, and wind. The efficient use and reduction of energy is closely related to air and greenhouse gas reductions. Thus, efforts to curtail air emissions and GHG contribute to the efficient use and reduction of energy consumption.

This section assesses the potential environmental impacts related to energy use from future development allowed under the LAUSD SUP Program Update and Measure RR Implementation Plan. This section describes the existing energy usage in the Planning Area as well as the relevant federal, state, and local regulations and programs. Greenhouse gas emissions are evaluated in Section 4.8, *Greenhouse Gas Emissions*.

#### 5.6.1 Environmental Setting

This section discusses the existing environmental setting relative to energy resources. As described in Chapter 4, *Program Description*, the Project is evaluated at a programmatic level and the analysis is based on information available to the District where reasonably foreseeable, direct, and indirect physical changes in the environment could be considered. Many site-specific projects have not been identified, therefore, this section describes a general discussion of the LAUSD area and, where applicable, the general areas of future potential land use changes as part of implementing the SUP Update and Measure RR Implementation Plan, as those are the areas that may result in changes to the environment that were not already considered in the previous environmental analyses or studies.

##### 5.6.1.1 REGULATORY FRAMEWORK

Energy used in the United States comes primarily from fossil fuels (i.e., petroleum, coal, and natural gas) and is primarily consumed in five sectors: electric power, transportation, industrial, residential, and commercial.

##### Federal Laws, Regulations, and Policies

The U.S. EPA plays a key role in the conservation and efficient use of energy in the United States. In this regard, the U.S. EPA has established renewable energy and energy efficiency programs aimed at reducing energy use in all sectors and providing technical information for state policy makers and energy providers. U.S. EPA renewable energy programs include AgStar (promotes the use of biogas recovery systems to reduce methane emissions from livestock waste), Combined Heat and Power Partnership (a voluntary program aimed at reducing environmental impact of power generation), and Green Power Partnership (a voluntary program that encourages organizations to use green power). Energy efficiency programs include ENERGY STAR, a joint program of the U.S. EPA and the Department of Energy. ENERGY STAR certifies energy efficient products (e.g., detergents and appliances), techniques for energy savings at home, certifies energy efficient new homes, and provides energy strategies for buildings and plants.

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### 5.6.1.1.1.1 *Energy Policy Act of 1992*

The Energy Policy Act of 1992 (1992 Act) was passed to reduce US dependence on foreign petroleum and improve air quality. The 1992 Act includes several provisions intended to build inventory of alternative fuel vehicles (AFVs) in large, centrally fueled fleets in metropolitan areas. The 1992 Act defines “alternative fuels” as methanol, ethanol, and other alcohols; blends of 85% or more of alcohol with gasoline (E85); natural gas and liquid fuels domestically produced from natural gas; propane; hydrogen; electricity; biodiesel (B100); coal-derived liquid fuels; fuels, other than alcohol, derived from biological materials; and P-Series fuels, which were added to the definition in 1999.<sup>238</sup>

The 1992 Act requires certain federal, state, and local governments and private fleets to purchase a percentage of light-duty AFVs capable of running on alternative fuels each year. Financial incentives are also included in the 1992 Act. Federal tax deductions will be allowed for businesses and individuals to cover the incremental cost of AFVs. States are also required by the Energy Policy Act to consider a variety of incentive programs to help promote AFVs.

### 5.6.1.1.1.2 *Energy Policy Act of 2005*

The Energy Policy Act of 2005 includes provisions for renewed and expanded tax credits for electricity generated by qualified energy sources, such as landfill gas; provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification; and establishes a federal purchase requirement for renewable energy.

### 5.6.1.1.1.3 *U.S. Department of Transportation, U.S. Department of Energy, and U.S. Environmental Protection Agency*

The U.S. Department of Transportation, U.S. Department of Energy, and U.S. EPA are three agencies with substantial influence over energy policies related to transportation fuels consumption. Generally, federal agencies influence transportation energy consumption through establishment and enforcement of fuel economy standards for automobiles and light trucks through funding energy-related research and development projects, and through funding for transportation infrastructure projects.

Established by U.S. Congress in 1975, the Corporate Average Fuel Economy (CAFE) standards reduced energy consumption by increasing the fuel economy of cars and light trucks. The National Highway Traffic Safety Administration (NHTSA), an agency within the U.S. Department of Transportation, and the U.S. EPA jointly administer the CAFE standards. The US Congress has stated that CAFE standards must be set at the “maximum feasible level” with consideration given to (1) technological feasibility; (2) economic practicality; (3) effects of other standards on fuel economy; and (4) need for the nation to conserve energy.

In 2018, the U.S. EPA published the final rule for the One National Program on Federal Preemption of State Fuel Economy Standards that finalizes the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule. The SAFE

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<sup>238</sup> U.S. Department of Energy, Energy Efficiency and Renewable Energy, Alternative Fuels Data Center. 2023, May. [https://afdc.energy.gov/laws/key\\_legislation#:~:text=Energy%20Policy%20Act%20of%201992,-Back%20to%20Top&text=The%20Energy%20Policy%20Act%20\(EPA\)%20of%201992%20\(Public%20Law,renewable%20energy%2C%20and%20energy%20efficiency](https://afdc.energy.gov/laws/key_legislation#:~:text=Energy%20Policy%20Act%20of%201992,-Back%20to%20Top&text=The%20Energy%20Policy%20Act%20(EPA)%20of%201992%20(Public%20Law,renewable%20energy%2C%20and%20energy%20efficiency). Accessed May 2023.



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Vehicles Rule maintains the 2020 CAFE and CO<sub>2</sub> standards for model years 2021 through 2026 (Federal Register 2018). On January 20, 2021, President Biden issued Executive Order 13990 “Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis” which directed the U.S. EPA to consider whether to propose suspending, revising, or rescinding the standards previously revised under the SAFE Vehicles Rule. On March 31, 2022, the NHTSA revoked the SAFE Vehicles Rule and initiated new CAFE standards which require an industry-wide fleet average of approximately 49 mpg for passenger cars and light trucks in model year.<sup>239</sup> The new standards will increase fuel efficiency 8% annually for model years 2024–2025 and 10% annually for model year 2026 and will also increase the estimated fleetwide average by nearly 10 mpg for model year 2026, relative to model year 2021 (NHTSA 2022). The new CAFE standards will reduce fuel use by more than 200 billion gallons through 2050 as compared to continuing under the old standards for model year 2024–2026 (NHTSA 2022). Refer to Section 5.8 *Greenhouse Gas Emissions*, of this Draft PEIR, for additional information.

Fuel efficiency standards for medium- and heavy-duty trucks have been jointly developed by U.S. EPA and NHTSA. In August 2016, the U.S. EPA and NHTSA finalized Phase 2 standards for medium and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution. The Phase 2 heavy-duty truck standards require the phase-in of a 5 to 25% reduction in fuel consumptions over the 2017 baseline, depending on the compliance year and vehicle type.

### 5.6.1.1.2 State Laws, Regulations and Policies

The California Energy Commission (CEC) is the state’s regulatory agency responsible for creating energy policy and planning for the state’s energy system as a whole. Core responsibilities of the CEC consists of achieving energy efficiency, advancing state energy policy, developing renewable energy, investing in energy innovation, overseeing energy infrastructure, preparing for energy emergencies, and transforming transportation.

The CEC is also working with other agencies to implement the Clean Energy and Pollution Reduction Act, Senate Bill 350, which establishes clean energy, clean air, and GHG reduction goals. SB 350 establishes a goal to increase California’s renewable energy procurement from 33% by 2020 to 50% by 2030 and requires all the state’s electricity to come from carbon-free resources by 2045.

#### 5.6.1.1.2.1 California Building Standards Code (Title 24, Parts 6 and 11)

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR, Title 24, Part 6) were adopted to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2022 Title 24 standards, which became effective January 2023. The 2022 Title 24 standards encourages efficient electric heat pumps, establishes electric-ready requirements

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<sup>239</sup> U.S. DOT National Highway Traffic Safety Administration. Safer Affordable Fuel-Efficient ‘SAFE’ Rule. <https://www.nhtsa.gov/corporate-average-fuel-economy/safe>. Accessed May 5, 2023.

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for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more<sup>240</sup>.

The California Green Building Standards Code (CCR, Title 24, Part 11), commonly referred to as the CALGreen Code, became effective in 2023. The purpose of CALGreen is to improve public health, safety, and general welfare through enhanced design and construction of buildings using concepts which reduce negative impacts and promote those principles which have a positive environmental impact and encourage sustainable construction practices. CALGreen was adopted to address the five divisions of building construction; planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The 2022 CALGreen Code includes mandatory measures for non-residential development related to site development, energy efficiency, water efficiency and conservation; material conservation and resource efficiency; and environmental quality. For example, several definitions related to energy that were added or revised affect electric vehicle (EV) chargers and charging, and hot water recirculation systems. For new multi-family dwelling units, the residential mandatory measures were revised to provide additional EV charging requirements, including quantity, location, size, single EV space, multiple EV spaces, and identification.<sup>241</sup>

### 5.6.1.1.2.2 *California Appliance Efficiency Regulations*

Appliance efficiency regulations are codified in Title 20 of the CCR. California's Appliance efficiency regulations set minimum efficiency levels for consumer electronics, household appliances and plumbing equipment. Manufacturers of regulated appliances are required to energy and water efficiency state or federal standards and certify appliance performance. This information is available to the public through the Modernized Appliance Efficiency Database.

On December 9, 2020, the CEC adopted amendments to the appliance efficiency regulations to incorporate several new technologies pertaining to computers and computer monitors. The regulations include standards for both federally regulated appliances and non-federally regulated appliances.<sup>242</sup> In conformance with Public Resources Code section 25402(c)(1)(A), compliance with these regulations becomes effective on December 9, 2021.

### 5.6.1.1.2.3 *Renewables Portfolio Standard*

The CEC has deployed its renewable portfolio standard (RPS) for the advancement of renewable energy. The RPS requires all load-servicing entities in California to produce a portion of their electricity sales from eligible renewable resources certified by the CEC. SB 350 also requires the state to double energy statewide energy savings in electricity and natural gas by 2030. SB 350 also requires state agencies to conduct studies to identify

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<sup>240</sup> CEC. 2022 Building Energy Efficiency Standards. <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency>. Accessed April 13, 2023.

<sup>241</sup> California Building Standards Commission. 2023. <https://www.dgs.ca.gov/BSC/Codes>. Accessed April 16, 2023.

<sup>242</sup> CEC. 2021. Compliance Advisory. <https://www.energy.ca.gov/rules-and-regulations/appliance-efficiency-regulations-title-20>. Accessed April 16, 2023.

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and assess barriers to, and opportunities for various areas including, solar photovoltaic energy generation, access to other renewable energy by low-income customers, etc.

The California RPS implements Senate Bill 350, Clean Energy and Pollution Reduction Act, (Chapter 547, Statutes of 2015), which amends existing law to increase RPS procurement requirements for retail sellers and local publicly owned electric utilities (POUs) to 50% by 2030. This RPS applies to all electricity retailers in the state, including POUs, investor-owned utilities, electricity service providers, and community choice aggregators. SB 350 (Chapter 547, Statutes of 2015) includes interim targets of 40% by 2024 and 45% by 2027. In 2018, SB 100 further increased California's RPS and requires retail sellers and local publicly-owned electric utilities to procure eligible renewable electricity for 44% of retail sales by the end of 2024, 52% by the end of 2027, and 60% by the end of 2030; and requires that CARB should plan for 100% eligible renewable energy resources and zero-carbon resources by the end of 2045. The California Public Utilities Commission (CPUC) and the CEC jointly implement the RPS program. The CPUC's responsibilities include: (1) determining annual procurement targets and enforcing compliance; (2) reviewing and approving each investor-owned utility's renewable energy procurement plan; (3) reviewing contracts for RPS eligible energy; and (4) establishing the standard terms and conditions used in contracts for eligible renewable energy.

### 5.6.1.1.2.4 *California Senate Bill 1389*

Senate Bill (SB) 1389 (Public Resources Code Sections 25300–25323; SB 1389) requires the CEC to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety (Public Resources Code Section 25301[a]). The Integrated Energy Policy Report provides the results of the CEC's assessments related to energy sector trends, building decarbonization and energy efficiency, zero-emissions vehicles, energy equity, climate change adaptation, electricity reliability in the Southern California region, natural gas assessment, and electricity, natural gas, and transportation energy demand forecasts.

### 5.6.1.1.2.5 *California Assembly Bill 1493 (AB 1493, Pavley)*

In response to the transportation sector's large share of California's carbon dioxide (CO<sub>2</sub>) emissions, AB 1493 (commonly referred to as the Pavley regulations), enacted on July 22, 2002, requires CARB to set greenhouse gas (GHG) emission standards for new passenger vehicles, light-duty trucks, and other vehicles manufactured in and after 2009 whose primary use is non-commercial personal transportation. Phase I of the legislation established standards for model years 2009–2016 and Phase II established standards for model years 2017–2025. As discussed above, in September 2019, U.S. EPA published the SAFE Vehicles Rule in the federal register (Federal Register, Vol. 84, No. 188, Friday, September 27, 2019, Rules and Regulations, Sections 51310–51363) that maintains the vehicle miles per gallon standards applicable in model year 2020 for model years 2021 through 2026. California and 23 other states and environmental groups in November 2019 in U.S. District Court in Washington, filed a petition for the U.S. EPA to reconsider the published rule. The Court has not yet ruled on these lawsuits.

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### 5.6.1.1.2.6 *California Air Resources Board*

CARB's Advanced Clean Car Program was adopted in 2012. The Advanced Clean Cars II regulations will rapidly scale down emissions of light-duty passenger cars, pickup trucks and SUVs starting with the 2026 model year through 2035. The regulations are two-pronged. First, it amends the Zero-emission Vehicle Regulation to require an increasing number of zero-emission vehicles, and relies on currently available advanced vehicle technologies, including battery-electric, hydrogen fuel cell electric and plug-in hybrid electric-vehicles, to meet air quality and climate change emissions standards. Second, the Low-emission Vehicle Regulations were amended to include increasingly stringent standards for gasoline cars and heavier passenger trucks to continue to reduce smog-forming emissions.<sup>243</sup>

### 5.6.1.1.2.7 *CARB's Advanced Clean Trucks Program*

The Advanced Clean Trucks (ACT) regulations require that manufacturers sell zero-emissions or near-zero-emissions trucks as an increasing percentage of their annual California sales beginning in 2024. The goal of this proposed strategy is to achieve NO<sub>x</sub> and GHG emission reductions through advanced clean technology, and to increase the penetration of the first wave of zero-emissions heavy-duty technology into applications that are well suited to its use. Fleets that operate in urban centers, have stop and go driving cycles, and are centrally maintained and fueled are well suited for introducing zero-emission technology. Promoting the development and use of advanced clean trucks will help CARB achieve its emission reduction strategies as outlined in the SIP, Sustainable Freight Action Plan, SB 350, and AB 32.<sup>244</sup>

### 5.6.1.1.2.8 *Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling*

In 2004, CARB adopted an Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling in order to reduce public exposure to diesel particulate matter emissions (Title 13 CCR Section 2485 and Title 17 CCR Section 93115). The measure applies to diesel fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given location. While the goal of this measure is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from unnecessary idling.

## 5.6.1.2 REGIONAL LAWS, REGULATIONS, AND POLICIES

### 5.6.1.2.1.1 *Southern California Association of Governments*

The District is located within the planning jurisdiction of SCAG. Pursuant to SB 375, SCAG prepared its first-ever SCS that was included in the 2012–2035 RTP/SCS, which was adopted by SCAG in April 2012. The goals and policies of that SCS demonstrated a reduction in per capita VMT (and a corresponding decrease in per

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<sup>243</sup> CARB. 2023. Advanced Clean Cars Program. <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program>. Accessed April 18, 2023.

<sup>244</sup> CARB. 2023. Advanced Clean Trucks Program. <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>. Accessed May 10, 2023.

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capita transportation-related fuel consumption) and focused on transportation and land use planning strategies that included encouraging infill projects, locating residents closer to where they work and play, and designing communities with access to high quality transit services. In April 2016, SCAG adopted the 2016–2040 RTP/SCS, which furthered the goals of the 2012–2035 RTP/SCS. On September 3, 2020, the SCAG’s Regional Council formally adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS) also known as “Connect SoCal”, which is an update to the previous 2012–2035 RTP/SCS and 2016–2040 RTP/SCS (SCAG 2021). The 2020–2045 RTP/SCS describes how the region can attain the GHG emission-reduction targets set by CARB by achieving a 19% reduction in per capita transportation GHG emissions by 2035 compared to the 2005 level on a per capita basis.

### 5.6.1.2.1.2 South Coast Air Quality Management District (SCAQMD)

As discussed in Section 5.2, *Air Quality*, of this Subsequent PEIR, SCAQMD is responsible for air quality planning in the South Coast Air Basin (where the District is located) and developing rules and regulations to bring the Air Basin into attainment of the ambient air quality standards. As part of its efforts to reduce local air pollution, SCAQMD has promoted programs to promoted energy conservation, low-carbon fuel technologies (natural gas vehicles; electric hybrids, hydraulic-hybrids, and battery-electric vehicles), renewable energy, VMT reduction programs, and market incentive programs.

### 5.6.1.2.1.3 Clean Cities Program

The U.S. Department of Energy’s Clean Cities Program promotes voluntary, locally based government/industry partnerships for the purpose of expanding the use of alternatives to gasoline and diesel fuel by accelerating the deployment of AFVs and building a local AFV refueling infrastructure. The mission of the Clean Cities Program is to advance the nation’s economic, environmental, and energy security by supporting local decisions to adopt practices that contribute to the reduction of petroleum consumption. The Clean Cities Program carries out this mission through a network of more than 80 volunteer coalitions, which develop public/private partnerships to promote alternative fuels and vehicles, fuel blends, fuel economy, hybrid vehicles, and idle reduction<sup>245</sup>. The Southern California/SCAG Clean Cities Coalition was first designated by the U.S. Department of Energy on March 1, 1996. SCAG directly administers the SCAG Clean Cities Program. This coalition supports government and industry partnerships to expand alternative fuel vehicles and infrastructure t the SCAG region.<sup>246</sup>

## 0.13.2.5 5.6.1.3 LOCAL LAWS, REGULATIONS, AND POLICIES

### Los Angeles County General Plan 2035

The General Plan provides the fundamental basis for the County’s land use and development policy, and represents the basic community values, ideals, and aspirations to govern a shared environment through 2035. General goals and policies relevant to the Draft PEIR include those related to infill development (Goal LU 4); vibrant, livable and healthy communities that contain a mix of community-serving uses (Goal LU 5); land use

<sup>245</sup> Department of Energy. Clean Cities Program. <https://cleancities.energy.gov/coalitions/los-angeles>. Accessed April 28, 2023.

<sup>246</sup> Department of Energy. Clean Cities Program. <https://cleancities.energy.gov/coalitions/southern-california>. Accessed April 28, 2023.

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patterns and community infrastructure that promote health and wellness for all neighborhoods (Goal LU 9); well-designed, healthy places (Goal LU 10); interconnected and safe bicycle- and pedestrian-friendly streets, sidewalks, paths and trails that promote active transportation and transit use (e.g., Goal M 2, Goal M 5) as well as safe spaces for pedestrian use (e.g., Policy M 2.7, Policy M 2.8); sustainable agricultural practices (Goal C/NR 9) and sustainable management of renewable and non-renewable energy resources (Goal C/NR 12); and others. Approval of the Draft PEIR would result in the revisions to the General Plan's Air Quality Element set forth in Table 2-1, Updates to General Plan Air Quality Element, and Table 2-2, General Plan Implementation Program Updates, in Chapter 2, Project Description, of the General Plan.

### 5.6.1.3.1.1 *Los Angeles Countywide Sustainability Plan*

The Los Angeles Countywide Sustainability Plan, also named Our County, is a regional sustainability plan for Los Angeles focused on the following goals<sup>247</sup>:

Goal 1: Resilient and healthy community environments where residents thrive in place

Goal 2: Buildings and infrastructure that support human health and resilience

Goal 3: Equitable and sustainable land use and development without displacement

Goal 4: A prosperous LA County that provides opportunities for all residents and businesses and supports the transition to a green economy

Goal 5: Thriving ecosystems, habitats, and biodiversity;

Goal 6: Accessible parks, beaches, recreational waters, public lands, and public spaces that create opportunities for respite, recreation, ecological discovery, and cultural activities

Goal 7: A fossil fuel-free LA County

Goal 8: A convenient, safe, clean, and affordable transportation system that enhances mobility while reducing car dependency

Goal 9: Sustainable production and consumption of resources

Goal 10: A sustainable and just food system that enhances access to affordable, local, and healthy food

Goal 11: Inclusive, transparent, and accountable governance that facilitates participation in sustainability efforts, especially by disempowered communities

Goal 12: A commitment to realize OurCounty sustainable goals through creative, equitable, and coordinated funding and partnerships

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<sup>247</sup> Regional Sustainability Plan for Los Angeles: Our County. <https://ourcountyla.lacounty.gov/wp-content/uploads/2019/07/OurCounty-Final-Plan.pdf>. Accessed April 28, 2023.

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### 5.6.1.3.1.2 Los Angeles County Green Building Standards

In April 2016, the County amended the County Code to include Title 31, Green Building Standards Code. The Green Building Standards Code incorporates by reference standards from the CAL Green Code previously described and supersedes the green building ordinance and the drought tolerant landscaping ordinance in Title 22 of the County Code. The Green Building Standards Code includes mandatory residential and non-residential measures related to low impact development, electric vehicle charging infrastructure, cool roof installations, and construction waste management practices.<sup>248</sup>

### 5.6.1.3.1.3 Unincorporated Los Angeles County Community Climate Action Plan (CCAP) 2045

The 2045 CAP achieves substantial GHG emission reductions through strategies, measures, and actions for years 2030, 2035, and 2045. The County of Los Angeles released the Revised Draft 2045 Climate Action Plan (2045 CAP) in March 2023, which is an update to the 2020 CCAP and sets new GHG emissions reduction targets for 2030 and 2035, consistent with state goals, and sets a long-term aspirational goal for carbon neutrality by 2045. The 2045 CAP includes five categories for GHG emissions reductions: (1) energy supply, (2) transportation, (3) building energy and water, (4) waste, and (5) agriculture, forestry, and other land uses. Under these categories, there are a number of strategies, measures, and actions which will achieve the GHG emissions reductions outlined in the Draft 2045 CAP such as decarbonizing the energy supply, increase densities and diversity of land uses near transit, reducing single occupancy vehicle trips, improve efficiency of existing building energy use, conserving water, and others. Adoption of the 2045 CAP has not yet occurred as of May 2023.<sup>249</sup>

### 5.6.1.3.1.4 County of Los Angeles Green Infrastructure Guidelines

The Sustainable Infrastructure Guidelines (SIG) were developed to implement sustainable, resilient infrastructure for Public Works buildings. The SIG would minimize impacts on resources such as water and energy; target strategies that can be implemented effectively, complement existing sustainability programs, such as Leadership in Energy and Environmental Design (LEED), Envision Rating System (Envision), and SITES Rating System; minimize long term operating costs; consider cost/benefit relationships of all strategies to ensure cost effectiveness; and minimize maintenance requirements. Strategies to reduce energy usage include minimizing light pollution, reducing energy consumption, incorporating energy submetering; commissioning energy systems; incorporating renewable/alternative energy; optimizing traffic signals systems; optimizing street lighting; and energy innovation.<sup>250</sup>

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<sup>248</sup> County Code Title 31, Chapter 4 and Chapter 5

<sup>249</sup> County of Los Angeles. 2023, March. Revised Draft 2045 Climate Action Plan. [https://planning.lacounty.gov/wp-content/uploads/2023/03/LA\\_County\\_2045-CAP\\_Rev\\_Public\\_Draft\\_March\\_2023\\_Chapters.pdf](https://planning.lacounty.gov/wp-content/uploads/2023/03/LA_County_2045-CAP_Rev_Public_Draft_March_2023_Chapters.pdf). Accessed May 2023.

<sup>250</sup> Los Angeles County Department of Public Works. 2017. Sustainable Infrastructure Guidelines. [https://pw.lacounty.gov/adm/sustainability/docs/LA%20SIG\\_Final.pdf](https://pw.lacounty.gov/adm/sustainability/docs/LA%20SIG_Final.pdf). Accessed April 18, 2023.



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### 5.6.1.4 LAUSD POLICIES

#### 5.6.1.4.1 LAUSD Sustainability Initiative

LAUSD is already committed to reducing 20% of energy consumption by 2024 and has implemented a number of energy-saving measures, including the Lighting Retrofit Program at 100 schools, the direct install program with the Los Angeles Department of Water and Power at 12 schools, Prop 39 energy efficiency upgrade projects at 21 schools, and is an active participant in the U.S. Department of Energy/LA Better Buildings Challenges, as well as the Zero Energy Schools Accelerator. On December 3, 2019, the Board approved the Clean Energy resolution<sup>251</sup>, that commits the District to 100% clean, renewable energy by 2040. Additionally, on February 8, 2022, the Board approved the Climate Literacy resolution<sup>252</sup>, which aims to enact a comprehensive Climate Literacy program for District schools in order to help address the escalating climate crisis. The resolution will also create a Climate Literacy Task Force to coordinate resources and support other districtwide efforts. Climate literacy also covers education about environmental justice, green jobs, and correcting misinformation.

#### 5.6.1.4.2 LAUSD Energy Conservation Initiatives

LAUSD is committed to energy conservation through a variety of projects and policies that increase energy efficiency in District facilities, reduce our reliance on fossil fuels, and increase conservation behavior throughout the District through awareness and education. Current goals include reduction in energy consumption and carbon footprint and raising awareness about energy conservation and climate change.

#### 5.6.1.4.3 LAUSD Energy Management Unit

The Energy Management Unit (EMU) works closely with the Sustainability Initiatives Unit and focuses on multiple areas of energy conservation and usage.

#### 5.6.1.4.4 Renewable Energy Initiatives

**Solar Initiative:** In 2008, the Sustainability Initiatives Unit launched an ambitious photovoltaic solar energy program with the goal of energizing 21 megawatts (MW) of solar energy.

**Geothermal Technology:** Geothermal technology, also known as “ground source heat pump”, has been installed at Playa Vista Elementary School.

### Collaborative for High Performance Schools

The “Collaborative for High Performance Schools” (CHPS) is a school design standards-setting organization associated with the LEED group. The District requires that CHPS criteria be incorporated to the extent feasible into its school construction program.

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<sup>251</sup> LAUSD 2019. Res 018-19/20 Transitioning Los Angeles Unified School District to 100% Clean, Renewable Energy Resulting in Healthier Students and More Sustainable, Equitable Communities.

<sup>252</sup> LAUSD 2022. Res 016-21/22 Climate Literacy.



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### 5.6.1.4.5 California Clean Energy Jobs Act (Proposition 39)

Proposition 39 is a State grant program which allocates revenue to local education agencies to support energy efficiency projects. Through Proposition 39, LAUSD will receive funds over a five year period to implement projects that improve energy efficiency in the District's existing buildings. The projects are predicted to significantly reduce energy use in existing building systems on approximately 70 campuses and will focus on lighting, HVAC systems, controls, and plumbing.

### 5.6.1.4.6 LAUSD Energy and Resource Conservation Policy

The LAUSD has committed to becoming the most sustainable and environmentally friendly large urban school district in the country. To achieve the District's goal of environmental stewardship, and to also reduce the District's general fund obligations, the District shall implement energy and water conservation measures and practices at all District sites.

The objectives of LAUSD's Energy and Resource Conservation Policy are to:

- A. Ensure the health, safety, and comfort of students and staff during operational hours.
- B. Improve effective use of public funds and maximize savings by:
  - 1. Reducing energy consumption in school facilities.
  - 2. Minimizing operational and utility costs through energy and water conservation measures.
  - 3. Educating students and staff about appropriate energy and water conservation measures.
  - 4. Integrating energy and water conservation measures into the District's culture and operations.
  - 5. Optimizing capital investments projects in facilities.
- C. Encourage environmental stewardshustainable practices

### 0.13.2.5 5.6.1.5 LAUSD STANDARD CONDITIONS

#### *Standard Conditions of Approval*

This table lists the aesthetic related standard conditions that will be included as part of each SUP-related project, as appropriate.

Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
SC-GHG-1	Water Use and Efficiency	Requires work on water pumps, valves, piping, and/or tanks	During operation (Post-Construction)	During operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
SC-GHG-2	Water Use and Efficiency	Requires work on landscape irrigation system	Prior to full operation of irrigation system (Post-Construction)	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
SC-GHG-3	Water Use and Efficiency	Requires work on landscape irrigation system	Prior to full operation of irrigation system (Post-Construction)	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.
SC-GHG-4	Water Use and Efficiency	Requires work on landscape and/or irrigation system	Prior to full operation of irrigation system (Construction)	LAUSD shall develop a water budget for landscape (both non-recreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources.
SC-GHG-5	Energy Efficiency	Building construction	Prior to occupancy (Planning, Construction)	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.

### 5.6.2 Existing Conditions

#### 5.6.2.1 ELECTRICITY

Electricity, a consumptive utility, is a man-made resource. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. The delivery of electricity involves a number of system components, for distribution and use. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid. Energy capacity, or electrical power, is generally measured in watts (W) while energy use is measured in watt-hours (Wh). For example, if a light bulb has a capacity rating of 100 W, the energy required to keep the bulb on for 1 hour would be 100 Wh. If ten 100 W bulbs were on for 1 hour, the energy required would be 1,000 Wh or 1 kilowatt-hour (kWh). On a utility scale, a generator's capacity is typically rated in MW, which is 1 million W, while energy usage is measured in megawatt-hours (MWh) or gigawatt-hours (GWh), which is 1 billion Wh.

Southern California Edison (SCE) provides electrical services to approximately 15 million people, 15 counties, 180 incorporated cities (including the County of Los Angeles), 5,000 large businesses, and 280,000 small businesses throughout its 50,000-square-mile service area, across central, coastal and southern California, an area bounded by Mono County to the north, Ventura County to the west, San Bernardino County to the east, and Orange County to the south. SCE produces and purchases energy from a mix of conventional and renewable generating sources. SCE generates power from a variety of energy sources, including large hydropower (greater than 30 MW), coal, gas, nuclear sources, and renewable resources, such as wind, solar, small hydropower (less than 30 MW), and geothermal sources. The annual electricity sale to customers in 2021 was approximately 85,935,000 MWh.<sup>253</sup>

<sup>253</sup> Edison International & Southern California Edison: Annual Report 2022. <https://s3.amazonaws.com/cms.ipressroom.com/406/files/20232/2022-eix-sce-annual-report.pdf>. Accessed April 14, 2023.

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### 5.6.2.2 NATURAL GAS

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas consumed in California is obtained from naturally occurring reservoirs but relies upon out-of-state imports for nearly 90% of its natural gas supply. A majority of natural gas consumed in California is for electricity generation, along with the industrial, residential, and commercial sections. Among energy commodities consumed in California, natural gas accounts for one-third of total primary energy consumption in terms of British thermal units (BTU). Natural gas is typically measured in terms of cubic feet (cf) or BTU.<sup>254</sup> Natural gas is provided to the County by Southern California Gas (SoCalGas). SoCalGas is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial markets. SoCalGas serves approximately 21.1 million customers in more than 500 communities encompassing approximately 24,000 square miles throughout Central and Southern California, from the City of Visalia to the Mexican border. SoCalGas receives gas supplies from several sedimentary basins in the western U.S. and Canada, including supply basins located in New Mexico (San Juan Basin), West Texas (Permian Basin), the Rocky Mountains, and Western Canada as well as local California supplies. The traditional, southwestern U.S. sources of natural gas will continue to supply most of the natural gas demand from SoCalGas. The Rocky Mountain supply is available but is used as an alternative supplementary supply source, and the use of Canadian sources provide only a small share of SoCalGas supplies due to the high cost of transport. The annual natural gas sale to customers in 2020 was approximately 888,775 million cf.<sup>255</sup>

#### *Transportation Energy*

According to the CEC, transportation and fuel production accounted for about 50% of California's total energy consumption in 2022 based on a carbon dioxide equivalent basis. In 2022 (the most recent year for which data are available), petroleum-based fuels account for more than 90% of California's transportation fuel use. However, the state is now working on developing flexible strategies to reduce petroleum use. California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce VMT. The CEC predicts that the demand for gasoline and transportation fossil fuels in general will continue to decline over the next 10 years primarily due to improvements in fuel efficiency and increased electrification. According to fuel sales data from the CEC, fuel consumption in Los Angeles County (County) was approximately 2.8 billion gallons of gasoline and 0.61 billion gallons of diesel fuel in 2020.<sup>256</sup>

### 5.6.3 Methodology

The SUP Update is a planning-level document, and, as such, there are no specific projects, project construction dates, or specific construction plans identified. Construction from future schools' development that could be facilitated by the adoption of the SUP Update would have the potential to increase energy consumption at the construction stage through the use of heavy-duty construction equipment, such as excavators, cranes, and

<sup>254</sup> California Public Utilities Commission. 2023. <https://www.cpuc.ca.gov/industries-and-topics/natural-gas/natural-gas-and-california>. Accessed April 18, 2023.

<sup>255</sup> SoCalGas Company Profile. 2022. <https://www.socalgas.com/about-us/company-profile>. Accessed April 18, 2023.

<sup>256</sup> California Energy Commission Energy Reports. 2022. <http://www.ecdms.energy.ca.gov/gasbycounty.aspx>. Accessed April 18, 2023.

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forklifts, and through vehicle trips generated from workers and haul trucks traveling to and from project sites. The quantification of energy consumption associated with buildout cannot be specifically determined at this time.

Operation of future development that would be facilitated by the SUP Update would require energy in the form of electricity and natural gas for building heating, cooling, cooking, lighting, water demand and wastewater treatment, consumer electronics, and other energy needs, and transportation-fuels, for buses and vehicles traveling to District schools. However, quantification of energy consumption associated with electricity and natural gas consumption cannot be specifically determined at this time and would need to be evaluated at a project-specific basis. Therefore, this analysis is based on the potential for operational energy from future development that would result from the SUP Update to result in adverse impacts relative to the significance thresholds in the context of development intensity and compliance with regulatory plans, policies, standards, and regulations.

Energy for transportation for traveling to and from future development, including buses that would be facilitated from the SUP Update is estimated based on transportation fuel consumption factors from EMFAC along with VMT data, which takes into account mode and trip lengths, developed for the transportation analysis (see Section 5.18 *Transportation and Traffic*). Fuel consumption from motor vehicles is dependent on vehicle type and VMT.

### 5.6.4 Thresholds of Significance

According to CEQA Guidelines Appendix G, a project would normally have a significant effect on the environment if the project would:

- EN-1 Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or
- EN-2 Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

### 5.6.5 Environmental Impacts

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<b>Impact 5.6-1:</b>	<b>SUP-related projects would result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. [Threshold EN-1]</b>
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#### All SUP Projects

**Less than Significant.** Implementation of future development facilitated by adoption of the SUP UPDATE would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

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### Construction

Electricity use from construction activities would be short-term, limited to working hours, and only used for necessary construction-related activities such as; powering lights, electronic equipment, and convey water for dust control or other construction activities necessitating electrical power. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. Therefore, the impact from construction electrical demand for future development facilitated by the SUP Update would be less than significant and would not result in the wasteful, inefficient, and unnecessary consumption of energy, and no mitigation is required.

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would generally not be supplied to support construction activities; thus, there would be no expected natural gas demand generated by construction of future development facilitated by adoption of the SUP Update. The impact from construction natural gas demand for potential future development facilitated by adoption of the SUP Update would be less than significant and would not result in the wasteful, inefficient, and unnecessary consumption of energy.

Construction would also consume energy in the form of petroleum-based fuels associated with the use of construction vehicles and equipment, construction workers traveling to and from development sites, and delivery and haul truck trips (e.g., hauling of construction material to the site and demolition material to offsite reuse and disposal facilities). Transportation fuels (gasoline and diesel) are produced from crude oil, which can be domestic or imported from various regions around the world. Based on current proven reserves, crude oil production may be exhausted in the second half of the century<sup>257</sup>. Construction of future development facilitated by adoption of the SUP Update would utilize fuel efficient equipment consistent with State and federal regulations, such as the fuel efficiency regulationI accordance with the new CAFE standards and Advanced Clean Truck Program, which would result in more efficient use of transportation fuels (lower consumption). Construction equipment and vehicles would also be required to comply with anti-idling regulations in accordance with Section 2485 in Title 13 of the CCR, and fuel requirements in accordance with Section 93115 in Title 17 of the CCR. As such, construction of future development facilitated by adoption of the SUP Update would comply with regulatory measures to reduce the inefficient, wasteful, and unnecessary consumption of energy, such as petroleum-based transportation fuels. Compliance with anti-idling and emissions regulations would also result in fuel savings from the use of more fuel-efficient engines. Although these requirements are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in the efficient use of construction-related energy.

Based on the analysis above, construction of future development facilitated by adoption of the SUP Update would utilize energy only for necessary on-site activities and to transport construction materials and demolition debris to, from, and within the County. As discussed above, idling restrictions and the use of cleaner, energy-efficient equipment and fuels would result in less fuel combustion and energy consumption, and thus minimize construction-related energy use. Therefore, construction of future development facilitated by adoption of the

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<sup>257</sup> International Energy Agency: World Energy Outlook 2022. <https://www.iea.org/reports/world-energy-outlook-2022>. Accessed May 4, 2023.

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SUP Update would not result in the wasteful, inefficient, and unnecessary consumption of energy, and this impact would be less than significant, and no mitigation is required.

### *Operation*

The Project consists of the SUP Update and Measure RR Implementation Plan for which no new construction is proposed as part of implementing the plan. The SUP Update is not anticipated to include the acquisition of new sites for the construction of “stand alone” schools. However, some projects developed under the SUP Update may incorporate the acquisition of property, thus expanding an existing campus. The SUP Update would implement development strategies related to reducing vehicle trips for residents by focusing projects within communities’ existing schools. Existing schools tend to be embedded within the communities they serve; close to major transit stops, high quality transit corridors, and residential and mixed-use land uses.

The District’s Energy and Resource Conservation Policy implements energy and water conservation measures and practices at all District sites. The District’s policy is aimed at reducing energy consumption in school facilities and minimizing utility costs through integrating conservation measures into the District’s culture and operations. Additionally, the district is committed to transitioning LAUSD to 100% clean, renewable energy resulting in healthier students and more sustainable, equitable communities.<sup>258</sup> Modernization would result in greater energy efficiency in building standards, potentially reducing energy footprints in some areas. Per SC-GHG-5 for future development, LAUSD shall ensure that the designed time dependent valued energy 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.

During operation of LAUSD School facilities under the SUP Update, energy would be consumed for multiple purposes, including, but not limited to, heating, ventilation, and air conditioning; refrigeration; lighting; and the use of electronics, equipment, and appliances. Energy would also be consumed during operations related to water usage, solid waste disposal, and vehicle trips, including bus trips. Demand for electricity resources including for water supply, conveyance, distribution, and treatment, would comply with the applicable provisions of Title 24 and the CALGreen Code in effect at the time of building permit issuance, which may include greater energy and water efficient fixtures and fittings, energy efficient mechanical systems, light pollution reduction, site development best practices, sub metering, water efficient landscapes, recycling, and superior weather resistance and moisture management. Modernization efforts would reduce the electricity demand from existing schools facilitated by adoption of the SUP Update in the County by promoting energy efficiency designs and strategies beyond regulatory requirements and policies for renewable energy. Operations LAUSD Schools under the SUP Update would not result in the wasteful, inefficient, and unnecessary consumption of electricity.

As discussed in Section 5.18 Transportation, of this Draft Subsequent PEIR, LAUSD Transportation Services Division provides local and regional transit service to the LAUSD Schools. The District employs several strategies and initiatives to lower fuel use, increase efficiencies, use alternative fuels including Bio-diesel, and increase the use of electric buses. LAUSD operates the largest compressed natural gas (CNG) school bus fleet

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<sup>258</sup> Los Angeles Unified School District. Board of Education Report. File# Res-018-19/20, Version 3. December 4, 2019.

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in the nation with 600 CNG buses.<sup>259</sup> Natural gas buses produce less urban pollution and greenhouse gases than diesel buses, and, natural gas buses help reduce our dependence on foreign oil while providing lower fuel costs. LAUSD also operates alternative-fuel buses powered with gasoline and propane. The District has in its fleet, 100 ultra-low emission vehicle (ULEV) gasoline and 268 propane-powered school buses. Although propane school buses are a newer fuel type for LAUSD, it has been extensively utilized for public transit and school bus operations nationally. Propane is the third most common fuel used in vehicles, behind gasoline and diesel fuel.<sup>260</sup> Propane fuel is also the cleanest burning fuel when compared with diesel and CNG. Bio-diesel fuel is a cleaner burning alternative fuel produced from domestic, renewable resources, such as vegetable oils and animal fats. All remaining school buses with diesel engines operate on low-sulfur bio-diesel fuel. Compared to diesel, the use of bio-diesel creates a considerable reduction in particulate matter (PM) and CO<sub>2</sub> emissions. Additionally, these buses are equipped with special exhaust traps/filters that further reduce pollutants. The introduction of a bio-diesel fuel blend into the District's fleet provides a unique opportunity to leverage green technology that requires limited capital investment. Thus far, the conversion to bio-diesel has had a minimal impact on operations. Additionally, in 2021, LAUSD purchased 10 zero-emissions electric buses. A single electric bus will save more than \$10,000 annually in lower maintenance costs as compared with a traditional diesel bus and reduce greenhouse gases by 54,000 pounds each year. Potential growth from future new construction would be targeted near transit, active transportation, and expanded pedestrian infrastructure, to facilitate walking, biking, and transit use in place of vehicular travel. The general location of future development that would occur under the SUP Update would not conflict with the 2020–2045 RTP/SCS goals. Adoption of the SUP Update would support statewide and regional efforts to improve transportation energy efficiency and reduce transportation energy consumption. Adoption of the SUP Update would not conflict with the actions and strategies contained in the 2020-2045 RTP/SCS.

Future development facilitated by adoption of the SUP Update would support statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. The OurCounty Sustainability Plan outlines actions to decrease energy usage and reduce VMT which would result in energy savings in the County. The 2045 CAP also aligns with the goals of the OurCounty Sustainability Plan. The 2045 CAP also aims to reduce vehicle miles traveled, emissions, and transportation fuel consumption. The 2045 CAP aims to electrify 100% of the LA County bus fleet by 2030 (Measure T7), which would reduce diesel, gasoline, and natural gas consumption from buses and would have the co-benefit of reducing air pollutant and GHG emissions. Similarly, the 2045 CAP aims to transition passenger and heavy-duty vehicles to ZEVs in line with the State's Mobile Source Strategy (Measure T6 and T8), which would reduce diesel, gasoline, and natural gas consumption of on-road vehicles in support of State goals. The 2045 CAP's waste measures (Measure W1 and W2) would also result in greater waste diversion from landfills and decreased waste generation per capita resulting in less fuel consumption from haul trucks to landfills and would generate energy through waste-to-energy conversion systems. The SUP Update complies with the OurCounty Sustainability Plan, and 2045 CAP goals, policies, and actions for energy efficiency and renewable energy,

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<sup>259</sup> LAUSD Transportation Services Division. <https://achieve.lausd.net/Page/17168>. Accessed May 5, 2023.

<sup>260</sup> U.S. Department of Energy. Alternative Fuels Data Center. [https://afdc.energy.gov/fuels/propane\\_basics.html](https://afdc.energy.gov/fuels/propane_basics.html). Accessed May 3, 2023.

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including electric vehicle use, which would source transportation energy from renewable sources in accordance with the Renewables Portfolio Standard.

Municipal solid waste would continue to be diverted to County-certified construction and demolition waste processors using County-certified waste haulers. Diversion of solid waste would reduce truck trips to landfills, which are typically located some distance away from unincorporated areas within the County and would increase the amount of waste recovered (e.g., recycled, reused, etc.) at material recovery facilities, thereby further reducing transportation fuel consumption. The SUP Update would not conflict with AB 341, which required that commercial enterprises that generate four cubic yards or more of solid waste and multi-family housing complexes of five units or more participate in recycling programs in order to meet California's goal to recycle 75% of its solid waste by 2020. SB 1383, adopted in 2016, establishes goals of 50% organics waste reduction by 2020 and 75% reduction by 2025. Compliance with federal, state, and local waste management and reduction statutes and regulations related to solid waste would reduce waste related transportation energy. Based on the above, future development that could be facilitated by adoption of the SUP Update would minimize operational transportation fuel demand in line with state, regional, and County goals.

Implementation of future development facilitated by the SUP Update would not result in wasteful, inefficient, or unnecessary consumption of energy resources during either construction or operation of future development. Therefore, future development that would be facilitated by adoption of the SUP Update would not lead to wasteful, inefficient, and unnecessary consumption of energy, and this impact would be less than significant, and no mitigation would be required.

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### **Impact 5.6-2: SUP-related projects would conflict with or obstruct a state or local plan for renewable energy or energy efficiency. [Threshold EN-2]**

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**Less than Significant.** Implementation of future development facilitated by adoption of the SUP Update would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency during either construction or operation of future development.

### **All SUP Projects**

#### *Construction*

Potential new construction or modernization of school sites under the SUP Update would utilize construction contractors who must demonstrate compliance with applicable regulations. Construction equipment would be required to comply with federal, state, and regional requirements where applicable. With respect to truck fleet operators, the U.S. EPA and NHSTA have adopted fuel-efficiency standards for medium- and heavy-duty trucks that will be phased in over time. Construction equipment and trucks are required to comply with CARB regulations regarding heavy-duty truck idling limits of five minutes per occurrence and location. Additionally, CARB regulations regarding in-use off-road equipment require older, less efficient equipment to be replaced or repowered with newer, more efficient models or engines. These regulations would result in an increase in energy savings in the form of reduced fuel consumption from more fuel-efficient engines. These regulations would also have an overall beneficial effect on reducing fuel consumption from trucks over time as older trucks are replaced with newer models that meet the standards. Thus, based on the information above, construction



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of future development facilitated by adoption of the SUP Update would comply with existing energy efficiency standards, and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant, and no mitigation is required.

### *Operation*

The District's Energy and Resource Conservation Policy implements energy and water conservation measures and practices at all District sites. The District's policy is aimed at reducing energy consumption in school facilities and minimizing utility costs through integrating conservation measures into the District's culture and operations. Additionally, the district is committed to transitioning LAUSD to 100% clean, renewable energy resulting in healthier students and more sustainable, equitable communities.<sup>261</sup> Modernization according to the LAUSD Sustainability measures and Energy and Resource Conservation Policy would result in greater energy efficiency in building standards, potentially reducing energy footprints in some areas, and would not conflict with any relevant plan for renewables or energy efficiency.

The Unincorporated Los Angeles County Community Climate Action Plan 2045 (2045 CAP) was adopted in September 2018 as a subcomponent of the Air Quality Element of the Los Angeles County General Plan 2035. The 2045 CAP is an adopted GHG reduction plan, which also serves to reduce energy consumption. The SUP Update aligns with several Goals and Principles of the 2045 CAP relating to the reduction of energy such as reducing GHG emission (Goal 5) and supporting healthy and equitable communities (Goal 6). The 2045 CAP also proposes strategies to increase renewable energy production and improve energy efficiency, to reduce energy use in buildings and decarbonize the energy that is used, reduce indoor and outdoor water consumption, and increase the supply of energy to communities with zero-carbon or low-carbon electricity.

The 2045 CAP aims to reduce electricity use through requiring zero net energy buildings, increasing the efficiency of existing buildings, increasing the use of recycled water which would reduce electricity associated with water conveyance and distribution, and reducing indoor and outdoor water use. The 2045 CAP would also promote adoption of renewable energy production in both new and existing residential and commercial development, which would decrease grid energy demand and advance LA County toward its electrification and zero net energy targets (Measures ES2, E1, and E2), all of which would support the state's energy efficiency and renewable energy goals. Future development facilitated by adoption of the SUP Update would comply with CALGreen energy efficiency requirements, which would be consistent with the OurCounty Sustainability Plan, and the 2045 CAP goals for increasing energy and water use efficiency in new residential and commercial developments. Any new construction or modernization on existing school sites would comply with Title 24 requirements and CALGreen to reduce energy consumption by implementing energy efficient building designs, implementing solar-ready rooftops, reducing indoor and outdoor water demand, and installing energy-efficient appliances and equipment.

Potential future development under the SUP Update, including new construction or modernization of existing school sites, would be designed in a manner that is consistent with relevant energy conservation plans that result in greater use of renewable energy and the efficient use of energy resources. The operation of future development under the SUP Update would potentially reduce energy use and increase energy efficiencies and

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<sup>261</sup> LAUSD. Board of Education Report. File# Res-018-19/20, Version 3. December 4, 2019.

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water use efficiencies. Therefore, the construction of any future development under the SUP Update would support State energy efficiency and renewable energy goals. Therefore, the certification of the SUP Update would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Based on the information above, operation of future development facilitated by adoption of the SUP Update would comply with approved plans for energy efficiency and renewable energy and the goals of the 2045 CAP, for renewable energy and energy efficiency. Therefore, this impact would be less than significant, and no mitigation is required.

### 5.6.5.1 APPLICABLE REGULATIONS AND STANDARD CONDITIONS

#### 5.6.5.1.1 LAUSD Standard Conditions of Approval

- SC-GHG-5 (Energy Efficiency)

### 5.6.5.2 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of LAUSD Standard Condition, Impact 5.18-1 and 5.18-2 would be less than significant.

### 5.6.5.3 MITIGATION MEASURES

No mitigation measures are required.

### 5.6.5.4 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant.

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### 5.7 GEOLOGY AND SOILS

This section of the EIR evaluates the potential for implementation of the SUP to impact geological and soil resources in the District. The section regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions), along with the existing seismic hazards, underlying soil characteristics, slope stability, and erosion throughout the SUP area, and possible environmental impacts that may occur as SUP-related site-specific projects are implemented.

#### TERMINOLOGY

**Seismic Hazard Zone Maps.** Maps issued by the State Geologist under PRC Section 2696 that show zones of required investigation.

**Zones of Required Investigation** referred to as **Seismic Hazard Zones.** Defined in CCR Section 3722, are areas shown on Seismic Hazard Zone Maps where site investigations are required to determine the need for mitigation of potential liquefaction and/or earthquake-induced landslide ground displacements.

**Minimum Statewide Safety Standard.** The Seismic Hazards Mapping Act and related regulations establish a statewide minimum public safety standard for mitigation of earthquake hazards. This means that the minimum level of mitigation for a project should reduce the risk of ground failure during an earthquake to a level that does not cause the collapse of buildings for human occupancy, but in most cases, not to a level of no ground failure at all. More stringent requirements are prescribed by the California Building Code (CCR Title 24) for hospitals, public schools, and essential service buildings. For such structures, the requirements of the Seismic Hazards Mapping Act are intended to complement the CCR Title 24 requirements.

**Fault.** A shear or zone of closely associated shears across which earth materials on one side have been displaced with respect to those on the other side because of tectonic forces. A fault is distinguished from those fractures or shears caused by landsliding or other gravity-driven surficial failures. Faults are classified as Holocene-Active faults by the California Geological Survey if they show evidence of surface displacement within the last 11,700 years.<sup>262</sup>

**Energy Release.** The energy released by an earthquake is measured as moment magnitude ( $M_w$ ). The  $M_w$  scale is logarithmic; therefore, each one-point increase in magnitude represents a tenfold increase in amplitude of the waves and a 31-fold increase in energy. So, a magnitude 7 earthquake produces 100 times ( $10 \times 10$ ) the ground motion amplitude of a magnitude 5 earthquake.

**Ground Motion.** Motion at the ground surface during an earthquake is measured as horizontal ground acceleration in g, where g is the acceleration of gravity (9.81 meters/second<sup>2</sup> [9.81 m/s<sup>2</sup>]).

**The Modified Mercalli Intensity (MMI) Scale.** is a qualitative scale of how earthquakes are felt by people and how they affect buildings. The MMI is a 12-point scale ranging from Intensity I, which is rarely felt by

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<sup>262</sup> California Geological Survey (CGS). Revised 2018. Earthquake Fault Zones A Guide for Government Agencies, Property Owners/Developers, and Geoscience Practitioners for Assessing Fault Rupture Hazards in California: Special Publication 42. [https://www.conservation.ca.gov/cgs/documents/publications/special-publications/SP\\_042.pdf](https://www.conservation.ca.gov/cgs/documents/publications/special-publications/SP_042.pdf).

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people, to Intensity XII, in which damage to structures is total and objects are thrown into the air.<sup>263</sup> In California, the estimated relationship between peak ground acceleration and MMI intensity is shown in Table 5.7-1.

**Table 5.7-1 Estimated Relationship between Peak Ground Acceleration and Intensity**

Peak Ground Acceleration, g	MMI	Effects
0.039–0.092	V	Felt by nearly everyone; many awakened. Some dishes, windows broken. Unstable objects overturned. Pendulum clocks may stop.
0.092–0.18	VI	Felt by all, many frightened. Some heavy furniture moved; a few instances of fallen plaster. Damage slight.
0.18–0.34	VII	Damage negligible in buildings of good design and construction; slight to moderate in well-built ordinary structures; considerable damage in poorly built or badly designed structures; some chimneys broken.
0.34–0.65	VIII	Damage slight in specially designed structures; considerable damage in ordinary substantial buildings with partial collapse. Damage great in poorly built structures. Fall of chimneys, factory stacks, columns, monuments, walls. Heavy furniture overturned.
0.65–1.24	IX	Damage considerable in specially designed structures; well-designed frame structures thrown out of plumb. Damage great in substantial buildings, with partial collapse. Buildings shifted off foundations.
>1.24	X+	MMI X: Some well-built wooden structures destroyed; most masonry and frame structures destroyed with foundations. Rails bent. MMI XII: Damage total. Lines of sight and level are distorted. Objects thrown into the air.

Source: Wald, David J., et al. 1999, August. Relationships Between Peak Ground Acceleration, Peak Ground Velocity, and Modified Mercalli Intensity in California. Earthquake Spectra 15 No. 3.

Note: g = acceleration of gravity.

**Earthquake Fault Zones.** Regulatory zones (also known as A-P Zones) that encompass traces of Holocene-active faults to address hazards associated with surface fault rupture. Earthquake Fault Zones are delineated by the State Geologist and implemented by lead agencies through permitting, inspection and land-use planning activities. Before cities and counties can permit development within Earthquake Fault Zones, geologic investigations are required to show that the sites are not threatened by surface rupture from future earthquakes. Building sites must be set back from identified active faults.

**Liquefaction.** Liquefaction is a process whereby strong earthquake shaking causes sediment layers that are saturated with groundwater to lose strength and behave as a fluid. This subsurface process can lead to near-surface or surface ground failure that can result in property damage and structural failure. If surface ground failure does occur, it is usually expressed as lateral spreading, flow failures, ground oscillation, and/or general loss of bearing strength. Sand boils (injections of fluidized sediment) can commonly accompany these different types of failure.

In order to determine a region's susceptibility to liquefaction, three major factors must be analyzed:

- The intensity and duration of ground shaking.

<sup>263</sup> U.S. Geological Survey (USGS). 2012, 2023, April 26. The Modified Mercalli Intensity Scale. <https://www.usgs.gov/programs/earthquake-hazards/modified-mercalli-intensity-scale>.

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- The age and textural characteristic of the alluvial sediments: Generally, the younger, less well compacted sediments tend to have a higher susceptibility to liquefaction. Textural characteristics also play a dominant role in determining liquefaction susceptibility. Sand and silty sands deposited in river channels and floodplains tend to be more susceptible to liquefaction and floodplains tend to be more susceptible to liquefaction than coarser or finer grained alluvial materials.
- The depth to the groundwater. Groundwater saturation of sediments is required in order for earthquake induced liquefaction to occur. In general, groundwater depths shallower than 10 feet to the surface can cause the highest liquefaction susceptibility.

Research and historical data indicate that loose, granular materials at depths of less than 50 feet with silt and clay contents of less than 30% saturated by relatively shallow groundwater table are most susceptible to liquefaction.

**Earthquake-Induced Landslides.** Landslides triggered by earthquakes historically have been a significant cause of earthquake damage. In California, large earthquakes such as the 1971 San Fernando, 1989 Loma Prieta, and 1994 Northridge earthquakes triggered landslides that were responsible for destroying or damaging numerous structures, blocking major transportation corridors, and damaging life-line infrastructure. Areas that are most susceptible to earthquake-induced landslides are steep slopes in poorly cemented or highly fractured rocks; areas underlain by loose, weak soils; and areas on or adjacent to existing landslide deposits.<sup>264</sup>

**Collapsible Soils.** Collapsible soils are low-density, silty to very fine-grained, predominantly granular soils containing minute pores and voids. When saturated, these soils undergo a rearrangement of their grains and a loss of cementation, causing substantial, rapid settlement under even relatively light loads. A rise in the groundwater table or an increase in surface water infiltration, combined with the weight of a building or structure, can cause rapid settlement and consequent cracking of foundations and walls. Collapsible soils generally result from rapid deposition close to the source of the sediment where the materials have not been sufficiently moistened to form a compact soil.

**Expansive Soils.** Expansive soils contain certain types of clay minerals that shrink or swell as the moisture content changes; the shrinking or swelling can shift, crack, or break structures built on such soils. Arid or semiarid areas with seasonal changes of soil moisture experience a much higher frequency of problems from expansive soils than areas with higher rainfall and more constant soil moisture.<sup>265</sup>

**Subsidence.** Subsidence is the sinking of the land surface. Evidence of subsidence includes ground cracking and damage to roadways, aqueducts, and structures. Subsidence caused by excessive groundwater pumping is a common occurrence in areas of California where groundwater is pumped for agricultural and municipal wells.<sup>266</sup> Land subsidence also occurs due to oil withdrawal; the best-known example of which is in the

<sup>264</sup> CGS. 2001. Seismic Hazard Zone Report for the Oat Mountain 7.5-Minute Quadrangle, Los Angeles County, California. [http://gmw.consrv.ca.gov/shmp/download/quad/OAT\\_MOUNTAIN/reports/oatm\\_eval.pdf](http://gmw.consrv.ca.gov/shmp/download/quad/OAT_MOUNTAIN/reports/oatm_eval.pdf).

<sup>265</sup> Colorado Geological Survey (COGS). 2011, April 28. Definition of Swelling Soils. <http://geosurvey.state.co.us/hazards/Swelling%20Soils/Pages/Definition.aspx>.

<sup>266</sup> Harden, Deborah. 2004. California Geology. Upper Saddle River, NJ: Pearson Education, Inc.

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Wilmington Oil Field in southern Los Angeles County, where land subsidence has reached nine meters (30 feet).<sup>267</sup>

**Corrosive Soils.** Corrosion of various metals and concrete is a common problem in some soils. Corrosion affects materials both on and below the soil surface. Concrete and uncoated steel are used extensively. Streets, highways, sidewalks, houses, and pipelines for gas, sewage, and water are a few examples of the structures and facilities that are exposed to corrosion.

**Groundwater.** Groundwater is water underneath the surface of the earth. Rock or soil yielding groundwater to wells or springs in economically usable amounts is termed an aquifer; the upper surface of an aquifer is termed the water table.<sup>268</sup>

**Asbestos.** Asbestos is the name of a group of silicate minerals that are heat resistant and thus were commonly used as insulation and fire retardant. Inhaling asbestos fibers has been shown to cause lung disease (asbestosis) and lung cancer (mesothelioma).<sup>269</sup> Outcrops of asbestos minerals can pose health hazards to people nearby.

A **seiche** is a surface wave created when a body of water is shaken, usually by earthquake.

A **tsunami** is a long high sea wave caused by an earthquake, submarine landslide, or other disturbance.

A **Paleontological Resource** is a natural resource characterized as faunal or floral fossilized remains, but may also include specimens of non-fossil material dating to any period preceding human occupation.

### 5.7.1 Environmental Setting

#### 5.7.1.1 REGULATORY FRAMEWORK

Regional and local laws, regulations, plans, policies, and guidelines are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to geology and soils in the District. Site-specific projects will be identified in the future under the program, and there may be local jurisdictional plans and policies that are applicable depending on the type of project and the location. Specific requirements of these laws, regulations, plans, policies, and guidelines might not be up to date when a proposed site-specific school project undergoes review; therefore, this section provides a general discussion of the most important ones. Some of these are not directly applicable to the SUP or site-specific projects implemented under the SUP; however, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standard Conditions of Approval are also listed. See *Applicable Regulations and Standard Conditions* at the end of this chapter for those that require District compliance.

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<sup>267</sup> Poland, Joseph F. 1984. Guidebook to studies of land subsidence due to ground-water withdrawal. United Nations Educational, Scientific, and Cultural Organization (UNESCO). <http://www.camnl.wr.usgs.gov/rgws/Unesco/PDF-Chapters/Chapter3.pdf>.

<sup>268</sup> Sharp, John M., Jr. 2007. A Glossary of Hydrogeological Terms. University of Texas, Austin. <http://www.geo.utexas.edu/faculty/jmsharp/sharp-glossary.pdf>.

<sup>269</sup> Department of Toxic Substances Control (DTSC). 2010, September 13. Glossary of Environmental Terms. [http://www.dtsc.ca.gov/InformationResources/Glossary\\_of\\_Environmental\\_Terms.cfm](http://www.dtsc.ca.gov/InformationResources/Glossary_of_Environmental_Terms.cfm).

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### 5.7.1.1.1 Federal

#### 5.7.1.1.1.1 *Code of Federal Regulation, Title 10, Section 1022.11*

Flood insurance rate maps (FIRMs) are prepared by the Federal Insurance Administration of the Department of Housing and Urban Development after a risk study for a community has been completed and the risk premium rates have been established. The maps indicate the risk premium zones applicable in the community and when those rates are effective. FIRMs are used in making flood plain determinations and determining if a proposed action is in the base or critical action flood plain, as appropriate.

#### 5.7.1.1.1.2 *Code of Federal Regulations, Title 40, Parts 122 et seq.*

**National Pollution Discharge Elimination System (NPDES)** is a regulatory program administered by the U.S. EPA established under the Clean Water Act (US Code, Title 33, Sections 1342 et seq.). In the State of California, the NPDES Program has been delegated to the State of California for implementation through the State Water Resources Control Board and the nine Regional Water Quality Control Boards. NPDES permits are also referred to as waste discharge requirements (WDRs) that regulate discharges to waters of the United States. For a more detailed description of the NPDES permitting please refer to Chapter 5.9, Hydrology and Water Quality.

One of the facilities that may require to NPDES permit is construction sites. Construction activities that disturb one of one acre of land or more, must file for and obtain an NPDES permit. The SWRCB issues the statewide general NPDES Permit for stormwater discharges from construction sites. Under this Construction General permit, discharges of stormwater from construction sites with a disturbed area of one or more acres are required to either obtain individual NPDES permits or to be covered by the Construction General Permit. Coverage by the Construction General Permit is accomplished by completing and filing a Notice of Intent with the SWRCB and developing and implementing a Stormwater Pollution Prevention Plan (SWPPP). Each applicant under the Construction General Permit must ensure that a SWPPP is prepared prior to grading and is implemented during construction. The SWPPP must list best management practices (BMPs) to be used on the construction site to protect stormwater runoff, and must contain a visual monitoring program; a chemical monitoring program for “nonvisible” pollutants to be implemented if there is a failure of BMPs; and a monitoring plan if the site discharges directly to a water body listed on the state’s 303(d) list of impaired waters.

### 5.7.1.1.2 State

#### 5.7.1.1.2.1 *Uniform Building Code Chapter 18, Division 1 Section 1803.2 and 1804.5*

The **Uniform Building Code (UBC)** 1994, Chapter 18. Division 1 Section 1803.2 mandates that special foundation design consideration be employed if the soil Expansion Index is 20, or greater in accordance with Table 18-1-B. The methodology and scope for a geotechnical investigation are described in UBC Section 1803, and requires an assessment of a variety of factors, such as slope stability, soil strength, adequacy of load-bearing soils, the presence of compressible or expansive soils, and the potential for liquefaction. The required content of the geotechnical report includes recommendations for foundation type and design criteria. These recommendations can include foundation design provisions that are intended to mitigate the effects of

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expansive soils, liquefaction, and differential settlement. In general, mitigation can be accomplished through a combination of ground modification techniques (i.e., stone columns, reinforcing nail and anchors, deep soil mixing, etc.), selection of an appropriate foundation type and configuration, and use of appropriate building/foundation structural systems. Section 1804.5 Excavation, Grading, and Fill require the preparation of a geotechnical report where a building will be constructed on compacted fill.<sup>270</sup>

The **International Building Code** (IBC) replaced earlier regional building codes (including the Uniform Building Code) in 2000 and established consistent construction guidelines for the nation. In 2006, the IBC was incorporated into the 2007 CBC, and currently applies to all structures being constructed in California. The national model codes are therefore incorporated by reference into the building codes of local municipalities. The CBC includes building design and construction criteria that take into consideration the State's seismic conditions.

### *California Public Resources Code, Section 2621*

The **Alquist-Priolo Earthquake Fault Zoning Act**<sup>271</sup> was signed into state law in 1972 to mitigate the risk associated with earthquakes and prohibits the construction of certain types of structures for human occupancy on or near the trace of active faults. The act requires the state geologist to delineate "Earthquake Fault Zones" along faults that are "sufficiently active" and "well defined." The act also requires that cities and counties withhold development permits for sites within an Earthquake Fault Zone until geologic investigations demonstrate that the sites are not threatened by surface displacements from future faulting. Pursuant to this act, structures for human occupancy are not allowed within 50 feet of the trace of an active fault. Active earthquake faults are faults where surface rupture has occurred within the last 11,700 years.

#### *5.7.1.1.2.2 California Public Resources Code, Section 2690 et seq.*

The **Seismic Hazard Mapping Act** was adopted by the state in 1990 for the purpose of protecting public safety from the effects of (nonsurface fault rupture) earthquake hazards.

The State Department of Conservation, CGS<sup>272</sup> prepares and provides local governments with seismic hazard zones maps that identify areas susceptible to amplified shaking, liquefaction, earthquake-induced landslides, and other ground failures. The seismic hazards zones are referred to as "zones of required investigation" because site-specific geological investigations are required for construction projects in these areas. Before a project that is located within a mapped seismic hazard zone can be permitted, a geologic investigation, evaluation, and written report including evaluation of site-specific seismic hazards and recommendations for appropriate measures to minimize such hazards must be prepared by a licensed geologist. In addition, sellers (and their agents) of real property within a mapped Seismic Hazard Zone must disclose that the property lies

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<sup>270</sup> UBC. 1994: International Conference of Building Officials; Free Download Borrow and Streaming Archive. <https://archive.org/details/uniformbuildingc00inte/page/252/mode/2up?view=theater>.

<sup>271</sup> Under the 1972 Alquist Priolo Act, the zones that were mapped around active fault traces were originally known as "Special Study Zones". After January 1, 1994, these same mapped zones were then referred to as "Earthquake Fault Zones". The name of the law was also changed at that time, from the "Alquist Priolo Special Studies Zone Act" to its current name, the "Alquist Priolo Earthquake Fault Zoning Act."

<sup>272</sup> In April 1860, the California Legislature established the *Geological Survey of California* that has evolved during its 150 years of service, and several name changes, into today's modern *California Geological Survey* (CGS). <http://www.consrv.ca.gov/CGS/Pages/Index.aspx>.



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within such a zone at the time of sale. The intent of this act is to protect the public from the effects of strong ground shaking, liquefaction, landslides, ground failure, or other hazards caused by earthquakes.

### 5.7.1.1.2.3 *California Code of Regulations, Title 24, Part 2*

Current law states that every local agency enforcing building regulations, such as cities and counties, must adopt the provisions of the CBC within 180 days of its publication. The publication date of the CBC is established by the California Building Standards Commission. The most recent building standard adopted by the legislature and used throughout the state is the 2019 version, often with local, more restrictive amendments that are based on local geographic, topographic, or climatic conditions.<sup>273</sup> These codes provide minimum standards to protect property and public safety by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock onsite, and the strength of ground shaking with specified probability of occurring at a site. The CBC is based largely on the IBC published by the International Code Council (ICC), a non-profit organization recognized as a leading authority in the field of building codes.

Chapter 18 of the CBC, Soils and Foundations, specifies the required level of soil investigation, required by law in California. Requirements in Chapter 18 apply to building and foundations systems and consider reduction of potential seismic hazards.

### 5.7.1.1.2.4 *California Administration Code, Section 4-317(e)*

Section 4-317(e) of the California Administration Code (CAC)<sup>274</sup> requires geological and soil engineering studies to be made for the construction of any school building, or for the reconstruction or alternation or addition to any school building for work which alters structural elements if the site of the project is within the boundaries of a Seismic Hazard Zone, an Earthquake Fault Zone, or in a seismic hazard zone designated in the Safety Element of a Local General Plan.

### 5.7.1.1.2.5 *California Code of Regulations, Title 5, Section 14010*

**Title 5**<sup>275</sup> regulation sets safety standards for selection of new school sites. The section includes prohibitions on construction of public schools on sites containing active faults or fault traces or subject to moderate to high liquefaction or landslides.

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<sup>273</sup> The 2019 CBC took effect on January 1, 2020.

<sup>274</sup> CAC 2019, Section 4-317(e) Chapter 4 Administrative Regulations for the Division of the State Architect-Structural Safety. <https://up.codes/viewer/california/ca-administrative-code-2019/chapter/4/administrative-regulations-for-the-division-of-the-state-architect-structural-sa#4>.

<sup>275</sup> Title 5. Education, Division 1. California Department of Education, Chapter 13. School Facilities and Equipment, Subchapter 1. School Housing, Article 2. School Sites, 14010. Standards for School Site Selection. [Cal. Code Regs. Tit. 5, § 14010 - Standards for School Site Selection | State Regulations | US Law | LII / Legal Information Institute \(cornell.edu\)](#)

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### 5.7.1.1.2.6 *California Code of Regulations, Title 5, Section 14011 and 14012*

Section 14011, **Procedures for Site Acquisition–State-Funded School**, and Section 14012, **Procedures for Site Acquisition–Locally-Funded School**, requires that, in compliance with Education Code Sections 17212 and 17212.5, the geological and soil engineering study shall address all of the following:

- Nature of the site, including a discussion of liquefaction, subsidence or expansive soils, slope, stability, dam or flood inundation, and street flooding.
- Whether the site is located within a special study zone.
- Potential for earthquake or other geological hazard damage.
- Whether the site is situated on or near a pressure ridge, geological fault, or trace fault that may rupture during the life of the school building and the student risk factor.
- Economic feasibility of the construction effort to make the school building safe for occupancy.

### 5.7.1.1.2.7 *California Code of Regulations, Title 14, Division 2, Chapter 8, Article 10*

**Seismic Hazards Mapping Regulations** These regulations govern the exercise of city, county and state agency responsibilities to identify and map seismic hazard zones and to mitigate seismic hazards to protect public health and safety in accordance with the provisions of Public Resources Code, Section 2690 et seq. (Seismic Hazards Mapping Act).<sup>276</sup> Section 3724 “Specific Criteria for Project Approval” states:

The following specific criteria for project approval shall apply within seismic hazard zones and shall be used by affected lead agencies in complying with the provisions of the Act:

- (a) A project shall be approved only when the nature and severity of the seismic hazards at the site have been evaluated in a geotechnical report and appropriate mitigation measures have been proposed.
- (b) The geotechnical report shall be prepared by a *registered civil engineer or certified engineering geologist*, having competence in the field of seismic hazard evaluation and mitigation. The geotechnical report shall contain site-specific evaluations of the seismic hazard affecting the project, and shall identify portions of the project site containing seismic hazards. The report shall also identify any known off-site seismic hazards that could adversely affect the site in the event of an earthquake. The contents of the geotechnical report shall include, but shall not be limited to, the following:
  - (1) Project description.

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<sup>276</sup> State Department of Conservation, California Geological Survey. CGS Codes. CCR Title 14, Division 2, Chapter 8, Article 10. <https://www.conservation.ca.gov/cgs/Pages/Program-SHP/article10.aspx#3724>.

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- (2) A description of the geologic and geotechnical conditions at the site, including an appropriate site location map.
  - (3) Evaluation of site-specific seismic hazards based on geological and geotechnical conditions, in accordance with current standards of practice.
  - (4) Recommendations for appropriate mitigation measures as required in Section 3724(a), above.
  - (5) Name of report preparer(s), and signature(s) of a certified engineering geologist and/or registered civil engineer, having competence in the field of seismic hazard evaluation and mitigation.
- (c) Prior to approving the project, the lead agency shall independently review the geotechnical report to determine the adequacy of the hazard evaluation and proposed mitigation measures and to determine the requirements of Section 3724(a), above, are satisfied. Such reviews shall be conducted by a certified engineering geologist or registered civil engineer, having competence in the field of seismic hazard evaluation and mitigation.

The Act (PRC, Section 2621) and Regulations (CCR Title 14, Division 2, Chapter 8, Article 10) state that the site investigation reports must be prepared by a certified engineering geologist or registered civil engineer, who must have competence in the field of seismic hazard evaluation and mitigation, and be reviewed by a certified engineering geologist or registered civil engineer, also competent in the field of seismic hazard evaluation and mitigation.

Although the Seismic Hazards Mapping Act does not distinguish between the types of licensed professionals who may prepare and review the report, the current Business and Professions Code (Geologist and Geophysicist Act, Section 7832; and Professional Engineers Act, Section 6704) restricts the practice of these two professions. Because of the differing expertise and abilities of engineering geologists and civil engineers, the scope of the site investigation report for the project may require that both types of professionals prepare and review the report, each practicing in the area of their expertise. Involvement of both engineering geologists and civil engineers will generally provide greater assurance that the hazards are properly identified, assessed, and mitigated.

The State Mining and Geology Board recommends that engineering geologists and civil engineers conduct the assessment of the surface and subsurface geological/geotechnical conditions at the site, including off-site conditions, to identify potential hazards to the project. It is appropriate for the civil engineer to design and recommend mitigation measures. It also is appropriate for both engineering geologists and civil engineers to be involved in the implementation of the mitigation measures; engineering geologists to confirm the geological conditions and civil engineers to oversee the implementation of the approved mitigation measures.<sup>277</sup>

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<sup>277</sup> CGS. 2008, September 11. Guidelines for Evaluating and Mitigating Seismic Hazards in California (California Geological Survey Special Publication 117). [https://www.conservation.ca.gov/cgs/documents/program-shp/SP\\_117a.pdf](https://www.conservation.ca.gov/cgs/documents/program-shp/SP_117a.pdf).

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### 5.7.1.1.2.8 *California Geological Survey Special Publication 117*

CGS Special Publication 117 “**Guidelines for Evaluating and Mitigating Seismic Hazards in California**,” provides criteria for the evaluation and mitigation of earthquake-related hazards for projects within designated zones of required investigations. Special Publication 117 has two objectives: 1) To assist in the evaluation and mitigation of earthquake-related hazards for projects within designated zones of required investigations; and, 2) To promote uniform and effective statewide implementation of the evaluation and mitigation elements of the Seismic Hazards Mapping Act.<sup>278</sup> The document includes: recommended content for site investigation reports within zones of required investigations; earthquake ground-motion parameters; analysis of earthquake-induced landslide hazards; analysis of liquefaction hazards; guidelines for mitigating seismic hazards; guidelines for reviewing site-investigation reports.

According to Special Publication 117, the investigation of potential seismic hazards can be performed in two steps: 1) a preliminary screening investigation, and 2) a quantitative evaluation of the seismic hazard potential and its consequences. The investigation can be completed by skipping stage 1 or 2. For example, a preliminary screening investigation may find that a previous site-specific investigation, on or adjacent to the project site, has shown that no seismic hazards exist, and that a quantitative evaluation is not necessary. Conversely, a consultant or project manager may know from experience that a project site is susceptible to a given hazard, and may opt to forego the preliminary screening investigation and start with a quantitative evaluation of the hazard.

### 5.7.1.1.2.9 *California Geological Survey Note 48*

CGS Note 48 is also known as the “**Checklist for the Review of Engineering Geology and Seismology Reports for California Public Schools, Hospitals, and Essential Services Buildings**.”<sup>279</sup> Note 48 is used by the CGS to review the geology, seismology, and geologic hazards evaluated in reports that are prepared under CCR Title 24 (California Building Code). CCR Title 24 applies to California Public Schools, Hospitals, Skilled Nursing Facilities, and Essential Services Buildings. The Building Official for public schools is the DSA. Hospitals and Skilled Nursing Facilities in California are under the jurisdiction of the Office of Statewide Health Planning & Development (OSHPD). The CGS serves as an advisor under contract with these two state agencies. The Checklist includes items listed under: project location; engineering geology/site characterization; seismology and calculation of earthquake ground motion; liquefaction/seismic settlement analysis; slope stability analysis; other geologic hazards or adverse conditions, and; report documentation.

### 5.7.1.1.2.10 *California Government Code, Section 8875.8*

In California, unreinforced masonry buildings are generally brick buildings constructed prior to 1933 and predating modern earthquake-resistant design. In earthquakes, the brick walls (especially parapets) tend to disconnect from the building and fall outward, creating a hazard for people below and sometimes causing the

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<sup>278</sup> CGS. 2008, September 11. Guidelines for Evaluating and Mitigating Seismic Hazards in California (California Geological Survey Special Publication 117). [https://www.conservation.ca.gov/cgs/documents/program-shp/SP\\_117a.pdf](https://www.conservation.ca.gov/cgs/documents/program-shp/SP_117a.pdf).

<sup>279</sup> CGS. 2022, November . Note 48: Checklist for the Review of Engineering Geology and Seismology Reports for California Public Schools, Hospitals, and Essential Services Buildings. [CGS Note 48: Checklist for the Review of Engineering Geology and Seismology Reports for California Public Schools, Hospitals, and Essential Services Buildings, 2022.](#)

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building to collapse. The **Unreinforced Masonry Law**, enacted in 1986, requires cities and counties in Seismic Zone 4 to identify hazardous unreinforced masonry buildings and to consider local regulations to abate potentially dangerous buildings through retrofitting or demolition, as outlined in the State Office of Planning and Research Guidelines.

### 5.7.1.1.2.11 *California Education Code, Section 17281*

Section 17281, together with Article 6 (commencing with Section 17365) and Article 7 (commencing with Section 81130) of Chapter 1 of Part 49, is known as the Field Act. The Field Act was one of the first legislative acts to mandate earthquake-resistant construction (specifically for schools in California) in the United States. The Field Act was passed because of the 6.4 magnitude 1933 Long Beach earthquake, which destroyed or rendered unsafe 230 school buildings. Many school buildings completely collapsed due to unreinforced masonry construction and/or shoddy workmanship. Governor James Rolph, Jr. and the Legislature responded quickly by enacting the Field Act (named after Assembly Member Don C. Field, its key sponsor), which required earthquake-resistant design and construction of all public schools. It was enacted on April 10, 1933, exactly 30 days after the earthquake. It has since governed the planning, design, and construction of billions of dollars of public school (K-14) building investments.

The act also established the Office of the State Architect (now DSA), which developed design standards and quality control procedures, and required that schools be designed by registered architects and engineers. Charter school may, but are not required to, use Field Act compliant facilities.<sup>280</sup>

The Field Act is built on four major principles:<sup>281</sup>

- Seismic design standards
- Plan review
- Construction inspections
- Special tests

More specifically, the Field Act requires:

- The DSA must write design standards for public schools.
- Public school building construction plans must be prepared by qualified California-licensed structural engineers and architects.
- Designs and plans must be checked by DSA for compliance with the Field Act before contracts for construction can be awarded.

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<sup>280</sup> CDE. Charter Schools FAQ Section 10. <https://www.cde.ca.gov/sp//ch/qandasec10.asp>.

<sup>281</sup> State of California. Alfred E. Alquist, Seismic Safety Commission. *The Field Act and Public School Construction: A 2007 Perspective*. February 2007. [https://ssc.ca.gov/wp-content/uploads/sites/9/2020/08/cssc\\_2007-03\\_field\\_act\\_report.pdf](https://ssc.ca.gov/wp-content/uploads/sites/9/2020/08/cssc_2007-03_field_act_report.pdf).

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- Qualified inspectors, independent of the architecture and engineering contractors and hired directly by the school districts, must continuously inspect construction, and verify compliance with the approved plans.
- Responsible architects and/or structural engineers must observe the construction periodically. Changes to plans (if necessary) must be prepared by the responsible architects and/or structural engineers and are subject to approval by DSA.
- Special tests, if needed, must be ordered by DSA and performed by certified testing laboratories.
- Architects, engineers, inspectors, and contractors must file reports, under penalty of perjury, that verify that actual construction complies with approved plans.

In 1939, the **Garrison Act** applied Field Act standards to existing school buildings. The first real-world test of the Field Act took place in the 1940 Imperial Valley earthquake. This earthquake was magnitude 7.1, but the 16 post-Field Act school buildings subjected to intense shaking suffered damage that was less than 1% of their valuation. Older, pre-Field Act structures suffered damaged equal to 29% of their valuation.

Although the benefits of the Field Act were demonstrated during the 1940 earthquake, many districts still delayed inspecting or renovating older pre-Field Act structures. As a result, the first and second **Green Acts** were passed in 1967 and 1968, respectively, to set inspection deadlines for school districts. The 1971 San Fernando earthquake spurred the State Legislature to provide additional funding to retrofit older buildings.

### 5.7.1.1.2.12 *California Education Code, Section 17212*

This law requires that a geological and soil engineering study be prepared if a prospective school site is within the boundaries of any special studies zone or within an area designated as geologically hazardous in the safety element of the local general plan. Geologic and soil engineering studies provide an assessment of the nature of the site and the potential for earthquake or other geological hazard damage. The geologic and soil engineering studies are used to preclude the siting of a school in a location that would be too expensive to mitigate potential seismic hazards.

### 5.7.1.1.2.13 *California Education Code, Section 17212.5*

This law requires preparation of geological and soil engineering studies, as described in Section 17212, for the construction of any school building, or for the reconstruction, alteration, or addition to any school building that alters structural elements, if the estimated cost exceeds \$25,000. No school building shall be constructed, reconstructed, or relocated on the trace of a geologic fault along which surface rupture can reasonably be expected to occur within the life of the school building.

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### 5.7.1.1.2.14 California Department of Education

#### 5.7.1.1.2.14.1 *School Site Selection and Approval Guide. Appendix H: Factors to Be Included in a Geological and Environmental Hazards Report*

Beginning in the early 1970s, a series of bans on the use of certain asbestos-containing materials (ACMs) in construction were established by the EPA and the Consumer Product Safety Commission. Most U.S. manufacturers voluntarily discontinued the use of asbestos in certain building products during the 1980s.

### 5.7.1.1.2.15 Division of the State Architect, Regulatory Document IR A-4

Regulatory Document IR A-4, “Geohazard Report Requirements: 2019 CBC,” clarifies requirements for the submission of a geohazard report to the CGS for acceptance, and subsequently to DSA, for projects within the jurisdiction of DSA.<sup>282</sup>

#### *California Public Resources Code Sections 21000 et seq. and California Code of Regulations Title 14 Sections 15000 et seq.*

CEQA Guidelines Section 15064.5(d) specifies a process for evaluating human remains, and this issue is identified on the CEQA Checklist as an issue for evaluation in environmental documents. In addition, the CEQA Checklist identifies the presence of paleontological resources as an environmental concern that needs to be considered. Therefore, the issues of human remains and paleontological resources are included in the significance criteria and the evaluation of impacts at the program level.

## LAUSD

### *Standard Conditions of Approval*

This table lists the geology and soils related standard condition that will be included as part of each SUP-related project, as appropriate.

Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
SC-GEO-1	Seismic Hazards	Requires grading, excavation, or other ground-disturbing activities	During project design, and project construction (Planning, Construction)	LAUSD shall prepare a Geohazard Assessment for the construction of any new school or applicable school addition.
SC-GEO-2	Paleontological Resources	Project area is identified as sensitive for paleontological resources	During ground-disturbing activities (Construction)	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.

<sup>282</sup> DSA. 2021, June 611. IR A-4: Geohazard Report Requirements: 2019 CBC. <https://www.bing.com/search?q=https%3A%2F%2Fwww.dgs.ca.gov%2F-%2Fmedia%2FDivisions%2FDSA%2F...&form=IPRV10>.

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
				<p>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.</p> <ul style="list-style-type: none"> <li>• Ground-disturbing activities shall not continue until the discovery has been assessed by the Paleontologist.</li> <li>• The paleontologist shall have the authority to halt construction activities to allow a reasonable amount of time to identify potential resources.</li> <li>• Significant resources found shall be curated as determined necessary by the Paleontologist.</li> </ul>

Implementation of the geohazard assessment would include the following.

### 5.7.1.1.3 Purpose And Qualifications

For SUP-related project sites where preliminary geotechnical or environmental assessments have identified the potential for risks related to seismic or other geohazards, a supplemental geohazard assessment is required. In order to ensure the proposed site is safe for its intended use, the following scope of work shall be implemented by qualified professionals. Recommended qualifications include:

- Staff directing work is a registered California professional (PE, PG, CEG, etc.)
- Recognized experience in geotechnical engineering, geophysics and seismology in Southern California
- Expertise in identifying and dating recent and paleo-seismic events
- Expertise in soil horizon development identification and dating of recent age seismic events
- Recent publications related to the field of expertise (geophysics, seismology, paleoseismic events, soil horizon development, and dating of recent age seismic events)

#### 5.7.1.1.3.1 Task 1.0 – Conduct Seismic Database Review

To supplement existing geotechnical or geological information, a review of existing seismic databases and scientific literature will be conducted. The objective of the database review is to refine, to the extent possible, the location of the potential fault or other geohazards identified near the site during the preliminary review. Review of materials will include, but are not limited to, data provided by the USGS, the California Geological Survey, the California Geologic Energy Management Division (CalGEM), the Southern California Earthquake Center (SCEC), the City and/or County of Los Angeles, recent articles in academic journals, other professional geohazard investigations performed in the site vicinity, and seismic databases and models, such as Georef <https://pubs.geoscienceworld.org/georef>.



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### 5.7.1.1.3.2 Task 2.0 – Prepare Draft Report of Findings and Recommendations

Based on the preliminary geotechnical information and the results of the supplemental geohazard assessment, a draft report of combined findings and recommendations will be prepared for review by the LAUSD. The purpose of the report will be to clarify the location of the identified potential geohazards in relation to the proposed site and to characterize potential seismic hazards, if any, that could reasonably be expected to affect the site. The report shall also identify, to the extent possible, any other potential geohazards that may be present on or adjacent to the site, such as low angle or blind-thrust faults. The report shall include maps showing the locations of all identified potential hazards in relation to the site and recommendations for subsequent investigations, if any.

### 5.7.1.1.3.3 Task 3.0 – Finalize Report

Based on comments received from LAUSD, the report will be finalized.

## 5.7.1.2 EXISTING CONDITIONS

### 5.7.1.2.1 Regional Setting

California is divided into 11 geomorphic provinces, that is, regions defined by characteristic landforms. The District spans parts of two geomorphic provinces: the Transverse Ranges Geomorphic Province, an east-west-trending series of steep mountain ranges and valleys, and the Peninsular Ranges Geomorphic Province, a series of northwest-trending mountain ranges and valleys. The boundary between the two geomorphic provinces within the District is the southern base of the Santa Monica Mountains and the Hollywood Hills.

Nearly all the southern half of the District is in the Los Angeles Basin; the southwest corner of the District is in the Palos Verdes Hills. Major landforms in the Northwest region are, from north to south: Santa Susana Mountains, San Fernando Valley, Simi Hills, and Santa Monica Mountains. Major landforms in the Northeast region, from north to south, are: San Gabriel Mountains, San Fernando Valley, Verdugo Mountains, Santa Monica Mountains, and Hollywood Hills. The San Rafael Hills are in the Central region; the Repetto Hills are in the East region; and portions of the Los Angeles Basin are in the Central, East, West, and South regions.

### 5.7.1.2.2 District Setting

#### 5.7.1.2.2.1 Geologic Setting

The North Region is within the Transverse Ranges Geomorphic Province, and consists of the San Fernando and Verdugo valleys and mountain ranges and hills surrounding the two valleys—counterclockwise from the northeast: the San Gabriel Mountains and Verdugo Mountains, Santa Susana Mountains, Simi Hills; and northern portions of the Santa Monica Mountains and Hollywood Hills.

The West Region area includes most of the portions of the Santa Monica Mountains and Hollywood Hills – in the Transverse Ranges Geomorphic Province – that are within the District. The balance of the West Region is part of the western Los Angeles Basin in the Peninsular Ranges Geomorphic Province.

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The East Region includes part of the central Los Angeles Basin in the Peninsular Ranges Geomorphic Province and the eastern Hollywood Hills and San Rafael Hills, both in the Transverse Ranges Geomorphic Province, part of the central Los Angeles Basin and the Repetto Hills, both in the Peninsular Ranges Geomorphic Province.

The South Region spans part of the southern Los Angeles Basin and part of the Palos Verdes Hills, both in the Peninsular Ranges Geomorphic Province.

Sedimentary rocks underlie most of the District, ranging in age from Mesozoic in the Santa Susana Mountains, the northern parts of the Santa Monica Mountains and Hollywood Hills, the San Rafael Hills and Repetto Hills, and the Palos Verdes Hills, to Quaternary across most of the Los Angeles Basin and San Fernando Valley.<sup>283,284</sup>

The San Gabriel Mountains consist mostly of granitic igneous rocks, ranging from Mesozoic to Precambrian in age; Mesozoic-age granitic rocks also underlie parts of the Hollywood Hills. Some volcanic rocks of Tertiary age are present in the Santa Monica Mountains.<sup>285</sup>

### **5.7.1.2.2.1.1      *Geologic Asbestos***

5.7.1.2.2.1.2      Asbestos is the name of a group of silicate minerals that are heat resistant and were commonly used as insulation and fire retardant. Outcrops of asbestos minerals can pose health hazards to people nearby. The California Geological Survey has identified a former asbestos mine near the north District boundary.<sup>286</sup>

### **5.7.1.2.2.1.3      *Collapsible Soils***

Collapsible soils are present in many alluvial areas of Los Angeles County, including the Antelope and Santa Clarita Valley.<sup>287</sup>

### **5.7.1.2.2.1.4      *Expansive Soils***

The District is in a semiarid region with marked seasonal changes in precipitation—most rain falls in winter, and there is a long dry season in summer and autumn. Therefore, the District is in a climate such that a relatively high incidence of soil expansion is expected where soils contain the requisite clay minerals.

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<sup>283</sup> Geologic time scale: Quaternary, present to 1.8 million years before present (mybp); Tertiary, 1.8 to 65.5 mybp; Mesozoic, 65.5 to 251 mybp; Precambrian, 570+ mybp.

<sup>284</sup> The Repetto Hills are in the Community of East Los Angeles in unincorporated Los Angeles County, and in the City of Monterey Park.

<sup>285</sup> California Geological Survey. 2013, May 29. 2010 Geologic Map of California. <http://www.conservation.ca.gov/cgs/publications/gmc>.

<sup>286</sup> CGS and USGS. 2011. Reported Historic Asbestos Mines, Historic Asbestos Prospects, and Other Natural Occurrences of Asbestos in California. ftp [https://www.conservation.ca.gov/cgs/documents/publications/map-sheets/MS\\_059\\_Plate.pdf](https://www.conservation.ca.gov/cgs/documents/publications/map-sheets/MS_059_Plate.pdf).

<sup>287</sup> Department of Public Works, County of Los Angeles. 2017. Residential Code Manual. <https://dpw.lacounty.gov/bsd/lib/fp/Building/Residential%20Code%20Manuals/2011/RCM%20R401.4%20A3%20-%20Foundation%20on%20Collapsible%20Soils%202-13-12.pdf>.

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### 5.7.1.2.2.1.5 *Ground Subsidence*

Significant ground subsidence occurred in the Beverly Hills/Cheviot Hills, Santa Fe Springs, Wilmington, and Inglewood oil fields in the 1950s and 1960s. Subsidence in those four oil fields was slowed greatly in the 1960s by pumping large amounts of water or steam into oil reservoir rock.<sup>288</sup> The City of Los Angeles requires monitoring and mitigation measures to prevent significant subsidence related to oil and gas extraction and mining activities, under its Surface Mining District ordinance.<sup>289</sup> There are oil fields in many parts of the District—the communities of Harbor City and Wilmington in the City of Los Angeles and the Cities of Lomita and Carson, on the south; the Community of Marina Del Rey in the City of Los Angeles on the west; the City of West Hollywood and the Community of Hollywood in the City of Los Angeles in the central part of the District; and the Santa Susana Mountains along the District's north boundary.<sup>290</sup> Total oil production in Los Angeles County in 2018 was approximately 19 million barrels (1 barrel = 42 US gallons).<sup>291</sup>

Subsidence caused by groundwater withdrawal is documented in many areas of California, including the Santa Clara, Temecula, and San Jacinto Valleys.<sup>292</sup> Permanent ground subsidence to a depth of over six feet has occurred in the Antelope Valley in northern Los Angeles County. The most damaging effects of subsidence have been ground fissures in areas of differential ground subsidence.<sup>293</sup>

### 5.7.1.2.2.2 *Faulting and Seismicity*

Faults in the District are listed below and shown on Figure 5.7-1, *Fault Map*.<sup>294, 295</sup> Faults identified with (EFZ) are designated as Earthquake Fault Zones.

#### 5.7.1.2.2.2.1 *Active Faults*

- Simi Fault Zone
- Santa Susana Fault (EFZ)
- San Gabriel Fault
- San Fernando Fault (EFZ)
- Verdugo Fault
- Sierra Madre Fault (EFZ)

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<sup>288</sup> Department of Regional Planning, County of Los Angeles. 1990. Op Cit.

<sup>289</sup> Section 13.03, City of Los Angeles Municipal Code.

<sup>290</sup> CalGEM. 2023, April 29. Well Finder. <https://www.conservation.ca.gov/calgem/Pages/WellFinder.aspx>.

<sup>291</sup> Western States Petroleum Association (WSPA), April 29. Report Finds Eliminating Oil Refining and Production in Los Angeles County Will Substantially Raise Unemployment Rates and Reduce Household Incomes – 2023. <http://www.conservation.ca.gov/dog/Documents/2012%20Oil%20and%20Gas%20Production%20by%20County.pdf>.

<sup>292</sup> USGS. 2023. Areas of Land Subsidence in California. [https://ca.water.usgs.gov/land\\_subsidence/california-subsidence-areas.html](https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html).

<sup>293</sup> Los Angeles County Waterworks Districts. 2013, March 14. Antelope Valley Groundwater Restoration and Subsidence Mitigation Project.

<ftp://dpwftp.co.la.ca.us/pub/PDD/Wash%20DC%20Docs/4%20-%20Fact%20Sheets%20&%20Correspondence/Funding%20Priorities/Antelope%20Valley%20Groundwater%20Restoration%20and%20Subsidence%20Mitigation%20Project%20%28Fact%20Sheet%29.pdf>.

<sup>294</sup> CGS. 2023. GIS data layer.

<sup>295</sup> CGS. 2023. GIS data layer.

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- Raymond Fault (EFZ)
- Santa Monica Fault
- Hollywood Fault
- Newport-Inglewood Fault Zone (EFZ)
- Avalon-Compton Fault (EFZ)
- Cherry-Hill Fault (EFZ)
- Palos Verdes Hills Fault
- Cabrillo Fault

### 5.7.1.2.2.2.2 *Other Faults*<sup>296</sup>

- Vasquez Creek Fault
- Northridge Hills Fault
- Eagle Rock Fault
- De Mille Fault
- Chatsworth Fault
- Charnock Fault

### 5.7.1.2.2.2.3 *Historical Earthquakes*

Historical earthquakes within District boundary and within a radius of 25 miles of the District boundary that were magnitude 5 or larger between 1853 to the present are listed in Table 5.7-2.<sup>297</sup>

**Table 5.7-2 Selected Historic Earthquakes**

Earthquake	Year	Magnitude	Fault	Notes
Long Beach	1933	6.4	Newport-Inglewood	120 deaths, over \$50 million damage
San Fernando	1971	6.6	San Fernando	65 deaths, over \$500 million damage.
Point Mugu	1973	5.3	Fault system along southern edge of Transverse Ranges	–
Whittier Narrows	1987	5.9	thrust fault	8 deaths, \$358 million damage
Pasadena	1988	5.0	Raymond	–
Upland	1990	5.4	San Jose	–
Sierra Madre	1991	5.8	Clamshell – Sawpit Canyon	About \$40 million damage; unreinforced masonry buildings hardest hit.
Northridge	1994	6.7	Northridge Thrust	61 deaths, damage over \$40 billion
Chino Hills	2008	5.4	Puente Hills Thrust	–

Source: Southern California Earthquake Data Center 2013, [May 14. Chronological Earthquake Index. http://www.data.scec.org/significant/chron-index.html](http://www.data.scec.org/significant/chron-index.html).

<sup>296</sup> These faults are not identified by USGS as active.

<sup>297</sup> 1853 was chosen as the beginning of the chronology because the Los Angeles City School District, a predecessor to the LAUSD, was founded that year.

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Many unreinforced masonry buildings, including numerous schools, were destroyed by the Long Beach Earthquake of 1933. The earthquake happened at 5:54 PM on Friday, March 10 when schoolchildren were not at school. The Field Act, requiring earthquake-resistant design and construction of public schools, was passed in 1933 in response to the Long Beach Earthquake.<sup>298</sup>

The 1994 Northridge Earthquake occurred on a blind thrust fault and produced the strongest ground motions ever instrumentally recorded in an urban setting in North America.<sup>299</sup> Damage was widespread: sections of major freeways collapsed, parking structures and office buildings collapsed, and numerous apartment buildings suffered irreparable damage. Damage to wood-frame apartment houses was very widespread in the San Fernando Valley and Santa Monica areas, especially to structures with “soft” first floor or lower-level parking garages. The high accelerations, both vertical and horizontal, lifted structures off of their foundations and/or shifted walls laterally.<sup>300</sup>

### 5.7.1.2.2.4 Surface Rupture

Extensive surface fault ruptures resulting from the San Fernando Earthquake of 1971 damaged numerous homes, commercial buildings, and other structures. Surface rupture is the most easily avoided seismic hazard. Earthquake Fault Zones are mapped along the following five active faults in the District: Newport-Inglewood Fault Zone; Raymond Fault; Sierra Madre Fault; San Fernando Fault; and Santa Susana Fault (see Figure 5.7-1).<sup>301</sup> The Earthquake Zones of Required Investigation Hollywood Quadrangle map spans parts of the central Los Angeles area extending from downtown Los Angeles on the east to the City of West Hollywood and the Baldwin Hills on the west. The Hollywood quadrangle map shows an Earthquake Fault Zone along the Hollywood Fault extending from the City of West Hollywood at the west quadrangle boundary to the Community of Atwater Village in the City of Los Angeles at the east quadrangle boundary.<sup>302</sup>

### 5.7.1.2.2.5 Liquefaction

Much of the District is in zones of required investigation for liquefaction designated by the CGS, including parts of the San Fernando Valley and much of the portion of the Los Angeles Basin in the District (see Figure 5.7-2, *Liquefaction Zones*).<sup>303</sup>

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<sup>298</sup> Southern California Earthquake Data Center. 2023, April 30. Long Beach Earthquake. <https://scedc.caltech.edu/earthquake/longbeach1933.html>.

<sup>299</sup> A thrust fault is one on which one block of earth is thrust over a second block at a fault plane at a small angle to the horizontal; blind thrust faults show no expression at the ground surface.

<sup>300</sup> Southern California Earthquake Data Center. 2023, April 30. Long Beach Earthquake. <https://scedc.caltech.edu/earthquake/longbeach1933.html>.

<sup>301</sup> CGS. 2023. GIS data layer.

<sup>302</sup> CGS. 1999, March 25 and 2014, November 6. Earthquake Zones of Required Investigation Hollywood Quadrangle.

<sup>303</sup> California Geological Survey. 2023, April 30. GIS. EQ ZAPP: California Earthquake Hazards Zone of Application.

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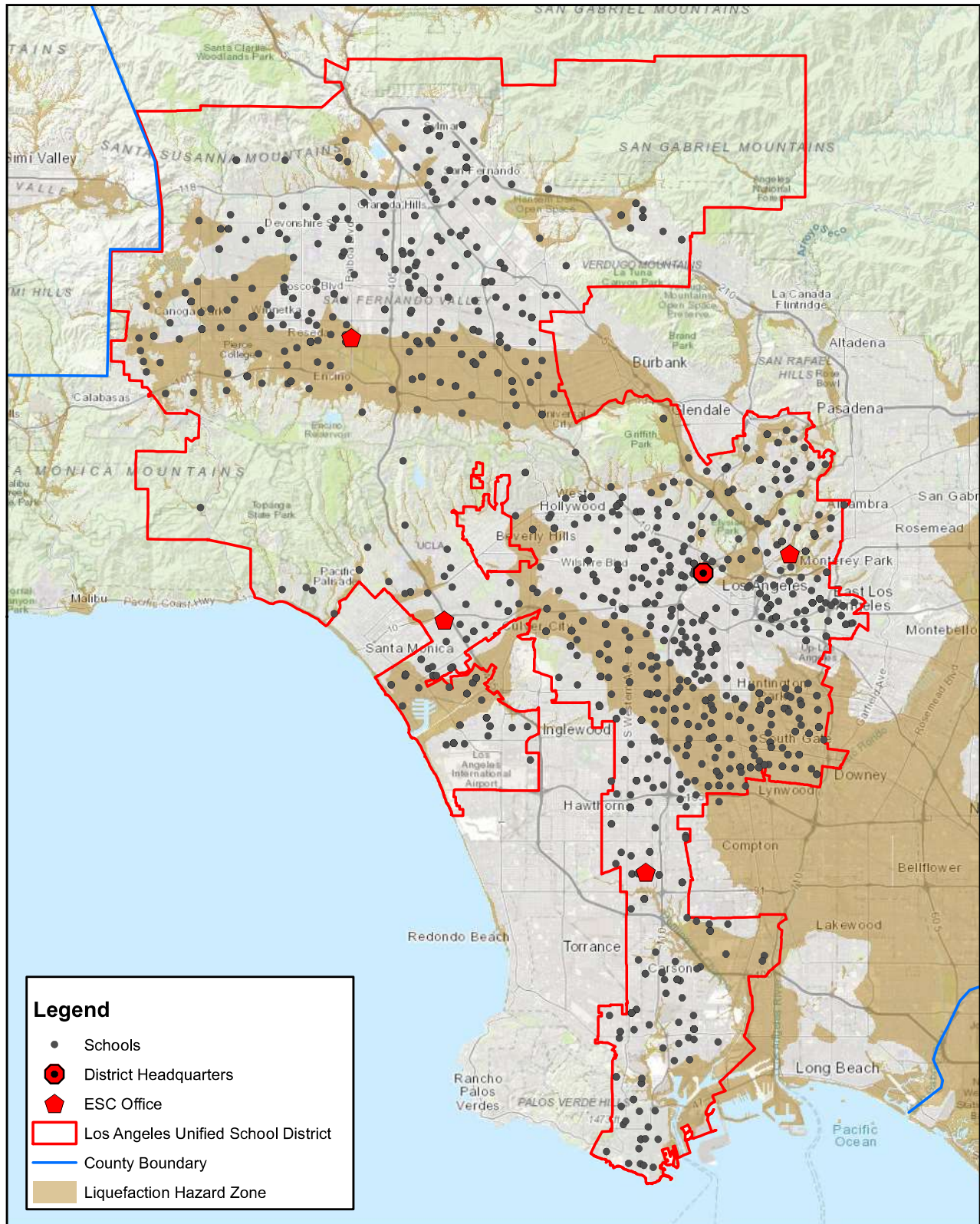
## 5. Environmental Analysis

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### Figure 5.7-2 Liquefaction Zones



0 3 6 Miles



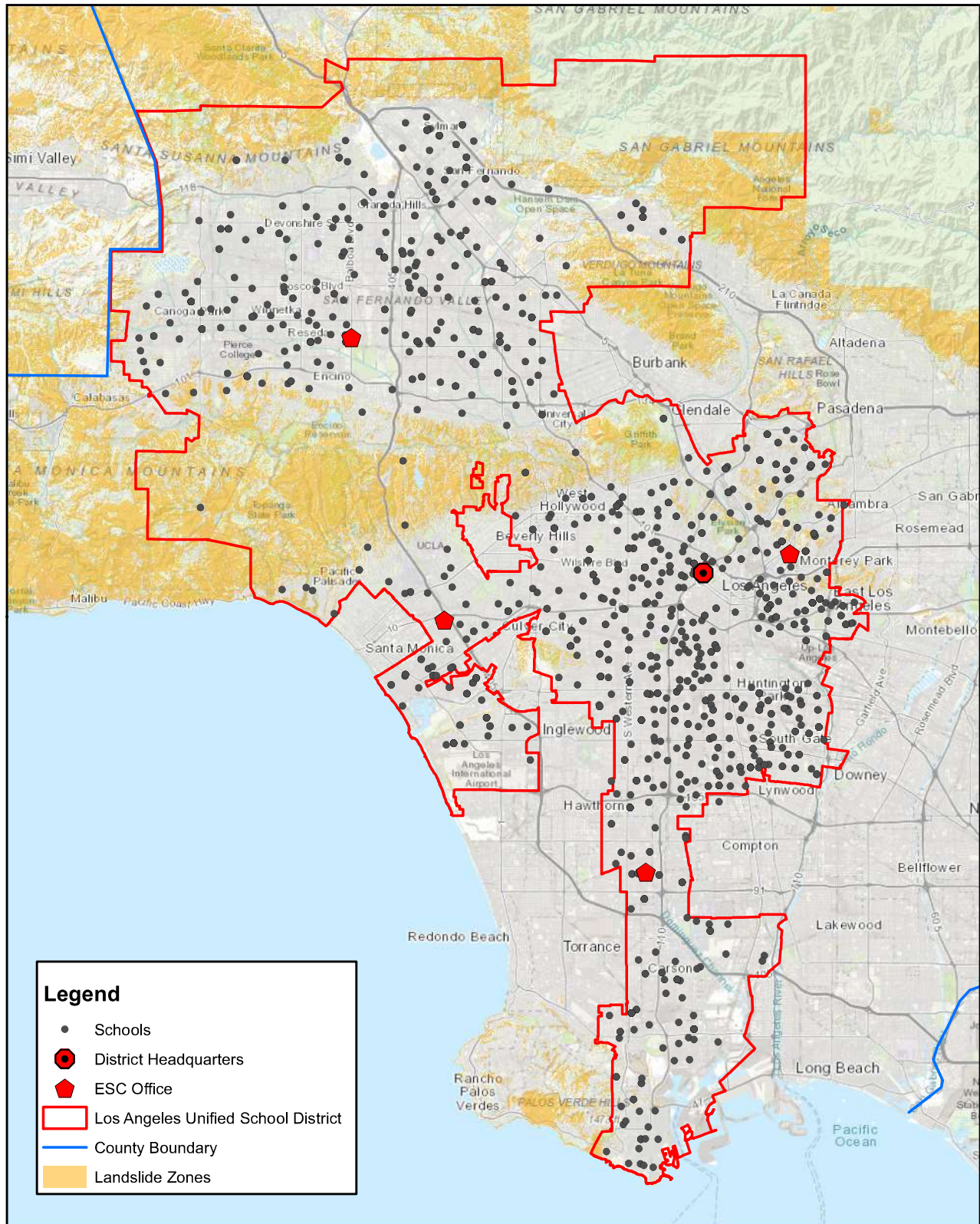
## 5. Environmental Analysis

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## 5. Environmental Analysis

### Figure 5.7-3 Landslide Zones



Source: California Department of Conservation, 2022

0 3 6 Miles



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### 5.7.1.2.2.6 *Earthquake-Induced Landslides*

Zones of required investigation for earthquake-induced landslides in the District are concentrated in mountainous and hilly regions: the Santa Susana and San Gabriel Mountains; Verdugo Mountains; Santa Monica Mountains and Hollywood Hills, and Palos Verdes Hills (see Figure 5.7-3, *Landslides Zones*).<sup>304</sup>

### 5.7.1.2.2.3 *Paleontological Resource Setting*

Paleontological resources are fossils, that is, evidence of past life on earth, including bones, shells, leaves, tracks, burrows, and impressions. The La Brea Tar Pits are one of the best-known discovery sites of ice-age fossils in the world. The La Brea Tar Pits are in and near the 23-acre Hancock Park in the City of Los Angeles, which includes an art museum and the Page Museum (tar pit-related displays and activities). The tar pits have provided an abundance of animal and plant fossils. Most are from the Pleistocene epoch (Ice Age) and date as far back as 40,000 years. Finds include mammoths, saber-tooth cats, insects, and birds.<sup>305</sup>

Many fossil-containing rock formations in the Santa Monica Mountains are described in the “Santa Monica Mountains National Recreation Area Paleontological Survey” conducted by the National Park Service in 2004. Over 2,300 fossil localities have been found within the Santa Monica Mountains National Recreation Area (SMMNRA); the eastern part of the SMMNRA is within the District. Fossils described range in age from late Jurassic to Quaternary. (The Jurassic Period extends from 200 million to 146 million years before present, and the Quaternary Epoch extends from 1.8 million ybp to the present.) Types of fossils include mollusks, sand dollars, barnacles, plants, wood, mammals, algae, crabs and other crustaceans, fishes including sharks, whales, sea lions, horses, birds, rodents, camel, bison, tapir, mammoth, mastodon, and giant ground sloth. Two fossil localities are described in the aforementioned paleontological survey: Fossil Ridge Park and Old Topanga Canyon, both in the District.<sup>306</sup> Most fossil localities in the City of Los Angeles are in local mountains.<sup>307</sup>

## 5.7.2 Thresholds of Significance

According to CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project would:

GEO-1 Expose people or structures to potential substantial adverse effects, including the loss of loss, injury, or death involving:

- 0) i) Rupture of a known earthquake fault, as delineated on the most recent 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.)

<sup>304</sup> CGS. 2023, April 30. GIS. EQ ZAPP: California Earthquake Hazards Zone of Application.

<sup>305</sup> City of Los Angeles. 2001, September. Conservation Element of the City of Los Angeles General Plan. [https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation\\_Element.pdf](https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf).

<sup>306</sup> NPS. 2004, January. Santa Monica Mountains National Recreation Area Paleontological Survey. <https://irma.nps.gov/DataStore/Reference/Profile/2274042>.

<sup>307</sup> City of Los Angeles. 2001, September. Conservation Element of the City of Los Angeles General Plan. [https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation\\_Element.pdf](https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf).

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- ii) Strong seismic ground shaking.
- iii) Seismic-related ground failure, including liquefaction.
- iv) Landslides.

GEO-2 Result in substantial soil erosion or the loss of topsoil.

GEO-3 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.

GEO-4 Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial risks to life or property.

GEO-5 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.

GEO-6 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

### 5.7.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.7-1: SUP implementation would not expose people or structures to substantial adverse effects from surface rupture of a known active fault. [Threshold GEO-1.i].**

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Fourteen active faults are mapped in the District by the CGS (listed above). Earthquake Fault Zones are mapped along seven of those faults (Santa Susana Fault, San Fernando Fault, Sierra Madre Fault, Raymond Fault, Newport-Inglewood Fault Zone, Avalon-Compton Fault, and Cherry-Hill Fault; see Figure 5.7-1).

#### 5.7.3.1.1 New Construction on New Property or Existing Campus

New construction on new property adjacent to or on an existing school campus could expose people and structures to hazards from surface rupture of a known active fault if located near a fault. Before new construction could occur on new property, a seismic hazard evaluation would be required for the site, including review of Earthquake Fault Zone maps to determine whether the property is in such a zone.

New construction on existing school campuses could lead to increases in the numbers of people on those campuses and thus would also require seismic hazard evaluations to ensure that increased numbers of people would not be exposed to hazards arising from surface rupture of a known active fault.

New Earthquake Fault Zones could be designated within the life of the SUP. For instance, the Atwater Avenue Elementary School is within a newly proposed Earthquake Fault Zone along the Hollywood fault on the

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Earthquake Zones of Required Investigation Hollywood Quadrangle.<sup>308</sup> In the past LAUSD has demolished classroom buildings found to be on top of faults. LAUSD also has the option to hire a geologist to determine the exact location of the fault.

For each existing school or adjacent property where new construction may occur, the District conducts a review of seismic hazards following the OEHS CEQA Specification Manual, Appendix G: Supplemental Geohazard Assessment Scope of Work. This assessment includes a seismic database review, preparation of a draft report of findings and recommendations, and a final report. LAUSD follows a standard procedure for obtaining clearance for new buildings:

- Determine whether the site is in an Earthquake Fault Zone
- Conduct a Seismic Hazard Evaluation
- Receive DSA design approval
- Submit to DSA oversight and inspections, as required, during construction
- Obtain DSA certification that each new school building meets State statutory safety requirements.

LAUSD seismic hazard analysis currently complies with the requirements of the CBC, *Guidelines for Evaluating and Mitigating Seismic Hazards in California* (CGS Special Publication 117), and the *Checklist for the Review of Engineering Geology and Seismology Reports for California Public Schools, Hospitals, and Essential Services Buildings* (CGS Note 48).<sup>309, 310</sup> Under the CBC and CGS, the scope of geotechnical studies includes, at a minimum:

- A description of local and regional geologic conditions in the site vicinity
- A description of the geologic materials at the site
- Pertinent geologic maps depicting the local and regional geologic setting and the topography of the site
- Information on the current and historic ground water conditions beneath the site
- Information on a determination of whether or not the site is within a State of California Earthquake Fault Zone for fault rupture
- An evaluation of the potential for fault surface rupture at the site
- Information on the distances to selected faults, and the maximum magnitudes of active and potentially active faults in the region
- Information on the magnitudes of historic earthquakes in the region, and the distances of those earthquake's epicenters from the site

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<sup>308</sup> CGS. 1999, March 25 and 2014, November 6. Earthquake Zones of Required Investigation Hollywood Quadrangle.

<sup>309</sup> CGS. 2008, September 11. Guidelines for Evaluating and Mitigating Seismic Hazards in California (California Geological Survey Special Publication 117).

<sup>310</sup> CGS. 2022, November. Note 48: Checklist for the Review of Engineering Geology and Seismology Reports for California Public Schools, Hospitals, and Essential Services Buildings.

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- A preliminary evaluation of the potential for liquefaction at the site based on available published literature, ground water conditions, and soil properties
- A preliminary evaluation of the potential for landslides at the site based on available published literature, local topography, and soil and rock properties
- An evaluation of the site's location relative to known flood zones and dam inundation areas
- An evaluation of the site's location relative to the ocean or large bodies of confined water and the anticipated effects associated with tsunamis or seiches (oscillation waves in a body of water due to shaking or rupture).

The seismic hazard evaluation recommends measures, as appropriate, to reduce the risk of seismic related hazards. Each seismic hazard evaluation examines the potential for caving, ground motion, liquefaction, dynamic settlement, inundation, and landslides.

The SUP-related site-specific projects would continue to comply with seismic safety requirements of the LAUSD Supplemental Geohazard Assessment Scope of Work, CBC, DSA, and CDE. Surface rupture hazards from a known active fault would be less than significant.

### 5.7.3.1.2 Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation

These projects would occur on existing campuses and would not expand student capacity or total building area. Thus, these types of projects would not expose increased numbers of people or additional buildings to hazards from surface rupture of a fault.

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**Impact 5.7-2: SUP implementation would not expose people or structures to substantial adverse effects from strong ground shaking. [Threshold GEO-1.ii]**

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### 5.7.3.1.3 All SUP Projects

The District is in a seismically active region. Within 25 miles of the District, nine historical earthquakes reached magnitude 5 or more in a 75-year span (see Table 5.7-2). It is very likely that strong ground shaking will occur in the District within the lifetimes of buildings that would be built, modernized, and/or repaired under the SUP. As part of the environmental review for new construction projects, the LAUSD conducts a detailed review of seismic hazards as outlined under Impact 5.7-1.

The seismic hazard evaluation recommends mitigation measures, as appropriate, to reduce the risk of seismic related hazards. Each seismic hazard evaluation examines the potential for caving, ground motion, liquefaction, dynamic settlement, inundation, and landsliding.

The Seismic Hazard Mapping Act and Regulations state that the site-investigation reports must be prepared by a certified engineering geologist or registered civil engineer, who must have competence in the field of seismic hazard evaluation and mitigation, and be reviewed by a certified engineering geologist or registered



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civil engineer, also competent in the field of seismic hazard evaluation and mitigation.<sup>311</sup> Although the Seismic Hazards Mapping Act does not distinguish between the types of licensed professionals who may prepare and review the report, the current Business and Professions Code (Geologist and Geophysicist Act, Section 7832; and Professional Engineers Act, Section 6704) restricts the practice of these two professions. Because of the differing expertise and abilities of engineering geologists and civil engineers, the scope of the site-investigation report for the project may require that both types of professionals prepare and review the report, each practicing in the area of his or her expertise. Involvement of both engineering geologists and civil engineers will generally provide greater assurance that the hazards are properly identified, assessed, and mitigated. The State Mining and Geology Board recommends that engineering geologists and civil engineers conduct the assessment of the surface and subsurface geological/geotechnical conditions at the site, including off-site conditions, to identify potential hazards to the project. It is appropriate for the civil engineer to design and recommend mitigation measures. It also is appropriate for both engineering geologists and civil engineers to be involved in the implementation of the mitigation measures—engineering geologists to confirm the geological conditions and civil engineers to oversee the implementation of the approved mitigation measures.<sup>312</sup>

LAUSD will prepare a Seismic Hazard Evaluation for school construction projects, where appropriate, to satisfy the following requirements: (1) Seismic Hazard Mapping Act (California Public Resources Code, Section 2690 et seq); (2) Title 24 of the California Code of Regulations; (3) Guidelines for Evaluating and Mitigating Seismic Hazards in California (State Mining and Geology Board Special Publication 117); (4) the California Geological Survey Checklist for the Review of Geological/Seismic Reports for California Public Schools, Hospitals, and Essential Services Buildings; and (5) LAUSD Supplemental Geohazard Assessment Scope of Work. Design and construction of new buildings and modernizations of existing buildings would comply with seismic safety requirements of the DSA and CBC outlined in this discussion of Impact 5.7-2. Potential hazards from strong ground shaking would be less than significant.

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**Impact 5.7-3: SUP implementation would not expose people or structures to substantial adverse effects from seismic-related ground failure, including liquefaction [Threshold GEO-1.iii]**

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### 5.7.3.1.4 New Construction on New Property or Existing Campus

Construction of new classrooms, either on new property adjacent to or on an existing school campus, could subject increased numbers of people and new structures to hazards from seismic-related ground failure, including liquefaction. For any project which requires site grading or new building construction, the District will have a geotechnical investigation conducted by a professional engineering geologist or licensed geotechnical engineer pursuant to requirements of the CBC, DSA, and CDE. Requirements for the geotechnical study are listed above in Section 5.7.1.1, *Regulatory Framework*.

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<sup>311</sup> CGS. 2008, September 11. Guidelines for Evaluating and Mitigating Seismic Hazards in California (California Geological Survey Special Publication 117).

<sup>312</sup> CGS. 2008, September 11. Guidelines for Evaluating and Mitigating Seismic Hazards in California (California Geological Survey Special Publication 117).

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As part of the geotechnical study the seismic hazard evaluation examines the potential for caving, ground motion, liquefaction, dynamic settlement, inundation, and landslides. The geotechnical study for each project site would evaluate liquefaction potential and provide required recommendations for foundation and building design to minimize hazards from liquefaction. The scope of the geotechnical investigation will include sampling and testing of subsurface soils, and assessment of liquefaction potential. The study, including applicable recommendations, will support compliance with the CBC, DSA, CDE and LAUSD Supplemental Geohazard Assessment. Project implementation would not expose people or structures to substantial hazards from seismic-related ground failure, including liquefaction, and impacts would be less than significant.

### 5.7.3.1.5 Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

These projects would occur on existing campuses and would not expand student capacity or total building area. Thus, these types of projects would not expose increased numbers of people or buildings to hazards from liquefaction.

Implementation of site-specific SUP-related projects would not expose people or structures to substantial hazards from seismic-related ground failure, including liquefaction; therefore, impacts would be less than significant.

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**Impact 5.7-4: SUP implementation would not expose people or structures to substantial adverse effects from landslides. [Threshold GEO-1.iv]**

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### 5.7.3.1.6 New Construction on New Property or Existing Campus

LAUSD will not construct a school in areas that are prone to landslides. Construction of new classrooms, either on new property adjacent to or on an existing school campus, may be located in areas with hills which may subject increased numbers of people and new structures to hazards from landslides. For any project which requires site grading or new building construction, the District shall have a geotechnical investigation conducted by a professional engineering geologist or licensed geotechnical engineer pursuant to requirements of the CBC, DSA, and CDE. The scope of the geotechnical investigation shall include sampling and testing of subsurface soils; assessment of existing landslide potential on and next to the site; and assessment of the potential for the project to increase landslide hazard on or next to the site. The geotechnical investigation report, including compliance with applicable recommendations, would support compliance with the CBC, DSA, CDE and LAUSD Supplemental Geohazard Assessment. Impacts from exposure of people or structures to substantial adverse effects from landslides would thus be less than significant.

### 5.7.3.1.7 Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

These projects would occur on existing campuses and would not expand student capacity or total building area. Thus, these types of projects would not expose increased numbers of people or buildings to landslide hazards.

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**Impact 5.7-5: Implementation of SUP-related projects would not cause substantial soil erosion or loss of topsoil. [Threshold GEO-2]**

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### 5.7.3.1.8 New Construction on New Property or Existing Campus

New construction may disturb substantial amounts of soil depending on the type of project, and thus could cause extensive soil erosion if effective erosion control measures were not used. Construction projects one or more acres in area would prepare and implement SWPPPs specifying BMPs to be used during construction to minimize water pollution, including BMPs for erosion control and sediment control. Project requirements are outlined in LAUSD Supplemental Geohazard Assessment Scope of Work. Implementation of these measures would render any soil erosion impacts less than significant.

### 5.7.3.1.9 Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation

These projects would be required to prepare and implement SWPPPs pursuant to the Construction General Permit and LASUD standard conditions for stormwater. Soil erosion impacts would be less than significant.

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**Impact 5.7-6: SUP-related projects would not 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 collapsible soils, ground subsidence, or corrosive soils. [Threshold GEO-3]**

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### 5.7.3.1.10 COLLAPSIBLE SOILS

#### 5.7.3.1.11 New Construction on New Property

Collapsible soils could be present on new property acquired for school construction. For any project which requires site grading or new building construction, the District shall have a geotechnical investigation conducted by a professional engineering geologist or licensed geotechnical engineer pursuant to requirements of the CBC, DSA, and CDE. The scope of the geotechnical investigation shall include sampling and testing of subsurface soils; assessment of site soils for collapsibility; and recommendations for measures such as remedial grading to minimize hazards from collapsible soils. The geotechnical investigation report, including applicable recommendations, would support compliance with the CBC, DSA, and CDE and LAUSD Supplemental Geohazard Assessment Scope of Work. Impacts from a site-specific project located on collapsible soils would be less than significant.

#### 5.7.3.1.12 All Projects Involving Grading, Excavation, or Other Ground-Disturbing Activities

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**Impact 5.7-3: The SUP-related projects are not anticipated to destroy paleontological resources or unique geologic features. [Threshold GEO-4]**

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Grading, excavation, or other ground-disturbing activities during construction could damage previously undiscovered fossils. Once a project site is identified for acquisition or an existing school site is identified for modification, the LAUSD would conduct a paleontological investigation pursuant to the LAUSD Cultural

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Resource Assessment Procedures.<sup>313</sup> The procedures ensure that unique paleontological resources will be investigated before projects are approved. Under the procedures, the on-call paleontologist will consult with the Los Angeles County Museum of Natural History, Vertebrate Paleontology Department to determine whether paleontological specimens have been found at the site, the likelihood that a site in that area could yield significant specimens, and recommendations for additional studies, as warranted. If LAUSD determines that paleontological resources are not likely to be found in that area, no further studies are required.

If a paleontological investigation identifies the possibility of unique paleontological resources on a proposed project site or a likelihood that such resources are onsite the District considers (1) whether the proposed project with implementation of standard conditions would result in potentially significant impacts to those resources, and (2) if so, whether feasible measures or alternatives would avoid or substantially reduce the impacts.

Each project that may impact unique paleontological resources will implement LAUSD SC-GEO-2 for assessment, monitoring, protection, and salvage of potential resources. Impacts would be less than significant.

### **5.7.3.1.13 New Construction and Modernization on Existing Campus**

New construction, modernization, repair, replacement, upgrade, remodel, renovation, and installation projects would be located on existing developed campuses. Soils on existing campuses have been previously graded and compacted, thus reducing the potential for collapsible soils to be present. These types of projects would not be located on collapsible soils and would not expose increased numbers of people, or additional buildings, to hazards from collapsible soils.

### **5.7.3.1.14 GROUND SUBSIDENCE**

### **5.7.3.1.15 All SUP Projects**

Unmonitored extraction of oil and groundwater can lead to ground subsidence. To avoid overdraft of underlying groundwater basins are monitored and groundwater levels are managed at sustainable pumping rates by the Water Replenishment District of Southern California (WRD) in most of the part of the District south of downtown Los Angeles and the LADWP in most of the remainder of the District. Thus, substantial ground subsidence in the District due to groundwater withdrawal is unlikely.

Many District schools are near oil fields, specifically some schools in the South Region—Willowbrook in unincorporated Los Angeles County, Harbor Gateway in the City of Los Angeles, and the City of Gardena—and in the West Region near Marina del Rey.

The City of Los Angeles requires monitoring and mitigation measures to prevent significant subsidence related to oil and gas extraction and mining activities under its Surface Mining District ordinance.<sup>314</sup>

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<sup>313</sup> LAUSD OEHS CEQA Specification Manual, Appendix H, Cultural Resource Assessment Procedures. December 2005, Revised June 2007.

<sup>314</sup> Section 13.03, City of Los Angeles Municipal Code.

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Groundwater management by the WRD and LADWP and prevention of subsidence due to oil and gas extraction pursuant to the City of Los Angeles Surface Mining District ordinance would minimize regional ground subsidence in the District. Implementation of the SUP would not subject people to substantial hazards from ground subsidence, and impacts would be less than significant.

### 5.7.3.1.16 CORROSIVE SOILS

#### 5.7.3.1.17 All SUP Projects

Corrosive soils could be present at some project work sites. Construction on new properties as well as existing campuses may place metals and/or concrete on or in soils that could be corrosive. For any project which requires site grading or new building construction, the District's current procedure is to have a geotechnical investigation conducted by a professional engineering geologist or licensed geotechnical engineer pursuant to requirements of the CBC, DSA, and CDE. The scope of the geotechnical investigation includes sampling and testing of subsurface soils and assessment of corrosion potential in site soils. Where geotechnical investigation reports recommended retention of a qualified corrosion engineer for recommending measures for minimizing corrosion to structures and other improvements in or on the soil, the District would retain such engineer and carry out the recommendations. The geotechnical investigation report, including compliance with applicable recommendations, would support compliance with the CBC, DSA, and CDE and LAUSD Supplemental Geohazard Assessment Scope of Work. Impacts from corrosive soils would be less than significant.

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**Impact 5.7-7 SUP implementation would not subject people or structures to substantial hazards from expansive soils. [Threshold GEO-4]**

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#### 5.7.3.1.18 New Construction on New Property or Existing Campus

Expansive soils could be present at new properties acquired for school expansion. While soils on existing campuses have been previously graded and compacted, expansive soils may still be present at some sites. Geotechnical studies for each site would include testing of soil samples for expansion potential.

Building designs shall comply with the CBC, DSA, and CDE requirements for the preparation of a building specific geotechnical report assessing potential consequences of any liquefaction and soil strength loss, estimation of settlement, lateral movement, or reduction in foundation soil-bearing capacity, and discussion of mitigation measures that includes building design consideration. Building design considerations may include, but are not limited to ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements, or any combination of these measures. Compliance with geotechnical recommendations will meet requirements LAUSD Supplemental Geohazard Assessment Scope of Work, along with the CBC, the DSA, and the CDE. Impacts would be less than significant.

#### 5.7.3.1.19 Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation

Modernization, repair, upgrade, and renovation projects would not develop new buildings for human occupancy and would not expand student capacity or total building area. Thus, these types of projects would

## 5. Environmental Analysis

not be located on expansive soil that would create substantial risks to life or property, or expose increased numbers of people or buildings to hazards from expansive soils. These impacts would be less than significant.

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**Impact 5.7-8 SUP implementation would not use septic tanks or alternative waste water disposal systems. [Threshold GEO-5]**

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### 5.7.3.1.20 All Project Types

The proposed project would be connected to the municipal sewer system, and no septic tanks or alternative waste water disposal systems would be necessary. No impact would occur.

## 5.7.4 Applicable Regulations and Standard Conditions

### 5.7.4.1.1 State

- CCR, Title 5, Section 14010, 14011 and 14012: Standards for school site selection and acquisition
- CCR, Title 24, Part 2: California Building Code
- California Government Code, Section 8875.8: Unreinforced Masonry Law
- California Education Code, Section 17281: Field Act, along with Garrison Act and Green Acts
- California Education Code, Section 17212 and 17212.5: requirement for geological and soil engineering study
- CGS Special Publication 117, “Guidelines for Evaluating and Mitigating Seismic Hazards in California”
- CGS Note 48 “Checklist for the Review of Engineering Geology and Seismology Reports for California Public Schools, Hospitals, and Essential Services Buildings”
- California Department of Education. School Site Selection and Approval Guide. Appendix H: Factors to Be Included in a Geological and Environmental Hazards Report
- Division of the State Architect. Regulatory Document IR A-4, “Geological Hazard Report Requirements”
- State Water Resources Control Board. General Construction Permit (Order No. 2012-0006-DWQ; NPDES No. CAS000002)

### 5.7.4.1.2 LAUSD Standard Conditions of Approval

- LAUSD SC-GEO-1

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### **5.7.5 Level of Significance Before Mitigation**

Upon implementation of regulatory requirements and LAUSD Standard Condition listed above, the following impacts would be less than significant: 5.7-1, 5.7-2, 5.7-3, 5.7-4, 5.7-5, 5.7-6, 5.7-7, and 5.7-8.

### **5.7.6 Mitigation Measures**

No mitigation measures are required.

### **5.7.7 Level of Significance After Mitigation**

Impacts would be less than significant.

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## 5. Environmental Analysis

### 5.8 GREENHOUSE GAS EMISSIONS

This section of the Subsequent Program EIR evaluates the potential for implementation of the SUP to cumulatively contribute to GHG emission impacts in the District in light of changing information and conditions since the 2015 Program EIR. Because no one project is large enough to single-handedly result in a significant increase in global concentrations of GHG emissions, project-related climate change impacts are inherently cumulative. The section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions), along with the existing GHG emissions throughout the SUP area used in the 2015 EIR and possible environmental impacts that may occur as the SUP update-related site-specific projects are implemented.

#### TERMINOLOGY

The following are definitions for terms used throughout this section.

**Greenhouse gases (GHG).** Gases in the atmosphere that absorb infrared light, thereby retaining heat in the atmosphere and contributing to a greenhouse effect.

**Global warming potential (GWP).** Metric used to describe how much heat a molecule of a greenhouse gas absorbs relative to a molecule of CO<sub>2</sub> over a given period of time (20, 100, and 500 years). CO<sub>2</sub> has a GWP of 1.

**Carbon dioxide-equivalent (CO<sub>2</sub>e).** The standard unit to measure the amount of greenhouse gases in terms of the amount of CO<sub>2</sub> that would cause the same amount of warming. CO<sub>2</sub>e is based on the GWP ratios between the various GHGs relative to CO<sub>2</sub>.

**MTCO<sub>2</sub>e.** Metric ton of CO<sub>2</sub>e.

**MMTCO<sub>2</sub>e.** Million metric tons of CO<sub>2</sub>e.

#### *Greenhouse Gases and Climate Change*

Climate change is the variation of earth's climate over time, whether due to natural variability or as a result of human activities. Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as GHGs, to the atmosphere. The primary source of these GHGs is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor (water vapor is the strongest GHG and the most variable in its phases [vapor, cloud droplets, ice crystals]. However, water vapor is not considered a pollutant), CO<sub>2</sub>, methane (CH<sub>4</sub>), and O<sub>3</sub>—that are the likely causes of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHGs identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N<sub>2</sub>O) **and fluorinated gases**.<sup>315</sup> The major GHGs are briefly described as follows.

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<sup>315</sup> IPCC. 2001. "2001 IPCC Third Assessment Report: Climate Change 2001."

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**Carbon dioxide (CO<sub>2</sub>)** enters the atmosphere through the burning of fossil fuels (oil, natural gas, and coal), solid waste, trees and wood products, and respiration, and as a result of other chemical reactions (e.g., manufacture of cement). Carbon dioxide is removed from the atmosphere (sequestered) when it is absorbed by plants as part of the biological carbon cycle.

**Methane (CH<sub>4</sub>)** is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and from the decay of organic waste in municipal landfills and water treatment facilities.

**Nitrous oxide (N<sub>2</sub>O)** is emitted during agricultural and industrial activities as well as during combustion of fossil fuels and solid waste.

**Fluorinated gases** are synthetic, strong GHGs that are emitted from a variety of industrial processes. Fluorinated gases are sometimes used as substitutes for ozone-depleting substances. These gases are typically emitted in smaller quantities, but they are potent GHGs, sometimes referred to as high GWP gases.

- **Sulfur Hexafluoride (SF<sub>6</sub>)** is a colorless gas soluble in alcohol and ether, slightly soluble in water. SF<sub>6</sub> is a strong GHG used primarily in electrical transmission and distribution systems as an insulator.
- **Hydrofluorocarbons (HFCs)** contain only hydrogen, fluorine, and carbon atoms. They were introduced as alternatives to ozone-depleting substances to serve many industrial, commercial, and personal needs. HFCs are emitted as by-products of industrial processes and are also used in manufacturing. They do not significantly deplete the stratospheric ozone layer, but they are strong GHGs.
- **Hydrochlorofluorocarbons (HCFCs)** contain hydrogen, fluorine, chlorine, and carbon atoms. Although ozone-depleting substances, they are less potent at destroying stratospheric ozone than CFCs. They have been introduced as temporary replacements for CFCs and are GHGs.
- **Perfluorocarbons (PFCs)** are a group of human-made chemicals composed of carbon and fluorine only. These chemicals (predominantly CF<sub>4</sub> and perfluoroethane [C<sub>2</sub>F<sub>6</sub>]) were introduced as alternatives, along with HFCs, to the ozone-depleting substances. In addition, PFCs are emitted as by-products of industrial processes and are also used in manufacturing. PFCs do not harm the stratospheric ozone layer, but they have a high global warming potential.
- **Chlorofluorocarbons (CFCs)** are GHGs covered under the 1987 Montreal Protocol and used for refrigeration, air conditioning, packaging, insulation, solvents, or aerosol propellants. Since they are not destroyed in the lower atmosphere (troposphere, stratosphere), CFCs drift into the upper atmosphere where, given suitable conditions, they break down ozone. These gases are therefore being replaced by other GHG compounds covered under the Kyoto Protocol.

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Table 5.8-1 lists the GHG applicable to the SUP and its relative GWP.

**Table 5.8-1 GHG and Their Relative Global Warming Potential Compared to CO<sub>2</sub>**

GHG	Atmospheric Lifetime (years)	Global Warming Potential Relative to CO <sub>2</sub> <sup>a</sup>
Carbon Dioxide (CO <sub>2</sub> )	undefined	1
Methane (CH <sub>4</sub> )	12	25
Nitrous Oxide (N <sub>2</sub> O)	114	298
Sulfur Hexafluoride (SF <sub>6</sub> )	3,200	22,800
Nitrogen Trifluoride	720	17,200
Hexafluoroethane (PFC-116) (C <sub>2</sub> F <sub>6</sub> )	10,000	12,200
Octafluoropropane (PFC-218)	2,600	8,830
Octafluorocyclobutane (PFC-318)	3,200	10,300
Tetrafluoromethane (PFC-14) (CF <sub>4</sub> )	50,000	7,390
<b>Hydrofluorocarbons:</b>		
HFC-23	270	14,800
HFC-32	5	675
HFC-125	29	3,500
HFC-134a	14	1,430
HFC-143a	52	4,470
HFC-152a	1	124
HFC-227ea	34	3,220
HFC-236fa	240	9,810
HFC 245fa	8	1,030
HFC 365mfc	9	794
HFC-43-10mee	16	1,640

Source: CARB. 2023. GHG Global Warming Potentials. <https://ww2.arb.ca.gov/ghg-gwps>. Accessed May 2023.

<sup>a</sup> Based on 100-Year Time Horizon of the Global Warming Potential (GWP) of the air pollutant relative to CO<sub>2</sub>.

## 5.8.1 Environmental Setting

### 5.8.1.1 REGULATORY FRAMEWORK

National and state laws, regulations, plans, and guidelines are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to GHG in the District. Many site-specific projects have not been identified, and there may be local jurisdictional plans and policies that are applicable depending on the location of the project. Specific requirements of these laws, regulations, plans, and guidelines might not be up to date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important GHG-related matters that apply to SUP projects. Some of these are not directly applicable to the SUP or site-specific projects implemented under the SUP; however, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standard Conditions of Approval are also listed. See *Applicable Regulations and Standard Conditions* at the end of this chapter for those that require District compliance.

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### 5.8.1.1.1 Federal

The U.S. EPA announced on December 7, 2009 that GHG emissions threaten the public health and welfare of the American people and that GHG emission from on-road vehicles contribute to that threat. The EPA's final findings respond to the 2007 U.S. Supreme Court decision that GHG emissions fit within the Clean Air Act definition of air pollutants. The findings do not in and of themselves impose any emission reduction requirements, but allow the EPA to finalize the GHG standards proposed in 2009 for new light-duty vehicles as part of the joint rulemaking with the Department of Transportation.<sup>316</sup>

The EPA's endangerment finding covers emissions of six key GHGs—CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, hydrofluorocarbons, perfluorocarbons, and SF<sub>6</sub>.

In response to the endangerment finding, the EPA issued the Mandatory Reporting of GHG Rule that requires substantial emitters of GHG emissions (large stationary sources, etc.) to report GHG emissions data. The Final Rule on Mandatory Reporting of Greenhouse Gases is codified in 40, CFR, Part 98.

Regulation for GHG reporting in California is embraced in the Mandatory Reporting Rule and requires facilities and entities with more than 10,000 metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>e) of combustion and process emissions, all facilities belonging to certain industries, and all electric power entities to submit an annual GHG emissions data report directly to CARB. Furthermore, this regulation requires that reports from entities that emit more than 25,000 MTCO<sub>2</sub>e be verified by a CARB-accredited third-party verification body.

### 5.8.1.1.2 State

#### 5.8.1.1.2.1 Executive Order S-3-05

Executive Order S-3-05, signed June 2, 2005, set the following GHG reduction targets for the state:

- 2000 levels by 2010
- 1990 levels by 2020
- 80% below 1990 levels by 2050

#### 5.8.1.1.2.2 Assembly Bill 32, the Global Warming Solutions Act (2006)

Current State of California guidance and goals for reductions in GHG emissions are generally embodied in AB 32, the Global Warming Solutions Act. AB 32 was passed by the California state legislature on August 31, 2006, to reduce the state's contribution of GHG emissions to 1990 levels by 2020. AB 32 follows the 2020 tier of emissions reduction targets established in Executive Order S-3-05.

AB 32 directed CARB to adopt discrete early action measures to reduce GHG emissions and outline additional reduction measures to meet the 2020 target. Based on the GHG emissions inventory conducted for the Scoping

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<sup>316</sup> U.S. EPA. 2009, December. Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act. <https://www.epa.gov/climate-change/endangerment-and-cause-or-contribute-findings-greenhouse-gases-under-section-202a>.

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Plan by CARB, GHG emissions in California by 2020 are recorded as 369.2 MMTCO<sub>2</sub>e<sup>317</sup>. The 2020 emissions limit was updated in 2014 to 431 MMTCO<sub>2</sub>e from its initial value of 427 MMTCO<sub>2</sub>e approved in 2007. California Global Warming Solutions Act of 2006 (SB 32) further requires California to reduce statewide GHG emissions to 40% below the 1990 level by 2030.<sup>318</sup>

In order to effectively implement GHG goals, AB 32 requires CARB to establish various measures including a mandatory reporting system to track and monitor GHG emissions levels for large stationary sources that generate more than 25,000 MT of CO<sub>2</sub>e per year, prepare a plan demonstrating how GHG goals and deadlines can be met, and develop appropriate regulations and programs to implement the plan.

### 5.8.1.1.2.3 CARB 2022 Scoping Plan

The final Scoping Plan was adopted by CARB on November 16, 2022. Key elements of the Scoping Plan that may be applicable to the SUP include the following:

- Reducing anthropogenic emissions to 85% below 1990 levels by 2045.
- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards.
- Reducing vehicle miles traveled (VMT) per capita by 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045.
- 100% implementation of light duty vehicles.
- Phasing out the use of fossil gas used for heating.
- Providing communities with sustainable options for walking, biking, and public transit to reduce reliance on cars.

Table 5.8-2 shows the proposed reductions from regulations and programs outlined in the Scoping Plan as compared to the reference scenario (i.e., what the GHG emissions would look like if nothing at all beyond the existing policies that are required and already in place to achieve the 2030 target of at least 40% below 1990 levels were implemented).

#### 5.8.1.1.2.3.1 2022 Scoping Plan Update

Since release of the 2008 Scoping Plan, CARB has updated the statewide GHG emissions inventory to reflect GHG emissions statewide. CARB's latest update to the statewide GHG emissions inventory was released in 2022 for year 2020 emissions. In 2020, California produced 369.2 MMTCO<sub>2</sub>e GHG emissions, 35.3 MMTCO<sub>2</sub>e lower than 2019 levels and 61.8 MMTCO<sub>2</sub>e below the 2020 GHG Limit of 431 MMTCO<sub>2</sub>e.<sup>319</sup>

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<sup>317</sup> CARB, Current California GHG Emission Inventory (2022 Edition). <https://ww2.arb.ca.gov/ghg-inventory-data>. Accessed May 2023.

<sup>318</sup> CARB. GHG 1990 Emissions Level & 2020 Limit. <https://ww2.arb.ca.gov/ghg-2020-limit>. Accessed May 2023.

<sup>319</sup> CARB. 2022, October. California Greenhouse Gas Emissions for 2000–2020. Trends of Emissions and Other Indicators. [https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020\\_ghg\\_inventory\\_trends.pdf](https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf). Accessed May 2023.

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The 2022 Scoping Plan paves the road for California to achieve carbon neutrality by 2045 or earlier. The Scoping Plan extends and expands upon earlier plans adding a target to reduce anthropogenic emissions to 85% below 1990 levels by 2045. The main element of the plan is an aggressive reduction of fossil fuels use throughout California, building on and accelerating carbon reduction programs that have been in place for a decade and a half. This approach translates to a rapid move to zero-emission transportation; electrifying the cars, buses, trains, and trucks that now constitute California's single largest source of GHGs. The 2022 Scoping Plan's measures imply phasing out the use of fossil gas used for heating residences and buildings and limiting the use of chemicals and refrigerants. It also suggests providing communities with sustainable options for walking, biking, and public transit to reduce reliance on cars. Additionally, the plan measures imply the continuation of building out solar arrays, wind turbine capacity, and other resources that provide clean, renewable energy to displace fossil-fuel fired electrical generation. Scaling up new options, such as renewable hydrogen, for hard-to-electrify end uses and biomethane were needed as part of the 2022 Scoping Plan.

**Table 5.8-2 Estimated GHG Emission Reductions for the 2022 Scoping Plan Scenario in 2035/2045**

Measures	Reductions by 2035 (MMTCO <sub>2</sub> e)	Reductions by 2045 (MMTCO <sub>2</sub> e)
Deploy ZEVs and reduce driving demand	46	84
Coordinate supply of liquid fossil fuels with declining California fuel demand	25	30
Generate clean electricity	8	31
Decarbonize industrial energy supply	9	22
Decarbonize buildings	14	35
Reduce noncombustion emissions	0.41 (MMTCH <sub>4</sub> )	0.52 (MMTCH <sub>4</sub> )
Compensate for remaining emissions	25	64

Source: CARB. 2022, November. 2022 Scoping Plan for Achieving Carbon Neutrality. <https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf>. Accessed May 2022.

MMTCO<sub>2</sub>e: million metric tons of CO<sub>2</sub>e

### 5.8.1.1.2.4 Senate Bill 375

In 2008, SB 375 was adopted to achieve the GHG reduction targets in the Scoping Plan for the transportation sector through local land use decisions that affect travel behavior. Implementation is intended to reduce VMT and GHG emissions from light-duty trucks and automobiles (excludes emissions associated with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations with local land use planning. Specifically, SB 375 requires CARB to establish GHG emissions reduction targets for each of the 17 regions in California managed by a metropolitan planning organization (MPO). Pursuant to the recommendations of the Regional Transportation Advisory Committee, CARB adopted per capita reduction targets for each of the MPOs rather than a total magnitude reduction target. The SCAG is the MPO for the Southern California region, which includes the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. LAUSD's district boundary is within SCAG. SCAG's targets are an 8% per capita reduction from 2005 GHG emission levels by 2020 and a 19% per capita reduction from 2005 GHG emission levels by 2035.

The 2020 targets are smaller than the 2035 targets since a significant portion of the built environment in 2020 was previously defined. In general, the 2020 scenarios reflect that more time is needed for large land use and

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transportation infrastructure changes. Most of the reductions in the interim are anticipated to come from improving the efficiency of the region's existing transportation network.

SB 375 requires the MPOs to prepare a SCS in their regional transportation plan. For the SCAG region, the SCS was adopted on September 3, 2020. The SCS establishes a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce GHG emissions from transportation (excluding goods movement). The SCS is meant to provide growth strategies that will achieve the regional GHG emissions reduction targets. The SCS does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency for governments and developers.

### 5.8.1.1.2.5 *Assembly Bill 1493*

California vehicle GHG emission standards were enacted under AB 1493 (Pavley I). Pavley I is a clean-car standard that reduces GHG emissions from new passenger vehicles (light-duty to medium-duty vehicles) starting with the 2009 model year. California implements the Pavley I standards through a waiver granted to California by the EPA.

### 5.8.1.1.2.6 *Executive Order S-01-07*

On January 18, 2007, the state set a new Low Carbon Fuel Standard (LCFS) for transportation fuels sold within the state. Executive Order S-1-07 sets a declining standard for GHG emissions measured in CO<sub>2</sub>e grams per unit of fuel energy sold in California. The LCFS requires a reduction in the carbon intensity of California's transportation fuels of at least 10% by 2020. The LCFS applies to refiners, blenders, producers, and importers of transportation fuels, and would use market-based mechanisms to allow these providers to choose how they reduce emissions during the fuel cycle using the most economically feasible methods. Emissions of GHGs reduced from 187.786 MMTCO<sub>2</sub>e to 139.863 MMTCO<sub>2</sub>e from years 2007 to 2020, respectively. This represents a 25.5% reduction of GHG emissions from the transportation sector. Similarly, emissions of GHG from Oil and Gas Production and Processing subsector reduced from 17.902 MMTCO<sub>2</sub>e to 15.296 MMTCO<sub>2</sub>e from 2007 to 2020, respectively. This represents a 14.56% reduction of GHG emissions from the Oil and Gas Production and Processing subsector.<sup>320</sup> GHG reduction from each of these two sectors is below the 10% targeted reduction set forth in Executive Order S-1-07.

### 5.8.1.1.2.7 *Senate Bills 1078 and 107 and Executive Order S-14-08*

A major component of California's Renewable Energy Program is the renewable portfolio standard (RPS) established under Senate Bills 1078 (Sher) and 107 (Simitian). Under the RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year in order to reach at least 20% by December 30, 2010. Executive Order S-14-08, signed in November 2008, expanded the state's renewable energy standard to 33% renewable power by 2020. SB 350 (de León, October 2015) and 100 (de León,

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<sup>320</sup> CARB. Greenhouse Gas Emission Inventory Query Tool for Years 2000-2020 (15<sup>th</sup> Edition). Updated October 26, 2022. <https://ww2.arb.ca.gov/applications/greenhouse-gas-emission-inventory-0>. Accessed May 2023.

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September 2018) have increased the renewable energy target to 50% by 2030 and requires all the state's electricity to derive from carbon-free resources by 2045.

### 5.8.1.1.2.8 *Executive Order B-16-2012 and N-79-20*

On March 23, 2012, the state directed CARB, the California Energy Commission, California Public Utilities Commission, and other relevant agencies to work with the Plug-in Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to accommodate zero-emissions vehicles in major metropolitan areas, including infrastructure to support zero-emissions vehicles (e.g., electric vehicle charging stations). The executive order also directed that the number of zero-emission vehicles in California's state vehicle fleet increase through the normal course of fleet replacement. The executive order also established a goal of 1.5 million Zero-Emissions Vehicles (ZEVs) on California's roads by 2025. In 2020, Governor Gavin Newsom signed Executive Order N-79-20, which will require that all new passenger car and truck sales must be zero emission starting in year 2035.

### 5.8.1.1.2.9 *California Code of Regulations, Title 24, Part 6*

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission in June 1977 and are updated tri-annually in the California Building Code. California Code of Regulations, Title 24, Part 6 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.

The California Energy Commission updates the Building Energy Efficiency Standards (Energy Code) every three years. The 2022 Energy Code is the most current. The 2022 Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Energy Code.

### 5.8.1.1.2.10 *California Code of Regulations, Title 24, Part 11*

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (CALGreen) was adopted as part of the California Building Standards Code (Part 11, Title 24, California Code of Regulations). CALGreen established planning and design standards for sustainable site development, including, energy efficiency (in excess of the California Energy Code requirements), water efficiency and conservation, material conservation and resource efficiency, and environmental quality.<sup>321</sup> The mandatory provisions of the California Green Building Code Standards became effective January 1, 2011. The 2022 CALGreen is the current version.

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<sup>321</sup> 2022 California Green Building Standards Code, Title 24, Part 11 (CALGreen). <https://codes.iccsafe.org/content/CAGBC2022P1>. Accessed May 2023.



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### 5.8.1.1.2.11 California Code of Regulations, Title 20, Sections 1601 through 1608

The 2006 Appliance Efficiency Regulations were adopted by the California Energy Commission on October 11, 2006 and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non-federally regulated appliances.

### 5.8.1.1.3 LAUSD

#### 5.8.1.1.3.1 Standard Conditions of Approval

This table lists the GHG related standard conditions that will be included as part of each SUP-related project, as appropriate.

Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
SC-USS-1	Construction Waste Management	Generate demolition debris and/or construction waste	Prior and during construction	<p>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:</p> <p><b>School Design Guide.</b> Establishes a minimum non-hazardous construction and demolition (C&amp;D) debris recycling requirements of 75% by weight. Construction and demolition waste shall be recycled to the maximum extent feasible.</p> <p><b>Construction &amp; Demolition Waste Management.</b> 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&amp;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&amp;D waste generated by weight.</p>
SC-GHG-1	Water Use and Efficiency	Work on water pumps, valves, piping, and/or tanks	During operation (Post-Construction, Operation)	During school operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
SC-GHG-2	Water Use and Efficiency	Requires work on landscape irrigation system	Prior to full operation of irrigation system (Post-Construction)	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.
SC-GHG-3	Water Use and Efficiency	Requires work on landscape irrigation system	Prior to full operation of irrigation system (Post-Construction)	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
SC-GHG-4	Water Use and Efficiency	Requires work on landscape and/or irrigation system	Prior to full operation of irrigation system (Post-Construction)	LAUSD shall develop a water budget for landscape (both non-recreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources.
SC-GHG-5	Energy Efficiency	Building construction	Prior to occupancy (Planning, Construction)	LAUSD shall ensure that the time dependent valued energy of the proposed project design is at least 10%, 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.

### 5.8.1.2 EXISTING CONDITIONS

#### 5.8.1.2.1 California's GHG Sources and Relative Contribution

California is the second largest emitter of GHG in the United States, only surpassed by Texas.<sup>322</sup> However, California also has over 10 million more people than the state of Texas.

CARB's latest update to the statewide GHG emissions inventory was released in 2022 for year 2020 emissions. In 2020, California produced 369.2 MMTCO<sub>2</sub>e GHG emissions, 35.3 MMTCO<sub>2</sub>e lower than 2019 levels and 61.8 MMTCO<sub>2</sub>e below the 2020 GHG Limit of 431 MMTCO<sub>2</sub>e. California's transportation sector is the single largest generator of GHG emissions, producing 36.8% of the state's total emissions. The industrial sector is the second largest source, comprising 19.9%. The electricity sector is California's third largest source of GHG emissions, comprising 16.1% of the state's total emissions. Other major sources of GHG emissions include commercial and residential, agricultural operations, high global warming potential GHGs, and waste.<sup>323</sup>

#### 5.8.1.2.2 Human Influence on Climate Change

Fossil fuel burning by day-to-day human activities has contributed a significant impact on climate change since the start of the Industrial Revolution. Human activities have caused an increase of atmospheric CO<sub>2</sub> concentration by more than 40% with most of the increase occurring since 1970. An increase in the global average surface temperature by 1 °C has occurred since 1900. This change in temperature has been accompanied by many climate effects including warming of the ocean, causing a rise in sea level, a reduction in Arctic sea ice, heatwaves throughout the planet. Detail analysis have concluded that an increase of CO<sub>2</sub> and other GHGs has resulted in the warming during the afore mentioned period. Thus, continued emissions of

<sup>322</sup> U.S. EPA. 2023, May. State CO<sub>2</sub> Emissions from Fossil Fuel Combustion, 1990-2018. [https://www.epa.gov/sites/default/files/2020-10/documents/state\\_co2\\_emissions\\_from\\_fossil\\_fuel\\_combustion\\_1990-2018.pdf](https://www.epa.gov/sites/default/files/2020-10/documents/state_co2_emissions_from_fossil_fuel_combustion_1990-2018.pdf). Accessed May 2023.

<sup>323</sup> California Air Resources Board. 2022, October. California Greenhouse Gas Emissions for 2000–2020. Trends of Emissions and Other Indicators. [https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020\\_ghg\\_inventory\\_trends.pdf](https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf). Accessed May 2023.

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GHGs would result in further climate change. How much of an impact GHG emissions have on climate change will depends on the amount of GHG emitted by human activity.<sup>324</sup>

### 5.8.1.2.3 Potential Climate Change Impacts for California

The U.S. EPA has issued a fact sheet documenting how climate change impacts California. It states that over the last century, Southern California has warmed about three degrees (F) with all the state becoming warmer. Heat waves are becoming more prevalent causing snow to melt earlier in spring—and in Southern California, less rain is falling as well. The changing climate can impact water supply, increase the possibility for wildfires, and threaten coastal development and ecosystems. Anthropogenic-generated CO<sub>2</sub> emissions has increased by 40% since the late 1700s. Additionally, the increase of other GHGs have contributed to warming of the earth surface and lower atmosphere about one degree during the last 50 years. Areas that would be affected by climate change include snowpack, water supply, agriculture, wildfires and changing landscapes, human health, and sea level rise.<sup>325</sup>

Global climate change risks are shown in Table 5.8-3 and include impacts to snowpack, water resources, agriculture, wildfires and changing landscapes, human health, sea level, and electricity impacts. Specific climate change impacts that could affect the SUP include health impacts from a reduction in air quality, water resources impacts from a reduction in water supply, and increased energy demand.

**Table 5.8-3 Summary of Global Climate Change Risks to California**

Impact Category	Potential Risk
Snowpack	<ul style="list-style-type: none"> <li>• Less snow precipitation and more snow melts during the winter</li> <li>• Loss of winter recreation</li> <li>• Higher tree line</li> <li>• Threat some species</li> </ul>
Water Resources Impacts	<ul style="list-style-type: none"> <li>• Challenges in securing adequate water supply</li> <li>• Faster evaporation of water from soils and surface water</li> <li>• Longer dry periods and severe draughts</li> </ul>
Agricultural Impacts	<ul style="list-style-type: none"> <li>• Increasing temperature</li> <li>• Declining productivity</li> <li>• Irregular blooms and harvests</li> </ul>
Wildfires and Changing Landscapes	<ul style="list-style-type: none"> <li>• Increasing risk and severity of wildfires</li> <li>• Lengthening of the wildfire season</li> <li>• Movement of forest areas</li> <li>• Conversion of forest to grassland</li> <li>• Shifting vegetation and species distribution</li> </ul>
Human Health Impacts	<ul style="list-style-type: none"> <li>• Cause heat stroke and dehydration, and affect cardiovascular, respiratory, and nervous systems</li> <li>• Respiratory problems</li> </ul>
Sea Level Rise Impacts	<ul style="list-style-type: none"> <li>• Accelerated sea level rise</li> <li>• Increasing coastal floods</li> <li>• Shrinking beaches</li> <li>• Worsened impacts on infrastructure</li> </ul>
Electricity	<ul style="list-style-type: none"> <li>• Potential reduction in hydropower</li> </ul>

<sup>324</sup> National Academies Press. 2020. Climate Change: Evidence and Causes: Update 2020. <https://nap.nationalacademies.org/read/25733/chapter/3>.

<sup>325</sup> U.S. EPA. 2016, August. What Climate Change Means for California. EPA 430-F-16-007.

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**Table 5.8-3 Summary of Global Climate Change Risks to California**

Impact Category	Potential Risk
	<ul style="list-style-type: none"> <li>Increased energy demand</li> </ul>

Sources: U.S. EPA. August 2016. What Climate Change Means for California. EPA 430-F-16-007. <https://19january2017snapshot.epa.gov/sites/production/files/2016-09/documents/climate-change-ca.pdf>. Accessed May 2023.  
California Energy Commission, California Natural Resources Agency, Governor's Office of Planning and Research. 2018. California's Fourth Climate Change Assessment, Statewide Summary Report, 2018 [https://www.energy.ca.gov/sites/default/files/2019-11/Statewide\\_Reports-SUM-CCCA4-2018-013\\_Statewide\\_Summary\\_Report\\_ADA.pdf](https://www.energy.ca.gov/sites/default/files/2019-11/Statewide_Reports-SUM-CCCA4-2018-013_Statewide_Summary_Report_ADA.pdf). Accessed May 2023.

The existing school uses within the boundaries of the LAUSD jurisdictional area currently generate GHG emissions from mobile sources, natural gas and electricity use, water use and generation of wastewater, solid waste, and area sources (e.g., household consumer products, landscaping equipment).

### 5.8.2 Thresholds of Significance

#### 5.8.2.1 CEQA GUIDELINE THRESHOLDS

According to CEQA Guidelines Appendix G, a project would normally have a significant effect on the environment if the project would:

- GHG-1 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- GHG-2 Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

#### 5.8.2.2 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT THRESHOLDS

SCAQMD has adopted a significance threshold of 10,000 MTCO<sub>2</sub>e per year for permitted (stationary) sources of GHG emissions where SCAQMD is the lead agency. To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, SCAQMD has convened a GHG CEQA Significance Threshold Working Group. Based on Working Group Meeting No. 15 in September 2010, SCAQMD is proposing to adopt a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency. The proposed SCAQMD methodology in analyzing GHG impacts is based on a four-tiered approach. For projects that do not meet the first two tiers, GHG emissions must be quantified and are compared to the AQMD proposed screening threshold (10,000 MTCO<sub>2</sub>e for industrial facilities and 3,000 MTCO<sub>2</sub>e for non-industrial facilities). If emissions are below the screening threshold, then impacts are considered less than significant (i.e., Tier 3). If the emissions exceed the screening threshold, the emissions are then compared to the per capita efficiency metric threshold of 4.8 MTCO<sub>2</sub>e (i.e., Tier 4).

- **Tier 1.** If a project is exempt from CEQA, project-level and cumulative GHG emissions are less than significant.
- **Tier 2.** If the project complies with a GHG emissions reduction plan or mitigation program that avoids or substantially reduces GHG emissions in the project's geographic area (i.e., city or county), project-level and cumulative GHG emissions are less than significant.

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For projects that are not exempt or where no qualifying GHG reduction plans are directly applicable, SCAQMD requires an assessment of GHG emissions. SCAQMD is proposing a “bright-line” screening-level threshold of 3,000 MTCO<sub>2</sub>e annually for all non-industrial projects or the following land-use-specific thresholds: 1,400 MTCO<sub>2</sub>e for commercial projects, 3,500 MTCO<sub>2</sub>e for residential projects, or 3,000 MTCO<sub>2</sub>e for mixed-use projects. This bright-line threshold is based on a review of the Governor’s Office of Planning and Research database of CEQA projects. Based on their review of 711 CEQA projects, 90% of CEQA projects would exceed the bright-line thresholds identified above. Therefore, projects that do not exceed the bright-line threshold would have a nominal, and therefore, less than cumulatively considerable impact on GHG emissions:

- **Tier 3.** If GHG emissions are less than the screening-level threshold, project-level and cumulative GHG emissions are less than significant.
- **Tier 4.** If emissions exceed the screening threshold, a more detailed review of the project’s GHG emissions is warranted.

SCAQMD has proposed an efficiency target for projects that exceed the screening threshold. The current recommended approach is per capita efficiency targets. SCAQMD is not recommending use of a percent emissions reduction target. Instead, SCAQMD proposes a 2020 efficiency target of 4.8 MTCO<sub>2</sub>e per year per service population (MTCO<sub>2</sub>e/Yr/SP) for project-level analyses and 6.6 MTCO<sub>2</sub>e/Yr/SP for plan level projects (e.g., program-level projects such as general plans). Service population is defined as the sum of the residential and employment populations provided by a project. The per capita efficiency targets are based on the AB 32 GHG reduction target and 2020 GHG emissions inventory prepared for CARB’s 2008 Scoping Plan.<sup>326</sup>

### 5.8.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.8-1: SUP-related projects are not anticipated to generate GHG emissions that could exceed the thresholds and cumulatively contribute to GHG emissions impacts. [Threshold GHG-1]**

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GHG emissions related to a project are not confined to a particular air basin but are dispersed worldwide. Therefore, impacts identified for a project are not project-specific impacts to global warming, but the project’s contribution to this cumulative impact. Future school projects associated with the SUP would contribute to GHG emissions impacts through direct and indirect GHG emissions. The following discusses the potential impacts that could result from the types of project covered under the SUP.

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<sup>326</sup> SCAQMD. Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15 Tuesday, September 28, 2010 SCAQMD, Room GB, 10:00 AM – 12:00 PM. [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf).

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### 5.8.3.1.1 New Construction on New Property and Existing Campus

While the SUP does not include any new school projects built on stand-alone sites, the following analysis is presented as a conservative, worst-case illustration of how projects implemented under the SUP would not exceed this threshold; SUP-related projects are not anticipated to exceed GHG significance thresholds.

Rise Kohyang High School is an applicable project in the context of the SUP. This project entailed the construction of a high school facility on a 1.15-acre site designed to support a maximum of 600 students and 75 staff.

Projects under this category would generate direct GHG emissions from new vehicle trips and onsite area sources. Additionally, indirect emissions from offsite energy production required for onsite activities, water use, and waste disposal would also be generated. Overall, it is not anticipated that development of a school under this category would generate GHG emissions that would exceed the SCAQMD significance thresholds. Schools are typically growth accommodating land uses built to serve the local community; therefore, a new school would reduce the overall VMT in the region and thereby reduce mobile-source GHG emissions. In addition, the proposed SUP does not include any New School projects that would be built on stand-alone sites. Table 5.8-4 shows the total emissions generated from Rise Kohyang High School.

**Table 5.8-4 GHG Emissions of an LAUSD School**

Source	MTCO <sub>2</sub> e/Year
<b>Rise Kohyang High School<sup>a</sup></b>	
Area	<1
Energy	117
Transportation	1,029
Waste	<1
Water	<1
Amortized Construction Emissions <sup>b</sup>	14
<b>Total</b>	<b>1,475</b>
Proposed SCAQMD Bright-Line Screening Threshold	3,000 MT
<b>Exceeds Proposed Bright-Line Screening Threshold?</b>	<b>No</b>

Sources: Rise Kohyang High School Mitigated Negative Declaration, pg. 85, June 2019.

Notes: MTCO<sub>2</sub>e: metric tons of CO<sub>2</sub> equivalent GHG emissions.

<sup>a</sup> Based on 76,390 building square feet of school facilities with maximum capacity of 600 high school students.

<sup>b</sup> As construction emissions are short-term, they are amortized over 30 years per SCAQMD methodology.<sup>327</sup>

As shown in the table, development of a new school adjacent to an existing school would not exceed the proposed SCAQMD significance thresholds of 3,000 MT. Future school projects would comply with the Scoping Plan early action statewide measures (e.g., LCFS and RPS) and would also be built to meet the latest

<sup>327</sup> SCAQMD. 2008, December 5. Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans. Agenda No. 31. [http://www.aqmd.gov/docs/default-source/ccqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgboardsynopsis.pdf](http://www.aqmd.gov/docs/default-source/ccqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf).

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Building Energy Efficiency Standards and CALGreen. Compliance with these statewide requirements and measures would reduce GHG emissions.

While individual projects under LAUSD's School Upgrade Program would be less than SCAQMD's bright-line threshold and/or efficiency metric, it is unknown how many individual projects may occur under the SUP. However, the 10-year projection for the overall student population within the LAUSD jurisdiction indicates an overall 18% decrease from existing conditions (see Chapter 4 of this EIR). As new schools would generally be developed to accommodate growth and the overall student population would be on the decline, it is anticipated that development of new, stand-alone schools or expansion of an existing campus to include a new school component (e.g., addition of an elementary school to an existing middle school campus) would be minimal. The overall operational phase emissions generated by cumulative projects under the SUP would not be cumulatively considerable. Therefore, GHG emissions generated by the combination of the types of projects described in Chapter 4, *Program Description*, are considered less than significant.

### 5.8.3.1.2 Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

Building improvements are anticipated to result in increased energy efficiency, thereby reducing emissions from energy usage (i.e., natural gas and electricity). Most SUP-related projects involving repair, replacement, upgrades, remodeling, or renovation would not increase capacity to existing schools. However, some modernization projects may potentially add new capacity to existing schools through the installation of portables (see Chapter 4, Table 4-2 of this EIR). Overall student enrollment in the LAUSD is projected to decline for the next 10 years; therefore, it is anticipated that any new portables would primarily be installed to accommodate the existing enrolled student population. Additionally, if the installation of portables is required to accommodate growth, it is anticipated that emissions would be significantly less than the emissions shown in Table 5.8-4. Therefore, the cumulative contribution to GHG emissions from SUP-related projects under this category would be less than significant.

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**Impact 5.8-2: The SUP would not conflict with plans adopted for the purpose of reducing GHG emissions. [Threshold GHG-2]**

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### All SUP Projects

This section includes a consistency analysis with applicable plans adopted for the purpose of reducing GHG emissions (CARB's Scoping Plan and SCAG's 2020 Regional Transportation Plan/Sustainable Community Strategy [RTP/SCS]).

#### 5.8.3.1.2.1 CARB Scoping Plan

Since adoption of the 2008 Scoping Plan, state agencies have adopted programs identified in the plan, and the legislature has passed additional legislation to achieve the GHG reduction targets. Statewide strategies to reduce GHG emissions include the LCFS, California Appliance Energy Efficiency regulations, California Building Standards (i.e., CALGreen and the 2013 Building Energy Efficiency Standards), 33% RPS, and changes in the corporate average fuel economy standards (e.g., Pavley I and California Advanced Clean Cars [Pavley II]). According to the 2022 update to the California GHG Inventory, in 2020 the state emitted 369.2 MMTCO<sub>2e</sub>

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and 61.8 MMTCO<sub>2</sub>e below the 2020 limit of 431 MMTCO<sub>2</sub>e.<sup>328</sup> Future SUP-related projects would comply with these GHG emissions reduction measures. In addition, implementation of the District Standards as outlined in School Design Guide (January 2014) would require construction contractors to reuse, recycle, and salvage nonhazardous materials generated during demolition and/or new construction. Materials recovery would minimize the need to transport new materials from farther distances and production of new materials and thereby reduce emissions from mobile sources and energy usage. Therefore, the SUP would not conflict the CARB Scoping Plan.

### 5.8.3.1.2.2 SCAG's 2020 Regional Transportation Plan/Sustainable Communities Strategy

SCAG's 2020 RTP/SCS was adopted on September 3, 2020. It identifies multimodal transportation investments, including bus rapid transit, light rail transit, heavy rail transit, commuter rail, high-speed rail, active transportation strategies (e.g., bike ways and sidewalks), transportation demand management strategies, transportation systems management, highway improvements (interchange improvements, high-occupancy vehicle lanes, high-occupancy toll lanes), arterial improvements, goods movement strategies, aviation and airport ground access improvements, and operations and maintenance to the existing multimodal transportation system. SCAG's RTP/SCS identifies land use strategies that focus new housing and job growth in areas served by high quality transit areas and other opportunity areas, and that would be consistent with a land use development pattern that supports and complements the proposed transportation network, which emphasizes system preservation, active transportation, and transportation demand management measures. The 2020 RTP/SCS incorporates local land use projections and circulation networks from the cities' and counties' general plans. The projected regional development pattern, including location of land uses and residential densities in local general plans, when integrated with the proposed regional transportation network identified in the 2020 RTP/SCS, would reduce per capita vehicular travel-related GHG emissions and achieve the GHG reduction per capita targets for the SCAG region.

Development of new schools associated with the SUP would fill the educational needs of the local communities. Schools that serve the local community would reduce the average travel distance for students and could also promote non-motorized travel (e.g., walking and biking) thereby reducing the overall VMT. A reduction in the overall VMT would reduce GHG emissions from mobile sources. Therefore, the SUP would not conflict with the 2020 RTP/SCS and impacts would be less than significant.

## 5.8.4 Applicable Regulations and Standard Conditions

### 5.8.4.1.1 State

- CARB Rule 2480 (13 CCR 2480)
- CARB Rule 2485 (13 CCR 2485)
- Executive Order S-3-05: Greenhouse Gas Emission Reduction Targets

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<sup>328</sup> CARB. 2022, October. California Greenhouse Gas Emissions for 2000–2020. Trends of Emissions and Other Indicators. [https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020\\_ghg\\_inventory\\_trends.pdf](https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf). Accessed May 2023.



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- AB 32: California Global Warming Solutions Act
- SB 375: Sustainable Communities Strategies
- AB 1493: Pavley Fuel Efficiency Standards
- Title 20 California Code of Regulations: Appliance Energy Efficiency Standards
- Title 17 California Code of Regulations: Low Carbon Fuel Standard
- SB 1368: Statewide Retail Provider Emissions Performance Standards
- SB 1078: Renewable Portfolio Standards
- Title 24, Part 6, California Code of Regulations: Building and Energy Efficiency Standards
- Title 24, Part 11, California Code of Regulations: Green Building Standards Code

### 5.8.4.1.2 LAUSD Standard Conditions of Approval

- SC-USS-1
- SC-GHG-1 through SC-GHG-5

### 5.8.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standard Conditions listed above, Impacts 5.8-1 and 5.8.2 would be less than significant.

### 5.8.6 Mitigation Measures

No mitigation measures are required.

### 5.8.7 Level of Significance After Mitigation

Impacts would be less than significant.

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### 5.9 HAZARDS AND HAZARDOUS MATERIALS

This section of the EIR evaluates the potential for implementation of the SUP to create a significant impact related to hazards and hazardous materials in the District. This section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions), along with the existing hazards throughout the SUP area including two types of potential risks associated with site-specific new school construction and upgrade projects: 1) risks that construction of new school facilities could pose to onsite workers and the surrounding community, and 2) risks to students, faculty, and other LAUSD staff from on- and offsite hazards and sources of hazardous materials.

#### TERMINOLOGY

**Hazardous materials.** Generally refers to hazardous substances that exhibit corrosive, poisonous, flammable, and/or reactive properties and have the potential to harm human health and/or the environment. Hazardous materials are used in products (e.g., household cleaners, industrial solvents, paint, pesticides) and in the manufacturing of products (e.g., electronics, newspapers, plastic products). Hazardous materials can include petroleum, natural gas, synthetic gas, acutely toxic chemicals, and other toxic chemicals that are used in agriculture, commercial, and industrial uses; businesses; hospitals; and households. Accidental releases of hazardous materials have a variety of causes, including highway incidents, warehouse fires, train derailments, shipping accidents, and industrial incidents.

The terms “hazardous materials” as used in this section include all materials defined in the California Health and Safety Code (H&SC):

A material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. “Hazardous materials” include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the unified program agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.<sup>329</sup>

The term includes chemicals regulated as hazardous materials, wastes, or substances by the U.S. Department of Transportation (DOT), the U.S. EPA, the DTSC, the California Governor’s Office of Emergency Services, and other agencies. “Hazardous waste” is any hazardous material that has been discarded, except those materials specifically excluded by regulation.<sup>330</sup> Hazardous materials that have been intentionally disposed of or inadvertently released fall within the definition of “discarded” materials and can result in the creation of hazardous waste. Hazardous wastes are broadly characterized by their ignitability, toxicity, corrosivity, reactivity, radioactivity, or bioactivity. Federal and state hazardous waste definitions are similar, but distinct enough that separate classifications are in place for federal Resource Conservation and Recovery Act (RCRA) hazardous wastes and state non-RCRA hazardous wastes. Hazardous wastes require special handling and disposal because

<sup>329</sup> California Health and Safety Code, Division 20, Chapter 6.95, Article 1, Section 25501(n).

<sup>330</sup> California Health and Safety Code, Division 20, Chapter 6.5, Article 2, Section 25124.

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of their potential to impact public health and the environment. Some materials are designated “acutely” or “extremely” hazardous under relevant statutes and regulations.

**School Site.** The SUP is not anticipated to include the acquisition of new sites for the construction of “stand alone” schools. However, some projects developed under the SUP may incorporate the acquisition of property, thus expanding an existing campus. For this section, the term “school site” relates to the latter rather than the former definition.

### 5.9.1 Environmental Setting

#### 5.9.1.1 REGULATORY FRAMEWORK

Hazardous materials and wastes can pose a significant actual or potential hazard to human health and the environment when improperly treated, stored, transported, disposed of, or otherwise managed. Many federal, state, and local programs that regulate the use, storage, and transportation of hazardous materials and hazardous waste are in place to prevent these unwanted consequences.

National, state, regional and local laws, regulations, plans, and guidelines are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to hazards and hazardous materials in the District. Many site-specific projects have not been identified, and there may be local jurisdictional plans and policies that are applicable depending on the project site. Specific requirements of these laws, regulations, plans, and guidelines might not be up to date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. These regulatory programs are designed to reduce the danger that hazardous substances may pose to people and businesses under normal daily circumstances and as a result of emergencies and disasters. Although some of these may not directly applicable to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standard Conditions of Approval are also listed. See *Applicable Regulations and Standard Conditions* at the end of this chapter for those that require District compliance.

#### Federal

*United States Code, Title 42, Sections 6901 et seq.*

The **Resource Conservation and Recovery Act** of 1976 is the principal federal law that regulates the generation, management, and transportation of waste. Hazardous waste management includes the treatment, storage, or disposal of hazardous waste. Treatment is any process that changes the physical, chemical, or biological character of the waste to reduce its potential as an environmental threat. Treatment can include neutralizing the waste; recovering energy or material resources from the waste; rendering the waste less hazardous; or making the waste safer to transport, dispose of, or store.

RCRA assigns the U.S. EPA the authority to control hazardous waste from “cradle to grave”, that is, from generation to transportation, treatment, storage, and disposal. It also sets up a framework for the management of nonhazardous solid waste and certain hazardous wastes that are exempted from regulation, such as

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household hazardous wastes. The 1984 Hazardous and Solid Waste Amendments to RCRA enabled the EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances. These amendments also enacted restrictions on the land disposal of hazardous wastes, requiring them to be pretreated to render them less hazardous, or barring their disposal completely.

*United States Code, Title 42, Sections 9601 et seq.*

The federal **Comprehensive Environmental Response, Compensation, and Liability Act** (CERCLA) of 1980, commonly known as “Superfund,” was enacted to protect the water, air, and land resources from the risks created by past chemical disposal practices such as abandoned and historical hazardous wastes sites. Through the act, the EPA was given power to seek out the parties responsible for any release and assure their cooperation in the cleanup. This federal law created a tax on the chemical and petroleum industries that went to a trust fund for cleaning up abandoned or uncontrolled hazardous waste sites. CERCLA also enabled the revision of the National Contingency Plan, which provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The National Contingency Plan established the National Priority List of sites, known as Superfund sites. CERCLA was amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986 to continue cleanup activities around the country.

*United States Code, Title 42, Sections 11001 et seq*

The **Emergency Planning and Community Right-to-Know Act** (EPCRA) of 1986, commonly known as Title III of SARA, was enacted by Congress as the national legislation on community safety. This law was designated to help local communities protect public health, safety, and the environment from chemical hazards. The primary purpose of EPCRA is to inform communities and citizens of chemical hazards in their areas by requiring businesses to report the locations and quantities of chemicals stored onsite to state and local agencies. These reports help communities prepare to respond to chemical spills and similar emergencies. Section 313.1 of EPCRA requires manufacturers to report releases to the environment (air, soil, and water) of more than 600 designated toxic chemicals; report offsite transfers of waste for treatment or disposal at separate facilities; implement pollution prevention measures and activities; and participate in chemical recycling. These annual reports are submitted to the EPA and state agencies. The EPA maintains and publishes a database that contains information on toxic chemical releases and other waste management activities by certain industry groups and federal facilities. This online, publicly available, national digital database is called the Toxics Release Inventory (TRI) and was expanded by the Pollution Prevention Act of 1990.

To implement EPCRA, Congress required each state to appoint a State Emergency Response Commission (SERC) to coordinate planning and implementation activities associated with hazardous materials. The SERCs were required to divide their states into emergency planning districts and to name a local emergency planning committee (LEPC) for each district. The federal EPCRA program is implemented and administered in California by the California Emergency Management Agency (CalEMA), a SERC, 6 LEPCs, and 83 certified unified program agencies (CUPAs). CalEMA and the Governor’s Office of Emergency Services (OES) coordinate and provide staff support to the SERC and LEPCs. Broad representation by fire fighters, health

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officials, government and media representatives, community groups, industrial facilities, and emergency managers ensures that all necessary elements of the planning process are represented.

### *United States Code, Title 15, Sections 2601 et seq.*

The **Toxic Substances Control Act** of 1976 was enacted by Congress to give the EPA the ability to track the 75,000 industrial chemicals currently produced or imported into the United States. The EPA repeatedly screens these chemicals and can require reporting or testing of any that may pose an environmental or human health hazard. It can ban the manufacture and import of chemicals that pose an unreasonable risk. Also, the EPA has mechanisms in place to track the thousands of new chemicals that industry develops each year with either unknown or dangerous characteristics. It then can control these chemicals as necessary to protect human health and the environment. The act supplements other federal statutes, including the Clean Air Act and the TRI under EPCRA.

### **State**

#### *Senate Bill 14*

The California Hazardous Waste Source Reduction and Management Review Act of 1989, also known as SB-14, required large-quantity generators—those that annually produce more than 13.2 tons of hazardous waste or 26.4 pounds of extremely hazardous waste—to periodically conduct a source evaluation of their facilities and develop plans to reduce their volume of hazardous waste through measures such as changes in raw materials production methods, product reformulations, and employee training. The primary objective of the legislation was to reduce the quantity of hazardous waste generated in California and thereby promote public health and improve environmental quality. Generators that exceed the aforementioned waste volume thresholds are required to file waste minimization reports with DTSC every four years.

### *California Code of Regulations, Title 5, Division 1, Chapter 13, Subchapter 1, Article 2, Section 14010*

- CCR, Section 14010 (Title 5) has several standards that are considered in the selection of new school sites. CCR Title 5 requirements that relate to the identification and mitigation of potential health risks and safety hazards are summarized below:
- **Section 14010(c).** The property line of the site, even if it is part of a joint use agreement, shall be at least the following distance from the edge of respective power line easements:
  - 100 feet for 50–133 kV line.
  - 150 feet for 220–230 kV line.
  - 350 feet for 500–550 kV line.
- **Section 14010(d).** If the proposed site is within 1,500 feet of a railroad track easement, a safety study shall be done by a competent professional to assess potential rail safety hazards and identify possible and reasonable mitigation measures.

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- **Sections 14010(e) and (l).** The site shall not be located adjacent to a road or freeway that any site-related traffic study has determined will pose a safety problem. The site shall not be on major arterial streets with a heavy traffic pattern unless mitigation of traffic hazards and a plan for the safe arrival and departure of students has been prepared in accordance with Caltrans's "School Area Pedestrian Safety Manual."
- **Section 14010(f).** Pursuant to Education Code Sections 17212 and 17212.5, the site shall not contain an active earthquake fault or fault trace.
- **Section 14010(g).** Pursuant to Education Code Sections 17212 and 17212.5, the site is not within an area of flood or dam flood inundation unless the cost of mitigating the flood or inundation impact is reasonable.
- **Section 14010(h).** The site shall not be located near an aboveground water or fuel storage tank or within 1,500 feet of the easement of an aboveground or underground pipeline that can pose a safety hazard, as determined by a risk analysis study conducted by a competent professional.
- **Section 14010(i).** The site is not subject to moderate to high soil liquefaction or landslides.
- **Section 14010(m).** Existing or proposed zoning of the surrounding properties shall be compatible with schools in that it would not pose a potential health or safety risk to students or staff in accordance with Education Code Section 17213.
- **Section 14010 (q).** The district shall consider environmental factors of light, wind, noise, aesthetics, and air pollution in its site selection process.
- **Section 14010(t).** If the proposed site is on or within 2,000 feet of a significant disposal of hazardous waste, the school district shall contact the DTSC for a determination of whether the property should be considered a Hazardous Waste Property or Border Zone Property.

### *California Education Code*

The California Education Code sets several legal requirements for the evaluation of hazards and hazardous materials designed to ensure that school sites and school facilities are safe for students, staff, and visitors. The CDE, supported by the DTSC, have been assigned primary responsibility for ensuring that any new properties acquired for school construction or existing school properties used for school expansion are free from hazardous conditions that would endanger the health or safety of students and staff. Requirements relevant to the evaluation of hazards are principally found in Education Code Sections 17072, 17210, 17213, 17215, 17251, and 17268. School districts using state funding for site acquisition or expansion of existing school sites are required to receive approval from the CDE SFPD in order to proceed with project construction. In turn, the SFPD is required to certify to the California OPSC that the school site is free from toxic contamination that would be unsafe for students and staff. Specific requirements of the Education Code are as follows:

- **Phase I Environmental Site Assessment (ESA).** Per Education Code Sections 17210 and 17213.1, prior to site acquisition (or if the District owns or leases a school site, prior to project construction), the District shall arrange for a qualified environmental assessor to prepare a Phase I ESA. If the Phase I ESA concludes

## 5. Environmental Analysis

that further investigation of the site is not required and the DTSC concurs, the District may proceed with the acquisition or construction project without further environmental investigation.

- **Preliminary Environmental Assessment (PEA).** Per Education Code Section 17213.1, if the Phase I ESA and/or the DTSC conclude that further investigation of the site is needed, the District shall arrange for a qualified environmental assessor to conduct a PEA. The District shall also enter into an Environmental Oversight Agreement with the DTSC to oversee the preparation and implementation of the PEA. Alternatively, the district may elect to not pursue the acquisition or construction project. If the PEA concludes that further investigation of the site is not required and the DTSC concurs, the district may proceed with the acquisition or construction project. At the same time, the district shall make the PEA available for public review and comment. If the PEA determines that a release of hazardous material has occurred, the district may elect not to pursue the acquisition or construction project.
- **Response Actions.** Per Education Code Section 17213.2, if the PEA discloses the presence of a hazardous materials release, or threatened release, or the presence of naturally occurring hazardous materials at a proposed school site at concentrations that could pose a significant risk to humans, and the district acquires or already owns the site, the district shall enter into a School Cleanup Agreement with the DTSC and undertake response actions to clean up the site. The district need not take action in response to a release of hazardous material to groundwater underlying the site if the release originates from an offsite source. However, the district is obligated to take response actions, as required, to protect future occupants of the site from potential health risks and hazards posed by the contaminated groundwater, such as the off-gassing of volatile organic compounds from underlying groundwater into building indoor air. The district may not begin construction of a school building until the DTSC determines that 1) the construction will not interfere with the response action, 2) site conditions do not pose a significant threat to the health and safety of the construction workers, and 3) the nature and extent of the contamination have been thoroughly characterized. If a previously unidentified release of hazardous materials is discovered during construction, the district shall cease all construction activities, notify the DTSC, and take actions necessary to address the release. The district may not occupy a school building following construction until the DTSC certifies that all necessary response actions, except for operation and maintenance activities, have been completed and the site no longer poses a significant risk to humans.
- **Environmental Hardship.** Per Education Code Section 17072.13, a district may request environmental hardship status and secure state funding prior to final SFPD approval if the DTSC estimates that the necessary response action will take at least six months to complete and the SFPD determines that the site is the best available alternative site.
- **Site Hazards.** Per Education Code Section 17213(a), a district may not acquire a school site unless it has determined that the property is not any of the following:
  - The site of a current or former hazardous or solid waste disposal site, unless the site was a former solid waste disposal site and the wastes have been removed.



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- A hazardous substance release site identified by the DTSC in a current list for removal or remedial action (see Section 5.9.1.2).
- A site that contains one or more pipelines (underground or aboveground) that convey hazardous substances, acutely hazardous substances, or hazardous wastes, unless it is a natural gas line that is used only to supply natural gas to the school or neighborhood.

Per Education Code Section 17251, the CDE shall advise a district on the suitability of a proposed school site, based on factors that include safety and reduction of traffic hazards. To assist with this evaluation, the CDE has established standards for use by districts to ensure that the design and construction of school facilities are educationally appropriate and promote school safety. The CDE also provides information relating to the impact or potential impact upon any school site of hazardous substances, solid waste, safety, and hazardous air emissions. The CDE has developed specific standards to implement Section 17251 of the Education Code known as “Title 5” requirements (discussed in detail under “California Code of Regulations” heading below).

- **Air Toxics.** Per Education Code Section 17213(b), when preparing the CEQA support documents for a project, the district shall consult with the local air quality management district to identify facilities that might emit hazardous air emissions or handle hazardous or acutely hazardous materials, substances, or waste, including freeways and other busy traffic corridors, large agricultural operations, and rail yards within one-quarter mile of the site. Per Education Code Section 17213(c), if any such facilities are identified, the district must make one of the following findings:
  - The health risks from the identified facilities do not and will not constitute an actual or potential endangerment of public health to persons who would attend or be employed at the school.
  - Corrective measures required under order by another agency having jurisdiction over the facilities will, before the school is occupied, result in the mitigation of all chronic or accidental air emissions to levels that do not constitute an actual or potential endangerment of public health to persons who would attend or be employed at the proposed school. If this finding is made, the district shall make a subsequent finding, prior to occupancy at the school, that the emissions have been mitigated.

Per Education Code Section 17213(c), the district must perform a health risk assessment if a proposed school site is within 500 feet of a freeway or other busy traffic corridor, and either 1) find that air emissions from the freeway pose no significant short-term or long-term health risk to pupils or 2) adopt a Statement of Overriding Considerations on the grounds the district is unable to locate an alternative site that is suitable due to a severe shortage of sites that meet the requirements of Section 17213(a).

- **Airport Safety.** Per Education Code Section 17215, a district is required to provide the CDE written notice before acquiring title to property for a new school site if the proposed site is within two nautical miles of an airport runway or a potential runway included in an airport master plan. The CDE must then notify Caltrans, Division of Aeronautics, which in turn would investigate the proposed site and submit a written report of its findings, including recommendations concerning acquisition of the site. As part of the investigation, the owner and operator of the airport would be granted the opportunity to comment on the

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proposed school site. If the written report does not favor the acquisition of the property for a school site, state funds or local funds cannot be used for acquisition of, or school construction at, the site. Education Code Section 17215 does not apply to school sites acquired prior to January 1, 1966, nor to any additions or expansions to those sites. Specific Caltrans regulations that elaborate on the school site evaluation process are found in CCR Title 21, Division 2.5, Chapter 2.1, Section 3570.<sup>331</sup>

- **Applicability.** Per Education Code Section 17268, school districts that are not using state funding for construction of a new school building still need to comply with Section 17213(a), as summarized above, for identification of hazardous or solid waste disposal site, hazardous substance release site, and hazardous substance pipeline. Districts that want to use state funding may not approve construction of a new school building or a school site on leased or acquired land unless it complies with the requirements of Sections 17213.1 and 17213.2, as summarized above. However, if a project is eligible for a statutory or categorical exemption under CEQA, Sections 17213.1 and 17213.2 requirements do not apply.<sup>332</sup>

### *California Education Code, Title 1, Division 1, Part 10, Chapter 12.5, Section 17070 et seq.*

The Leroy Greene School Facilities Act of 1998 (SB 50), created a new state program called the **School Facility Program** (SFP). The SFP is divided into five major programs: New Construction, Modernization, Critically Overcrowded Schools, Joint Use Projects, and Charter School Facilities.<sup>333</sup> In order to obtain funding for new school construction and modernization projects, school districts must interact with and obtain approval from several state agencies, including the CDE School Facilities and Transportation Services Division (SFTSD), Department of Industrial Relations, OPSC, DSA, and DTSC.<sup>334</sup> The roles and responsibilities of these agencies with respect to the SFP are summarized below.

### **Local**

Cities and communities within the District attendance boundaries have General Plans or community plans that guide development. Where a proposed LAUSD school project is inconsistent with a local General Plan policy or zoning ordinance, LAUSD school sites are exempt under Government Code Section 53094<sup>335</sup>, pending a two-thirds vote of the Board of Education. On February 19, 2019, the LAUSD Board of Education Adopted a Resolution (Res 256-18/19)<sup>336</sup> to exempt all LAUSD school sites from local land use regulations under Government Code Section 53094. Although LAUSD school sites are exempt from local land use regulations, many of these general plans or community plans establish goals and policies providing applicable references for discussion.

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<sup>331</sup> California Department of Transportation California Code of Regulations Title 21, Division 2.5, Chapter 2.1 School Site Evaluation Criteria, March 5, 2003.

<sup>332</sup> Education Code Section 17268(c)

<sup>333</sup> Brunner, E.J., Financing School Facilities in California, a Ten Year \_Perspective. September 2018.

<sup>334</sup> Office of Public School Construction, School Facility Program Handbook, January 2019.

<sup>335</sup> California Government Code, Title 5, Division 2, Part 1, Chapter 1, Article 5.

<sup>336</sup> Regular Meeting Stamped Order of Business, Board of Education Report No. 256-18/19. LAUSD Board of Education, February 19, 2019.

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### Regulatory Agencies

#### *United States Environmental Protection Agency*

The U.S. EPA is the primary federal agency that regulates hazardous materials and waste. In general, the U.S. EPA works to develop and enforce regulations that implement environmental laws enacted by Congress. The agency is responsible for researching and setting national standards for a variety of environmental programs and delegates to states and Native American tribes the responsibility for issuing permits and for monitoring and enforcing compliance. U.S. EPA programs promote handling hazardous wastes safely, cleaning up contaminated land, and reducing waste volumes through such strategies as recycling. California falls under the jurisdiction of U.S. EPA Region 9. Under the authority of RCRA and in cooperation with state and tribal partners, the U.S. EPA Region 9 Land Superfund Divisions manage programs for site environmental assessment and cleanup, hazardous and solid waste management, and underground storage tanks.

#### *California Environmental Protection Agency*

Cal/EPA was created in 1991 by Governor Executive Order W-5-91. Several state regulatory boards, departments, and offices were placed under the Cal/EPA umbrella to create a cabinet-level voice for the protection of human health and the environment and to assure the coordinated deployment of state resources. Among those responsible for hazardous materials and waste management are the DTSC, Department of Pesticide Regulation, and Office of Environmental Health Hazard Assessment. Cal/EPA also oversees the unified hazardous waste and hazardous materials management regulatory program (Unified Program), which consolidates, coordinates, and makes consistent the following six programs:

- Hazardous Materials Release Response Plans and Inventories (Business Plans)
- Underground Storage Tank Program
- Aboveground Petroleum Storage Tank Act
- Hazardous Waste Generator and Onsite Hazardous Waste Treatment Programs
- California Uniform Fire Code: Hazardous Material Management Plans and Inventory Statements
- California Accidental Release Prevention (CalARP) Program.

#### *Department of Toxic Substances Control*

The DTSC is a division of Cal/EPA and is authorized to carry out the federal RCRA hazardous waste program in California to protect people from exposure to hazardous wastes. The department regulates hazardous waste, cleans up existing contamination, and looks for ways to control and reduce the hazardous waste produced in California, primarily under the authority of RCRA and in accordance with the California Hazardous Waste Control Law<sup>337</sup> and the Hazardous Waste Control Regulations.<sup>338</sup> Permitting, inspection, compliance, and corrective action programs ensure that people who manage hazardous waste follow state and federal

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<sup>337</sup> California Hazardous Waste Control Law, Division 20, Chapter 6.5.

<sup>338</sup> Hazardous Waste Control Regulations, 22 CCR Divisions 4 and 4.5.

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requirements and other laws that affect hazardous waste specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning.

The role of the DTSC in school construction begins with the SFPD site approval process. The DTSC assists school districts with the assessment of any possible contamination and, if necessary, with the development and implementation of a mitigation plan. The DTSC established a dedicated Schools Division in 2000 to oversee environmental assessment of new school sites. DTSC's role is limited to projects with state funding. DTSC oversight is not required where a state-funded project is statutorily or categorically exempt from CEQA. The school site evaluation process includes the following steps:

- **Phase I ESA.** Prior to site acquisition, or if the District owns or leases a site, prior to construction, a preliminary assessment of a property must be undertaken to determine whether there has been or may have been a release of a hazardous material, or whether a naturally occurring hazardous material such as methane or asbestos is present. A Phase I ESA must meet the most current requirements adopted by ASTM International (ASTM) for the “Standard Practice for Environmental Site Assessments.” If the Phase I ESA identifies no potential contamination, the school district will receive a “No Action” determination letter from DTSC, and the process is complete.<sup>339</sup> When a Phase I ESA reveals potential contamination, a Preliminary Environmental Assessment may be required to evaluate the threat to human health or the environment.
- **PEA.** A PEA is required when there is potential contamination on the school site. This can be determined through a Phase I ESA (see above) or districts may elect to proceed directly to a PEA based on site knowledge.<sup>340</sup> The assessment includes collection of environmental samples and evaluation of potential health risks. School districts enter into an Environmental Oversight Agreement with DTSC, then contract with a qualified environmental consultant to prepare an assessment according to DTSC guidelines. The assessment includes preparation of a work plan, collection and analysis of environmental samples, and preparation of a PEA Report.<sup>341</sup> The report includes results of environmental sampling and a health risk assessment conducted according to DTSC guidelines.<sup>342</sup> School districts must make the report available for public review and comment before DTSC's final determination.<sup>343</sup> DTSC is required to approve or disapprove the PEA Report within 30 days of close of the public review period<sup>344</sup> or within 30 days of the school district's approval of the Environmental Impact Report for the school.<sup>345</sup> If the assessment identifies no significant health or environmental risks, the school district will receive a “No Further Action” determination letter from DTSC<sup>346</sup> and the process is complete. If the assessment identifies potential contamination, further action will be required. In general, PEAs are conducted in accordance with the

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<sup>339</sup> CEC Section 17213.1(a)(2).

<sup>340</sup> CEC Section 17213.1(a)(4)(B).

<sup>341</sup> CEC Sections 17210(b) and 17213.1(a)(4)(B).

<sup>342</sup> CEC Section 17213.1(a)(4)(B).

<sup>343</sup> CEC Section 17213.1(a)(6).

<sup>344</sup> CEC Section 17213.1(a)(6)(A)

<sup>345</sup> CEC Section 17213.1(a)(6)(B).

<sup>346</sup> CEC Section 17213.1(a)(9).

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DTSC's "Preliminary Endangerment Assessment Guidance Manual."<sup>347</sup> Supplemental Site Investigations (SSIs) may be required to further evaluate areas of contamination identified during the PEA or areas that were inaccessible during the initial investigation.

- **Response Action.** If the PEA identifies significant contamination, school districts may elect to drop the proposed school site from consideration or clean up the contamination under a DTSC Voluntary Cleanup Agreement (VCA) or School Cleanup Agreement (SCA). An SCA is required for school districts planning to obtain final site or plan approval and full funding before completion of required response actions. Consistent with response actions conducted for other contaminated sites, DTSC follows Health and Safety Code requirements for all responses actions.<sup>348</sup> DTSC is required to provide opportunities for public comment on the Removal Action Workplan or Remedial Action Plan before approval of the final document.<sup>349</sup> When all necessary cleanup activities are complete, DTSC will certify that "No Further Action" is needed and certify the site as safe for school construction or occupancy.

The DTSC has issued numerous advisories and guidance specific to the investigation and cleanup of school sites. School projects conducted under DTSC oversight are required to follow the agency guidance, but school districts and others also may refer to the guidance documents when conducting self-directed environmental investigations and remedial activities. Current DTSC technical guidance commonly used for new school projects include:

- Preliminary Endangerment Assessment Guidance Manual, January 1994 (revised October 2013)
- Information Advisory: Clean Imported Fill Material, October 2001
- Interim Guidance for Sampling Agricultural Fields for School Sites, August 26, 2002
- Fact Sheet: PCBs in Schools: Voluntary Lighting Retrofits Can Address Hidden Dangers and Liabilities, February 2003
- Interim Guidance: Naturally Occurring Asbestos (NOA) at School Sites, September 24, 2004
- Advisory on Methane Assessment and Common Remedies at School Sites, April 26, 2005
- Interim Guidance: Evaluation of School Sites with Potential Soil Contamination as a Result of Lead from Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers, June 9, 2006
- Arsenic Strategies: Determination of Arsenic Remediation Development of Arsenic Cleanup Goals for Proposed and Existing School Sites, March 21, 2007

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<sup>347</sup> DTSC, January 1994 (Interim Final, revised October 2013).

<sup>348</sup> CEC Section 17210.1(a)(1) and (2) and Section 17213.2(a).

<sup>349</sup> Health and Safety Code, Division 20, Chapter 6.8, Section 25356.1(e) and (h).

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- Evaluation of Biogenic Methane, March 28, 2012
- Advisory: Active Soil Gas Investigations, Joint Document with Los Angeles and San Francisco Regional Water Quality Control Boards, April 2012.

### *Certified Unified Program Agency*

A CUPA is a local agency that has been certified by Cal/EPA to implement the local Unified Program. The CUPA can be a county, city, or joint powers authority. A participating agency is a local agency that has been designated by the local CUPA to administer one or more Unified Programs within their jurisdiction on behalf of the CUPA. A designated agency is a local agency that has not been certified by Cal/EPA to become a CUPA but is the responsible local agency that would implement the six Unified Programs<sup>350</sup> until they are certified.

Currently, there are 83 CUPAs in California. Three are within the LAUSD boundaries: the Los Angeles Fire Department within the City of Los Angeles; the City of Vernon Health & Environmental Control Department in the City of Vernon; and the Los Angeles County Fire Department in the remainder of the District.<sup>351</sup>

### *CDE School Facilities Planning Division*

The role of the SFPD is to review and approve school district sites and construction plans. Prior to approving a site for school purposes, the SFPD reviews many factors, including environmental hazards, proximity to airports, freeways, and power transmission lines. In most cases, the district must have completed the process of identifying the site and must have SFPD approval for the site prior to applying for site acquisition funding. As previously discussed, the CDE is given the authority in law to develop standards for school site acquisition related to the educational merit and the health and safety issues of the site. The CDE uses these standards to review a site and determine if it is an appropriate location for a school facility. The “School Site Selection and Approval Guide”<sup>352</sup> addresses the site selection standards in detail.

### *State Allocation Board*

The SAB is responsible for determining the allocation of state resources, including proceeds from General Obligation Bonds and other designated state funds used for new construction and modernization of public school facilities. The SAB meets once a month to review and approve applications for eligibility and funding, act on appeals, and adopt policies and regulations as they pertain to the programs under its purview.

### *Office of Public School Construction*

The OPSC serves the more than 1,000 public K–12 school districts in California. As staff to the SAB, the OPSC is responsible for allocating state funding for eligible new construction and modernization projects for California public school children. The OPSC is responsible for verifying that all applicant school districts meet

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<sup>350</sup> The six Unified Programs include: Hazardous Materials Disclosure and Business Plan, Underground Storage Tank Program, Aboveground Storage Tank Spill Prevention Control and Countermeasure Plan (SPCC), Hazardous Waste Generator Program, CalARP, and On-site Hazardous Waste Treatment (Tiered Permitting) Program

<sup>351</sup> Cal/EPA. 2023, May 13. Unified Program Regulator Directory. <http://cersapps.calepa.ca.gov/Public/Directory/>.

<sup>352</sup> CDE. 2004. <https://www.cde.ca.gov/ls/fa/sf/schoolsiteguide.asp>.

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specific criteria based on the type of eligibility or funding that is being requested and to assist school districts with the application process. The OPSC ensures that funds are allocated properly and in accordance with the law and decisions made by the SAB.

### *Division of State Architect*

The primary role of the DSA in the school construction process is to review plans and specifications to ensure that they comply with California's building codes, with an emphasis on structural and seismic safety. The DSA reviews working drawings submitted by the district to ensure that the proposed structures meet codes and requirements for construction, fire and life safety, and universal design compliance. DSA approval of all plans and specifications is required prior to a construction contract being signed for new construction, modernization, or alteration of any state-funded school building.

### ***New School Construction and Modernization Approval Process***

Most projects implemented under the SUP are anticipated to be minor school additions<sup>353</sup> or renovation upgrades that are eligible for a statutory or categorical exemption under CEQA guidelines, Article 18 or Article 19. In such a case, per Education Code Section 17268(c), the project is not subject to DTSC oversight and requirements of Sections 17213.1 and 17213.2. In addition, according to the CDE, all modernization projects subject to state funding under the modernization budget (i.e., Form SFPD 4.08), including replacement area and/or new area required by the Americans with Disabilities Act or the DSA handicapped access requirements, do not require a Phase I ESA or DTSC determination for SFPD final plan approval.<sup>354</sup>

In circumstances where a project does not qualify as a minor addition to schools and does not meet the criteria for a CEQA exemption, the following process would apply. The SFP provides state funding assistance for two major types of school construction projects: new construction and modernization. The process for accessing state funding is divided into two steps: an application for eligibility and an application for funding. In order to receive funding for an eligible project, the district must file applications first with the SFPD for project approval, and then with the OPSC and SAB for funding approval. With respect to the evaluation of hazards and hazardous materials, districts using state funding for site acquisition and new construction or expansion of schools on existing school sites must submit the following documents with their applications:<sup>355</sup>

- Form SFPD 4.02, "School Site Report", which includes sections for describing DTSC site investigation and cleanup requirements, as well as potential site hazards related to its proximity to airports/heliports, major roadways, railroads, hazardous waste disposal sites, pipelines carrying hazardous substances, high voltage power lines, hazardous air emissions, and earthquake faults.

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<sup>353</sup> LAUSD uses the Class 14 CEQA Exemption criteria to determine what qualifies as a minor addition: Class 14 consists of minor additions to existing schools within existing school grounds where the addition does not increase original student capacity by more than 25% or 10 classrooms, whichever is less. The addition of portable classrooms is included in this exemption. LAUSD also interprets that additions other than classrooms qualify for this exemption and we may apply multiple exemptions, but the key as it pertains to DTSC is Class 14 must be listed as one of the exemptions applied.

<sup>354</sup> California Department of Education, SFPD Advisory 00-01: Site and Plan Approval Procedures Related to Hazardous Materials Required by AB 387/Senate Bill 162, January 18, 2000.

<sup>355</sup> School Facilities Planning Division Form SFPD 4.01 – School Site Approval Procedures.

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- Form SFPD 4.03, “School Site Certification,” which requires the district to certify that the proposed site is free, or will be free prior to occupancy, from hazards that could be considered harmful to student and staff health and safety. It also requires the district to certify that it has (or will) comply with all applicable laws and policies associated with the acquisition of the school site, including commitments for DTSC-required activities and hazard evaluations related to CCR Title 5 site selection standards.
- Geological and other environmental hazard reports, including, but not limited to, high-pressure pipelines, liquid storage tanks, railroads, airports, electrical transmission lines, flooding, dam inundation, seismic faulting, and liquefaction.
- One or more of the following DTSC documents, as appropriate:
  - DTSC-approved Phase I ESA and PEA Executive Summary.
  - DTSC “final” determination letter approving the Phase I ESA and/or PEA.
  - If a response action was required, the DTSC “no further action” letter, or the certified completion of the response action.
  - Form SFPD 4.14 committing the district to complete a Phase I ESA addendum, PEA, or response action for lead-based paint, polychlorinated biphenyls, and/or organochlorine pesticides, if requesting final CDE approval prior to completing DTSC requirements.
  - Form SFPD 4.15 committing the district to complete a response action, if requesting final CDE approval prior to completing DTSC requirements.
- If the proposed school site is within two nautical miles of an existing or potential airport runway, a final determination letter from the Caltrans, Division of Aeronautics.
- Other studies, as applicable, to evaluate the unique characteristics and environment of the proposed school site, including the evaluation of hazards associated with railroads, pipelines, electric transmission lines and flooding.
- Form SFPD 4.07 for new school construction projects that will use state funding. SFPD 4.07 requires the district to certify compliance with DTSC requirements and CCR Title 5 Section 14010 standards regarding the evaluation of potential site hazards.
- Form SFPD 4.08 for school modernization projects that will use state funding. SFPD 4.08 requires the district to certify compliance with CCR Title 5, Section 14010, standards regarding the evaluation of potential site hazards. Per CDE policy, DTSC oversight and approval are not required for districts using state funding for school modernization projects. Additionally, DTSC oversight is not required where state-funded project is CEQA exempt.



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The following statutory and regulatory requirements relate to new school construction or modification projects in instances when a school district is not using state funding (also referred to as “locally funded” projects):

- Per Education Code Section 17210.1, a district is not subject to DTSC oversight and requirements of Sections 17213.1 and 17213.2 unless it is using state funding. However, such school sites may voluntarily participate in the DTSC’s school environmental review process.
- New school construction projects that do not use state funding are not required to be approved by CDE. However, locally funded projects are still required to comply with the property evaluation and public noticing requirements of CCR Title 5, Section 14012. CCR Title 5, Section 14012(a), requires that districts using local funding evaluate potential hazards and hazardous materials at proposed school sites in accordance with standards in CCR Title 5, Sections 14010 and 14011(e) through (l).

Per Education Code Section 17268(a), even if a district is not using state funding, it must still evaluate a proposed school site in accordance with Education Code Section 17213 (which includes a subset of the CCR Title 5 standards) prior to approving the construction of a new school building.

### LAUSD

#### *Standard Conditions of Approval*

This section includes the hazard related standard conditions that will be included as part of each SUP-related project, as appropriate. Because of the significant number of LAUSD standard conditions for hazards and hazardous materials and the complexity and overlap between procedures this section is formatted with full details instead of in a table.

The LAUSD Office of Environmental Health and Safety (OEHS) is responsible for the development and implementation of programs to ensure a safe and healthy environment for the students and employees of the District. OEHS administers a range of health and safety programs under two broad categories:

- **Safety and Industrial Hygiene.** OEHS provides support related to occupational safety and health regulatory program compliance, loss control, accident management, workers’ compensation cost reduction, industrial hygiene, liability loss control, ergonomic support, safety and industrial hygiene training, traffic/pedestrian safety, asbestos compliance oversight, lead in drinking water compliance, chemical product evaluation, regulatory agency support and citation management, and equipment approval. OEHS staff works on District-wide design standards and policies, conducts comprehensive analyses of all major facilities projects, and approves occupancy for new construction and significant site modification projects.

In addition to traditional safety and industrial hygiene program management, OEHS staff manages the District’s emergency operations centers (EOCs), responds to District emergency response situations (e.g., hazardous materials, fires, chemical spills, sewer overflows, vandalism), provides emergency response training, coordinates the District emergency response equipment inventory, and responds to catastrophic emergencies. In cooperation with School Operations, OEHS coordinates with local, state, and federal emergency management agencies, communicates with District executive management during large-scale emergencies, and conducts post-event analyses of District response activities.

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- **Environmental Programs.** OEHS provides support related to CEQA compliance, new construction site assessment and remediation, development and maintenance of site environmental surveillance systems (i.e., methane systems), hazardous/universal waste management, solid waste management, recycling programs, District environmental design standards, stormwater compliance, environmental auditing and program compliance, permitting, coordination between environmental regulatory agencies, environmental training programs, and the development and implementation of District-wide environmental compliance and sustainability programs.

OEHS is a recognized leader in coordinating District-wide activities related to environmental site assessment and remediation. OEHS staff works with contractors, FSD, and other District staff to coordinate the required provisions of CEQA for new school sites and existing school site modifications, which involves the development of appropriate CEQA documents up to and including Environmental Impact Reports. OEHS staff oversees (or, when necessary, works with the DTSC to oversee) completion of Phase I ESAs, development of PEAs, and development and management required site remedial action plans. In addition to new school sites, OEHS staff reviews and supports existing FSD projects and monitors the ongoing land use surrounding more than 1,000 schools and other sites.

OEHS has developed numerous practices, procedures, and standard conditions related to hazards and hazardous materials, including the following:

- **Site Hazards.** Procedures are in place for OEHS to evaluate the presence of potentially toxic or hazardous conditions on or in the vicinity of a proposed or existing District facility. If necessary, a site screening is conducted to determine the proximity of the project site to any rail lines, pipelines, oil fields, methane zones, methane buffer zones, freeways, landfills, industrial facilities, and high voltage power lines. The findings are documented in the OEHS Site Environmental Review and may involve preparation of supporting technical studies such as an air quality health risk assessment, pipeline safety hazard assessment, rail safety study, electromagnetic field exposure management plan, geohazard report, tank safety study, or methane assessment. OEHS is also actively involved in identifying potential environmental hazards in proximity to schools pursuant to LAUSD's Safe School Plans (SSPs) program. Finally, OEHS has procedures in place to identify and evaluate existing high risk facilities and new offsite projects that may impact a school within one-quarter mile. Applicable LAUSD guidance includes:
  - LAUSD-OEHS Safety Alert No. 03-02: Procedures – Responding to Toxic Air Emissions, February 2003
  - LAUSD Board Resolution: Siting of New Schools Near Industrial Facilities, January 22, 2008
  - LAUSD-OEHS Memorandum: Industrial Facilities in Proximity to Schools, MEM-1611, March 4, 2005
  - LAUSD-OEHS User Manual Pipeline Safety Hazard Assessment, October 2008
  - LAUSD-OEHS Procedures for Environmental Review of Proposed Projects, REF 5314.2, June 12, 2017

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- LAUSD-OEHS Reference Guide: Environmental Hazards in Proximity to Schools, REF-5892.1, December 21, 2020
- LAUSD-OEHS Procedures: Review of Non-District Projects to Determine Impact on Schools, undated draft
- **Site Investigation and Remediation.** OEHS conducts reviews of proposed projects at District facilities that have the potential to impact public health, safety, or the environment. To ensure the health and safety of students and staff, OEHS review of the following types of projects is required prior to construction or implementation, regardless of funding source:<sup>356</sup>
  - Proposed new school site;
  - Expansion, major repair, or modernization of existing school facilities, including paving projects;
  - Proposed placement/removal of bungalows or other temporary structures at existing school facilities;
  - Change in use or occupancy of existing facilities;
  - Proposed co-location or land lease agreements for charter school facilities;
  - Proposed joint-use and innovation funds programs;
  - Proposed lease or use of non-District property for District purposed;
  - Proposed Low Impact Developments (LIDs);
  - Proposed Drought Response Outreach Program for Schools (DROPS);
  - Proposed installation of radiofrequency (RF) devices including access points, smart switches, laptops, and other wireless devices; and
  - Proposed installation of electromagnetic field (EMF) generating equipment including large transformers, electrical panels, or similar energized equipment.

The site assessment process varies depending on the nature of each proposed project and current site conditions. Elements may include:

- 1) Site Screening, with a site reconnaissance, aerial photograph review, and environmental database search is required to identify all potential sources of risk which may impact the health and safety of individuals attending a proposed elementary or secondary school. The results are compared to the *OEHS Distance Criteria for School Siting/Screening* (Attachment 2) to determine the proximity of the project site to any rail lines, pipelines, oil fields, methane zones, methane buffer zones, radon zones, freeways, landfills,

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<sup>356</sup> LAUSD Office of Environmental Health and Safety. Procedures for Environmental Review of Proposed Projects REF 5314.2, June 12, 2017.

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industrial facilities, and high voltage power lines. All sources of environmental risk are evaluated further and may include one or more specialized studies.

- 2) Phase I ESA – The Phase I ESA documents historic site use as well as those of neighboring properties that may have impacted the site. It is generally required in instances of projects involving construction of new buildings, or where there will be disturbance of significant volumes of soil. Based on the findings of the Phase I ESA, further investigation and intrusive sampling may be required. This assessment must be completed utilizing the most current ASTM standard.
- 3) PEA/SSI to investigate for the presence of hazardous materials; and
- 4) Remedial Action and Mitigation Measures – Should significant risks from subsurface contamination be identified, a Removal Action Workplan or Remedial Action Plan is prepared and implemented with oversight by OEHS and in some cases the DTSC or other appropriate regulatory agencies. Documentation of the implemented remedial action is included in a subsequent Remedial Action Completion Report

These studies must be conducted in consultation with OEHS staff. If significant risks are identified, mitigation measures must be evaluated, and impacts reduced to acceptable levels consistent with regulatory standards and/or applicable guidance

- 5) 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.

Soil Management – Consideration must be given to the management of excavated soil associated with identified earthwork activities. Please note that excavated soils should only be reused on-site if they are to be placed beneath paved areas. If construction or earthmoving activities require import or export of soils and materials, OEHS must be notified to provide oversight to ensure that these activities are conducted in accordance with the requirements of District Specification 01 4524 (formally 1440) and in compliance with applicable environmental agency rules and requirements.

Furthermore, work must be stopped immediately and OEHS notified if subsurface features such as buried debris, tanks or seepage pits, stained/odoriferous soils, or items of potential cultural significance are found during construction related activities.

Facility Safety Inspection – Prior to occupancy of newly constructed schools, structural additions, and related projects which add additional classroom space, or other projects where a Division of State Architects’ Form 6 PI is issued, a health and safety inspection is conducted following standard OEHS inspection protocols and reported in the *Essential Safety Checklist & Approval Form*.

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Prior to occupancy of modernized or renovated schools, a health and safety inspection is conducted following standard OEHS inspection protocols and reported in the *Essential Safety Checklist & Approval Form for Modernization Projects*.

Both checklists are completed in accordance with OEHS's *Occupancy Approval Criteria for Completed School Projects*.

It is the responsibility of the project proponent to request the inspection at least two months prior to occupancy. Once all occupancy criteria have been satisfied, OEHS will issue a completed Essential Safety Checklist & Approval Form. Deficiencies that do not prevent a school project from opening will be documented by OEHS in a Corrective Action Notice (CAN) that is normally issued after occupancy is approved.

- **Hazardous Materials.** OEHS has programs and procedures in place to ensure that hazardous materials are handled safely throughout the District. OEHS approves and maintains an inventory of all chemical products to be used by the District.<sup>357</sup> It also reviews Safety Data Sheets (SDS) before products are released for use and encourages the substitution of chemical projects with less toxic products whenever possible. It is responsible for ensuring that school campuses and Maintenance and Operation facilities meeting regulatory thresholds for the storage of hazardous materials (i.e., 55 gallons of liquid, 200 cubic feet of gas, or 500 pounds of solid) have filed a Hazardous Materials Business Plan with the local CUPA that includes chemical inventories and an emergency response plan. Other programs are designed to ensure the safe handling, storage, and use of hazardous materials on school campuses and facilities. Applicable LAUSD-OEHS guidance includes:

- LAUSD Section 13614 – Abatement of Hazardous Materials, July 7, 2003
- LAUSD Section 13280 – Asbestos Abatement and Asbestos Related Disturbance, November 21, 2003
- LAUSD-OEHS School Laboratory Chemical Hygiene & Safety Plan, March 15, 2014
- LAUSD-OEHS Safety Alert No. 05-03: Chemical Products Evaluations for District Use, June 22, 2022
- LAUSD Section 13282 – Lead Abatement and Lead Related Construction Work, March 15, 2007
- LAUSD-OEHS Safe School Inspection Guidebook, July 2021
- LAUSD-OEHS Hazard Communication Plan – Your Right to Know, November 2013
- LAUSD Facilities Services Division, Facilities School Maintenance and Operations Repair & Construction Safety Standards, February 28, 2013

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<sup>357</sup> LAUSD OEHS Safety Alert No. 05-03, Chemical Product Evaluations for District Use, February 22, 2022.

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- LAUSD-OEHS Reference Guide: Daily Flushing Requirements for Drinking Fountains and Faucets, REF-3930.4, August 26, 2013.
- **Hazardous Waste.** OEHS manages the District's hazardous waste program, which involves waste stream analysis and classification, packaging waste, manifesting waste, transportation, storage, disposal, reporting, and recordkeeping. OEHS also manages the District's hazardous waste warehouse, waste yards, hazardous waste contractors, and conduct training and audits. Applicable LAUSD guidance includes:
  - LAUSD-OEHS Safety Alert No. 03-11: Procedures – Disposal of Electronic Devices, April 29, 2005
  - LAUSD-OEHS Hazardous Waste Management Procedures for Maintenance and Operations and Garages, March 22, 2007
  - LAUSD-OEHS Reference Guide: Disposal Procedures for Hazardous Waste and Universal Waste, REF-4149.2, June 12, 2020.

The LAUSD Office of Environmental Health and Safety works in conjunction with Ware Disposal, Urbaser-American, and Republic Services, Inc. to provide rubbish and diversion programs District-wide. These vendors provide LAUSD with trash, recycling, and green waste disposal services.<sup>358</sup>

Project sites involving substantial ground disturbance will be reviewed by OEHS. At a minimum, the project site will be evaluated to the standards described in: Phase I ESA Protocol, E 1527-21, Standard Practice for Environmental Assessments: Phase I Environmental Site Assessment Process.

For site acquisition: Title 5 compliance. Comply with all siting and environmental impact study requirements of the School Facilities Planning Division as defined in Title 5, Division 1, Chapter 13 of the California Code of Regulations, including:

- DTSC site review for hazardous agents, including industrial, agricultural, and naturally occurring pollutants such as asbestos and heavy metals.
- The air pollution control district or air quality management district having jurisdiction in the area must identify nearby facilities which might reasonably be anticipated to emit hazardous air emissions, or to handle hazardous or acutely hazardous materials, substances, or waste and determine that they will not adversely affect student, staff, or teacher health.
- All other siting requirements, including separation from power-line easements, railroad tracks, hazardous pipelines, adverse levels of traffic noise, and avoiding construction on active earthquake faults or fault traces.

0.13.2.5 All new school sites receiving state funding are required by law to follow the Title 5 requirements. Privately funded schools must also engage the SFPD and DTSC to

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<sup>358</sup> Los Angeles Unified School District Fingertip Facts 2022-2023. <https://achieve.lausd.net/oehswastemanagement>.

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validate that their site complies with the Title 5 and the Education Code, as outlined above, for investigating, and remediating hazard substance releases.

### 5.9.1.2 HAZARDOUS MATERIAL RELEASE SITES

California Government Code Section 65962.5 requires Cal/EPA to compile, maintain, and update specified lists of hazardous material release sites. CEQA<sup>359</sup> requires a lead agency to consult the lists compiled pursuant to Government Code Section 65962.5 to determine whether the lead agency's project and any project alternatives are identified on any of the lists. California Education Code Section 17213(a)(2) requires a school district to determine that a property to be purchased or built upon is not a hazardous substance release site identified by the DTSC in a current list adopted pursuant to Section 25356 of the Health and Safety Code for removal or remedial action.

The required lists of hazardous material release sites are commonly referred to as the "Cortese List" after the legislator who authored the legislation. Because the statute was enacted over 20 years ago, some of the provisions refer to agency activities that were conducted many years ago and are no longer being implemented, and in some cases, the information to be included in the Cortese List does not exist. Those requesting a copy of the Cortese List are now referred directly to the appropriate information resources on websites hosted by the boards or departments referenced in the statute, including DTSC's online EnviroStor database and the State Water Resources Control Board's (SWRCB) online GeoTracker database. These two databases include hazardous material release sites, along with other categories of sites or facilities specific to each agency's jurisdiction.

Federal, state, local, and proprietary databases for hazardous sites are routinely researched during performance of a Phase I ESA to determine if a proposed project site is listed in the database, or whether hazardous sites are present within prescribed distances from the project site. Several private companies provide comprehensive database services that comply with ASTM standards to make such research time efficient and cost-effective. Preparation of a Phase I ESA will ensure that the regulatory obligations for the identification of hazardous material release sites are met for a given project. In instances where a Phase I ESA is not required, LAUSD may research the EnviroStor and GeoTracker websites or obtain a database search report to assess environmental conditions in the vicinity of the project as part of its Preliminary Screening evaluation. Regulatory databases that may be consulted include the following:

- **EPA National Priorities List (NPL).** Lists all sites under the EPA's Superfund program, which was established to fund cleanup of contaminated sites that pose risk to human health and the environment.
- **EPA Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) and Archived Sites.** List contains 15,000 sites nationally identified as hazardous sites. This would also involve a review for archived sites that have been removed from CERCLIS due to No Further Remedial Action Planned (NFRAP) status.

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<sup>359</sup> PRC Section 21092.6.

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- **EPA Resource Conservation and Recovery Act Information System (RCRIS or RCRAInfo).** RCRIS or RCRAInfo is a national inventory system about hazardous waste handlers. Generators, transporters, handlers, and disposers of hazardous waste are required to provide information for this database.
- **DTSC Cortese List.** The DTSC maintains the Hazardous Waste and Substances Sites (Cortese) List as a planning document for use by the State and local agencies to comply with the CEQA requirements in providing information about the location of hazardous materials release sites. This list includes the Site Mitigation and Brownfields Reuse Program Database (CalSites).
- **DTSC HazNet.** DTSC uses this database to track hazardous waste shipments.
- **SWRCB LUSTIS.** Leaking Underground Storage Tank Information System. The SWRCB maintains an inventory of USTs and leaking USTs, which tracks unauthorized releases.

A search of commonly accessed online databases on May 15, 2023 identified the following information potentially relevant to the District's proposed SUP.

### EnviroStor

The EnviroStor database, maintained by the DTSC, identifies sites that have known contamination or sites for which there may be reasons to investigate further. The database includes federal Superfund sites (National Priorities List), state response sites, voluntary cleanup sites, school investigation and cleanup sites, corrective action sites, and tiered California permit sites. It also includes sites that are being investigated for suspected but unconfirmed contamination. A search of this database found a number of facilities in the 12 cities completely or mostly served by the District, shown in Table 5.9-1.



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Table 5.9-1 EnviroStor Cleanup Program Sites

Status	Los Angeles	San Fernando	West Hollywood	Bell	Carson	Cudahy	Gardena	Huntington Park	Lomita	Maywood	South Gate	Vernon	TOTAL
<b>School Investigation and School Cleanup Sites</b>													
Certified or No Further Action	74	1	0	3	1	1	0	4	0	1	5	0	
Active, Inactive, or Referred to Other Agency	5	0	0	0	0	1	0	0	0	0	1	0	
<b>Subtotal</b>	<b>79</b>	<b>1</b>	<b>0</b>	<b>3</b>	<b>1</b>	<b>2</b>	<b>0</b>	<b>4</b>	<b>0</b>	<b>1</b>	<b>6</b>	<b>0</b>	<b>97</b>
<b>Evaluation, or Military Evaluation Sites</b>													
No Action Required, No Further Action, or Inactive-Withdrawn	131	3	0	18	2	3	9	12	0	2	5	10	<b>195</b>
Active, Inactive-Action Required, Inactive-Needs Evaluation, or Referred to Other Agency	227	5	2	24	12	4	16	10	0	5	12	19	<b>336</b>
<b>Subtotal</b>	<b>358</b>	<b>8</b>	<b>2</b>	<b>42</b>	<b>14</b>	<b>7</b>	<b>25</b>	<b>22</b>	<b>0</b>	<b>7</b>	<b>17</b>	<b>29</b>	<b>531</b>
<b>Federal Superfund, Corrective Action, State Response, or Voluntary Cleanup Sites</b>													
Completed, Certified, No Further Action, or De-Listed	86	1	1	5	9	0	6	0	0	0	6	12	<b>126</b>
Active, Backlog, Inactive, or Referred to Other Agency	133	0	0	6	28	4	15	8	0	1	13	22	<b>230</b>
<b>Subtotal</b>	<b>219</b>	<b>1</b>	<b>1</b>	<b>11</b>	<b>37</b>	<b>1</b>	<b>21</b>	<b>8</b>	<b>0</b>	<b>1</b>	<b>19</b>	<b>34</b>	<b>356</b>
<b>Historical or Tiered Permit Sites</b>													
Certified, Closed, No Further Action, No Action Required, Protective Filer, or Undergoing Closure	50	0	1	0	14	0	8	3	0	0	5	7	<b>88</b>
Active, Inactive Action Required, Inactive Needs Evaluation, or Referred to Other Agency	66	3	0	0	8	0	17	2	0	0	2	3	<b>101</b>
<b>Subtotal</b>	<b>116</b>	<b>3</b>	<b>1</b>	<b>0</b>	<b>22</b>	<b>0</b>	<b>25</b>	<b>5</b>	<b>0</b>	<b>0</b>	<b>7</b>	<b>10</b>	<b>189</b>
<b>Hazardous Waste Facilities</b>													
Permitted – Operating, Interim Operating Permitted,	26	0	0	0	3		1	0	0	0	0	1	<b>31</b>

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Status	Los Angeles	San Fernando	West Hollywood	Bell	Carson	Cudahy	Gardena	Huntington Park	Lomita	Maywood	South Gate	Vernon	TOTAL
and Post-Closure Permitted													
Historical – Non-Operating	39	0	0	0	12	0	5	3	0	0	3	7	69
<b>Subtotal</b>	<b>65</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>15</b>	<b>0</b>	<b>6</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>8</b>	<b>100</b>
<b>TOTAL</b>	<b>914</b>	<b>13</b>		<b>56</b>	<b>89</b>	<b>10</b>	<b>71</b>		<b>0</b>	<b>9</b>	<b>47</b>	<b>23</b>	<b>1,232</b>

Source: DTSC EnviroStor database 2023. <http://www.envirostor.dtsc.ca.gov/public/>.

### GeoTracker

The GeoTracker database, maintained by the SWRCB, lists a range of types of hazardous materials sites that could affect groundwater quality, including leaking underground storage tank sites, cleanup program sites, land disposal sites, and military sites. A search of this database found a number of such facilities in the 12 cities completely or mostly served by the District (see Table 5.9-2).

**Table 5.9-2 GeoTracker Sites**

Status	Los Angeles	San Fernando	West Hollywood	Bell	Carson	Cudahy	Gardena	Huntington Park	Lomita	Maywood	South Gate	Vernon	TOTAL
<b>Leaking Underground Storage Tank Sites</b>													
Open – Site Assessment or Open – Assessment and Interim Remedial Action	11	1	0	0	2	0	1	1	1	0	3	0	20
Open – Remediation or Open – Verification Monitoring	66	0	1	2	15	1	2	0	1	1	4	0	93
Open – Eligible for Closure or Open – Inactive	13	0	0	0	2	0	1	1	1	0	2	0	20
Completed – Case Closed	1,153	14	36	29	147	14	119	56	20	21	86	0	1,695
<b>Subtotal</b>	<b>1,243</b>	<b>15</b>	<b>37</b>	<b>31</b>	<b>166</b>	<b>15</b>	<b>123</b>	<b>58</b>	<b>23</b>	<b>22</b>	<b>95</b>	<b>0</b>	<b>1,828</b>
<b>Cleanup Program Sites</b>													
Open – all open statuses	202	2	12	4	63	2	25	7	0	2	15	11	345
Completed – Case Closed	193	3	2	1	74	3	20	3	1	4	16	15	335
<b>Subtotal</b>	<b>395</b>	<b>5</b>	<b>14</b>	<b>5</b>	<b>137</b>	<b>5</b>	<b>45</b>	<b>10</b>	<b>1</b>	<b>6</b>	<b>31</b>	<b>26</b>	<b>680</b>

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Status	Los Angeles	San Fernando	West Hollywood	Bell	Carson	Cudahy	Gardena	Huntington Park	Lomita	Maywood	South Gate	Vernon	TOTAL
<b>Land Disposal Sites</b>													
Open – all open statuses	4	0	0	0	0	0	0	0	0	0	0	2	6
Completed – Case Closed	20	0	0	0	29	1	3	1	0	0	5	2	61
<b>Subtotal</b>	<b>24</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>29</b>	<b>1</b>	<b>3</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>5</b>	<b>4</b>	<b>67</b>
<b>Military Sites Military Cleanup Sites, Military Privatized Sites, and Military UST Sites</b>													
Open – all open statuses	2	0	0	0	0	0	0	0	0	0	0	0	2
<b>Subtotal</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>
<b>Permitted Underground Storage Tank (UST) Facilities and Single-Walled UST Sites</b>													
<b>Subtotal</b>	<b>916</b>	<b>14</b>	<b>14</b>	<b>7</b>	<b>51</b>	<b>5</b>	<b>70</b>	<b>14</b>	<b>11</b>	<b>8</b>	<b>40</b>	<b>29</b>	<b>1,179</b>
<b>TOTAL</b>	<b>2,580</b>	<b>34</b>	<b>65</b>	<b>43</b>	<b>383</b>	<b>26</b>	<b>241</b>	<b>83</b>	<b>35</b>	<b>36</b>	<b>171</b>	<b>59</b>	<b>3,927</b>

Source: SWRCB Geotracker database 2023. <https://geotracker.waterboards.ca.gov/>.

## Hazardous Waste Generators

Large-quantity generators generate 1,000 kilograms per month or more of hazardous waste, or more than 1 kilogram per month of acutely hazardous waste. Small quantity generators generate from 100 to 999 kilograms per month of hazardous waste. A search of the RCRAInfo database, maintained by the EPA, found a number of hazardous waste generators in the 12 cities completely or mostly served by the District (see Table 5.9-3).

**Table 5.9-3 RCRA Info Hazardous Waste Generators**

City	Large Quantity Generators	Small Quantity Generators	Total
Los Angeles	870	3,071	3,941
San Fernando	16	101	117
West Hollywood	14	30	44
Bell	11	38	49
Carson	91	219	310
Cudahy	9	16	25
Gardena	64	364	428
Huntington Park	16	92	108
Lomita	5	38	43
Maywood	7	31	38
South Gate	93	137	230
Vernon	137	138	275
<b>Total</b>	<b>1,341</b>	<b>4,270</b>	<b>5,611</b>

Source: U.S. EPA. RCRAInfo. 2023, May 16. <https://enviro.epa.gov/envirofacts/rcrainfo/search>.

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0.13.2.5 A recent search also found 396 LAUSD listings for facilities (individual schools and administration/maintenance buildings) identified in the RCRA Info database.<sup>360</sup> Each of the LAUSD facilities has been assigned a unique hazardous waste identification number that is used for the offsite transport and disposal of hazardous wastes. The District's hazardous waste management program, including prior approval for all waste management activities conducted at individual schools and facilities, is overseen by the District's Environmental Compliance Manager.

### 5.9.1.3 AIRPORTS AND HELIPORTS

#### Airports

Assembly Bill 2776, effective January 1, 2004, defines an "airport influence area" as the area where airport-related factors "may significantly affect land uses or necessitate restrictions on those uses as determined by an airport land use commission." The California Public Utilities Code establishes airport land use commissions in every county to provide for the orderly development of air transportation and ensure compatible land uses around airports that are open to public use. According to California Department of Transportation (Caltrans), Division of Aeronautics, the airport influence area is usually the planning area designated by an airport land use commission for each airport.

Five public use airports are within the District: Los Angeles International Airport, Van Nuys Airport, Whiteman Airport, Bob Hope Airport, and Santa Monica Airport. Los Angeles International Airport, Van Nuys Airport, and Whiteman Airport are located in the City of Los Angeles. Bob Hope Airport in the City of Burbank and Santa Monica Airport in the City of Santa Monica have influence areas that extend into the District. The influence area for Hawthorne Airport (Jack Northrop Field) in the City of Hawthorne does not extend into the District, but its runways lie within two miles of existing or potential District school sites. Existing District schools within the influence areas of these airports are identified as follows:

- One District school is located within the airport influence area for Van Nuys Airport: the North Valley Occupational Center Aviation Center.<sup>361, 362</sup> This school is on airport property at the southeast corner of Saticoy Street and Havenhurst Avenue.
- Four District schools are within the airport influence area for Los Angeles International Airport: Westchester High School; Paseo Del Rey Magnet School; Emerson Adult Center; and Loyola Elementary School.<sup>363</sup>

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<sup>360</sup> U.S. EPA. RCRAInfo. 2023, May 16. <https://enviro.epa.gov/envirofacts/rcrainfo/search>.

<sup>361</sup> Airport Land Use Commission (ALUC), Los Angeles County. 2023, May 16. Van Nuys Airport Airport Influence Area. <https://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=acf2e87194a54af9b266bf07547f240a>.

<sup>362</sup> Los Angeles Unified School District North Valley Occupational Center. 2023, May 16. <https://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=acf2e87194a54af9b266bf07547f240a>.

<sup>363</sup> ALUC, Los Angeles County. 2023, May 16. Van Nuys Airport Airport Influence Area. <https://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=acf2e87194a54af9b266bf07547f240a>.

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- No District schools are within the airport influence area for Whiteman Airport.<sup>364</sup>
- One District school is partly in the airport influence area for Bob Hope Airport: Glenwood Elementary School.<sup>365</sup>
- No District schools are within the airport influence area for Santa Monica Airport.<sup>366</sup>

### Heliports

0.13.2.5 There are 41 heliports in the 12 cities in or mostly in the District, including 36 in the City of Los Angeles, 1 in the City of Carson, 2 in the City of San Fernando, and 2 in the City of West Hollywood.<sup>367</sup> Siting of heliports in the City of Los Angeles is subject to approval from the Los Angeles City Fire Department and a zoning coy determination or a Conditional Use Permit.<sup>368</sup>

### 5.9.1.4 EMERGENCY RESPONSE PLANS

#### City of Los Angeles

The City of Los Angeles Emergency Management Department (EMD) is responsible for the coordination of Los Angeles' emergency planning, training, response, and recovery efforts in the midst of major disasters such as fires, floods, earthquakes, acts of terrorism, and major events in the city that require involvement by multiple city departments. EMD maintains the city's emergency operations master plan and local hazard mitigation plan. EMD also operates the city's emergency operations center.

#### Los Angeles County

All cities within the District are member jurisdictions of the Los Angeles County Operational Area. The Los Angeles County Office of Emergency Management (OEM) maintains the Los Angeles County Operational Area Emergency Response Plan and the County of Los Angeles All-Hazard Mitigation Plan. OEM leads and coordinates disaster plans and disaster preparedness exercises for all cities and 288 special districts in the County, including LAUSD.

#### LAUSD

OEHS manages four District EOCs; responds to District emergency response situations (e.g., hazardous materials, fires, chemical spills, sewer overflows, vandalism); provides emergency response training; coordinates the District emergency response equipment inventory; responds to catastrophic emergencies; liaises with local, state, and federal emergency management agencies; communicates with District executive management during

<sup>364</sup> ALUC, Los Angeles County. 2023, May 16. Van Nuys Airport Airport Influence Area. <https://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=acf2e87194a54af9b266bf07547f240a>.

<sup>365</sup> ALUC, Los Angeles County. 2023, May 16. Van Nuys Airport Airport Influence Area. <https://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=acf2e87194a54af9b266bf07547f240a>.

<sup>366</sup> ALUC, Los Angeles County. 2023, May 16. Van Nuys Airport Airport Influence Area. <https://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=acf2e87194a54af9b266bf07547f240a>.

<sup>367</sup> Airnav.com. 2020, May 16. Airport Information. <https://www.airnav.com/cgi-bin/airport-search>.

<sup>368</sup> Planning Advisory Service, Information Report 198, May 1965. <https://www.planning.org/pas/reports/report198.htm>.

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large-scale emergencies; and conducts post-event analyses of District response activities. OEHS staff work with School Operations and School Police to ensure that required District emergency response/management processes are in place and functional. Day-to-day emergency preparedness and response planning and coordination are overseen by LAUSD's Office of Emergency Services.

LAUSD has developed a district-wide Emergency Operations Plan that addresses the District's responsibilities in emergencies associated with natural disaster, human-caused emergencies, and technological incidents.<sup>369</sup> The EOP provides a framework for coordination of responses and recovery efforts within the District in coordination with local, state, and federal agencies. It also establishes an emergency organization to direct and control operations at all sites during a period of emergency by assigning responsibilities to specific personnel. The EOP meets the requirements of Los Angeles County's policies on emergency response and planning and the Standardized Emergency Management System (SEMS) operations area response.

0.13.2.5 District schools are required to comply with California Education Code Sections 32281–32289 dealing with the preparation of SSPs to address violence prevention, student wellness, emergency preparedness, traffic safety, and crisis intervention. The District has developed an Integrated Safe School Plan ISSP system to assist individual schools in the development of their individual ISSPs.<sup>370</sup> The purpose of the model plan is to standardize ISSPs throughout the District and minimize the time required for annual updates. The District Facilities Project Execution (PEX) is responsible for the construction of new schools and repair and modernization of existing schools as part of a multi-year bond funded capital improvement program. The PEX Construction Safety Management Department provides field support to District jobsites and is committed to enhancing the safety culture through a goal driven program of safety awareness, safety training, and institution of proven accident and incident prevention techniques. Assistance to staff and contractors is provided regarding health and safety regulations, reporting requirements, safety training, and other related issues. Partnering with the contractors and labor is encouraged to promote a safe working environment with the shared goal of zero jobsite accidents and incidents.<sup>371</sup> Finally, safety procedures are in place for specific school activities and conditions as school laboratories<sup>372</sup> and methane safety.<sup>373</sup>

### 5.9.1.5 HAZARDOUS MATERIALS PIPELINES

Per California Education Code Section 17213(a)(3), a school district may not acquire a school site if it contains one or more pipelines that carry hazardous substances, extremely hazardous substances, or hazardous wastes, unless the pipeline is a natural gas line that is used only to supply natural gas to that school or neighborhood. Further, California Education Code Section 17212.2(a) states:

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<sup>369</sup> LAUSD Emergency Operations Plan 2022, Adopted April 12, 2016. <https://achieve.lausd.net/eoc>.

<sup>370</sup> LAUSD Integrated Safe School Plan for 2022-2023, October 3, 2022. <https://achieve.lausd.net/Page/2643>.

<sup>371</sup> LAUSD Facilities Services Division Construction Safety Department– <https://www.laschools.org/new-site/construction-safety/> May 17, 2023.

<sup>372</sup> LAUSD OEHS Laboratory Chemical Hygiene & Safety Plan, Version 1.2 March 16, 2014.

<sup>373</sup> LAUSD OEHS Reference Guide REF 5671.0 Methane Safety Program Implementation Guidelines, January 9, 2012.

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The governing board of a school district may make a written request upon a person, corporation, public utility, local publicly owned utility, or governmental agency for information necessary or useful to assess and determine the safety of a proposed school site or an addition to an existing school site, pursuant to Section 17251 and this chapter, including pipelines, electric transmission and distribution lines, railroads, and storage tanks. The written request shall identify the physical location of the school site for which information is sought, describe the information sought, and contain a statement as to why the information is needed or useful. Information requested may include...

(2) Whether there are existing pipelines, planned pipelines, or easements for pipelines on, or in proximity to, as specified pursuant to regulations adopted pursuant to Section 17251, the school site, including the location of the pipeline, the age of the pipeline, the pipeline material, the class of pipeline, the diameter of the pipeline, the depth at which the pipeline is buried, the wall thickness of the pipeline, the product or products transported by the pipeline, the operating pressure of the pipeline, the history of spills or leaks of material being transported by the pipeline, as reported to a governmental agency, and the location of the shutoff valves for the pipeline that are capable of preventing or halting the transport of product or products to the schoolsite.

CCR Title 5, Section 14010(h), establishes the following requirements for new school sites with respect to hazardous materials pipelines:

The site shall not be located near an above-ground water or fuel storage tank or within 1,500 feet of the easement of an above-ground or underground pipeline that can pose a safety hazard as determined by a risk analysis study, conducted by a competent professional, which may include certification from a local public utility commission.

Information on completing a safety study related to high-pressure gas pipelines that cross or lie within railroad track easements is discussed in CCR Title 5, Section 14010(d):

If the proposed site is within 1,500 feet of a railroad track easement, a safety study shall be done by a competent professional trained in assessing cargo manifests, frequency, speed, and schedule of railroad traffic, grade, curves, type and condition of track need for sound or safety barriers, need for pedestrian and vehicle safeguards at railroad crossings, presence of high pressure gas lines near the tracks that could rupture in the event of a derailment, preparation of an evacuation plan. In addition to the analysis, possible and reasonable mitigation measures must be identified.

By CDE policy,<sup>374</sup> any pipeline that has a maximum operating capacity of at least 80 pounds per square inch, including but not limited to those that carry natural gas, liquid petroleum, fuels, or hazardous chemicals, shall be included in a pipeline survey, regardless of whether the pipeline is classified as a transmission or distribution

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<sup>374</sup> CDE Proposed Standard Protocol Pipeline Risk Analysis, Prepared by URS Corporation, February 2007.

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line. Pipelines within a railroad or other easement or pipelines serving gas and oil well sites and fields are also included.

Specific guidance for the evaluation of high-pressure water lines is in CDE's "School Site Selection and Approval Guide,"<sup>375</sup> as follows:

To ensure the protection of students, faculty, and school property if the proposed school site is within 1,500 feet of the easement of an aboveground or underground pipeline that can pose a safety hazard, the school district should obtain the following information from the pipeline owner and operator:

- Pipeline alignment, size, type of pipe, depth of cover.
- Operating water pressures in pipelines near the proposed school site.
- Estimated volume of water that might be released from the pipeline should a rupture occur on the site.
- Owner's assessment of the structural condition of the pipeline.

### 5.9.2 Thresholds of Significance

According to CEQA Guidelines (14 CCR Sections 15000–15387, Appendix G) and CEQA Statute (PRC Section 21151.8), a project would normally have a significant effect on the environment if it would:

#### 5.9.2.1 CEQA GUIDELINES THRESHOLDS

HAZ-1 Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

HAZ-2 Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

HAZ-3 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of an existing or proposed school.

HAZ-4 Be located on a site which is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

HAZ-5 For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would result in a safety hazard for people residing or working in the project area.

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<sup>375</sup> CDE Schools Facilities Planning Division, Resources for School Facilities Planning, School Site Selection and Approval Guide, 2004. <http://www.cde.ca.gov/ls/fa/sf/school/siteguide.asp>.



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HAZ-6 For a project in the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area.

HAZ-7 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

### 5.9.2.2 CEQA STATUTE THRESHOLDS

An environmental impact report shall not be certified, or a negative declaration shall not be approved for a project involving the purchase of a school site or the construction of a new elementary or secondary school by a school district if the site contains:

HAZ-8 A current or former hazardous waste disposal site or solid waste disposal site, unless the wastes been removed.<sup>376</sup>

HAZ-9 A hazardous substance release site identified by the Department of Toxic Substances Control in a current list adopted pursuant to Section 25356 of the Health and Safety Code for removal or remedial action pursuant to Chapter 6.8 (commencing with Section 25300) of Division 20 of the Health and Safety Code.<sup>377</sup>

HAZ-10 One or more pipelines, situated underground or aboveground, which carry hazardous substances, acutely hazardous materials, or hazardous wastes, unless the pipeline is a natural gas line that is used only to supply natural gas to that school or neighborhood or other nearby schools.<sup>378</sup>

### 5.9.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

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**IMPACT 5.9-1: SUP-related projects would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. [Threshold HAZ-1]**

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#### 5.9.3.1.1 All SUP Projects

Most projects constructed under the SUP would likely involve the transport, storage, use, or disposal of limited quantities of hazardous materials, such as fuels, lubricants, solvents and degreasers, and paints. Examples of such activities include fueling and servicing construction equipment, application of paints and other coatings, and demolition of buildings that contain asbestos or lead-based paint. At any construction site, activity would be short term or one time in nature and would be governed by existing regulations of several agencies, including the EPA, DOT, OSHA, California Division of Occupational Safety and Health (Cal/OSHA), DTSC, and the Los Angeles city or county fire department, depending on jurisdiction.

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<sup>376</sup> PRC Section 21151.8(a)(1)(A).

<sup>377</sup> PRC Section 21151.8(a)(1)(B).

<sup>378</sup> PRC Section 21151.8(a)(1)(C).

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Once a project is completed and the new facility is operational, hazardous materials that might be handled, used, transported, or disposed of include standard cleaning products, pesticides, herbicides, paints, fuels, and lubricants used in association with standard campus janitorial, maintenance, and landscaping. In addition, certain curricula, such as chemistry and industrial arts (wood, metal, electronics, and auto shops), could involve the use of small quantities of chemicals, fuels and other petroleum products, solvents, and paints. Small volumes of hazardous wastes, such as waste paint, batteries, fluorescent lamps, mercury-containing equipment, or unused maintenance products would be generated to maintain the new school facilities, which would require management in accordance with standard District policies and practices. Most hazardous materials stored on school campuses present little risk of upset, since they are generally stored in small containers (30 gallons or less) in designated areas. The amounts of hazardous materials that are handled at any one time are likewise small, reducing the potential consequences of an accident during transport, storage, or handling.

The types and amount of hazardous materials that are now handled by the District are not expected to substantially change upon construction of individual projects or upon completion of the SUP in its entirety. The amounts of hazardous materials handled at a given campus would remain relatively small and would be subject to federal, state, and local health and safety requirements. The District would continue to implement its existing programs, practices, and procedures for handling hazardous materials, which would be extended to all new facilities. For example, only commercial products on a chemical inventory list maintained by OEHS would be approved for use, and hazardous wastes would have to be stored in designated areas with appropriate warning signs and labels. Hazardous business plans would be developed and filed with the local CUPA if any new facility was used for the storage of hazardous materials above threshold quantities. Therefore, no significant impacts related to hazardous materials are expected to occur during operation of new facilities constructed under the School Upgrade Program.

An important component of the SUP is to eliminate hazards associated with asbestos and lead-based paint in existing buildings, which creates a unique set of hazardous-materials-handling challenges during the project demolition phase. Additionally, hazardous materials or contaminated soil may be encountered when preparing for new school projects or unexpectedly during excavation or grading activities associated with construction. Potential impacts associated with these special circumstances are analyzed in the following sections.

### 5.9.3.1.1.1 Asbestos

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

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Compliance with asbestos regulations and requirements is the responsibility of the District's Facilities Environmental Technical Unit (FETU). FETU is responsible for hazardous material abatement and management and for state and federal AHERA regulatory compliance as follows:

- Execute abatement projects with FETU force account labor;
- Perform assessments, prepare abatement designs as well as review assessment reports, abatement designs, and close out reports following abatement contracts submitted by environmental consultants for all District contracted projects;
- Develop specifications and procedures for safe handling of asbestos, lead, and mold, in concert with the OEHS; and
- Review and approve qualifications of abatement contractors and environmental consultants and manage master service contracts for such services.<sup>379</sup>

The District maintains an inventory of school-owned buildings that could contain asbestos and provides the required employee, contractor, and public notifications of these locations. All projects at existing school and administrative sites must be reviewed for potential impacts to ACM prior to the project being started. Prior to disturbance, materials that are suspected of containing asbestos are tested for asbestos content using accredited laboratories. All ACM must be removed by licensed asbestos abatement contractors or by trained and certified FETU personnel using work practices and engineering controls that have been designed to reduce the potential for asbestos fiber release. Specific handling procedures in place for handling ACM are the following, which the FETU will abide by as and when needed:<sup>380</sup>

- Asbestos is to be handled only by qualified and certified contractors. Asbestos contractors/subcontractors must be approved in accordance with applicable federal, state, and local regulations and must be approved by the District to perform abatement and disposal of ACM and asbestos-containing construction materials (ACCM), as defined.
- It is the contractor's responsibility to review the Asbestos Assessment Report (Phase 1) and the Abatement Design (Phase 2) prepared for a site prior to the commencement of work and take the necessary steps to ensure the safety of students, faculty, contractor employees, and the general public through compliance with regulatory and District specification requirements.
- Contractors must verify the presence or absence of asbestos content in building materials prior to impacting these materials during construction remodeling or demolition work.
- Upon discovery of any ACM or ACCM or presumed asbestos-containing materials (PACM) not identified in the Phase 1 report, the contractor will stop work in such areas and notify the LAUSD Construction

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<sup>379</sup> LAUSD Office of the Inspector General, Facilities Environmental Technical Unit. <https://www.laschools.org/new-site/maintenance-services/fetu>. May 17, 2023.

<sup>380</sup> LAUSD Facilities School Maintenance and Operations Repair & Construction Safety Standards, February 28, 2013.

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Inspector. The material will be inspected and tested, if necessary, by the District's ATU or by a District-assigned environmental consultant.

- The contractor shall ensure employees are trained in asbestos awareness to identify ACM, ACCM, and PACM. Training will be in compliance with the requirements of the District's Standard Specification Section 13280, "Asbestos Abatement and Asbestos Related Disturbance", and be documented. Proof of such training is required to be submitted to a District-authorized representative prior to commencement of work.
- All asbestos abatement/removal work must follow all regulations of the EPA and/or applicable state agency, OSHA, and the SCAQMD.
- LAUSD Maintenance and Operations personnel working in areas with ACM or PACM must have appropriate asbestos training, which may include minor abatement and compliance with negative exposure assessment protocols. OEHS is responsible to ensure all asbestos surveys have been completed and information and training disseminated to effected employees and contractors per the applicable asbestos standards and District protocols.

In addition, the following standard District procedures apply to asbestos abatement action which the District will implement as and when needed:

- **LAUSD Section 13280: Asbestos Abatement and Asbestos Related Disturbance (November 21, 2003).** Construction contractors are required to comply with the requirements of this LAUSD standard specification during any project where ACM may be disturbed. Included among the specific requirements are procedures for worker training, permitting, air monitoring, personnel protection, development of emergency plans, waste management, and reporting. Specific procedures are outlined for the performance of asbestos abatement, including maintenance of regulated areas through polyethylene sheeting and air filtration equipment, wet cleaning, and vacuum cleaning of exposed surfaces, and posting of signs.

Compliance with federal and state regulations and the District guidelines and procedures outlined above would ensure that impacts associated with the handling and disposal of ACM will be less than significant for any given school construction or modernization project.

### 5.9.3.1.1.2 *Lead*

Lead is a naturally occurring element that can be found in various building materials and projects, such as paint (lead-based paint), water pipes, and solder in plumbing systems. Because of its toxic properties, lead is regulated as a hazardous material. Lead is also regulated as a toxic air contaminant. Any activity that involves cutting, grinding, or drilling during building renovation or demolition, or that involves relocation of underground utilities, could release lead dust or particles unless proper precautions are taken. State-certified contractors must perform the inspection, testing, and removal (abatement) of lead-containing building materials in compliance with applicable health and safety and hazardous materials regulations.

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As with asbestos, all projects at existing school and office sites must be reviewed by the ATU for impact to lead-based paint prior to the project being started. All coated surfaces (paint, varnish, or glazed) are assumed to contain lead, and work that impacts coated surfaces must be performed by properly trained individuals. Specific handling procedures for handling building materials that may contain lead are the following, with which the ATU will ensure compliance as and when needed:<sup>381</sup>

- Lead abatement, as defined, is to be performed by contractors or subcontractors whose workers are certified by the California Department of Public Health. Lead-related construction work may be performed by contractors' or subcontractors' workers who have been trained in lead awareness, as described in the District's Standard Specification Section 13282, "Lead Abatement and Lead Related Construction Work." Evidence of certification and/or training is required to be provided to the District's environmental representative prior to the commencement of work.
- It is the contractor's responsibility to review the assessment report addressing the impact to lead-based materials, lead-containing materials or coatings, and materials assumed to contain lead prior to commencement of work and take the necessary steps to ensure the safety of students, faculty, contractor employees, and the general public.
- Contractor must identify any lead-based paint or coatings and assumed lead-containing coatings in or on the materials to be impacted within the proposed scope of work prior to any construction, remodeling, maintenance, repair, or demolition activities.
- No lead abatement will proceed until the District's environment representative has given written approval of the lead abatement contractor's written abatement work plan.
- No work by contractors other than the lead abatement contractor will be permitted to work in regulated areas until clearance is provided by the District's environmental representative.
- The lead abatement contractor or general contractor performing monitoring of lead-related construction work will be responsible for characterizing the waste stream (e.g., paint chips, components) and disposing of waste according to the characterization. Hazardous waste will be transported under a Uniform Hazardous Waste Manifest in accordance with District Standard Specification Section 13282.

In addition, the following standard District procedures apply to lead abatement projects, which the District will also implement as appropriate:

- **LAUSD Section 13282: Lead Abatement and Lead Related Construction Work (March 15, 2007).** Construction contractors are required to comply with the requirements of this LAUSD standard specification during any project where lead-containing materials may be disturbed. Included among the specific requirements are procedures for worker training, permitting, air monitoring, personnel protection and medical monitoring, development of emergency plans, and waste management. Procedures specific to waste disposal are testing requirements for determining the hazardous properties of the lead-containing

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<sup>381</sup> LAUSD Facilities School Maintenance and Operations Repair & Construction Safety Standards, February 28, 2013.

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materials using prescribed federal and state testing procedures.<sup>382</sup> Specific procedures are outlined for the abatement of lead-based paint, including its removal by sanding, chemical agents, or water jets, or its isolation by encapsulation.

Compliance with federal and state regulations and the District guidelines and procedures outlined above would ensure that impacts associated with the handling and disposal of lead-containing building materials would be less than significant for any given school construction or modernization project.

### 5.9.3.1.1.3 *Water Intrusion Assessment and Mold*

**Water Intrusion Assessment and Mold Remediation Procedure (February 9, 2014).** Construction contractors are required to comply with the requirements of this LAUSD standard specification during any project where water intrusion and/or mold are identified. Included among the specific requirements are procedures for prevention, inspection, assessment and sampling, containment, remediating building materials, and hazard communication and notification.<sup>383</sup> The information contained in this manual was compiled from the following reference sources: The U.S. EPA, Centers for Disease Control (CDC), California Department of Public Health (CA CDPH), New York Department of Health Services (NYDHS), American Conference of Governmental Industrial Hygienist (ACGIH), Institute of Inspection, Cleaning and Restoration (IICRC), Guidelines for the Assessment of Bioaerosols in the Indoor Environment, American Society of Heating, Refrigeration and Air-Conditioning Engineers (ASHRAE), The City of Los Angeles, and the California Department of Occupational Safety and Health (CA DOSH). Currently there are no United States Federal, California State, or Los Angeles City regulations for evaluating potential health effects of fungal contamination and remediation. These guidelines are subject to change as more information regarding fungal contaminants becomes available. Other Hazardous Materials

Hazardous materials that exist at a new school construction or modernization site, often identified during performance of a Phase I ESA, would be handled in accordance with federal and state laws and regulations prior to embarking on a new school project. In particular, DOT regulations,<sup>384</sup> U.S. EPA regulations,<sup>385</sup> and federal OSHA regulations<sup>386</sup> govern the handling, storage, transportation, and disposal of hazardous substances. Such items may include spent, unused, abandoned, or discarded hazardous waste or commercial products containing hazardous substances. The following standard District procedures apply in these instances, which the District will follow:

- **LAUSD Section 13614: Abatement of Hazardous Materials (July 7, 2003).** This specification includes procedures for the proper packaging, transportation, and disposal of any identified or discovered hazardous materials that must be removed before construction can proceed. It specifically excludes underground storage tanks and contaminated soil or groundwater. Construction contractors are required to comply with

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<sup>382</sup> Toxicity Characteristic Leaching Procedure (TCLP) test for federal hazardous wastes and Total Threshold Limit Concentration (TTLC) and Soluble Threshold Limit Concentration (STLC) tests for state hazardous wastes.

<sup>383</sup> Facilities Environmental Technical Unit. Special Construction. Water Intrusion and Mold Remediation Procedure. February 9, 2014.

<sup>384</sup> CFR Title 49, Parts 172 through 179 and 387.

<sup>385</sup> CFR Title 40, Parts 136, 261, 262, and 761.

<sup>386</sup> CFR Title 29, Part 1910.120.

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specific procedures regarding worker training, health and safety, hazardous material containment, and offsite transport and disposal.

New school construction and modernization projects would be subject to environmental review processes designed to ensure that soil or groundwater contamination is not present in any areas of a site that would be disturbed. The environmental review process could involve the performance of a Phase I Environmental Site Assessment, Preliminary Environmental Assessment, and/or Response Action, as outline previously in this Hazards Section. If contaminated soil or groundwater were discovered, it would be removed/remediated to the satisfaction of LAUSD-OEHS and/or the DTSC. The removal or remedial action would be conducted in accordance with federal and state requirements governing hazardous materials excavation, onsite handling, and offsite transport to minimize potential exposures to construction workers and the general public. The procedures required by the Education Code and CCRs for investigating, assessing and remediating hazardous materials are outlined above. Once a project has been granted environmental clearance, additional discoveries of contamination during construction are not anticipated, but could occur. If hazardous materials or contaminated soil were encountered during construction, the contractor would stop work and immediately notify the District. The District would arrange for an environmental assessment to determine the nature and extent of the contamination and the type of remediation that is required. Potential remedial measures could include, but are not necessarily limited to, excavation and offsite disposal, excavation and onsite treatment, or in-situ treatment. These activities would be performed in accordance with all applicable federal, state, and local laws and regulations pertaining to notification, environmental investigation, and cleanup.

In the event that a previously unknown underground storage tank (UST) was discovered, it would be left in place and cordoned off, and work in the vicinity of the UST would cease immediately. The contractor would notify the District, who in turn would notify the local CUPA in charge of UST programs.<sup>387</sup> The UST would be registered, and a permit would be obtained for its removal. Once the UST was removed, soil samples would be collected under agency oversight to determine whether or not there had been a release of the tank contents. If a release were identified, it would be remediated under CUPA, DTSC, and/or Los Angeles Regional Water Quality Control Board (RWQCB) oversight, as appropriate. These activities would continue until a “no further action” letter had been received from the responsible agency. Other potentially hazardous buried features discovered during construction, such as hydraulic hoists, seepage pits, clarifiers, and sumps, would be similarly investigated and remediated, except that regulatory agency notification and oversight would not be required unless a reportable release was discovered or the agency was already involved in the project.

In the event that contaminated soil, contaminated groundwater, or potentially hazardous subsurface features such as USTs were encountered, the construction schedule would be modified or delayed to ensure that construction would not inhibit further investigation and remedial activities and would not expose the public or construction workers to significant risks associated with hazardous conditions. Compliance with federal and state regulations and the District guidelines outlined above would ensure that impacts associated with exposure

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<sup>387</sup> The Los Angeles City Fire Department is the CUPA responsible for underground storage tank (UST) programs in the City of Los Angeles. Other CUPAs, including the Los Angeles County Department of Public Works, have jurisdiction for UST programs in areas outside Los Angeles City boundaries.

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to hazardous materials encountered prior to or during construction are less than significant for any given school construction or modernization project.

### 5.9.3.1.2 New Construction on New Property or Existing Campus

If the District elects to receive state bond funding for new construction projects and the project does not qualify for a CEQA exemption, the DTSC would be engaged through the LAUSD Master Oversight Agreement to oversee and approve the project in accordance with California Education Code, Sections 17213.1 and 17213.2.<sup>388</sup> If either of these two conditions is not met, the District OEHS would perform a site assessment evaluation of the environmental impacts of the project and self-certify that all potential hazards and health risks have been identified and mitigated to less than significant levels. The self-certification process would be conducted in accordance with the Site Assessment and Remediation procedures outlined in the previous section “LAUSD Practices, Procedures, and Standard Conditions,” and in particular with the OEHS “Reference Guide: Procedures for Environmental Review of Proposed Projects” (REF-5314.1). The DTSC oversight or LAUSD self-certification process would ensure that potential impacts resulting from the transport, use, and/or disposal of hazardous materials during the construction or operational phase of a project are less than significant.

### 5.9.3.1.3 Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

Assuming that all modernization, repair, replacement, upgrade, remodel, and renovation projects are either locally funded or funded through the state’s Form SFPD 4.08 Modernization application process, DTSC involvement would likely not be required or solicited for any modernization project conducted under the SUP. Instead, the OEHS would self-certify that the potential hazards and health risks associated with the project are negligible or less than significant, or would require the necessary mitigation measures to be taken to reduce the potential impacts to less than significant levels. Several types of modernization projects are considered minor improvements that do not require OEHS notification or review, as summarized in Table 5.9-4.

Modernization projects not on this list, including those that involve historical resources, sensitive biological resources, adjacent noise-sensitive uses, listed hazardous waste sites, significant interior modernization projects affecting 20% or more of the total building space, and activities that require state funding, would be reviewed by OEHS for CEQA applicability and the need for any technical studies to address potential safety hazards or site assessment activities to evaluate environmental conditions. This review would be conducted in accordance with procedures outlined in the OEHS “Reference Guide: Procedures for Environmental Review of Proposed Projects” (REF-5314.1). Compliance with applicable laws, regulations, and LAUSD Standard Conditions of Approval during project construction and operation would ensure that impacts associated with the transport, use, and/or disposal of hazardous materials are less than significant.

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<sup>388</sup> LAUSD and DTSC entered into a Master Oversight Agreement on February 10, 2000 to facilitate DTSC oversight of environmental investigations and response actions conducted by the District in accordance with Education Code Section 17213.1 and 17213.2. The Master Oversight Agreement was updated on June 5, 2013 to assist the District in obtaining state bond funding for projects that require a response action that has not been completed.



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**Table 5.9-4 Modernization Projects Not Requiring OEHS Notification or Review**

Category	Subcategory	Examples
Routine Activities Affecting the Interior of Structures	Carpentry	Wood trim, metal or plastic trim; wood and metal door systems; windows, including sash, transforms, wooden window frames or blinds; wood framing and paneling; cabinets/bookshelves; flooring, including ceramic tiles, linoleum, carpet, or hardwood floors; wood ramps, restroom partitions/hardware; room partition walls and doors; interior plaster; and drywall
	Electrical	Installation, repair, replacement and maintenance of electrical conveyances, debit card systems, fuses, wiring, light ballasts, electrical short circuits, exposed wires, broken or loose conduits, lenses on lights, clocks, battery back-up systems, electrical panels, old lighting/lamp fixtures, emergency egress lighting, permanent and temporary emergency lighting, bells systems, emergency egress lighting, circuit breakers, key switch, timed switches, light switches, stage dimmer boards, chandeliers, stage lighting, fire alarm systems, and remote power supplies
	Heating, Ventilating and Air Conditioning (HVAC)	Installation, repair, replacement and maintenance of steam boilers, hot water heating boilers, wall heaters, heating furnace, split air conditioning systems, window A/C systems, HVAC systems, gas heating or electrical cooling roof top units (3-10 tons), chillers, chilled and hot water heating lines, multi-zone A/C unit (15-60 tons) gas heating or hot water heating, HVAC system pneumatic controls, HVAC system electronic/electric controls, HVAC energy management control systems, shell and tube condensers, steam convectors, plate heat exchangers, A/C unit heat pumps, A/C unit wall mounts, A/C unit air and water balance, steam coils and traps, chilled and hot water coils, boiler fuel trains, boiler controls, and steam radiators or convectors
	Plumbing	Installation, repair, replacement, and maintenance of bathroom fixtures (including toilets, urinals, lavatories, and floor drains), hose bibs, sumps and pumps, shut-off valves, gas pressure regulators, water pressure regulators, eye washers, storm drains and clarifiers, hydraulic hoists, hazardous waste drains and clarifiers, shower, sinks, faucets, drinking fountains, piping, earthquake valves, and seismic strapping
	Miscellaneous	Installation, repair, replacement and maintenance of auto shop hydraulic hoists, surface sump pumps, compressors for shop classes, dust collection equipment in shop classes, dust collection systems, exhaust systems and hoods, A/C ducting systems, ventilation louvers, gravity vents, lockers, A/C curb covers, bathroom mirror frames, hardware cloth for pest control, and metal shelving, and hoist and clarifier removals.
Routine Activities Affecting Exterior or Outdoor Areas	Exterior Building Façade Work	Installation, repair, replacement, or maintenance of weather stripping on exterior doors, wood yard boxes, vandalized structures (repair or replacement), porch overhangs, skirting on portable buildings, window security grills, emergency exit grills, metal window frames, coiling counter doors, roof access hatches, sliding glass doors, skylights, handicap ramps and stairs, hand rails, rain gutters and downspouts, exterior stucco and paint
	Recreational Facilities (including athletic fields, gymnasiums, and playground areas)	Repair, replacement and/or maintenance of athletic field lighting, tennis/basketball court lighting, scoreboards, kick boards along fences and backstops, wood seating and foot rests on permanent interior or exterior bleachers, swimming pool grout, metal stadium bleachers (replacement must not exceed existing capacity), folding gymnasium bleachers, football training equipment, baseball back stops, playground matting, gymnasium basketball goals, and drain covers
	Landscaping	Installation, repair, replacement, and maintenance of irrigation systems (including lawn sprinklers and sprinkler controls), trees, shrubs, and other vegetation
	Paving	Repair or resurfacing of existing paved areas, including asphalt parking lots, walkways, asphalt playgrounds, flag pole footing, and drainage facilities
	Miscellaneous	Installation, repair, replacement and/or maintenance of building signs, chain link fences/gates, and wrought iron fences/gates

Source: Memorandum from Angelo Bellomo, OEHS, to James McConnell, Facilities Services Division. "Activities Not Requiring OEHS Review," July 27, 2006.

Note: Certain projects still require OEHS review if they are on the Subsurface Notification Program list.

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**IMPACT 5.9-2: SUP implementation would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials. [Threshold HAZ-2]**

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### 5.9.3.1.4 All SUP Projects

The SUP may require the use of hazardous materials in small quantities during construction and operation of new facilities, as explained in the discussion for Impact 5.9-1, above. The amount of hazardous materials that are handled at any one time would be relatively small, reducing the potential consequences of an accident during handling. Further, the District would continue to comply with federal and state laws and existing campus programs, practices, and procedures to eliminate or reduce the consequences of hazardous materials accidents. For example, staff and students who work around routinely used hazardous materials would continue to wear appropriate protective equipment, if necessary, and safety equipment would be available in all areas where hazardous materials are stored. Procedures are in place to ensure that appropriate warning signs and labels are affixed to hazardous chemicals and wastes; emergency wash stations, ventilation, and special plumbing are provided where needed; and adult supervision is maintained whenever students handle hazardous materials.

The consequences of spills as a result of a fall or dropping a container would depend on whether the hazardous material was released, the specific hazards associated with the material, the facility design, and the availability of emergency response equipment. In addition to health impacts associated with direct contact from an accidental spill, indirect impacts could occur. In areas without adequate ventilation, including partially enclosed outdoor areas (e.g., stairwells), vapors from released volatile materials could be trapped in stagnant air pockets and persons entering these areas could be subject to health hazards associated with inhalation of the vapors. In these instances, all individuals would be evacuated from the affected area until the vapors dissipated to safe levels, as determined by the Haz Mat Team and/or OEHS staff.

Some hazardous materials emergencies may require the further assistance of local police and/or fire department if they are significant (in terms of volume or area affected) or where the incident involves both fire and hazardous materials. In such events, school administrators would immediately contact the local emergency responders through the 911 emergency network. Procedures for the systematic evacuation of students from classrooms and other school facilities are established and practiced by LAUSD at all schools through its SSP program, as explained in Section 5.9.1.4. Each school's SSP describes procedures to be followed in the event of a biological or chemical release.<sup>389</sup> Examples of chemical threats within or adjacent to schools include the discharge of acid in a school laboratory, an overturned truck of hazardous materials in proximity to a school, or an explosion at a nearby oil refinery or chemical plant.

Compliance with applicable laws, regulations, and implementation of LAUSD Standard Conditions of Approval during project construction and operation would ensure that impacts associated with upset or accidental conditions which could cause a release of hazardous materials are less than significant.

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<sup>389</sup> LAUSD OEHS LAUSD Integrated Safe School Plan for 2022-2023, October 3, 2022. <https://achieve.lausd.net/Page/2643>.

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**IMPACT 5.9-3: SUP-related projects would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of an existing or proposed school. [Threshold HAZ-3]**

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### 5.9.3.1.5 All SUP Projects

The SUP covers the entire school district and over 600 schools. Site-specific projects that would be implemented under the SUP would be school related and would not emit hazardous emissions or handle significant quantities of hazardous or acutely hazardous materials, substances, or waste. Hazardous materials expected at District schools would be associated with janitorial, maintenance, and repair activities. These materials would be used in small quantities and would be stored in compliance with established state and federal requirements. Additionally, if contaminants that could become airborne during demolition and hauling (ACM, LBP, or pesticides) are present on a specific site, they would be removed in accordance with DTSC and SCAQMD requirements prior to demolition activities. Therefore, emissions impacts from existing or proposed schools within one-quarter mile of other existing schools would be less than significant.

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**IMPACT 5.9-4: SUP-related projects may be located on a site which is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 but would not create a significant hazard to the public or the environment. [Threshold HAZ-4]**

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LAUSD currently operates more than 1,438 schools for grades K–12. None of these existing campuses is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. A total of 97 LAUSD schools are listed as School Investigation or School Cleanup Sites on the DTSC's EnviroStor database (see Section 5.9.1.2). The listed sites are proposed and existing school properties where investigation and/or remedial activities are ongoing or have been completed under DTSC oversight. Most listings are school sites that were acquired or expanded for the District's New School Construction Program.

In addition, approximately 396 LAUSD schools, administrative buildings, and maintenance facilities are listed as hazardous waste generators on the EPA RCRA Info database (see Section 5.9.1.2). These schools and school facilities typically have disposed of small quantities of hazardous wastes in the past, such as chemicals from science, shop, and photography classes and waste generated during routine campus maintenance. Some schools may have undergone renovation or construction projects that resulted in the one-time generation of asbestos, polychlorinated biphenyl (PCB) waste, or contaminated soil. None of these database listings qualifies existing LAUSD school sites as hazardous materials sites pursuant to Government Code Section 65962.5.

### 5.9.3.1.6 New Construction on New Property

Various types of "listed" sites may be present on properties that may be acquired for expansion of school sites. In most cases, these sites will be active and historical facilities identified as hazardous waste generators or operators of USTs. For each proposed project that involves new property acquisition, the District would consult specified comprehensive lists of contaminated sites to determine whether the proposed site contains hazardous materials consistent with Government Code Section 65962.5. Where a site proposed for acquisition is identified on one of the lists, the District would, through the site assessment and CEQA processes, consider whether the site's hazardous materials pose a significant threat to students or staff.

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Under Education Code Section 17213(a), the District is prohibited from acquiring any current or former hazardous waste disposal site or solid waste disposal site unless the site is a former solid waste disposal site and the wastes have been removed; any hazardous substance release site identified by DTSC in a current list adopted under Health & Safety Code Section 25356 for a removal or remedial action pursuant to Health & Safety Code Sections 25300, *et seq.*; or any site containing pipelines carrying hazardous substances or hazardous wastes, unless the pipeline is a natural gas line used only to supply natural gas to the school or neighborhood. In order to comply with this requirement, the OEHS would investigate the possible presence of hazardous materials for each acquisition and construction project through a Phase I ESA and, if necessary, a Phase II assessment/PEA. If the property would be acquired using state bond funds, environmental investigation, assessment, and remediation, if any, would be conducted under DTSC oversight. LAUSD would incorporate information regarding site investigations in the environmental review document it prepares for a specific project, which would be available to the public for review and comment as required by CEQA. The public would then have the opportunity to review the site-specific investigations through the public review process.

In addition, if LAUSD's investigation identifies a significant disposal of hazardous waste on or within 2,000 feet of a proposed school site, CCR Title 5, Section 14010(t), requires the District to contact the DTSC for a determination as to whether the property should be considered a Hazardous Waste Property or Border Zone Property. Upon notification, the DTSC must evaluate available information about site conditions and consider whether to impose a deed restriction on the property that would prevent, among other land uses, schools for persons under the age of 21.<sup>390</sup>

LAUSD would ensure that any new property acquired for new construction undergoes a site assessment in compliance with applicable laws and regulations regarding site acquisition for new school construction, as outlined above. These procedures would ensure that any listed hazardous materials sites are identified and that proper response measures are taken, including any necessary investigation and remedial actions. These steps would ensure that impacts associated with hazardous materials listed sites would be less than significant.

### 5.9.3.1.7 New Construction and Modernization on Existing Campus

New construction, modernization, repair, replacement, upgrade, remodel, renovation and installation projects would not involve the acquisition or leasing of new properties for school construction. Therefore, because no existing LAUSD school is currently included on a list of hazardous materials sites, no evaluation would be needed to determine whether the new project site is included on such a list and no impact would occur.

Compliance with applicable laws, regulations, and implementation of LAUSD Standard Conditions of Approval would ensure that hazardous materials sites on or in the vicinity of a project site are identified and proper response measures are taken prior to site acquisition and project construction. Therefore, impacts would be less than significant.

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<sup>390</sup> California Hazardous Waste Control Law, Section 25220 *et seq.*

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**Impact 5.9-5: SUP-related projects would not result in an airport safety hazard for people residing or working in the project area. [Threshold HAZ-5]**

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New construction and modernization projects pursuant to the SUP could be undertaken on expanded or existing campuses within the vicinity of an existing airport. As explained in Section 5.9.1.3, three airports are within the City of Los Angeles (Los Angeles International Airport, Van Nuys Airport, and Whiteman Airport), and two other airports are near District boundaries (Bob Hope Airport and Santa Monica Airport). Only six existing LAUSD schools are within the influence areas of these airports, as identified in the relevant Airport Land Use Plans (ALUPs). Therefore, very few, if any, new construction and modernization projects under the SUP would likely be conducted on properties that are within the jurisdiction of an ALUP. Any such projects would only be undertaken after consultation with the airport and in a manner that does not conflict with the ALUP.

### 5.9.3.1.8 All SUP Projects

Several existing District schools are within two nautical miles of the aforementioned airports. However, projects conducted on existing campuses that do not involve acquisition of new property would not need to be reviewed for airport safety or noise. It should also be noted that Education Code Section 17215 does not apply to school sites acquired prior to January 1, 1966, nor to any additions or extensions to those sites. Therefore, no impacts would occur.

Per Education Code Section 17215, the District must receive approval from the CDE and Caltrans before acquiring title to property for a new school site if the proposed site is within 2 nautical miles of an airport runway. The consideration of a proposed site in relation to airports is part of the District's CCR Title 5 and CEQA site review procedures. By following these procedures and state regulations, impacts associated with airport hazards would be less than significant.

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**Impact 5.9-6: SUP-related projects would not result in a private airstrip safety hazard for people residing or working in the project area. [Threshold HAZ-6]**

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### 5.9.3.1.9 All SUP Projects

As indicated in Section 5.9.1.3, there are 41 private-use heliports in the 12 cities within or mostly in the District, including 36 in the City of Los Angeles. New construction and modernization projects on existing campuses would not create any new safety hazards associated with heliport operations. If heliports are close to any new property acquired for a school site, its operations would be reviewed by the District to determine if they present any unusual safety, noise, or pollution concerns for students and staff at the new property. Any concerns would be addressed and mitigated through the project-specific CEQA evaluation process.

The Federal Aviation Administration (FAA) and many state and local governments use great caution and apply strict safety standards to reduce safety risks associated with air traffic at heliports and private airports, especially unsafe actions by pilots and improper facilities. The FAA evaluated the risk to individuals residing within 1 mile of a heliport, or so-called "neighborhood risk", and concluded that for heliports that support 400 annual helicopter missions, the average likelihood of an accident over the surrounding neighborhood is one accident

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in 495 years.<sup>391</sup> When coupled with the additionally remote probability that anyone on the ground is injured if/when an accident does occur, a heliport and its associated operations are statistically a very low risk to neighborhood residents and property. Therefore, the probability of an accident involving school activities and nearby heliports is considered unlikely, and impacts are judged to be less than significant.

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**Impact 5.9-7: The SUP would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. [Threshold HAZ-7]**

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### 5.9.3.1.10 All SUP Projects

Major hazardous materials accidents are extremely infrequent, and additional emergency response capabilities are not anticipated to be necessary to respond to the potential incremental increase in the number of incidents that could occur from implementation of the SUP. Individual projects constructed under the SUP would conform to applicable local ordinances that deal with emergency response and evacuation, would allow for adequate emergency access, and would be designed to be compliant with adopted emergency response plans and emergency evacuation plans. All construction, modernization, and repair work would be conducted within existing LAUSD campuses or newly acquired property and would not impede emergency access into communities surrounding District schools. During construction, emergency response procedures would be governed by the District's emergency response protocol and the contractor's emergency response plan (see Section 5.9.1.4). Upon project completion, District-wide emergency response plans, policies, and guidance developed by LAUSD would be extended to include the new project. In particular, LAUSD has developed a district-wide Emergency Operations Plan that assigns responsibilities and provides a framework for coordination of response and recovery efforts in the event of an emergency.<sup>392</sup> Additionally, pursuant to Education Code Section 32286(a), all new school campuses must adopt a comprehensive Integrated Safe School Plan ISSP system within one year of initiating operation, which must be reviewed and updated by March 1 of every year thereafter. LAUSD-OEHS has developed the ISSP<sup>393</sup> for use as a template in the preparation of ISSPs for each of the District's schools. The ISSP 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. It provides an effective framework for managing emergencies ranging from minor incidents to major earthquakes, using a school site [incident management team](#). LAUSD's ISSP is compliant with the National Incident Management System (NIMS) and the California SEMS. School administrators can download a copy of the ISSP template from the District's website to use in preparing their individual ISSPs. With these District guidelines and standard conditions in place, a site-specific ISSP would be prepared for any new school, and existing ISSPs, which are

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<sup>391</sup> U.S. Department of Transportation Federal Aviation Administration, "Analysis of Helicopter Accident Risk Exposure Near Heliports, Airports, and Unimproved Sites," R.J. Adams et al., Publication No. DOT/FAA/RD-90/9, February 1992. <https://apps.dtic.mil/sti/pdfs/ADA249127.pdf#:~:text=Enclosed%20is%20FAA%20FRD-90%2F9%2C%20Analysis%20of%20Helicopter%20Accident%20Risk,provide%20guidance%20on%20ways%20to%20reduce%20such%20accidents>.

<sup>392</sup> Los Angeles Unified School District Emergency Operations Plan 2022, Adopted April 12, 2016. <https://achieve.lausd.net/eoc>.

<sup>393</sup> LAUSD Integrated Safe School Plan for 2022-2023, October 3, 2022. <https://achieve.lausd.net/Page/2643>.

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updated annually, would be modified to reflect changed conditions as the result of any new construction or modifications that have occurred on their campuses.

Public schools are considered critical community facilities and are often used as evacuation centers during disasters. State design and construction standards for critical facilities such as schools and hospitals are more rigorous than those for many other types of structures; thus, public schools are more likely than some other types of structures to be safely used and occupied after a disaster such as a strong earthquake. New construction, modernization, and repair work conducted pursuant to the SUP would have a favorable impact on emergency response by making improvements to schools that would comply with current, stringent seismic standards and that could be used as evacuation centers in the event of a disaster.

New school construction and modernization projects would conform to local ordinances and would not interfere with an existing emergency response or evacuation plan. New projects also would conform to the District's emergency response plans and protocol during construction and operation. Impacts associated with implementation of or interference with adopted emergency response plans and emergency evacuation plans would be less than significant.

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**Impact 5.9-8: SUP-related project sites are not anticipated to contain a current or former hazardous waste disposal site or solid waste disposal site; if they do contain a former solid waste disposal site, wastes would be removed. [Threshold HAZ-8]**

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### 5.9.3.1.11 New Construction on New Property

Under Education Code Section 17213(a)(1), the District is prohibited from acquiring any current or former hazardous waste disposal site or solid waste disposal site unless the site is a former solid waste disposal site and the wastes have been removed. For each proposed project that involves new property acquisition, the District would consult specified comprehensive lists of contaminated sites, including the DTSC EnviroStor and SWRCB GeoTracker databases, to determine whether the proposed site is a current or former hazardous waste disposal site or solid waste disposal site. This review would be performed as part of the District's site assessment process, which would include the preparation of a Phase I ESA and, if necessary, a Phase II assessment/PEA. If the property is to be acquired using state bond funds, these environmental assessments would be conducted under DTSC supervision. Where a proposed school site is identified on one of the lists, the District would, through the site assessment and CEQA processes, determine whether the site is a current or former hazardous waste disposal site or solid waste site. The District would not select the site if it is a current or former hazardous waste disposal site, or if it is a current solid waste site. The District would consider a former solid waste site for a proposed school project only if the wastes have been removed and the District determines that the site poses no significant health risk to students, staff and faculty, and no significant risk of harm to the environment. The public would then have the opportunity to review the site-specific investigations through the public review process. LAUSD will comply with the process described in this section to reduce risks from current or former hazardous waste disposal site or solid waste disposal site. Impacts would be less than significant.

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### 5.9.3.1.12 New Construction and Modernization on Existing Campus

New construction, modernization, repair, replacement, upgrade, remodel, renovation and installation projects would not involve the acquisition or leasing of new properties for school construction. Therefore, because no existing LAUSD school contains a current or former hazardous waste disposal site or solid waste disposal site, no evaluation would be needed to determine whether the new project site is included on such a list, and no impact would occur.

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**Impact 5.9-9: SUP-related project sites may be located on a hazardous substance release site that DTSC previously listed under Health & Safety Code Section 25356 for removal or remedial action so long as all response actions are taken and DTSC certifies the school may be occupied. [Threshold HAZ-9]**

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### 5.9.3.1.13 New Construction on New Property

Under Education Code Section 17213(a)(2), the District is prohibited from acquiring property that is a hazardous substance release site identified by the DTSC in a current list adopted pursuant to Health & Safety Code Section 25356 for removal or remedial action under Health & Safety Code Sections 25300, et seq. For each proposed project that involves new property acquisition, the District would consult specified comprehensive lists of contaminated sites, including the DTSC EnviroStor and SWRCB GeoTracker databases, to determine whether the proposed site is so listed by DTSC. This review would be performed as part of the District's site assessment process, which would include the preparation of a Phase I ESA and, if necessary, a Phase II assessment/PEA and remediation. If the property is to be acquired using state bond funds, these environmental assessment activities would be conducted under DTSC supervision. Where a proposed school site is listed by DTSC under Health & Safety Code Section 25356, the District would, through the site assessment and CEQA processes and under DTSC's oversight, undertake all required removal and/or remedial actions, ensure that DTSC removes the site from this listing, determine that the site as remediated poses no significant health risk to students, faculty and staff and secure DTSC's certification that all school buildings may be occupied and used for their intended purpose. The public would then have the opportunity to review the site-specific investigations through the public review process. Compliance with the process and steps outlined in this paragraph would ensure that impacts from any site used for a school project that DTSC formerly listed under Section 25356 would not be a hazard to people on or near the site. Impacts related to hazardous substance release site would be less than significant.

### 5.9.3.1.14 New Construction and Modernization on Existing Campus

These types of projects would not involve the acquisition or leasing of new properties for school construction. Therefore, because no existing LAUSD school contains a current or former hazardous or solid waste disposal site, no evaluation would be needed to determine whether the new project site is included on such a list and no impact would occur.



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**Impact 5.9-10: SUP-related project sites would not contain one or more pipelines, situated underground or aboveground, that carry hazardous substances, extremely hazardous substances, or hazardous wastes. [Threshold HAZ-10]**

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### 5.9.3.1.15 New Construction on New Property

Under Education Code Section 17213(a)(3) the District is prohibited from acquiring any property that contains one or more underground or aboveground pipelines that carry hazardous substances, extremely hazardous substances or hazardous wastes. Natural gas distribution lines that serve the school or a neighborhood are specifically excluded from the definition of pipelines subject to this state law. In order to comply with this and other state laws and regulations related to hazardous material pipelines, the District would investigate the possible presence of such pipelines for each new school site acquisition and construction project as a component of its normal site assessment process. The District would incorporate information regarding site investigations in the environmental review document it prepares for a specific project, which would be available to the public for review and comment as required by CEQA. The public would then have the opportunity to review the site-specific investigations through the public review process.

The LAUSD-OEHS has developed a “User Manual Pipeline Safety Hazard Assessment” and CEQA Specification Manual Pipeline Safety Hazard Analysis (SC-HAZ-2) with a specific protocol for the evaluation of hazardous materials pipelines within 1,500 feet of a school site.<sup>394, 395</sup> The manual provides instructions for completing a pipeline safety hazard assessment (PSHA) for natural gas, hazardous liquid, and high-volume water pipelines for one or more of the following cases:

- High pressure natural gas, petroleum product, crude oil and chemical pipelines that lie within 1,500 feet of proposed or existing school sites.
- High pressure natural gas, petroleum product, crude oil and chemical pipelines crossing or located within railroad easements that lie within 1,500 feet of proposed or existing school sites.
- Crude oil and natural gas gathering lines associated with active oil well sites that are less than 300 feet from proposed or existing school sites.
- High-volume water pipelines that lie within 1,500 feet of proposed or existing school sites.

Briefly stated, the screening method uses hazard footprint look-up tables to compare hazard footprint length with distance from the pipeline to the school. If a hazard footprint reaches the proposed school property line, then a quantitative risk analysis is completed. If no hazard footprint reaches the school site, then the screening analysis is complete. If PSHA results indicate that risk from a safety hazard is significant (i.e., risk equals or exceeds a threshold level of one in one million [ $1.0 \times 10^{-6}$ ]), then the District can identify and develop mitigation measures that may reduce predicted fatality risk to be within acceptable limits.

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<sup>394</sup> LAUSD OEHS User Manual Pipeline Safety Hazard Assessment, revised October 2008.

<sup>395</sup> LAUSD OEHS CEQA Specification Manual, Appendix L, Pipeline Safety Hazard Analysis. December 2005, Revised June 2007.

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The CDE has also developed and published guidance procedures for evaluating safety hazards associated with natural gas and hazardous liquid releases from underground and aboveground pipelines, as well as flooding associated with releases from large-diameter water pipelines.<sup>396</sup> This guidance would also be followed to assess potential pipeline hazards in the vicinity of a proposed school site. The identification and evaluation of possible hazardous material pipelines on or within 1,500 feet of a proposed school site in accordance with LAUSD Standard Conditions and CDE assessment procedures would ensure that measures are taken to reduce impacts associated with such pipelines. Pipeline risk reduction measures include, but are not limited to, the following:

- Develop and implement emergency response procedures allowing students and staff to shelter in place inside the school.
- Install or develop warning systems to improve evacuation time.
- Provide staff with safety training and develop better communication and coordination with emergency response personnel.
- Require that a school be notified of any third party construction near an existing pipeline.
- Establish emergency telephone communication with school office.

Hazard impacts associated with hazardous substances or materials, or hazardous waste pipelines would be less than significant.

### 5.9.3.1.16 New Construction and Modernization on Existing Campus

Depending on the size and nature of the new construction or modernization project, the District may elect to conduct a PSHA, as described above. If so, it would be conducted in the same manner and with the same thoroughness as those studies conducted for site acquisition. If state funding is sought, the District would self-certify that the project will not create any new significant safety hazards or exacerbate any existing safety hazards to students with respect to pipelines when filing the application and Form SFPD 4.08 with the CDE.

Compliance with these requirements outlined above would ensure that any new school construction or modernization project would not expose people or structures to a significant risk involving their proximity to aboveground or underground pipelines. Therefore, impacts from such pipelines would be less than significant.

## 5.9.4 Applicable Regulations and Standard Conditions

### 5.9.4.1.1 Federal

- United States Code Title 15, Sections 2601 et seq.: Toxic Substances Control Act
- United States Code Title 42, Sections 9601 et seq.: Comprehensive Environmental Response, Compensation and Liability Act and Superfund Amendments and Reauthorization Act

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<sup>396</sup> CDE Guidance Protocol for School Site Pipeline Risk Analysis, prepared by URS Corporation, 2007.

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- United States Code Title 42, Sections 6901 et seq.: Resource Conservation and Recovery Act
- United States Code Title 42, Sections 11001 et seq.: Emergency Planning & Community Right to Know Act
- Code of Federal Regulations Title 29, Part 1910: Occupational Health and Safety Administration Standards
- Code of Federal Regulations Title 40, Parts 260-265: Hazardous Waste Management
- Code of Federal Regulations Title 40, Part 136: Guidelines Establishing Test Procedures for the Analysis of Pollutants
- Code of Federal Regulations Title 40, Parts 700-766: Implementing Regulations for the Toxic Substances Control Act (including asbestos and PCBs)
- Code of Federal Regulations Title 49, Parts 170-179: DOT Hazardous Materials Regulations
- Code of Federal Regulations Title 49, Parts 190-198: DOT Pipeline Safety Regulations

### 5.9.4.1.2 State

Numerous CDE procedures are listed and referenced throughout this chapter of the EIR. To the extent that they may be applicable to a new school construction and/or modernization project, they are included herein as standard conditions. Those of particular importance or relevance are itemized below:

- CDE School Site Selection and Approval Guide, 2004
- CDE Guidance Protocol for School Site Pipeline Risk Analysis, prepared by URS Corporation, 2007.
- California Education Code Title 1, Division 1, Part 10, Chapter 12.5, Section 17070 et seq.: Leroy F. Greene School Facilities Act of 1998
- California Education Code Title 1, Division 1, Part 10.5, Chapter 1, Sections 17210, 17213, and 17215: School sites. General Provisions
- California Education Code Title 1, Division 1, Part 10.5, Chapter 3, Sections 17251 and 17268: Construction of School Buildings
- California Education Code Title 1, Division 1, Part 19, Chapter 2.5, Sections 32280-32289: School Safety Plans
- California Health and Safety Code, Division 20, Chapter 6.5: Hazardous Waste Control
- California Health and Safety Code, Division 20, Chapter 6.95: Hazardous Materials Release Response Plans and Inventory

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- California Code of Regulations Title 5, Division 1 Chapter 13, Subchapter 1: School Facilities Construction (Title 5 requirements)
- California Code of Regulations Title 21, Division 2.5, Chapter 2.1, Section 3570: Caltrans School Site Evaluation Criteria (for airports)
- California Code of Regulations Title 22, Division 4.5: Environmental Health Standards for the Management of Hazardous Waste

### 5.9.4.1.3 LAUSD Standard Conditions of Approval

Numerous LAUSD Standard Conditions are listed and referenced throughout this chapter of the EIR. Those of particular importance or relevance are itemized below.

- LAUSD OEHS CEQA Specification Manual, Appendix M, Criteria for School Siting in Proximity to High Voltage Power Lines. December 2005, Revised June 2007. Board of Education resolutions: Effects of Non-Ionizing Radiation-2000; Wireless Telecommunication Installations-2009; T Mobile Cell Tower Notification and Condemnation-2009 (SC-HAZ-1)
- LAUSD OEHS CEQA Specification Manual, Appendix L, Pipeline Safety Hazard Analysis. December 2005, Revised June 2007 (SC-HAZ-2)
- LAUSD OEHS CEQA Specification Manual, Appendix K, Rail Safety Study. December 2005, Revised June 2007 (SC-HAZ-3)
- LAUSD OEHS Impacted Soil, CFR Title 40, Part 763; Specification 01 45244524 – Environmental Import/Export Materials Testing, August 29, 2018; Specification 02 8213, Asbestos Abatement and Asbestos Related Disturbance; September 22, 2014; Title 29 CFR, Title 8, California Code of Regulations; LAUSD OEHS, Guidelines and Procedures to Address Polychlorinated Biphenyls (PCBs) in Building Materials, Office of Environmental Health and Safety, October 2016; Specification 02 8400, Polychlorinated Biphenyl (PCB), June 22, 2017 (SC-HAZ-4)
- LAUSD OEHS CEQA Specification Manual, Appendix J, Air Toxics Health Risk Assessment (HRA). December 2005, Revised June 2007. (SC-AQ-1)
- LAUSD-OEHS Policy Bulletin: Procedures for Modifications and Additions to District Property Funded by or Performed by a Third Party, BUL-5761.0, May 14, 2012
- LAUSD-OEHS Phase I Environmental Site Assessment: Standard Scope of Work, June 2007
- LAUSD Specification 01 4524 – Environmental Import/Export Materials Testing, August 29, 2018
- LAUSD-OEHS Safety Alert No. 01-04: Procedures – Responding to Toxic Air Release, November 2001
- LAUSD Board Resolution: Siting of New Schools Near Industrial Facilities, January 22, 2008

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- LAUSD-OEHS Memorandum: Industrial Facilities in Proximity to Schools, MEM-1611, March 4, 2005
- LAUSD-OEHS User Manual Pipeline Safety Hazard Assessment, October 2008
- LAUSD-OEHS Reference Guide: Environmental Hazards in Proximity to Schools, REF-5892.0, October 8, 2012
- LAUSD-OEHS Procedures: Review of Non-District Projects to Determine Impact on Schools, undated draft
- LAUSD-OEHS Safety Alert No. 04-08: Emergency Preparedness – Recommendations for Parents, Teachers, and School Administrators, August 2004
- LAUSD-OEHS Reference Guide: Emergency Drills and Procedures, REF-5803.4, August 29, 2018
- LAUSD Existing Facilities – Construction Safety, SAF:30, March 2, 2007
- Los Angeles Unified School District Emergency Operations Plan 2022, Adopted April 12, 2016
- LAUSD Bulletin: Use of School Facilities in an Emergency or Disaster Situation, BUL-6084.0, June 11, 2013
- LAUSD Integrated Safe School Plan for 2022-2023
- LAUSD-OEHS Integrated Safe School Plan 2022
- LAUSD Bulletin: District Emergency Response and Preparedness, BUL-5433.1, March 8, 2013
- LAUSD Reference Guide: School Site Emergency/Disaster Supplies, REF-5451.2, August 15, 2016
- LAUSD Reference Completing and Updating the Integrated Safe School Plan 2020-2021, REF-5511.10, July 1, 2011
- LAUSD-OEHS Reference Guide: Emergency Response and Communication Procedures for the Release of Areas Closed Due to Emergency Incidents, REF-5741.0, April 23, 2012
- LAUSD-OEHS Emergency Response Communications and Response Actions, 2012
- LAUSD-OEHS Reference Guide: Methane Safety Program Implementation Guidelines, REF-5671.0, January 9, 2012
- LAUSD Non-School Facility Site Disaster Plan, undated
- LAUSD-OEHS Safety Alert No. 02-03: Chemical Handling Safety Procedures for Schools, March 2002
- LAUSD-OEHS Safety Alert No. 03-08: Mercury Hazards, May 2003
- LAUSD Section 13614 – Abatement of Hazardous Materials, July 7, 2003

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- LAUSD-OEHS Laboratory Chemical Hygiene & Safety Plan, Version 1.2, March 19, 2014
- LAUSD-OEHS Safety Alert No. 05-08: Discharge of Photographic Chemicals into Sewers, June 2005
- LAUSD-OEHS Safety Alert No. 05-03: Approval of Chemical Products for District Use, April 21, 2006
- LAUSD-OEHS Safe School Inspection Guidebook, Revised July 2021
- LAUSD-OEHS Hazard Communication Plan – Your Right to Know, November 2013
- LAUSD-OEHS Safety Alert No. 14-01: Hazard Communication, January 2014
- LAUSD-OEHS Safety Alert No. 14-03: Warning Signs for California Proposition 65, January 2014
- LAUSD-OEHS Safety Alert No. 03-11: Procedures – Disposal of Electronic Devices, April 29, 2005
- LAUSD-OEHS Environmental Guidance Manual for Garages. Accessed online at: <https://achieve.lausd.net/cms/lib/CA01000043/Centricity/domain/135/pdf%20files/EnvironmentalGuidanceManualforGarages11-06.pdf>. May 17, 2023
- LAUSD-OEHS Reference Guide: Disposal Procedures for Hazardous Waste and Universal Waste, REF-4149.2, June 12, 2020
- LAUSD-OEHS Memorandum: End-of-School-Year Hazardous Waste Pick-Up, MEM-5779.0, June 11, 2012
- LAUSD-OEHS Safety Alert No. 02-08: Modifications to Asbestos Containing Materials, December 2002
- LAUSD-OEHS Safety Alert No. 03-10: Preventing Lead Exposure During Construction & Renovation, May 2003
- LAUSD Section 13280 – Asbestos Abatement and Asbestos Related Disturbance, November 21, 2003
- LAUSD-OEHS Safety Alert No. 05-10: Modifications to Building Materials Containing Asbestos or Lead, August 2005
- LAUSD Section 13282 – Lead Abatement and Lead Related Construction Work, March 15, 2007
- LAUSD-OEHS Safety Alert No. 12-02: Asbestos Warning Signs, April 2012
- LAUSD Facilities School Maintenance and Operations Repair & Construction Safety Standards, February 28, 2013.
- LAUSD-OEHS Reference Guide: Daily Flushing Requirements for Drinking Fountains and Faucets, REF-3930.4, August 26, 2013

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### 5.9.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standard Conditions listed above, the following impacts would be less than significant: Impacts 5.9-1, 5.9-2, 5.9-3, 5.9-4, 5.9-5, 5.9-6, 5.9-7, 5.9-8, 5.9-9, and 5.9-10.

### 5.9.6 Mitigation Measures

No mitigation measures are required.

### 5.9.7 Level of Significance After Mitigation

Impacts would be less than significant.

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### 5.10 HYDROLOGY AND WATER QUALITY

This section of the EIR evaluates the potential for implementation of the SUP to impact hydrology and water quality (surface and groundwater) in the District. This section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions), along with the existing hydrology and water quality issues throughout the SUP area, and possible environmental impacts that may occur as SUP-related site-specific projects are implemented.

#### TERMINOLOGY

**Hydrology.** The distribution and circulation of water, both on land and underground.

**Surface Water.** Water on the surface of the land and includes lakes, rivers, streams, and creeks.

**Groundwater.** Water below the surface of the earth.

**Water Quality.** The chemical, biological or physical characteristics of surface or groundwater.

**Water Quality Standard.** The foundation of the water quality-based control program mandated by the Clean Water Act. In the setting of standards, agencies make political and technical/scientific decisions about how the water will be used

**Point source.** Any discernible, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, from which pollutants are or may be discharged. This term does not include agricultural stormwater discharges and return flows from irrigated agriculture (Clean Water Act Section 502<sup>1</sup>).

**Pollutant.** Dredged spoil, solid waste, incinerator residue, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt and industrial, municipal, and agricultural waste discharged into water. This term does not mean (A) “sewage from vessels” within the meaning of section 1322 of this title; or (B) water, gas, or other material which is injected into a well to facilitate production of oil or gas, or water derived in association with oil or gas production and disposed of in a well, if the well is used either to facilitate production or for disposal purposes is approved by authority of the State in which the well is located, and if such State determines that such injection or disposal will not result in the degradation of ground or surface water resources (Clean Water Act Section 502<sup>397</sup>).

**Pollution.** The man-made or man-induced alteration of the chemical, physical, biological, and radiological integrity of water (CWA Section 502<sup>398</sup>).

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<sup>397</sup> U.S. EPA 2023. *Clean Water Act Section 502: General Definitions*. <https://www.epa.gov/cwa-404/clean-water-act-section-502-general-definitions>.

<sup>398</sup> U.S. EPA 2023. *Clean Water Act Section 502: General Definitions*. <https://www.epa.gov/cwa-404/clean-water-act-section-502-general-definitions>.

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**Total Maximum Daily Load.** A TMDL is the calculation of the maximum amount of a pollutant allowed to enter a waterbody so that the waterbody will meet and continue to meet water quality standards for that particular pollutant. A TMDL determines a pollutant reduction target and allocates load reductions necessary to the source(s) of the pollutant. According to the Clean Water Act, each state must develop TMDLs for all the waters identified on the state's Clean Water Act Section 303(d) list of impaired waters, according to their priority ranking on that list.

**One-Hundred-Year Flood.** The term “one-hundred-year flood” is used in an attempt to simplify the definition of a flood that statistically has a 1% chance of occurring in any given year. The 100-year flood is also referred to as the 1% flood because its annual exceedance probability is 1%. Based on historical data about rainfall and stream stage this extreme hydrologic event is a flood having a 100-year recurrence interval.

**Seiche.** A surface wave created when an inland body of water is shaken, usually by earthquake activity. Seiches could pose flood hazards due to a wave overtopping an aboveground reservoir, or percolation basins.

**Mudflow.** A type of landslide composed of saturated rock debris and soil with a consistency of wet cement. Areas that could be subject to mudflows are at the bases of foothills and mountains; canyons and areas immediately below the mouths of canyons; and washes.

**Tsunami.** A tsunami is a very high, large wave in the ocean that is usually caused by an earthquake or volcanic eruption under the sea.

### 5.10.1 Environmental Setting

#### 5.10.1.1 REGULATORY FRAMEWORK

National, state, regional, and local laws, regulations, plans, and guidelines most likely to apply to SUP-related projects are summarized below. Note, specific requirements of these laws, regulations, plans, and guidelines might not be current when a proposed site-specific school project undergoes review and additional jurisdictional plans and policies may be applicable, depending on the project. Although some of the regulations discussed herein may not directly applicable to the SUP or site-specific projects implemented under the SUP, they are included to provide background and assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standard Conditions of Approval are also listed. See *Applicable Regulations and Standard Conditions* at the end of this chapter for those that require District compliance.

##### 5.10.1.1.1 Federal

###### 5.10.1.1.1.1 *United States Code, Title 33, Sections 1251 et seq. (1972)*

The **Clean Water Act** (CWA) is the principal statute governing water quality. The CWA establishes the basic structure for regulating discharges of pollutants into the waters of the United States and gives the United State Environmental Protection Agency (EPA) the authority to implement pollution control programs, such as setting wastewater standards for industry. The objective of this CWA is to restore and maintain the *chemical, physical, and biological integrity* of the Nation's waters and to eliminate the discharge of pollutants into Waters of the U.S. from both point and nonpoint sources of pollution. The CWA sets water quality standards for various

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contaminants in surface waters and makes it unlawful for any person to discharge any pollutant from a point source into navigable waters unless a permit is obtained under its provisions. The CWA mandates permits for wastewater and stormwater discharges, requires states to establish site-specific water quality standards for navigable bodies of water, and regulates other activities that affect water quality, such as dredging and the filling of wetlands. The CWA also funded the construction of sewage treatment plants and recognized the need for planning to address non-point sources of pollution (e.g., stormwater runoff).

**Section 401** of the CWA gives the SWRCB and the nine RWQCBs the authority to regulate dredged or fill material to waters of the state via CWA section 401 water quality certifications, which are issued to applicants for a federal license or permit for activities that may result in a discharge into waters of the U.S., including but not limited to, the discharge or dredged or fill material. On April 2, 2019, the SWRCB adopted the *State Wetland Definition and Procedures for the Discharge of Dredged or Fill Material to Waters of the State* (Procedures)<sup>399</sup>, which became effective May 28, 2020. Applicants proposing to discharge dredged or fill material are required to comply with the procedures unless an exclusion applies or the discharge qualifies for coverage under a General Order.

**Section 402(p)** of the CWA establishes a framework for regulating municipal and industrial stormwater discharges under the NPDES Program. EPA NPDES regulations require, among other things, that discharges of stormwater to waters of the United States from construction projects that disturb one or more acres of soil, comply with a NPDES Permit.<sup>400</sup>

**Section 404** of the CWA authorizes the U.S. Army Corps of Engineers (Corps) to regulate the discharge of dredged or fill material within the waters of the United States and adjacent wetlands. Nationwide 404 permits are available in certain cases to streamline the 404 process. For instance, Nationwide Permit #39, “Residential, Commercial and Institutional Developments,” could apply to school construction provided the impacts to waters of the United States are a half-acre or less and involve less than 300 linear feet of stream. Notification of the Corps is required. Mitigation for impacts may also be required.

### 5.10.1.1.1.2 United States Code, Title 42, Sections 4001 et seq.

The **National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973** mandate the FEMA to evaluate flood hazards. FEMA administers the National Flood Insurance Program (NFIP) to provide subsidized flood insurance to communities that comply with FEMA regulations limiting development in floodplains. FEMA also issues FIRMs that identify which land areas are subject to flooding. These maps provide flood information and identify flood hazard zones in the community. The design standard for flood protection is established by FEMA. FEMA’s minimum level of flood protection for new development is the 100-year flood event, also described as a flood that has a 1-in-100 chance of occurring in any given year.

<sup>399</sup> SWRCB. 2022. *Wetland Riparian Area Protection Policy. State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State*. [https://www.waterboards.ca.gov/water\\_issues/programs/cwa401/wrapp.html](https://www.waterboards.ca.gov/water_issues/programs/cwa401/wrapp.html).

<sup>400</sup> U.S. EPA 2022. *Summary of the Clean Water Act, 33 U.S.C. §1251 et seq. (1972)*. <https://www.epa.gov/laws-regulations/summary-clean-water-act>.

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Minimum NFIP floodplain management building requirements are applicable to some properties in the SUP Area per Volume 44 Code of Federal Regulations, Sections 59 through 65. As required by these regulations, all buildings constructed within a riverine floodplain (i.e., Flood Zones A, AO, AH, AE, and A1 through A30, as delineated on the FIRM) must be elevated so that the lowest floor is at or above the base flood elevation level in accordance with the effective FIRM. Also, if the area of construction is within a Regulatory Floodway delineated on the FIRM, any development must not increase base flood elevation levels. The term “development” is defined by FEMA as any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials. Per these regulations, if development in these areas occurs, a hydrologic and hydraulic analysis must be performed prior to the start of development and must demonstrate that the development does not cause any rise in base flood elevation levels, since no rise is permitted within regulatory floodways.

All buildings constructed within a coastal high hazard area, defined as any of the “V” Flood Zones as delineated on the FIRM, must be elevated on pilings and columns so that the lowest horizontal structural member, excluding the pilings and columns, is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto must be anchored to resist flotation, collapse, and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.

Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision, as soon as practicable, but not later than six months after such data becomes available.

### **5.10.1.1.1.2.1      *Local Floodplain Development Requirements***

In order to participate in the National Flood Insurance Program, pursuant to the Flood Disaster Protection Act of 1973, local jurisdictions, including cities and counties, must enact floodplain development regulations. These regulations generally prohibit development within a floodplain unless the lowest floor of the structure is above the predicted flood level. Some flood-prone areas, known as floodways, are set aside specifically for the conveyance of flood flows, and development in these areas is prohibited or severely restricted. Los Angeles County, the City of Los Angeles, and most other cities have floodplain and water quality regulations for new development.

### **5.10.1.1.1.3      *Code of Federal Regulations, Title 40, Parts 122 et seq.***

The **National Pollution Discharge Elimination System** (NPDES) program controls water pollution by regulating point sources that discharge pollutants into waters of the United States. Point sources are discrete conveyances such as pipes or man-made ditches. Examples of pollutants include, but are not limited to, rock, sand, dirt, and agricultural, industrial, and municipal waste discharged into waters of the United States.

The NPDES program is a federal program that has been delegated to the State of California for implementation through the SWRCB and the nine RWQCBs. The permits contain limits on what can be discharged, monitoring and reporting requirements, and other provisions to ensure discharge to not impact water quality.

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NPDES permits can be issued as individual or general. The individual permit is specific to a facility or group of dischargers, often due to higher potential for pollutant discharge. General permits cover multiple facilities within a specific category, such as stormwater discharges from industrial, municipal, and construction sources. The use of general permits streamlines the permit process and allows the SWRCB to allocate resources in a more efficient manner, provide timely permit coverage for large numbers of facilities in the same category, and provide for consistency of permit conditions for similar facilities. As such, dischargers covered under general permits know the applicable requirements before obtaining coverage under that permit. Furthermore, obtaining coverage under a general permit is faster than an individual permit.

### 5.10.1.1.2 State

#### 5.10.1.1.2.1 *California Government Code, Section 53097*

California Government Code Section 53097 requires school districts to comply with any city or county ordinance regulating drainage improvements. Section 53097 also requires school districts to comply with ordinances requiring review and approval of grading plans as they relate to design and construction of onsite improvements that affect drainage.

#### 5.10.1.1.2.2 *California Water Code, Sections 13000 et seq.*

The **Porter-Cologne Water Quality Act** is the law that governs water quality in California. The SWRCB, through its nine RWQCBs, carries out the regulation, protection, and administration of water quality in each region. Each RWQCB is required to adopt a Water Quality Control Plan or Basin Plan, which are intended to preserve and enhance water quality and protect the beneficial uses of regional waters. The District lies within in the Los Angeles River Basin, Region 4. The *Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*<sup>401</sup> (Basin Plan) was adopted in 1994 and designates beneficial uses for surface water and groundwater, sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's antidegradation policy, and describes implementation programs. In addition, the Basin Plan incorporates (by reference) all applicable SWRCB and RWQCB plans and pertinent water quality policies and regulations.

#### 5.10.1.1.2.3 *California Water Code, Section 13260, Waste Discharge Requirements*

**California Water Code Section 13260** states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, must file a Report of Waste Discharge (ROWD) containing information that may be required by the appropriate RWQCB. The ROWD used to initiate the application process for all WDRs and NPDES permits issued by a RWQCB, except landfill facilities and General WDRs or general NPDES permits that use a Notice of Intent to enroll or specify the use of an alternative application form designed for that permit.

Individual WDRs are written for a specific discharger and General WDRs regulate a similar group of dischargers. The RWQCB may also use conditional waivers to regulate discharges that have the lowest threat

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<sup>401</sup> [https://www.waterboards.ca.gov/losangeles/water\\_issues/programs/basin\\_plan/](https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/).

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to water quality. Generally, WDRs, NPDES permits, and waivers stipulate self-monitoring programs that require the waste discharger to collect water quality data and submit it to the RWQCB for evaluation of compliance with the applicable regulation.

### 5.10.1.1.2.4 *California Fish and Game Code, Sections 1602 et seq.*

**Fish and Game Code section 1602** requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

- Divert or obstruct the natural flow of any river, stream, or lake;
- Change the bed, channel, or bank of any river, stream, or lake;
- Use material from any river, stream, or lake; or
- Deposit or dispose of material into any river, stream, or lake.

This includes dry for periods of time, as well as those that flow year-round. CDFW requires a Lake and Streambed Alteration (LSA) Agreement when a project activity may substantially adversely affect fish and wildlife resources to attempt to avoid and/or mitigate those impacts through design, construction planning, and mitigation measures.

### 5.10.1.1.2.5 *California Education Code, Sections 17212, 17215.5; CCR, Title 5, Section 14010(g)*

**School Siting Restriction in Floodplains** prohibits a school district from selecting a site for a new school that is within an area of flood or dam flood inundation, unless the cost of mitigating the flood or inundation impact is reasonable. Potential damage can be mitigated by elevating the site above flood levels, creating improved levees or drainage infrastructure, and/or emergency notification and evacuation procedures. CDE may require a hydrologic study or other means of confirming that a site will not be subject to flooding and/or a report of proposed mitigation measures. The pre-construction geological and soils engineering study shall address the nature of the site that includes a discussion of liquefaction, subsidence or expansive soils, slope, stability, dam or flood inundation and street flooding.

### 5.10.1.1.3 **State Regulatory Agencies**

#### 5.10.1.1.3.1 *State Water Resources Control Board*

**Industrial General Permit**, Order 2014-0057-DWQ, was adopted on April 1, 2014, became effective July 1, 2015, and was amended in 2015 and 2018. The permit expired June 30, 2020, but it was administratively extended until the next permit is adopted. This NPDES General Permit regulates industrial stormwater discharges and authorized non-stormwater discharges (NSWDs) from specific categories of industrial facilities identified in Attachment A of the permit (i.e., transportation facilities), as well as from facilities designated by the RWQCBs to enroll in the permit. The General Permit does not apply to industrial stormwater discharges and NSWDs that are regulated by individual or other general NPDES permits and does not preempt or supersede the authority of municipal agencies to prohibit, restrict, or control industrial stormwater discharges and authorized NSWDs that may discharge to stormwater conveyance systems or other watercourses within

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their jurisdictions, as allowed by State and federal law. For the LAUSD, this permit would only apply to transportation facilities, such as bus and fleet maintenance facilities, which have the potential for industrial activities to contact stormwater runoff that discharges from the site.

**Construction General Permit.** In 2012, pursuant to the CWA, the SWRCB adopted an amended statewide NPDES General Permit for stormwater discharges from construction sites. In 2022, the SWRCB adopted a new General Permit, which will be effective beginning September 1, 2023<sup>402</sup>

Projects that were enrolled in the 2009 General Permit (Order 2009-0009-DWQ, as amended by Orders 2010-0014-DWQ and 2012-0006-DWQ) prior to September 1, 2023, may continue coverage under the 2009 General Permit until that project receives an approved Notice of Termination from the Regional Water Board, up to two years after the effective date of the 2022 General Permit (i.e., September 1, 2023). Two years after September 1, 2023, all existing Notices of Intent subject to the previous permit will be administratively terminated. Projects currently enrolled in the 2009 General Permit are not able to increase a project's disturbed acreage through the Change of Information process, on or after the effective date of the 2022 General Permit; the project must be re-enrolled in the 2022 General Permit for the increase in disturbed acreage. Projects enrolled in the 2009 Small Construction Rainfall Erosivity Waiver may continue to operate under a project's active waiver until it expires. Waivers granted under the 2009 General Permit cannot be modified or extended.

Under the Construction General Permit, discharges of stormwater from construction sites with a disturbed area of one or more acres or are part of a larger common plan of development with an acre or more of soil disturbance are required to be covered by the Construction General Permit. Enrollment in the Construction General Permit is accomplished by developing a SWPPP and submitting electronically to the SWRCB as part of the electronic Notice of Intent, completed and certified via their Stormwater Multiple Application and Report Tracking System (SMARTS) Database<sup>403</sup> prior to land disturbance. The SWPPP is required to include:

- Identification of all pollutants, their sources, and control mechanisms, including sources of sediment associated with all construction activities (e.g., sediment, paint, cement, stucco, cleaners, site erosion);
- Pollutant source assessment, consisting of a list of potential pollutant sources and identification of site areas where additional BMPs are necessary to reduce or prevent pollutants in stormwater and authorized non-stormwater discharges that are used in construction activities, stored on-site, were spilled or released during construction activities or past land use activities and not cleaned up, and were applied to land as part of past land use activities. The permit requires considering all potential sources of pollutants associated with applicable TMDLs listed in Attachment H of the permit and stating whether or not sources of those pollutants are present on-site.

<sup>402</sup> SWRCB. *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities*, Order WQ 2022-0057-DWQ NPDES No. CAS000002. [https://www.waterboards.ca.gov/water\\_issues/programs/stormwater/construction/docs/2022-0057-dwq-with-attachments/cgp2022\\_order.pdf](https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction/docs/2022-0057-dwq-with-attachments/cgp2022_order.pdf).

<sup>403</sup> SWRCB. 2023. *Stormwater Multiple Application and Report Tracking System*. <https://smarts.waterboards.ca.gov/smarts/faces/SwSmartsLogin.xhtml>.

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- Description of site-specific BMPs implemented to reduce or eliminate stormwater pollution, minimum BMPs, Standard Urban Stormwater Mitigation Plan (i.e., post-construction) BMPs, BMPs to address applicable TMDL implementation requirements (as required by Attachment H of the permit), active treatment systems as included in an Active Treatment System Plan (as required in Section E.1 of Attachment F of the permit), passive treatment technologies (as required in Section D.2 of Attachment G of the permit), and dewatering systems (as required by Attachment J of the permit).
- Construction Site Monitoring Program that describes methods and procedures for monitoring discharges in accordance with the applicable Attachment D or E of the permit.

Per the SWRCB's *Requiring Sustainable Water Resources Management Resolution*<sup>404</sup>, requires Construction General Permit-enrolled projects to include performance standards for post-construction BMPs. The standards include the use of permanent post-construction BMPs that manage stormwater runoff rates to match pre-construction project site hydrology and to sustain and ensure the physical structure and biological integrity of aquatic ecosystems in the receiving waters. This “runoff reduction” approach is analogous in principle to LID and is “proven to protect watersheds and waterbodies from hydrologic-based adverse changes and pollution impacts associated with the post-construction landscape”.

The Construction General Permit requires that projects in which NPDES Phase I or Phase II MS4 post-construction requirements do not apply, to comply with the Construction General Permit's Post-Construction Standards described in the permit Section I.U:

- “The discharger shall use non-structural and/or structural measures to replicate the pre-construction water balance (for this General Permit, defined as the volume of rainfall that ends up as runoff) for the smallest storms up to and including the 85th percentile, 24-hour precipitation event (or the smallest precipitation event that generates runoff, whichever is larger).
- For sites with disturbed area exceeding two acres, the discharger shall preserve the pre-construction drainage density (miles of stream length per square mile of drainage area) for all drainage areas within the area serving a first order stream or larger stream and ensure that post-project runoff time of concentration is equal to or greater than pre-project time of concentration.”

**Dewatering General Permit.** Order No. R4-2018-0125, *General NPDES Permit/ WDRs for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties* regulates discharges of treated or untreated groundwater generated from permanent or temporary dewatering operations or other applicable wastewater discharges not specifically covered in other general or individual NPDES permits. Discharges from facilities to waters of the U.S. that do not cause, have the reasonable potential to cause, or contribute to an in-stream excursion above any applicable state or federal water quality objectives/criteria or cause acute or chronic toxicity in the receiving water are authorized discharges in accordance with the conditions of the permit.

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<sup>404</sup> SWRCB. 2008. Requiring Sustainable Water Resources Management, Resolution No. 2008-0030.  
[https://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/resolutions/2008/rs2008\\_0030.pdf](https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2008/rs2008_0030.pdf).



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### 5.10.1.1.3.2 The Statewide Municipal Stormwater Permitting Program

The Municipal Stormwater Permitting Program regulates stormwater discharges from municipal separate storm sewer systems (MS4s). MS4 permits were issued in two phases.

#### 5.10.1.1.3.2.1 Phase I MS4 NPDES Permit

Under Phase I,<sup>405</sup> which started in 1990, the RWQCBs have adopted general NPDES stormwater permits for medium (serving between 100,000 and 250,000 people) and large (serving 250,000 people) municipalities. Most of these permits are issued to a group of co-permittees encompassing an entire metropolitan area. These permits are reissued as the permits expire.

The current Phase I MS4 Permit in the Los Angeles area is Order No. R4-2021-0105 NPDES Permit No. CAS004001 (Los Angeles Regional MS4 Permit) and the permittees are the County of Los Angeles, Los Angeles County Flood Control District (LACFCD), 85 incorporated cities within the coastal watersheds of Los Angeles County, Ventura County Watershed Protection District, County of Ventura, and 10 incorporated cities within Ventura County.<sup>406</sup> This order expires on September 11, 2026. The Los Angeles Regional MS4 Permit allows the permittees to develop Watershed Management Programs (WMPs) to implement the requirements of the Permit on a watershed-wide scale through customized strategies, control measures, and BMPs largely through LID techniques. In the WMP, permittees select the highest watershed priorities and address complying with the requirements of Receiving Water Limitations, Total Maximum Daily Load (TMDL) provisions, and Permit Attachments L through R by customizing the BMPs. The Los Angeles Regional MS4 Permit requires the permittees to monitor their outfalls and/or alternative access points, such as manholes or channels, within their jurisdictional boundary. Each of the WMPs have a RWQCB-approved Coordinated Integrated Monitoring Plan (CIMP) that describes the monitoring program intended to assess the chemical, physical, and biological impacts of discharges from the urban areas on receiving waters, compliance with receiving water limitations and water quality-based effluent limitations established to implement TMDL wet-weather and dry-weather wasteload allocations, characterize discharge pollutant loads and their sources, and measure and improve the effectiveness of BMPs implemented under the Los Angeles Regional MS4 Permit and WMP.

Pursuant to prior versions of the Los Angeles Regional MS4 Permit, the County of Los Angeles developed a *Standard Urban Stormwater Mitigation Plan*<sup>407</sup> (SUSMP). A SUSMP is a plan that designates BMPs that must be used in specified categories of development projects. The SUSMP was developed as part of the municipal stormwater program to address stormwater pollution from new development and redevelopment by the private sector. The SUSMP contains minimum required BMPs that must be used for a designated project. Additional BMPs may be required by ordinance or code adopted by the permittee and applied generally or on a case-by-case basis. Co-permittees are required to adopt the requirements set in the over-arching SUSMP in their own SUSMPs. Developers must incorporate appropriate SUSMP requirements into their project plans. Each

<sup>405</sup> SWRCB. 2023. *Phase I MS4 Area Wide Permits Program* [http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/phase\\_i\\_municipal.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_i_municipal.shtml).

<sup>406</sup> SWRCB. 2023. *Los Angeles County MS4 Permit*. [https://www.waterboards.ca.gov/rwqcb4/water\\_issues/programs/stormwater/municipal/losangeles.html](https://www.waterboards.ca.gov/rwqcb4/water_issues/programs/stormwater/municipal/losangeles.html).

<sup>407</sup> County of Los Angeles. 2000. *Standard Urban Storm Water Mitigation Plan for Los Angeles County and Cities in Los Angeles County*. March 8. [https://www.waterboards.ca.gov/losangeles/water\\_issues/programs/stormwater/susmp/susmp\\_rbfinal.pdf](https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/susmp/susmp_rbfinal.pdf).

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permittee must approve the project plan as part of the development plan approval process and prior to issuing building and grading permits for the projects covered by the SUSMP requirements.

Although the LAUSD is not required to participate in the programs described in this subsection, it is likely that some of LAUSD facilities covered by this PEIR ultimately discharge to structural BMPs installed as part of the WMPs and SUSMPs, which are monitored according to CIMP.

### 5.10.1.1.3.2.2 Phase II MS4 NPDES Permit

**Phase II Small MS4 Permit** (i.e., *NPDES General Permit for Waste Discharge Requirements for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)*) (WQ Order No. 2013-0001-DWQ, as amended by Order WQ 2015-0133-EXEC, Order WQ 2016-0069-EXEC, WQ Order 2017-XXXX-DWQ, Order WQ 2018-0001-EXEC, and Order WQ 2018-0007-EXEC)<sup>408</sup> covers smaller municipalities (population less than 100,000), including non-traditional Small MS4s, which are facilities that include, but are not limited to, universities, prisons, large hospitals, military bases, and State parks (see Attachment B of the permit). All non-traditional MS4s, except K-12 School Districts, Offices of Education and Community Colleges that are not yet designated in Attachment B are now subject to the Small MS4. Permittees are required to develop and implement BMPs with a specific focus: program management, education and outreach, public involvement and participation, illicit discharge detection and elimination, construction site stormwater runoff control and outreach, pollution prevention/good housekeeping for permittee operations, post-construction stormwater management, and TMDLs.

The LAUSD is not enrolled in or regulated by the Phase II Small MS4 General Permit; however, the LAUSD implements the LAUSD *Stormwater Best Management Practice Maintenance and Operations Manual*<sup>409</sup> and *Stormwater Technical Manual* and participates in a Drought Response Outreach Program for Schools<sup>410</sup> (DROPS) and Proposition 84 Stormwater Management Grant Programs<sup>411</sup>. In partnership with LADWP, the LAUSD uses the city-wide Stormwater Capture Master Plan<sup>412</sup> to identify opportunities for stormwater capture in the northeast San Fernando Valley area. Combined, implementation of these plans and programs are similar to BMPs implemented under the Phase II Small MS4 Permit, and are aimed at controlling long-term stormwater pollution from and hydromodification caused by LAUSD facilities.

<sup>408</sup> SWRCB. 2022. *Phase II MS4 State Wide Permits Program* [http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/phase\\_ii\\_municipal.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml).

<sup>409</sup> Geosyntec. 2019. *Stormwater Best Management Practice Maintenance and Operations Manual*. October.

<sup>410</sup> SWRCB. 2022. *Drought Response Outreach Program for Schools (DROPS)*. [https://www.waterboards.ca.gov/water\\_issues/programs/grants\\_loans/drops/](https://www.waterboards.ca.gov/water_issues/programs/grants_loans/drops/).

<sup>411</sup> SWRCB. 2022. *Storm Water Grant Program (SWGPP) - Prop 84*. [https://www.waterboards.ca.gov/water\\_issues/programs/grants\\_loans/swgpp/prop84/](https://www.waterboards.ca.gov/water_issues/programs/grants_loans/swgpp/prop84/).

<sup>412</sup> Geosyntec. 2015. *Stormwater Capture Master Plan*. [https://learninggreen.laschools.org/uploads/8/0/0/8000811/scmp\\_master\\_plan\\_final\\_presentation.pdf](https://learninggreen.laschools.org/uploads/8/0/0/8000811/scmp_master_plan_final_presentation.pdf).

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### 5.10.1.1.4 Local

#### 5.10.1.1.4.1 City or County Storm Drain System – Permits and Approvals

Where LAUSD projects connect to City or County storm drain systems, the connection is subject to the requirements of the City or County. Storm drain connections made from the property line to a catch basin or a storm drain pipe in the public right-of-way require a permit or approval from the municipality that owns or operates the storm drain. The City of Los Angeles Department of Public Works requires a Sewer Permit (S-Permit) for a new connection of a property's storm sewer line to the City's storm sewer system or the repair of an existing connection. The Bureau of Engineering issues the S-Permit.<sup>413</sup> The design standards are provided in the Bureau of Engineering Storm Drain Design Manual.<sup>414</sup> Hydrologic design performed by the project's drainage engineer is checked by the City using the Los Angeles County Hydrology Manual.<sup>415</sup> All storm drain design calculations should take into account future possible development upstream when sizing pipes. This may not be possible if there are pre-existing downstream limitations.

An LACFCD permit is required: (1) for any work in an LACFCD easement, (2) for storm drain connections or remodeling of existing LACFCD drainage facilities, and (3) for work in streets that will physically affect existing LACFCD drainage structures. Other cities within the LAUSD boundary have similar requirements.

### 5.10.1.1.5 LAUSD

#### 5.10.1.1.5.1 Standard Conditions of Approval

This table lists the hydrology and water quality standard conditions that will be included as part of each SUP-related project, as appropriate.

Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
SC-HWQ-1	Stormwater Requirements	Land disturbance, for qualifying projects—new and significantly redeveloped school sites	During project design	<p><b>LAUSD shall comply with:</b></p> <p><b>LAUSD's Stormwater Technical Manual</b> that describes LID requirements—techniques and site planning; structural BMP site considerations—physical constraints, LAUSD criteria, pollutants of concern, and other site characteristics; structural BMP selection process—infiltration and hydromodification requirements, site suitability, and BMP prioritization; and structural treatment BMPs—general characteristics and applicability, sizing requirements, and design criteria. These guidelines are intended to improve water quality and mitigate potential impacts to Waters of the U.S. and State.</p> <p><b>2019 California Green Building Standards Code, Title 24, Part 11 (CGBSC or CalGreen).</b> This code features regulations for energy efficiency, water efficiency and conservation, material conservation and resource efficiency and environmental quality, along with</p>

<sup>413</sup> City of Los Angeles, Bureau of Engineering. 2023. *Permits and Services*. <https://eng.lacity.org/permits>.

<sup>414</sup> City of Los Angeles, Bureau of Engineering 2023. *Technical Info, Manuals and Standards*. <https://eng.lacity.org/techdocs>.

<sup>415</sup> County of Los Angeles, Department of Public Works. 2023. *Design Manuals*. [http://dpw.lacounty.gov/DES/design\\_manuals/](http://dpw.lacounty.gov/DES/design_manuals/).

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
				<p>mandatory provisions for commercial, residential, and public-school buildings, which improves water quality and mitigates potential impacts to Waters of the U.S. and State.</p> <p><b>Collaborative for High Performance Schools (CHPS)</b> is a school design standards-setting organization associated with the "Leadership in Energy and Environmental Design" (LEED) group. The District requires that CHPS criteria be incorporated to the extent feasible into its school construction program, which improves water quality and mitigates potential impacts to Waters of the U.S. and State.</p>
SC-HWQ-2	Stormwater Requirements	Land disturbance, for qualifying projects	During project design and construction	<p><b>Compliance Checklist for Stormwater Requirements at Construction Sites.</b></p> <p>This checklist has requirements for compliance with the General Construction Activity Permit and is used by Environmental Health and Safety (OEHS) to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing stormwater pollution to be specified in a SWPPP; and monitoring stormwater discharges to ensure that sedimentation of downstream waters remains within regulatory limits.</p>
SC-HWQ-3	Stormwater Requirements	Land disturbance, for qualifying projects—new and significantly redeveloped school sites	During construction and operation	<p><b>Stormwater Best Management Practices Maintenance and Operations Manual<sup>416</sup>.</b></p> <p>The Maintenance and Operations Manual describes: maintenance and operations for source control BMPs (via fact sheets) and structural BMPs; facility inspection and maintenance (and contains the corresponding checklists); and vegetation maintenance and irrigation.</p>
SC-HWQ-4	Miscellaneous Requirements	Ongoing maintenance and repair	During construction and operation	<ul style="list-style-type: none"> <li>• Environmental Training Curriculum</li> <li>• Hazardous Waste Management Program</li> <li>• Medical Waste Management Program</li> <li>• Environmental Compliance Inspections</li> <li>• Safe School Inspections</li> <li>• Integrated Pest Management Program</li> <li>• Fats Oil and Grease Management Program</li> <li>• Solid Waste Management Program</li> </ul>
SC-HWQ-5	Flood Hazards	Site acquisition	During project design	<p>The analysis for new projects shall include evaluation of all possible flood hazards as determined by: (1) review of FEMA flood maps; (2) review of flood information provided by local city or county floodplain managers; (3) review of California Department of Water Resources dam safety information; and (4) local drainage analysis by a civil engineer. The flood hazard determination shall include consideration of tsunamis and debris flow. New projects should be located outside of these hazard areas, if practical.</p>
SC-HWQ-6	Flood Hazards	Site acquisition	During project design	<p>Where placing the project outside the floodplain is impractical, the school or project structure shall be protected from flooding by containment and control of</p>

<sup>416</sup> Geosyntec Consultants. 2019. *Stormwater Best Management Practices Maintenance and Operations Manual*. October.

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
				flood flows (e.g., elevating lowest floors at least one foot above the expected 100-year flood level).
SC-HWQ-7	Tsunami Hazards	Place new classrooms or outdoor play areas within 0.62 mile of the coast, and less than 100 feet above mean sea level	Prior to classroom occupation	LAUSD shall evaluate tsunami hazards to determine if the project site is within a tsunami inundation zone as delineated by CalEMA or NOAA. If the project site is within a tsunami hazard zone, LAUSD shall prepare and implement a tsunami awareness program and evacuation plan. This plan shall comply with the provisions of the LAUSD Emergency Operations Plan.
SC-HWQ-8	Debris Flow	Place new classrooms or outdoor play areas in areas subject to potentially damaging debris flow	During project design	LAUSD shall consult with the Los Angeles County Department of Public Works, and/or local city officials, as appropriate, regarding the debris flow potential near the mouth of or in natural canyons and feasible mitigation measures shall be developed to reduce any potential risk. Potential debris flow hazards shall be reduced by one or more of the following: adequate building setbacks from natural slopes, construction of debris control facilities in upstream areas, monitoring and maintaining potential debris flow areas and basins. In addition, potential loss shall be minimized by establishing an evacuation plan, and elevated awareness and early warning of pending events.

## 5.10.1.1.5.2 LAUSD Stormwater Technical Manual

As described briefly in subsections above, the LAUSD Stormwater Technical Manual<sup>417</sup> establishes LID design requirements and describes techniques to store, infiltrate, evaporate, and detain runoff on site. Per the manual, the goal of LID is to mimic undeveloped hydrology, to the extent feasible, to increase groundwater recharge, enhance water quality, and prevent degradation of downstream natural drainage courses. This goal can be accomplished with creative site planning and the incorporation of localized, naturally functioning BMPs into the site design. LID techniques can also be used to assist in obtaining Leadership in Energy and Environmental Design (LEED) credits and can be applied for obtaining grant funding and rebates. The manual is also intended to meet current post-construction SUSMP requirements<sup>418</sup> in a manner appropriate for LAUSD. Specifically, the guidelines in the manual address the mandated post-construction element of the NPDES program requirements enforced by the Los Angeles RWQCB in the Los Angeles region.

There are two primary purposes of the LAUSD Stormwater Technical Manual:

1. To guide design architects and LAUSD's supervising design management staff during the planning and design stages of new and significant redevelopment school project planning to ensure that appropriate stormwater reduction and treatment elements are included in the final construction documents. The manual requires LAUSD to consider LID techniques and source control BMPs during the design, construction, and use of a facility. Any qualifying new

<sup>417</sup> Geosyntec. 2019. LAUSD Stormwater Technical Manual. Prepared for Los Angeles Unified School District. Revised October 2019.

<sup>418</sup> County of Los Angeles, Department of Public Works. 2008. *SUSMP Review Sheet*. [http://dpw.lacounty.gov/bsd/nas/library/documents/Drainage%20and%20Grading/Plan%20Check%20Documents/dg\\_pc~rev~-SUSMP%20Review%20Sheet%2006-13-2011.pdf](http://dpw.lacounty.gov/bsd/nas/library/documents/Drainage%20and%20Grading/Plan%20Check%20Documents/dg_pc~rev~-SUSMP%20Review%20Sheet%2006-13-2011.pdf).

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development and redevelopment projects on LAUSD property are to be designed to incorporate structural BMPs to meet the intent of the most current version of the County of Los Angeles LID Standards Manual<sup>419</sup>, which was written to comply with the Los Angeles Regional MS4 Permit.

2. To provide guidance to LAUSD Maintenance and Operations staff on implementation of source control BMPs and maintenance of structural treatment BMPs. This manual provides the best currently available guidance on post-construction stormwater management practices required for new and significantly redeveloped school sites, per School Design Guide Section 3.2.E., Storm and Sanitary Drainage.

Also as mentioned above, the LAUSD and the Los Angeles Department of Water and Power coordinated to develop a Stormwater Capture Master Plan to identify opportunities for stormwater capture in the northeast San Fernando Valley area<sup>420</sup>. The goal of the plan is to prevent pollution from urban areas to waters of the U.S., while contributing to the groundwater supply.

### 5.10.1.1.5.3 *LAUSD Compliance Checklist and Contracting Protocol for Stormwater Requirements at Construction Sites*

A Compliance Checklist for Stormwater Requirements at Construction Sites<sup>421</sup> (“Compliance Checklist”), issued by the LAUSD OEHS lists requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed in the Compliance Checklist include a SWPPP; BMPs for minimizing stormwater pollution to be specified in a SWPPP; and monitoring stormwater discharges to evaluate BMP performance and permit compliance.

For construction sites one acre or more, LAUSD contractors must enroll in the Construction General Permit (see details above), fully implement the site-specific SWPPP, and conduct all required monitoring and reporting. For projects with land disturbance *less than* one acre, enrollment in the Construction General Permit is not required. However, LAUSD requires any BMP indicated in the California Stormwater Quality Association (CASQA) BMP Handbook<sup>422</sup> preventing or minimizing stormwater pollution to be implemented by construction contractor (at no cost to LAUSD). In addition, the contractor shall prepare and submit a SWPPP for review and approval by the LAUSD.

### 5.10.1.1.5.4 *Other LAUSD Standards*

LAUSD has developed and implemented many programs at its sites to protect the environment and has done so without a permit mandate. These programs include, but are not limited to: Environmental Training Curriculum, Hazardous Waste Management Program, Medical Waste Management Program, Environmental

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<sup>419</sup> County of Los Angeles, Department of Public Works. 2014. *Design Manuals*. [https://dpw.lacounty.gov/des/Design\\_Manuals/](https://dpw.lacounty.gov/des/Design_Manuals/).

<sup>420</sup> Geosyntec. 2015. *Stormwater Capture Master Plan*.

[https://learninggreen.laschools.org/uploads/8/0/0/8/8000811/scmp\\_master\\_plan\\_final\\_presentation.pdf](https://learninggreen.laschools.org/uploads/8/0/0/8/8000811/scmp_master_plan_final_presentation.pdf).

<sup>421</sup> LAUSD. (No date). *Compliance Checklist for Storm Water Requirements at Construction Sites*. <https://achieve.lausd.net/cms/lib/CA01000043/Centricity/domain/135/pdf%20files/Stormwaterconstructionchecklistfinal.pdf>.

<sup>422</sup> CASQA. 2019. *Construction BMP Online Handbook*. <https://www.casqa.org/resources/bmp-handbooks>.



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Compliance Inspections, Safe School Inspections, Integrated Pest Management Program, Fats Oil and Grease Management Program, Solid Waste Management and Recycling Programs, Water Conservation and Drought Awareness Resolution<sup>423</sup>, Water Savings Resolution<sup>424</sup>, Energy and Resource Conservation Policy<sup>425</sup> (contains requirements for water conservation), and Sustainability and the Design and Construction of High Performance Schools<sup>426</sup>. Moreover, as described above, the LAUSD developed a post-construction stormwater white paper in 2007 and followed it, at the Los Angeles RWQCB's request, in 2009 with a technical manual for stormwater management. The technical manual and white paper set District policy for LID, design, and maintenance of post-construction BMPs. The white paper and manual were developed and implemented on a cooperative basis with the Los Angeles RWQCB<sup>427</sup> outside the confines of a permit mandate. The design of all new schools and modernization projects must incorporate, to the extent possible, CHPS and LEED green building criteria. The LAUSD works collaboratively with internal stakeholders to incorporate the most current high performance, resource-efficient strategies into the design, construction, and operation of schools and facilities. These policies act to reduce impacts from LAUSD facilities to surface and groundwater.

### 5.10.1.2 EXISTING CONDITIONS

#### 5.10.1.2.1 Regional Setting

The LAUSD has school sites in four watersheds: from north to south—Los Angeles River, Malibu, Ballona Creek, and Dominguez Channel and Los Angeles Harbor—Watersheds (see Figure 5.10-1, *Watersheds*). Malibu Creek Watershed has only one school site; the other three watersheds are discussed in the following subsections.

##### 5.10.1.2.1.1 Watersheds

The **Los Angeles River Watershed** spans 834 square miles<sup>428</sup>. The Los Angeles River is 55 miles long and due to major flood events at the beginning of the century, most of the river was lined with concrete by the 1950s<sup>429</sup>. Approximately 324 square miles of the watershed are covered by forest or open space land including the area near the headwaters which originate in the Santa Monica, Santa Susana, and San Gabriel Mountains. The rest

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<sup>423</sup> LAUSD. 2014. *Motions/Resolutions Presented to the Los Angeles Board of Education for Consideration, Subject: Water Conservation and Drought Awareness (Res-060-11/12)*.

<https://learninggreen.laschools.org/uploads/8/0/0/0/8000811/waterconservationanddroughtawareness2014.pdf>.

<sup>424</sup> LAUSD. 2010. *Motions/Resolutions Presented to the Los Angeles Board of Education for Consideration, Subject: Water Savings Reduction*. [https://learninggreen.laschools.org/uploads/8/0/0/0/8000811/lausd\\_water\\_savings\\_resolution\\_12-14-10.pdf](https://learninggreen.laschools.org/uploads/8/0/0/0/8000811/lausd_water_savings_resolution_12-14-10.pdf).

<sup>425</sup> LAUSD. 2015. *Energy and Resource Conservation Policy*. [https://learninggreen.laschools.org/uploads/8/0/0/0/8000811/bul-6513\\_energyconservationpolicy.pdf](https://learninggreen.laschools.org/uploads/8/0/0/0/8000811/bul-6513_energyconservationpolicy.pdf).

<sup>426</sup> LAUSD. 2003. *Motions/Resolutions Presented to the Los Angeles Board of Education for Consideration, Subject: Sustainability and the Design and Construction of High Performance Schools*. [https://learninggreen.laschools.org/uploads/8/0/0/0/8000811/sustainability\\_and\\_the\\_design\\_and\\_construction\\_of\\_high\\_performance\\_schools.pdf](https://learninggreen.laschools.org/uploads/8/0/0/0/8000811/sustainability_and_the_design_and_construction_of_high_performance_schools.pdf).

<sup>427</sup> Los Angeles RWQCB. 2006. *Post-Construction Stormwater Controls at LAUSD Construction Sites*. [https://www.waterboards.ca.gov/rwqcb4/water\\_issues/programs/stormwater/news/1-post-construction.pdf](https://www.waterboards.ca.gov/rwqcb4/water_issues/programs/stormwater/news/1-post-construction.pdf).

<sup>428</sup> County of Los Angeles, Department of Public Works. 2023. *Los Angeles River Watershed*. <https://dpw.lacounty.gov/wmd/watershed/la/>.

<sup>429</sup> SWRCB, Regional Water Quality Control Board 4. (No date). *Los Angeles River Watershed*. [https://www.waterboards.ca.gov/rwqcb4/water\\_issues/programs/regional\\_program/Water\\_Quality\\_and\\_Watersheds/los\\_angeles\\_river\\_watershed/la\\_summary.shtml](https://www.waterboards.ca.gov/rwqcb4/water_issues/programs/regional_program/Water_Quality_and_Watersheds/los_angeles_river_watershed/la_summary.shtml).

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of the watershed is highly developed<sup>26</sup>. Pollutants from dense clusters of residential, industrial, and other urban activities and point sources have impaired water quality in the middle and lower watershed. The effects of excessive nutrients, excessive metals, and high coliform loading are widespread problems in the watershed<sup>26</sup>.

The **Ballona Creek Watershed** is approximately 128 square miles and highly urbanized. It includes 540 acres of downstream wetlands. Water quality in Ballona Creek and its related tributaries is impaired by pollutants such as trash, metal, bacteria, and pesticides due to the watershed's large, dense population and its impervious ground surface that prevents runoff from infiltrating into underground aquifers<sup>430</sup>

The **Dominguez Channel and Los Angeles Harbor Watershed** covers approximately 109 square miles and is located in the southern portion of the Los Angeles Basin. Approximately 68 square miles of the watershed drains to the 15.7-mile-long Dominguez Channel, which begins in Hawthorne and discharges into the Los Angeles Harbor in the east basin. The remaining approximately 41 square miles, which includes Wilmington Drain and Machado Lake, drains directly to the Los Angeles Harbor independently of Dominguez Channel. Over 90% of the land area is developed. Residential use covers about 41% and another 44% is industrial, commercial, and transportation related. Overall, the watershed is approximately 61% impervious. Constructed waterways are predominant, however some small, natural creeks are located in the hills of the Palos Verdes Peninsula<sup>431</sup>. The Dominguez Channel and Los Angeles Harbor are impaired by pollutants (i.e., trash, metals, bacteria, nutrients) mainly because of the Watershed's large, dense population and the amount of impervious ground surface that prevents large quantities of runoff from infiltrating into the soils. Despite its industrial nature, contaminant sources, and low flushing ability, the inner Los Angeles harbor area supports fairly diverse fish and benthic populations and provides a protected nursery area for juvenile fish. Some wetlands persist in the Machado Lake area<sup>27</sup>.

### 5.10.1.2.1.2 Surface Water Quality

Section 303(d) of the Clean Water Act requires the identification of water bodies that do not meet, or are not expected to meet, water quality standards (i.e., impaired water bodies). The affected water body and associated pollutant or stressor is then prioritized in the 303(d) List. The Clean Water Act further requires the development of a TMDL for each listing. Pollutant source assessments conducted as part of SWPPP development for Construction General Permit and Industrial General Permit enrollment are required to consider whether the site or project has the potential to discharge applicable 303(d) and TMDL parameters.

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<sup>430</sup> City of Los Angeles, LA Sanitation. 2023. *Ballona Creek Total Maximum Daily Load (TMDL) Project*. [https://www.lacitiesan.org/san/faces/home/portal/s-lsh-sp/s-lsh-sp-scbp/s-lsh-sp-scbp-sfp/s-lsh-sp-scbp-sfp-bctmdl?\\_afzLoop=6352094227029150&\\_afzWindowMode=0&\\_afzWindowId=null&\\_afzCtrlState=tj809x4xk\\_1#!%40%40%3F\\_afzWindowId%3Dnull%26\\_afzLoop%3D6352094227029150%26\\_afzWindowMode%3D0%26\\_afzCtrlState%3Dtj809x4xk\\_5](https://www.lacitiesan.org/san/faces/home/portal/s-lsh-sp/s-lsh-sp-scbp/s-lsh-sp-scbp-sfp/s-lsh-sp-scbp-sfp-bctmdl?_afzLoop=6352094227029150&_afzWindowMode=0&_afzWindowId=null&_afzCtrlState=tj809x4xk_1#!%40%40%3F_afzWindowId%3Dnull%26_afzLoop%3D6352094227029150%26_afzWindowMode%3D0%26_afzCtrlState%3Dtj809x4xk_5).

<sup>431</sup> City of Los Angeles, LA Sanitation. 2023. *Dominguez Channel*. [https://www.lacitiesan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-wp/s-lsh-wwd-wp-ewmp/s-lsh-wwd-wp-ewmp-de?\\_afzLoop=486494032612181&\\_afzWindowMode=0&\\_afzWindowId=null&\\_afzCtrlState=bpaor3797\\_1#!%40%40%3F\\_afzWindowId%3Dnull%26\\_afzLoop%3D486494032612181%26\\_afzWindowMode%3D0%26\\_afzCtrlState%3Dbpaor3797\\_5](https://www.lacitiesan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-wp/s-lsh-wwd-wp-ewmp/s-lsh-wwd-wp-ewmp-de?_afzLoop=486494032612181&_afzWindowMode=0&_afzWindowId=null&_afzCtrlState=bpaor3797_1#!%40%40%3F_afzWindowId%3Dnull%26_afzLoop%3D486494032612181%26_afzWindowMode%3D0%26_afzCtrlState%3Dbpaor3797_5).



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**Los Angeles River:** Segments of the Los Angeles River are 303(d)-listed for the following parameters:<sup>432</sup>

- Los Angeles River Reach 1 (Estuary to Carson Street) (3.38 miles): ammonia, cadmium, copper, dissolved cyanide, indicator bacteria, lead, nutrients (algae), pH, trash, and dissolved zinc
- Los Angeles River Reach 2 (Carson to Figueroa Street) (18.78 miles): ammonia, copper, indicator bacteria, lead, nutrients (algae), oil, and trash
- Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.) (7.93 miles): ammonia, copper, indicator bacteria, lead, nutrients (algae), toxicity, and trash
- Los Angeles River Reach 4 (Sepulveda Dr. to Sepulveda Dam) (11.11 miles): indicator bacteria, nutrients (algae), toxicity, and trash
- Los Angeles River Reach 5 (within Sepulveda Basin) (1.94 miles): ammonia, benthic community effects, copper, lead, nutrients (algae), oil, toxicity, and trash
- Los Angeles River Reach 6 (Above Sepulveda Flood Control Basin) 7 miles): copper, indicator bacteria, selenium, and toxicity

**Ballona Creek:** Ballona Creek (6.5 miles) is 303(d)-listed for copper, cyanide, indicator bacteria, lead, toxicity, trash, viruses (enteric), and zinc. Ballona Creek Estuary (2.25 miles) is 303(d)-listed for cadmium, chlordane, copper, Dichlorodiphenyltrichloroethane (DDT), indicator bacteria, lead, polycyclic aromatic hydrocarbons (PAHs), and PCBs, silver, toxicity, and zinc. The Ballona Creek Wetlands (289.2 acres) are 303(d)-listed for exotic vegetation, habitat alterations, and reduced tidal flushing, and trash

The Watershed has the following TMDLs:

- Ballona Creek Trash
- Ballona Creek Estuary Toxic Pollutants
- Ballona Creek, Ballona Estuary, and Sepulveda Channel Bacteria
- Ballona Creek Metals

**Dominguez Channel:** Portions of the Dominguez Channel are listed under Section 303(d) for contamination: the lined portion above Vermont Ave. (6.77 miles) is 303(d)-listed for copper, diazinon, indicator bacteria, lead, toxicity, zinc; the estuary or unlined portion below Vermont Ave. (140.3 miles) is listed for benthic community effects, benzo(a)pyrene, benzo(a)anthracene, chlordane, chrysene, copper, DDT, dieldrin, indicator bacteria, lead, PCBs, phenanthrene, pyrene, and toxicity. Dominguez Channel and Los Angeles Harbor has a TMDL

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<sup>432</sup> SRWCB. 2023. 2020-2022 Integrated Report.  
[https://www.waterboards.ca.gov/water\\_issues/programs/water\\_quality\\_assessment/2020\\_2022\\_integrated\\_report.html](https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2020_2022_integrated_report.html).

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toxic pollutants to address 79 impairments in the water column, sediment, and fish tissue; impairments included metals, PAHs, and chlorinated organic compounds.

### 5.10.1.2.1.3 *Groundwater*

California Code of Regulations Title 22 requires all wells used for potable water supplies to be sampled at least once every three years for chloride, sulfate, and total dissolved solids, and, at least annually, for nitrate. In addition, all wells are sampled for minerals, physical characteristics, inorganics, radioactivity, VOCs, and various emerging contaminants on a regular and continuous basis. All data is provided to the State Water Resources Control Board, Division of Drinking Water (DDW). The District locations overlie the San Fernando Valley, Raymond, San Gabriel Valley, and Coastal Plain of Los Angeles Groundwater Basins (see Figure 5.10-2, *Groundwater Basins*).<sup>433</sup> A brief summary of the Basins' water quality status is provided in the following subsections.

#### 5.10.1.2.1.3.1 *San Fernando Valley*

Half of the Los Angeles Department of Water and Power's 115 groundwater wells in the San Fernando Valley are inactive due to groundwater contamination. Industrial contamination issues are the principal reason for restricted use of local groundwater pumping<sup>434</sup>. Much of LADWP's pumping capacity has been impaired by contaminants, primarily VOCs. In the San Fernando Basin, more than 80 of the Department's 115 water supply wells have been removed from service or restricted in use. These issues have caused a renewed focus on sustainable management of local groundwater basins.

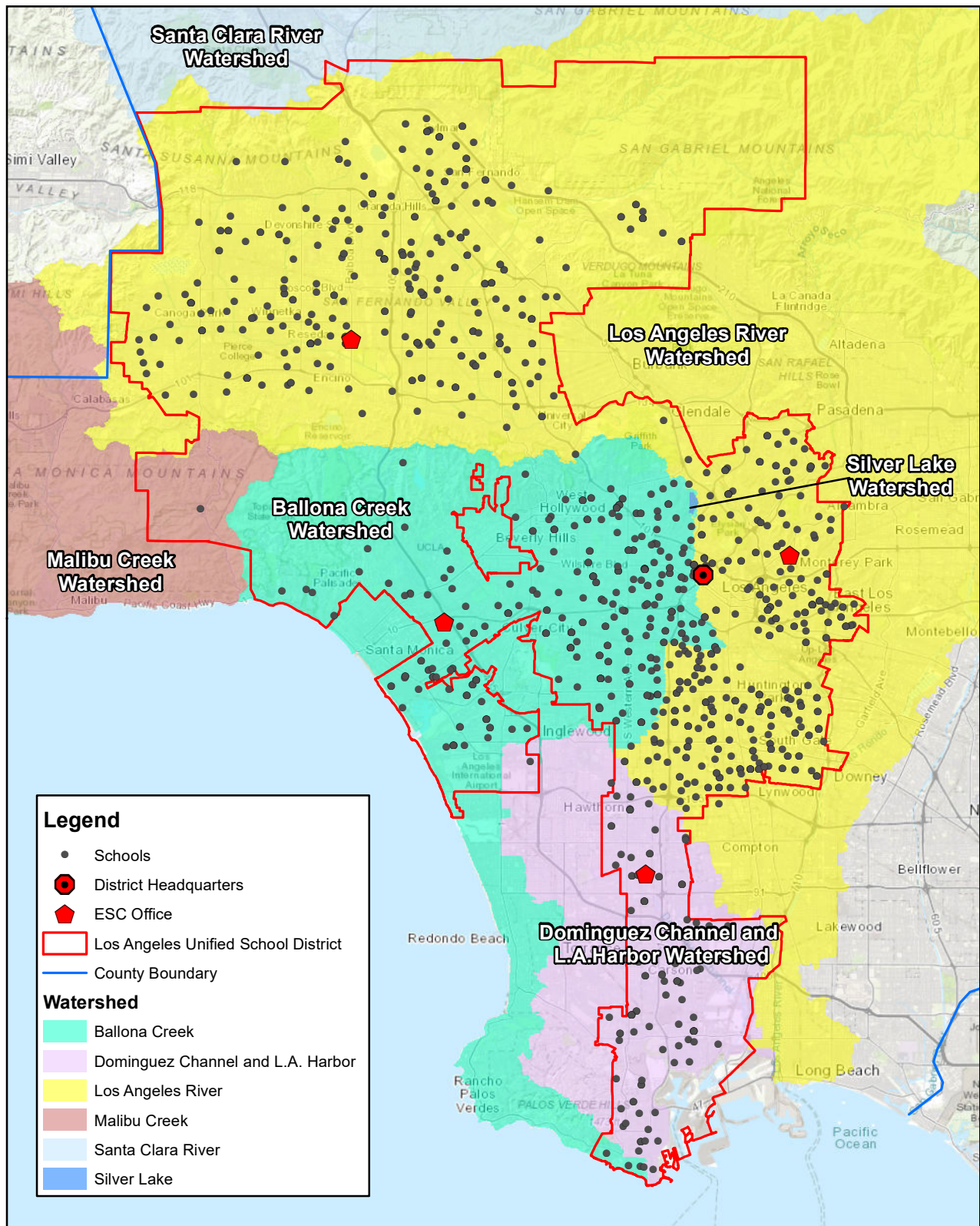
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<sup>433</sup> California DWR. 2013. GIS data layer.

<sup>434</sup> Los Angeles Department of Water and Power. 2015. *Urban Water Management Plan*. <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/M217.pdf>.

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### Figure 5.10-1 Watersheds



Source: City of Los Angeles, 2023

0 3 6 Miles



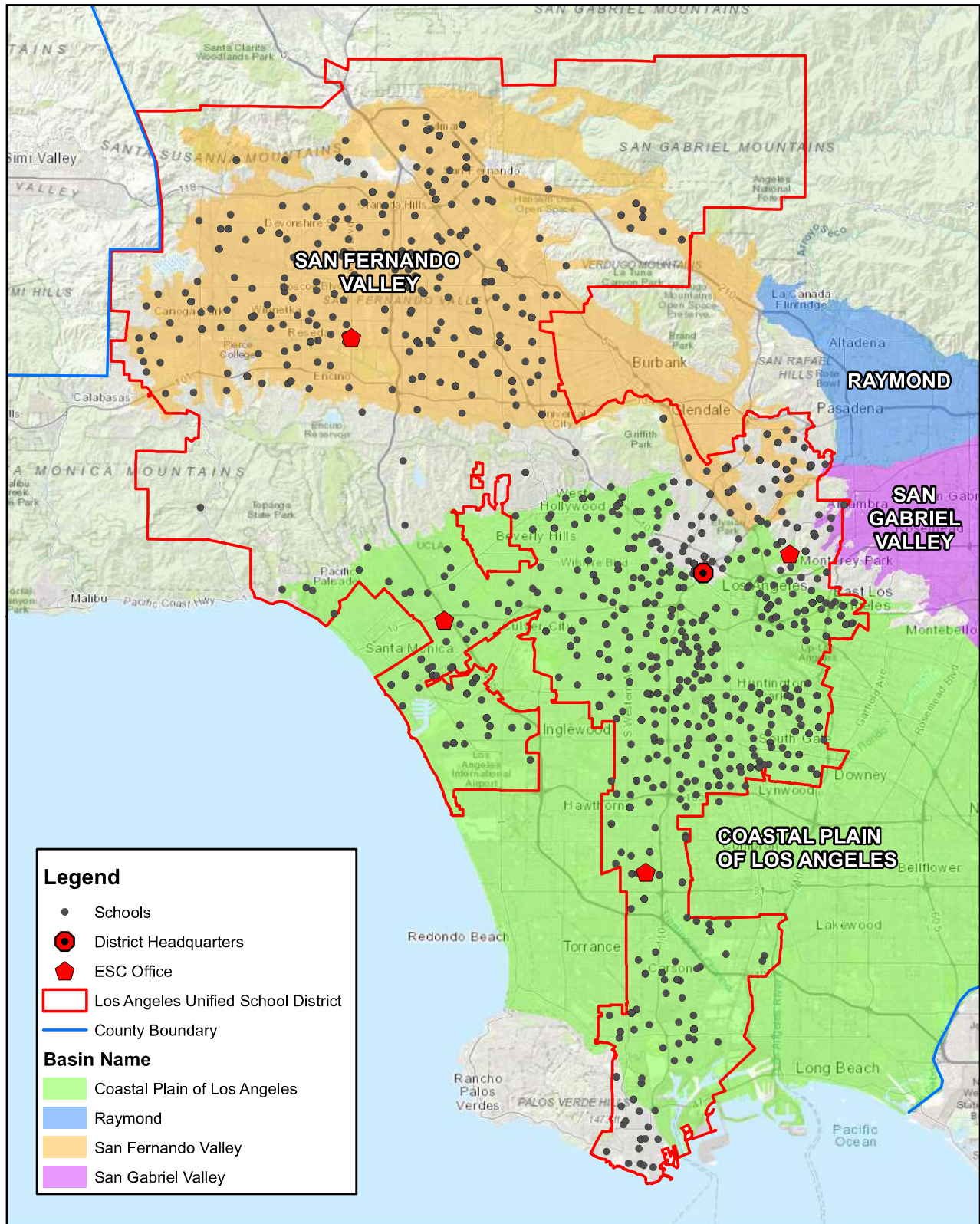
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### Figure 5.10-2 Groundwater Basins



Source: California Department of Water Resources, 2022

0 3 6 Miles



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### 5.10.1.2.1.3.2 *Raymond Basin*

The Raymond Basin has 74 production wells and 22 are inactive<sup>435</sup>. Impairments include periodic exceedances of fluoride near the San Gabriel Mountains, nitrate concentrations near Pasadena, VOCs near Arroyo Seco, and radiation is occasionally detected near the San Gabriel Mountains. A Superfund site exists near the Jet Propulsion Laboratories because of perchlorate contamination<sup>436</sup>.

### 5.10.1.2.1.3.3 *San Gabriel Basin*

San Gabriel Valley Basin has 250 wells, 200 of which are active<sup>437</sup>. Groundwater accounts for approximately 85% of the basin's water supply<sup>438</sup>. Four areas of the San Gabriel Valley Groundwater Basin are Superfund sites due to contamination from trichloroethylene, perchloroethylene, carbon tetrachloride, perchlorate, N-Nitrosodimethylamine, and 1, 4-Dioxane. Cleanup is occurring in at least one of the areas.

### 5.10.1.2.1.3.4 *Coastal Plain of Los Angeles Basin*

The Coastal Plain Basin has two sub-basins; West Coast Basin and Central Basin. Combined, the basins have 423 active wells<sup>439</sup>. The basin serves 4 million residents in 43 cities over 420 square miles. Groundwater accounts for approximately 50% of the basin's water supply<sup>54</sup>. Water quality problems associated with hydrocarbon pollutants caused Los Angeles Department of Water and Power to discontinue using its West Coast Basin facilities. Declining groundwater levels and overdraft conditions have become additional concerns for Los Angeles basins, where decades of expanding urbanization, increasing impervious hardscape, and channelization of stormwater runoff have diverted natural replenishment away from local aquifers. Aging wellfields and distribution system infrastructure has also presented challenges to the development and use of the City's local groundwater resources<sup>440</sup>.

The West Coast Basin Seawater Barrier and the Dominguez Gap Barrier were constructed to prevent seawater intrusion into the aquifer. The barriers consist of a series of injection wells positioned linearly between the ocean and the aquifer. LACFCD owns, operates, and maintains the barrier projects. WRD purchases the water that is injected into the barriers. WRD protects the Basin through groundwater replenishment, deterrence of sea water intrusion, and groundwater quality monitoring.

<sup>435</sup>Zampello, Tony. 2009. *Groundwater Management in the San Gabriel Valley*. <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fdpw.lacounty.gov%2Fwmd%2Fhwmp%2Fdocs%2FAgency%2520Overview%2520IRWMP%2520Leadership%25205-09%2520ILppt&wdOrigin=BROWSELINK>.

<sup>436</sup> California Department of Water Resources. 2004. *Raymond Groundwater Basin, Bulletin 118*. [https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/4\\_023\\_Raymond.pdf](https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/4_023_Raymond.pdf).

<sup>437</sup> Main San Gabriel Basin Watermaster. (No date). 2021-2022 *Annual Report*. [https://www.watermaster.org/files/ugd/af1ff8\\_a25dc5d6666f4339a54b5965f8d29a63.pdf](https://www.watermaster.org/files/ugd/af1ff8_a25dc5d6666f4339a54b5965f8d29a63.pdf).

<sup>438</sup>Main San Gabriel Basin Watermaster. (No date). 2021-2022 *Annual Report*. [https://www.watermaster.org/files/ugd/af1ff8\\_a25dc5d6666f4339a54b5965f8d29a63.pdf](https://www.watermaster.org/files/ugd/af1ff8_a25dc5d6666f4339a54b5965f8d29a63.pdf).

<sup>439</sup> Water Replenishment District. 2021. *A Tale of Two Groundwater Basins Webinar with Orange County Water District (OCWD)*, presented by Brian Partington, PG, CHG. April 28.

<sup>440</sup> Los Angeles Department of Water and Power. 2015. *Urban Water Management Plan*. <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/M217.pdf/>.

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### 5.10.1.2.2 Flood Hazards

#### 5.10.1.2.2.1 Designated Flood Zones

One-hundred-year flood zones within the LAUSD boundary are generally along waterways—such as the Los Angeles River, Tujunga Wash, and Ballona Creek—and in some low-lying areas of the Los Angeles Basin, such as parts of southwest Los Angeles and parts of the City of Carson and Community of Wilmington (see Figure 5.10-3, *Flood Zones*).

#### 5.10.1.2.2.2 Seismically Induced Dam Inundation

Parts of the LAUSD are in dam inundation zones; the dams are listed by their watersheds.

##### 5.10.1.2.2.2.1 Los Angeles Watershed: San Fernando Valley and Surroundings

Parts of the eastern San Fernando Valley are in dam inundation areas of the following dams (all information obtained from California Department of Water Resources Division of Safety of Dams *California Dam Breach Inundation Maps* (2023)<sup>441</sup>:

- Hansen Dam on the Tujunga Wash, near the Community of Lake View Terrace in the City of Los Angeles.
- Los Angeles Reservoir near the Community of Sylmar in the City of Los Angeles
- Lower San Fernando Reservoir
- Encino Reservoir and Stone Canyon in the Santa Monica Mountains
- Sepulveda Dam on the Los Angeles River near the Community of Van Nuys in the City of Los Angeles
- Pacoima Reservoir on Pacoima Wash north of the City of San Fernando
- Schoolhouse and Wilson Debris Basins, north of Sylmar
- Big Tujunga No. 1 on Tujunga Creek four miles north of the City of La Cañada-Flintridge

##### 5.10.1.2.2.2.2 Los Angeles Watershed: Los Angeles Basin

- Lower Franklin and Greystone Reservoir, north of Beverly Hills
- Mulholland, Silver Lake, and Elysian, between Hollywood and downtown Los Angeles
- La Tuna, Blanchard, Stough, Lower Sunset, and Brand, Debris Basins between Sun Valley, Burbank, and Tujunga to La Canada Flintridge

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<sup>441</sup> California Department of Water Resources, Division of Safety of Dams. 2023. *California Dam Breach Inundation Maps* (GIS). <https://fnds.water.ca.gov/maps/damim/>.



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- Glenoaks 968 Reservoir and Eagle Rock Reservoir between Glendale and Pasadena
- Devil's Gate Dam on the Arroyo Seco in the City of Pasadena. The part of the dam inundation area for Devil's Gate Dam in the District is a narrow area along the Arroyo Seco next to the communities of Highland Park and Mount Washington in the City of Los Angeles
- Whittier Narrows Dam on the San Gabriel River and Rio Hondo in the City of Montebello and in unincorporated Los Angeles County

### 5.10.1.2.2.3 Dominguez Watershed

- Palos Verdes Reservoir in the City of Rolling Hills Estates in the Palos Verdes Hills

### 5.10.1.2.3 Seiches

A seiche is a surface wave created when an inland water body is shaken, usually by an earthquake. The greatest potential flood hazard from seiches in the District is overtopping or failure of a dam, addressed above under *Seismically Induced Dam Inundation*.

### 5.10.1.2.4 Tsunamis

California 'Tsunami Hazard Area Map' are produced collectively by the California Governor's Office of Emergency Services, the California Geological Survey, AECOM Technical Services, and the Tsunami Research Center at the University of Southern California. The tsunami inundation area extends inland about 1.6 miles from the Pacific Ocean in the Community of Marina Del Rey in unincorporated Los Angeles County (including portions of the community of Venice Beach) and to about 1.7 miles inland from the shore of the Los Angeles Harbor in the Community of Wilmington in the City of Los Angeles.<sup>442</sup> In most other coastal parts of the District, such as the Communities of Pacific Palisades and Playa Del Rey in the City of Los Angeles, the tsunami inundation area is limited to within several hundred feet of the coast.

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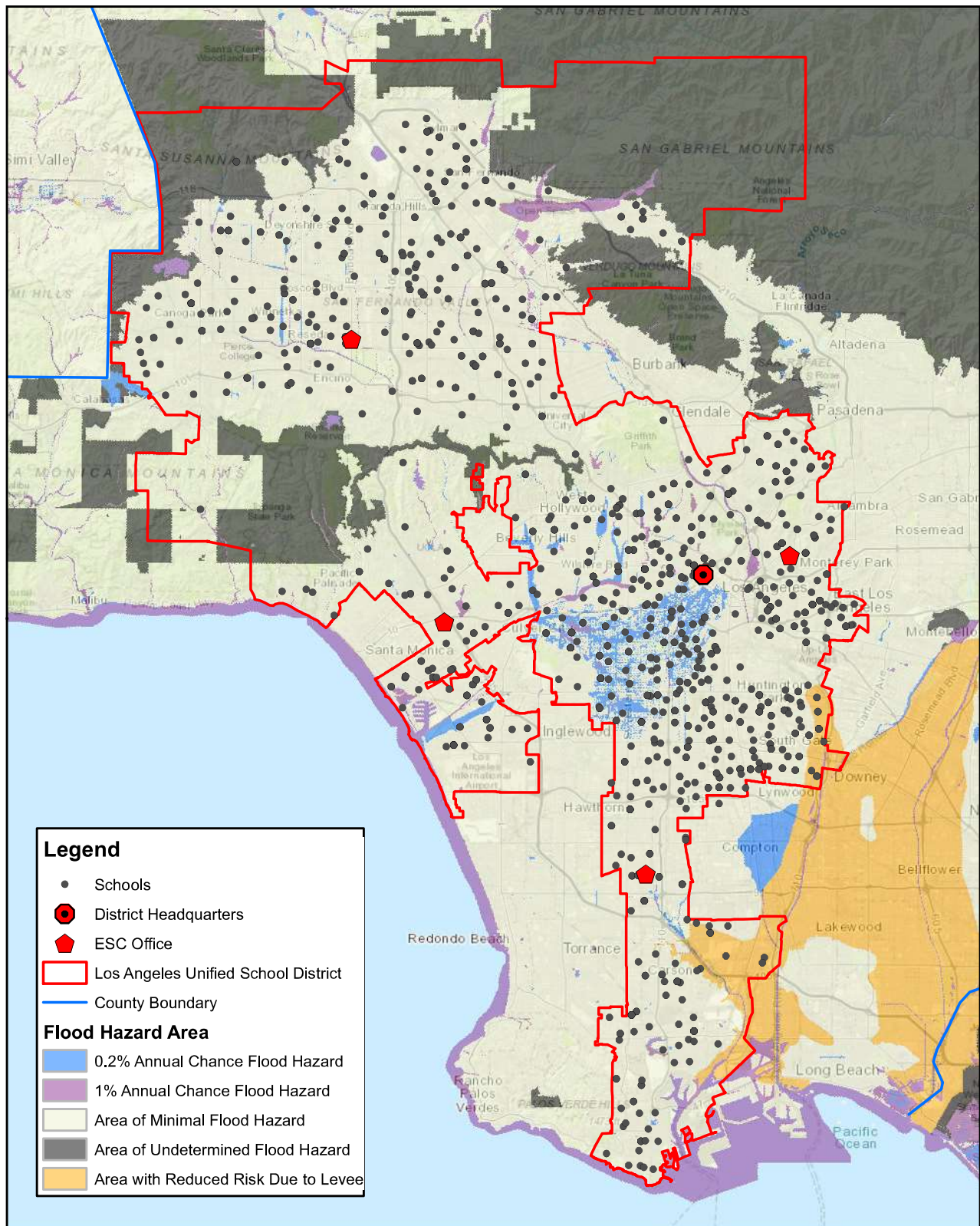
<sup>442</sup> California Department of Conservation. 2023. *Los Angeles County Tsunami Hazard Areas*. <https://www.conservation.ca.gov/cgs/tsunami/maps/los-angeles>.

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## 5. Environmental Analysis

### Figure 5.10-3 Flood Zones



Source: FEMA, 2020

0 3 6 Miles



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### 5.10.1.2.5 Mudflows and Debris Flows

A mudflow is a landslide composed of saturated rock debris and soil with a consistency of wet cement. Areas that could be subject to mudflows are at the bases of foothills and mountains; canyons and areas immediately below the mouths of canyons; and washes. Such areas are found in and along the margins of the San Gabriel Mountains, Santa Susana Mountains, Simi Hills, and Santa Monica Mountains. Most of the urbanized parts of the District are on broad alluvial plains are less likely to be subject to mudflows. In recent years, mudflows have occurred during significant storm events in wildfire-impacted areas. Los Angeles County Department of Public Works publishes a *Debris and Mudflow Potential Forecast*<sup>443</sup> that applies to communities for which Mudflow Phase Maps have been prepared.

### 5.10.2 Thresholds of Significance

According to CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project would:

HWQ-1 Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

HWQ-2 Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

HWQ-3 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 a substantial erosion or siltation on- or off-site; 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.

HWQ-4 In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

HWQ-5 Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

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<sup>443</sup> County of Los Angeles, Department of Public Works. 2023. *Debris and Mudflow Potential Forecast*. <https://dpw.lacounty.gov/wrd/forecast/>.

## 5. Environmental Analysis

### 5.10.3 Environmental Impacts

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**Impact 5.10-1: SUP-related projects would not violate any water quality standards or waste discharge requirements. [Threshold HWQ-1]**

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#### 5.10.3.1.1 All SUP Projects

Stormwater can run off surfaces such as rooftops, paved streets, highways, and parking lots and can carry pollutants such as: oil, chemicals, sediment, waste, trash, bacteria, and metals. The polluted runoff can then drain directly into a MS4 or directly into a water body. Additionally, urban areas have increased impervious surfaces compared to the land's natural state, which contribute to an increase in runoff velocity and volume. As a result, stream hydrology is impacted through streambed and channel scouring, in-stream sedimentation, and loss of aquatic and riparian habitat. In addition to hydrological impacts, impervious surfaces can contribute to greater pollutant loading, resulting in turbid water, nutrient enrichment, bacterial contamination, trash loading, and increased temperature and salinity due a reduction of vegetation cover. However, with appropriate measures in place, impacts to water bodies from SUP projects can greatly be reduced or eliminated.

##### 5.10.3.1.1.1 Construction Impacts

The SUP would include projects that require grading and other construction activities (i.e., use and storage of construction materials, storage, and disposal of solid and hazardous waste, etc.) that could cause deterioration of water quality if construction-related pollutants discharge to surface waters or a MS4. For projects that would disturb more than one-acre, potential construction impacts would be mitigated by complying with the Construction General Permit, which includes the following steps:

- Assess the project and its potential pollutants.
- Develop a SWPPP that complies with the Construction General Permit.
- Enroll in the Construction General Permit by filing a Notice of Intent with the SWRCB.
- Implement erosion, sediment, material, and waste management and good housekeeping BMPs described in the SWPPP.
- Conduct dewatering in accordance with the SWPPP (projects not covered under the Construction General Permit will likely need to comply with the Dewatering General Permit).
- Install post-construction BMPs, per the LAUSD's Stormwater Technical Manual.
- Comply with the Construction General Permit's final stabilization requirements and file a Notice of Termination.
- Operate and/or implement and maintain post-construction BMPs long-term.

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The LAUSD's Compliance Checklist (as described in SC-HWQ-2) would be used by LAUSD to verify compliance with the Construction General Permit.

Projects that disturb under an acre of land are not required to be enrolled in the Construction General Permit. These projects are expected to have a lower potential for impacts to water quality compared to projects that disturb an acre or greater; however, some potential does exist and should be assessed on a case-by-case basis. By implementing SC-HWQ-4, specifically the Environmental Training Curriculum, Hazardous Waste Management Program, Environmental Compliance Inspections, Solid Waste Management Program, these impacts would be mitigated. Post-construction stormwater runoff impacts will be mitigated by the implementation of LAUSD's Stormwater Technical Manual, CalGreen and CHPS standards (SC-HWQ-1), and LAUSD's Stormwater BMP Maintenance and Operations Manual (SC-HWQ-3). By complying with the Construction General Permit, implementing LAUSD's Stormwater Technical Manual, CalGreen, and CHPS standards, the LAUSD Stormwater BMP Maintenance and Operations Manual, and SW-HWQ-4, construction and post-construction impacts will be mitigated.

### 5.10.3.1.1.2 Operational Impacts

New and expanded schools will be designed to reduce impacts to stormwater quality long-term. BMPs will be implemented to reduce or eliminate stormwater pollutants from school activities, per the LAUSD Stormwater BMP Maintenance and Operations Manual. Additionally, the student population of the LAUSD is expected to decline in the future (Section 4.3.1) and it's probable that stormwater pollution would also decline with this.

The LAUSD supports the Los Angeles Department of Water and Power/Metropolitan Water District initiative to replace turf with drought-tolerant landscaping to reduce LAUSD's water consumption, which also reduces the potential for non-stormwater discharges (i.e., irrigation runoff) and stormwater pollution by fertilizers and pesticides. Additionally, the LAUSD revised its approved plant palette to encourage the use of native and drought-tolerant landscaping on academic and administrative campuses and smart irrigation systems have been installed on 84 LAUSD campuses<sup>444</sup>. The LAUSD's water conservation and pollution prevention outreach campaigns include the Save the Drop initiative and the DROPS and Proposition 84 programs. The District is also working with several community-based organizations that provide programs that raise awareness about water stewardship<sup>68</sup>.

Compliance with applicable laws, regulations, and LAUSD policies and standards during project construction and operation would ensure that impacts associated with water quality standards or waste discharge requirements are less than significant.

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<sup>444</sup> Geosyntec. 2015. *Stormwater Capture Master Plan*. <https://learninggreen.laschools.org/water-stewardship.html>.



## 5. Environmental Analysis

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**Impact 5.10-2: SUP-related projects would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. [Threshold HWQ-2]**

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### 5.10.3.1.2 All SUP Projects

SUP-related projects would not result in any substantial changes in the quantity of groundwater supplies or interfere substantially with groundwater recharge. No groundwater extraction activities would occur, and no wells would be constructed. Additionally, the SUP is not growth-inducing. Water use by the LAUSD, including groundwater, is based on the number of students in the District. Since there is an expected decline in student population over time (Section 4.3.1), impacts to groundwater supply would also be reduced. Therefore, there is no growth-induced groundwater impact.

The creation of new impervious surface typically reduces some percolation of stormwater to underlying aquifers (if present); however, SUP project design features would include LID measures and green infrastructure installed per LAUSD's Stormwater Technical Manual and CalGreen and CHPS standards to control runoff from the newly impervious areas and promote onsite percolation, such as permeable pavement, infiltration trenches, bioswales, etc. Per the Stormwater Technical Manual, projects<sup>445</sup> are required to retain the full stormwater quality design volume (SWQDv) onsite through infiltration, evapotranspiration, or a combination thereof, unless it is demonstrated that it is technically infeasible to do so. If alternative compliance measures such as biofiltration are used, they must be designed to capture and treat 1.5 times the portion of the SWQDv not retained onsite.

Furthermore, LAUSD has a comprehensive program of water stewardship programs that include water efficiency, stormwater capture, recycled water, and increased conservation behavior through education and awareness. The LAUSD partners with the City of Los Angeles, Los Angeles Department of Water and Power, the Metropolitan Water District, TreePeople, the Council for Watershed Health, and the State Water Resources Control Board to accomplish its goals of reducing water consumption, potable water use, and groundwater pollution and replenishing underground aquifers via awareness of water stewardship<sup>446</sup>.

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<sup>445</sup> Per the Stormwater Technical Manual, projects requiring LID implementation are:

1. New projects with disturbed soil over one acre and that add at least 10,000 square feet of impervious area, or parking lots of 5,000 square feet or more, or parking lots with 25 or more parking spaces.
2. Redevelopment projects that create, add, or replace 5,000 square feet or more of impervious area. For redevelopment projects altering more than 50% of the existing impervious area and the existing development does not have post-construction stormwater quality control measures, then the entire project site must meet the requirements of the County of Los Angeles LID Standards Manual. For redevelopment projects altering less than 50% of the existing impervious area, only the proposed alteration must meet the requirements of the County of Los Angeles LID Standards Manual.
3. Redevelopment does not include routine maintenance activities that are conducted to maintain original line and grade, hydraulic capacity, original purpose of facility, or emergency redevelopment activity required to protect public health and safety.
4. Impervious surface replacement, such as the reconstruction of parking lots and roadways, which does not disturb additional area and maintains the original grade and alignment, is considered routine maintenance activity. Redevelopment does not include repaving of existing roads to maintain original line and grade.

<sup>446</sup> Geosyntec. 2015. *Stormwater Capture Master Plan*. <https://learninggreen.laschools.org/water-stewardship.html>.



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This would mitigate any impacts from newly created impervious surfaces to groundwater recharge. Compliance with applicable laws, regulations, and LAUSD Standards during project construction and operation would ensure that impacts associated with groundwater supplies are less than significant.

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**Impact 5.10-3: SUP-related projects 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 through the addition of impervious surfaces, in a manner which would: i) result in a substantial erosion or siltation on- or off-site; 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. [Threshold HWQ-3]**

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### 5.10.3.1.3 All SUP Projects

The SUP projects' potential to substantially alter the existing drainage pattern of the project sites or surrounding areas (although the alteration of the course of a stream or river would be unlikely) in a manner which would result in substantial on- or off-site erosion, siltation, or flooding is less than significant with the implementation of LAUSD plans and policies. The LAUSD has standard conditions that apply to all projects that require compliance with applicable NPDES stormwater permit requirements, restrict sediment flows into storm drainage systems, and compliance with the LAUSD's Stormwater Technical Manual. Additionally, compliance with applicable laws, regulations during project siting, construction and operation would ensure that impacts associated with alteration of the drainage pattern that would result in substantial erosion or siltation on- or off-site, are less than significant.

### 5.10.3.1.4 During Construction

For projects greater than one-acre, the project SWPPP and minimum BMPs implemented during the project's construction activities would include, as applicable:

- Minimize disturbed areas of the site;
- Preserve existing vegetation to the maximum extent practicable;
- Re-vegetate exposed areas as quickly as possible, with a maximum of 14 days of inactivity;
- Implement erosion and sediment control practices;
- Implement dust control measures, such as silt fences and regular watering of areas;
- Stabilize construction entrances/exits and construction roads;
- Install storm drain inlet protection measures; and
- Install linear sediment control measures, such as silt fences and fiber rolls, around the perimeter and on slopes.

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New construction, modernization, repair, replacement, upgrade, remodel, renovation and installation projects on existing school campuses would include stormwater BMPs where required. These BMPs would be adequately designed to accommodate site runoff, so that it would not adversely impact downstream storm drain facilities or provide substantial additional sources of polluted runoff. In addition, California Government Code Section 53097 requires school districts to comply with city and county ordinances regulating drainage improvements and requiring review and approval of grading plans as they relate to design and construction of on-site improvements that affect drainage. LAUSD would comply with Section 53097 in implementing the SUP. This compliance would ensure that school projects would not have a significant adverse effect on the local drainage system. The implementation of engineered drainage improvements would ensure that impacts to existing or planned drainage system would be less than significant.

### 5.10.3.1.5 Post-Construction

Depending on the location of future projects, new projects could alter the existing drainage pattern of a site or area or increase the rate or amount of surface runoff; however, the SUP projects would be designed so they do not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; therefore, impacts are less than significant. The operational phase of projects implemented under the SUP may incorporate a number of features outlined in the LAUSD Technical Manual to reduce the impact of erosion and siltation. The site design, source control, and treatment control BMPs for the operational phase would include, as applicable:

- Use native or drought-tolerant vegetation and shrubs on slope areas;
- Drain rooftop runoff into landscaped areas and/or planters;
- Use natural drainage swales and energy dissipaters at the outlets of storm drains or culverts; and
- Control erosion and runoff through the use of brow ditches on slopes.

Drainage patterns within the LAUSD area are well established, with most drainage channels owned and operated by Los Angeles County and local cities, resulting in low potential for drainage alteration in most areas. However, new construction, modernization, repair, replacement, upgrade, remodel, renovation and installation projects on existing school campuses in outlying areas could potentially alter drainage patterns. The LAUSD SC-HWQ-1 requires collecting surface runoff in a stormwater collection system designed for 25-year peak runoff rates. Compliance with applicable laws, regulations, and LAUSD SC-HWQ-1 through SC-HWQ-5 during project construction and operation would ensure that impacts associated with drainage and flooding are less than significant.

## 5. Environmental Analysis

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**Impact 5.10-4: SUP-related projects would not substantially alter the existing drainage pattern of the site or area, or increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. [Threshold HWQ-4]**

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### 5.10.3.1.6 New Construction on New Property

Depending on the location of future projects, new projects could alter the existing drainage pattern of a site or area, or increase the rate or amount of surface runoff. LAUSD has standard measures that require collection of stormwater runoff, compliance with any applicable NPDES stormwater permit, and compliance with the District's Stormwater Technical Manual. Additionally, compliance with applicable laws, regulations, and LAUSD SC-HWQ-1 through SC-HWQ-3 during construction and operation would ensure that impacts associated with alteration of the drainage pattern that would increase the rate or amount of surface runoff and would result in flooding on- or off-site, are less than significant.

### 5.10.3.1.7 New Construction and Modernization on Existing Campus

Drainage patterns within this area are well established, with most drainage channels owned and operated by Los Angeles County and local cities, resulting in low potential for drainage alteration in most areas. However, New construction, modernization, repair, replacement, upgrade, remodel, renovation and installation projects on existing school campuses in outlying areas could potentially alter drainage patterns. The LAUSD SC-HWQ-1 requires collecting surface runoff in a stormwater collection system designed for 25-year peak runoff rates. This condition would partially avoid drainage impacts, particularly for on-site flows, but may not adequately address off-site flows. The Education Code, however, requires that school sites not be within a flood zone unless the cost of mitigating the flood or inundation impact is reasonable (Sections 17212 and 17215.5). Mitigation in flood hazard areas could include importing fill to elevate the site above the floodplain or diversion of flows around the site, which could increase the flood hazard onto adjacent properties. This requirement would discourage locating schools in flood zones where drainage patterns could be disturbed. Compliance with applicable laws, regulations, and LAUSD SC-HWQ-1 through SC-HWQ-5 during project construction and operation would ensure that impacts associated with drainage and flooding are less than significant.

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**Impact 5.10-5: SUP-related projects 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. [Threshold HWQ-5]**

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### 5.10.3.1.8 New Construction on New Property

Depending on the location of future projects, new projects could create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems. Site-specific project design would include provisions to control surface runoff, and the requirements of applicable NPDES permits and Standard Urban Stormwater Mitigation Plans would be included. For example, the LAUSD requires the collection of stormwater runoff, compliance with any applicable NPDES stormwater permit, and compliance with the District's Stormwater Technical Manual. Compliance with applicable laws, regulations, and LAUSD SC-HWQ-1, SC-HWQ-2SC-HWQ-3, and SC-HWQ-3 during project siting, construction, and operation would ensure

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that impacts associated with runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, are less than significant.

### New Construction and Modernization on Existing Campus

New construction, modernization, repair, replacement, upgrade, remodel, renovation, and installation projects on existing school campuses would include stormwater BMPs where required. These BMPs would be adequately designed to accommodate site runoff, so that it would not adversely impact downstream storm drain facilities or provide substantial additional sources of polluted runoff. In addition, California Government Code Section 53097 requires school districts to comply with city and county ordinances regulating drainage improvements and requiring review and approval of grading plans as they relate to design and construction of on-site improvements that affect drainage. LAUSD would comply with Section 53097 in implementing the SUP. This compliance would ensure that school projects would not have a significant adverse effect on the local drainage system. The implementation of engineered drainage improvements would ensure that impacts to existing or planned drainage system would be less than significant.

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**Impact 5.10-6: SUP-related projects would not otherwise substantially degrade water quality. [Threshold HWQ-6]**

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#### 5.10.3.1.9 All SUP Projects

As discussed under Impacts 5.10-1 through 5.10-5, the SUP may increase stormwater runoff, which potentially could impact water quality. However, SUP-related projects would incorporate existing LAUSD Standard Conditions and comply with regulations during design, construction, and operation. Appropriate design measures would be recommended to ensure that impacts are less than significant.

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**Impact 5.10-7: SUP-related projects would not place housing within a 100-year flood hazard area. [Threshold HWQ-7]**

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#### 5.10.3.1.10 All SUP Projects

No residential development is planned as part of the SUP. Therefore, the SUP would not place housing within a 100-year flood hazard area.

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**Impact 5.10-8: SUP-related projects would not place structures within a 100-year flood hazard area that would impede or redirect flood flows. [Threshold HWQ-8]**

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#### 5.10.3.1.11 All SUP Projects

New structures on new property, and new structures or replacement/installation/upgrade projects on existing campuses may be placed within a 100-year flood plain. However, according to CDE requirements, a school must not be sited within a floodplain area unless the cost of mitigating the impact is reasonable.<sup>447</sup> In addition,

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<sup>447</sup> CDE. 2023. *Title 5, California Code of Regulations, Division 1, Chapter 13, Subchapter 1, School Facilities Construction.* <https://www.cde.ca.gov/ls/fa/sf/title5regs.asp>.

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a hydrologic study may be required in areas of flooding or potential flooding. Flooding can cause significant safety concerns for students and staff. In response to these concerns, measures can be taken to reduce impacts from flooding such as elevating the site above flood levels, creating or improving levees, and emergency notification and evacuation procedures.

Compliance with applicable laws, regulations, and implementation of LAUSD Standard Conditions during project construction and operation would ensure that impacts associated with structures within a 100-year flood hazard area which would impede or redirect flood flows, are less than significant.

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**Impact 5.10-9: SUP-related projects could expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. [Threshold HWQ-9]**

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### 5.10.3.1.12 All SUP Projects

New structures on new property and new structures or replacement/installation/upgrade projects on existing campuses potentially may be placed within a 100-year flood plain. However, CDE requirements specify a distance of 1,500 feet from a reservoir or dam. Dams and reservoirs are monitored during storm events and measures are implemented to prevent overtopping. Also, as noted above (Impact 5.10-8), according to CDE requirements, a school cannot be within a floodplain area unless the cost of mitigating the impact is unreasonable.<sup>448</sup> In addition, a hydrologic study would be required in areas of flooding or potential flooding. Flooding can cause significant safety concerns for students and staff. In response to these concerns, measures would be taken to reduce impacts from flooding such as elevating the site above flood levels, creating or improving levees, and emergency notification and evacuation procedures.

Impacts from unmapped flooding, tsunamis, and debris flow can be mitigated by taking these potential hazards into account during the project planning process, and ensuring that these hazards do not occur or can be mitigated to a less-than-significant level. Hazard reduction would be addressed, as applicable, in the site selection and design process for site-specific projects. LAUSD SC-HWQ-4 and SC-HWQ-5 would be incorporated into projects in flood zones. Impacts would be less than significant.

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**Impact 5.10-10: SUP-related projects may be subject to inundation by seiche, tsunami, or mudflow. [Threshold HWQ-10]**

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### 5.10.3.1.13 All SUP Projects

A seiche is a surface wave created when a body of water is shaken, usually by an earthquake. Seiches are of concern where water bodies (e.g., reservoirs) are located immediately adjacent to proposed development sites. CDE requirements specify a distance of 1,500 feet from a reservoir or dam. Dams and reservoirs are monitored during storm events and measures are implemented to prevent water overflow.

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<sup>448</sup> California Department of Education. 2023. *Title 5, California Code of Regulations, Division 1, Chapter 13, Subchapter 1, School Facilities Construction*. <https://www.cde.ca.gov/ls/fa/sf/title5regs.asp>.

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In addition to seiche hazards, new projects in the coastal zones of Central and South LAUSD (specifically Pacific Palisades, Venice, Westchester and San Pedro areas) could be subject to tsunami hazard according to the general criteria published by the National Oceanic and Atmospheric Administration (NOAA) and CalEMA.<sup>449</sup> Tsunamis are rare events, but can be catastrophic when they occur. The NOAA operates a tsunami warning system and provides assistance for tsunami hazard mitigation. Mitigation generally involves tsunami hazard awareness, attention to tsunami warning signs, and moving to higher ground if it is suspected that a tsunami is approaching.

The LAUSD Emergency Operations Plan (2010)<sup>450</sup> identifies tsunami as a low-risk hazard and indicated there are no LAUSD facilities in or near areas that have been identified to be vulnerable to the effects of a tsunami. Nevertheless, it is possible new projects may occur within the tsunami inundation zones identified on tsunami inundation zone map of coastal areas in Los Angeles County published by CalEMA.<sup>451</sup> Based on general review of these maps, new school projects within up to 0.62 mile of the coast and below 100 feet elevation are potentially subject to tsunami inundation. However, site-specific review of the tsunami inundation zone maps is required to determine actual tsunami inundation zones. Any new school project sites within tsunami inundation zones, as delineated by Cal-EMA or NOAA, shall be subject to preparation and implementation of a tsunami awareness program and evacuation plan. The tsunami awareness evacuation plan shall conform to the LAUSD Emergency Operations Plan as outlined in LAUSD SC-HWQ-6.

The LAUSD Emergency Operations Plan meets the requirements of Los Angeles County's policies on Emergency Response and Planning. The LAUSD Plan also establishes an emergency organization to direct and control operations at all sites during a period of emergency by assigning responsibilities to specific personnel. In addition, the LAUSD Operations Plan:

- Conforms to the State mandated Standardized Emergency Management System and effectively restructures emergency response at all levels in compliance with the Incident Command System.
- Establishes response policies and procedures, providing LAUSD clear guidance for planning purposes.
- Describes and details procedural steps necessary to protect lives and property.
- Outlines coordination requirements.
- Provides a basis for unified training and response exercises to ensure compliance.

Projects constructed in or near the mouth of steep canyons in the Los Angeles area could be subject to debris flows. Debris flows can form rapidly, convey boulders, and be very destructive and hazardous. Although most large canyons have debris collection structures at their mouths to prevent this type of damage downstream, some of the smaller canyons may lack such protection. Most school projects would be in established urban

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<sup>449</sup> NOAA. 2014. *Center for Tsunami Research*. <http://nctr.pmel.noaa.gov/index.html>.

<sup>450</sup> LAUSD. 2022. *Emergency Operations Plan*. <https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/318/EOP%20LAUSD%202022%20FINAL%206.7.22.pdf>.

<sup>451</sup> California Department of Conservation. 2023. *California Tsunami Maps*. <https://www.conservation.ca.gov/cgs/tsunami/maps>.

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areas far from the debris-producing areas in the mountains. However, it is possible some projects could be sited in areas subject to debris flows, particularly those north of the 210 freeway. LAUSD SC-HWQ-6 would be incorporated into projects in potential debris flow zones. Impacts would be less than significant.

### 5.10.4 Applicable Regulations and Standard Conditions

#### 5.10.4.1.1 Federal

- 33 U.S.C. Section 1251 et seq. (1972): Clean Water Act
- 33 U.S.C. Section 1342: National Pollutant Discharge Elimination System
- 42 U.S.C. Section 4001 et seq.: National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973

#### 5.10.4.1.2 State

- California Government Code, Section 53097: Local Drainage Requirements
- The Porter-Cologne Water Quality Act; California Water Code, Section 13000 et seq.
- Streambed Alteration Agreement; California Fish and Game Code, Section 1602 et seq.
- Waste Discharge Requirements, California Water Code, Section 13260
- Education Code, Sections 17212, 17215.5: School Siting Restriction in Floodplains
- CCR, Title 5, Section 14010(g): School Siting Restriction in Floodplains
- Statewide General NPDES Permit for Stormwater Discharges from Industrial Sites
- Statewide General NPDES Permit for Stormwater Discharges from Construction Sites

#### 5.10.4.1.3 Local

- Local Drainage Requirements
- Local Floodplain Development Requirements
- City or County Storm Drain System – Permits and Approvals

#### 5.10.4.1.4 LAUSD Standard Conditions of Approval

- SC-HWQ-1 through SC-HWQ-7

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### **5.10.5 Level of Significance Before Mitigation**

Upon implementation of regulatory requirements and LAUSD Standard Conditions listed above, the following impacts would be less than significant: 5.10-1, 5.10-2, 5.10-3, 5.10-4, 5.10-5, 5.10-6, 5.10-7, 5.10-8, 5.10-9, 5.10-10.

### **5.10.6 Mitigation Measures**

5.10.6.1.1 No mitigation measures are required.

### **5.10.7 Level of Significance After Mitigation**

Impacts would be less than significant.



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### 5.11 LAND USE AND PLANNING

This section of the Subsequent Program EIR evaluates the potential for implementation of the SUP Update and Measure RR Implementation plan to impact land uses in the District. This section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions), along with existing land uses throughout the LAUSD area, and possible environmental impacts that may occur as SUP Update related site-specific projects are implemented.

Land use impacts can be either direct or indirect. Direct impacts result in land use incompatibilities, division of neighborhoods or communities, or interference with other land use plans, including habitat or wildlife conservation plans. This section focuses on direct land use impacts. Indirect impacts are secondary effects resulting from land use policy implementation, such as an increase in demand for public utilities or services, or increased traffic on roadways. Indirect impacts are addressed in other sections of this Subsequent Program EIR.

#### 5.11.1 Environmental Setting

As shown in Figures 3-2 and 5.11-1, the District consists of four regions, corresponding to the cardinal directions, extending north to the San Gabriel Mountains in the Angeles National Forest, including the communities of Granada Hills and Sylmar; west to the Ventura County boundary and to the Pacific Ocean, including the communities of Venice, Marina Del Rey, and Playa Del Rey in the City of Los Angeles; east to the community of East Los Angeles in unincorporated Los Angeles County; and south to the community of San Pedro in the City of Los Angeles, and parts of the cities of Rancho Palos Verdes and Rolling Hills Estates in the Palos Verdes Peninsula.

##### 5.11.1.1 REGULATORY FRAMEWORK

State, regional, and local laws, regulations, plans, and guidelines are summarized as follows. The following regulatory framework discussion does not include all plans and policies that relate to land use and planning in the District. Many site-specific projects have not been identified, and there may be local jurisdictional plans and policies that are applicable depending on the project site. Specific requirements of these laws, regulations, plans, and guidelines might not be up to date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. Although some of these may not be directly applicable to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. See *Applicable Regulations and Standard Conditions* at the end of this chapter for those that require District compliance.

##### 5.11.1.2.1 Federal

###### *United States Forest Service*

The Angeles National Forest stretches across Los Angeles County encompassing the San Gabriel Mountain Range; it is 1,018 square miles, or 25% of the land area of Los Angeles County. The U.S. Forest Service is

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responsible for managing public forest lands. Its mission is the stewardship of forest lands and resources through programs that provide recreation and multiple uses of natural resources, wilderness areas, and significant habitat areas. The U.S. Forest Service prepares and periodically updates the Land and Resource Management Plan as a policy guide for the use of lands in the national forests. Within the boundaries of the national forest, nearly 40,000 acres are privately owned. For these parcels, commonly referred to as in-holdings, the county retains responsibility for land use regulation. Part of the northeast portion of the District is in the Angeles National Forest.

### *National Park Service*

The SMMNRA is a part of the National Park System and is managed by the National Park Service. The SMMNRA preserves natural habitats and historical and cultural sites, offers recreational opportunities, and improves the air quality for the Los Angeles basin. Covered by chaparral, oak woodlands, and coastal sage scrub, it is home to many species that are listed as rare, threatened, or endangered. The eastern part of the SMMNRA is in the District.

#### **5.11.1.2.2 State**

##### *California Government Code, Section 65300*

State planning law requires every city in California to adopt a comprehensive, long-term general plan for the physical development of the city, and of any land outside its boundaries (sphere of influence) that in the planning agency's judgment bears relation to its planning. A general plan should consist of an integrated and internally consistent set of goals and policies that are grouped by topic into a set of elements and are guided by a citywide vision. State law requires that a general plan address seven elements or topics (land use, circulation, housing, conservation, open space, noise, and safety), but allows some discretion on the arrangement and content.

##### *California Education Code, Section 17251 and California Code of Regulations, Title 5, Section 14001 through 14012*

Education Code Section 17251 and the CCR Title 5, Section 14001 through 14012 outline the CDE's authority for approving proposed school sites and constructing school buildings. CDE must approve each site in order for that site to receive state acquisition funds under the School Facilities Program administered by the State Allocation Board. According to the CDE School Site Selection and Approval Guide, some of the many factors that affect school site selection include health and safety, location, size, and surrounding land uses. The SFPD has developed screening and ranking procedures applied during the site selection process.<sup>452</sup>

##### *California Education Code, Section 38131.b*

The **Civic Center Act** permits public use of school facilities. School facilities available for Civic Center use include gyms, playing fields, stadiums, auditoriums, multipurpose rooms, cafeterias, and classrooms. Facilities are available within designated time frames outside school hours. Organizations wishing to use a school location

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<sup>452</sup> CDE. School Site Selection and Approval Guide. <https://www.cde.ca.gov/ls/fa/sf/schoolsiteguide.asp>

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for a Civic Center use must apply for a permit from the District. A variety of rules, regulations, and restrictions governing the use of school buildings for civic center purposes appear in detail on the permit and the application.

### *Public Resources Code, Section 30000 et seq.*

The **California Coastal Act of 1976** (Coastal Act) constitutes the California Coastal Management Program for the purposes of the Federal Coastal Zone Management Act. The Coastal Act established the California Coastal Commission (Coastal Commission), identified a designated California Coastal Zone, and established the Coastal Commission's responsibility to include the preparation and ongoing oversight of a Coastal Plan for the protection and management of the Coastal Zone. Each local jurisdictional authority (city or county) with lands within the coastal zone is required to develop, and comply with, a coastal management plan.

The Coastal Act requires that any person or public agency proposing development within the Coastal Zone obtain a Coastal Development Permit (CDP) from either the Commission or the city or county having the jurisdictional authority to issue a CDP.

New school construction in portions of the Central and South LAUSD areas could require a CDP. Any construction within the Coastal Zone must generally conform to the requirements of the California Coastal Act, and specifically Chapter 3, Section 6 (Development). On or near the shoreline, coastal-dependent developments have priority over those uses not dependent on a coastal location. To comply with the Coastal Zone Management Act, localities develop Local Coastal Plans (LCPs). Local Coastal Plans in the District boundaries are as follows:

#### ■ **Region West**

- Santa Monica Mountains Local Coastal Program Amendment, Los Angeles County)
- Marina Del Rey/Ballona Local Coastal Program, Los Angeles County
- Playa Vista A Segment, Los Angeles County
- City of Santa Monica Local Coastal Program
- Pacific Palisades, City of Los Angeles
- Venice, City of Los Angeles
- Playa Vista, City of Los Angeles
- Del Rey Lagoon Segment, City of Los Angeles
- Airport/El Segundo Dunes Segment, City of Los Angeles
- City of El Segundo Local Coastal Program

#### ■ **Region South**

- City of Torrance Local Coastal Program

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- City of Long Beach Local Coastal Program
- San Pedro Local Coastal Program, City of Los Angeles<sup>453</sup>

### 5.11.1.2.3 Regional

#### *Southern California Association of Governments*

The SCAG is a federally recognized MPO that encompasses over 38,000 square miles and represents the Counties of Los Angeles, Orange, Ventura, Imperial, San Bernardino, and Riverside and 191 cities. SCAG is a regional planning agency and a forum for addressing regional issues concerning transportation, the economy, community development, and the environment.<sup>454</sup> SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and state law. In this role, SCAG reviews proposed development and infrastructure projects to analyze their impacts on regional planning programs. As the Southern California region's MPO, SCAG cooperates with SCAQMD, Caltrans, and other agencies in preparing regional planning documents. Los Angeles County is further divided into nine SCAG subregions:

- North Los Angeles County
- City of Los Angeles
- San Fernando Valley Council of Governments
- Las Virgenes Malibu Conejo Council of Governments
- Arroyo Verdugo Council of Governments
- Westside Cities Council of Governments
- South Bay Cities Council of Governments
- San Gabriel Valley Council of Governments
- Gateway Cities Council of Governments

The District encompasses all of the Central Los Angeles subregion, all but the northwest corner of the San Fernando Valley Subregion, and parts of the remaining seven subregions.<sup>455</sup>

#### ***SCAG Regional Transportation Plan/Sustainable Communities Strategy***

On May 7, 2020, SCAG adopted the Connect SoCal Program Environmental Impact Report. Connect SoCal 2020 provides a strategy for accommodating projected population, household, and employment growth in the SCAG region by 2045, as well as a transportation investment strategy for the region. The Plan details how the SCAG region can achieve several outcomes essential to the success of the region's long-range transportation

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<sup>453</sup> CCC. 2020 October, 9. Summary Of LCP Program Activity In FY 20-21. <https://coastal.ca.gov/rflg/>.

<sup>454</sup> SCAG. <https://scag.ca.gov/about-us>.

<sup>455</sup> Metropolitan Transportation Authority of Los Angeles County (Metro). March 2021. Multi-County Goods Movement Action Plan: Los Angeles County Action Plan. <http://media.metro.net/2021/Goods-Movement-Strategic-Plan-Spreads.pdf>.

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and land use goals. The Connect SoCal Program complies with SB 375, the state's SCS law, which integrates land use and transportation planning and mandates both a reduction in greenhouse gas emissions from passenger vehicles (19% reduction for the SCAG region) and the provision of adequate housing for the region's 25-year projected population growth. The Plan identifies transportation and land use strategies to accommodate projected population and household and employment growth and improve the quality of life for existing and future residents.<sup>456</sup>

### 5.1.6.1....1 *Sustainable Communities Program*

The Sustainable Communities Program (SCP) is a technical assistance program that strengthens partnerships with local agencies and strategic partners who are responsible for land use and transportation decisions to help the region achieve its unified goals, including:

- Provide needed planning resources to local jurisdictions for active and multimodal transportation, sustainability, land use, and affordable housing;
- Promote, address, and ensure health and equity in regional land use and transportation planning and close the gap of racial injustice and better serve communities of color;
- Encourage regional planning strategies to reduce motorized vehicle miles traveled and greenhouse gas emissions, particularly in environmental justice communities where there is the highest need for air quality improvements;
- Develop local plans that support the implementation of key strategies and goals outlined in Connect SoCal's Sustainable Communities Strategy;
- Develop resources that support the key strategies and policy direction of the adopted Connect SoCal;
- Support a resilient region that looks at climate adaptation and public health preparedness as key strategies to address community prosperity, transportation safety, economic recovery and sustainability; and
- Increase the region's competitiveness for federal and state funds, including, but not limited to, the California Active Transportation Program and Greenhouse Gas Reduction Funds.<sup>457</sup>

The SCP provides opportunities to secure resources to meet the diverse planning needs of local communities and support implementation of regional planning policies and strategies. Specific funding categories are developed every four years alongside the adoption of Connect SoCal—the Regional Transportation Plan/Sustainable Communities Strategy, with Calls for Applications released on a rolling basis thereafter. SCAG is currently providing technical assistance to 57 local agencies and has funded 110 projects totaling over \$21.6 million since 2016.

<sup>456</sup> SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy. <https://scag.ca.gov/certified-2020-peir-0>. Accessed on April, 13 2023.

<sup>457</sup> SCAG SCP. April 2023. <https://scag.ca.gov/scp>.

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### 5.11.1.2.4 Local

County and city general plans are basic planning documents and act as a blueprint for future development. a general plan describes a community's development goals and policies. It also is the foundation for land use decisions made by the planning commission, city council, or board of supervisors. County and city zoning codes establish detailed requirements that implement the general plan policies at the level of the individual parcel of land. The zoning code presents development standards for different land uses and identifies which uses are allowed in the various zoning districts of a jurisdiction. California law requires the zoning codes to be consistent with the jurisdiction's general plan.

Although most school property is owned by the District, the underlying city or county zoning can be residential, industrial, commercial, or other designations. Potential new school properties typically are zoned for residential or other uses. Under a general plan and/or zoning ordinance, schools in a particular area will be (1) permitted by right, (2) not permitted, or (3) "conditionally permitted." If schools are permitted by right, then a school district need take no action to comply with the general plan or zoning ordinance. Under state law, a school district must submit to the local planning agency the location, purpose, and extent of each proposed school use.<sup>458</sup> The planning agency may either approve the location, purpose, and extent of a proposed school use as being in conformity with the general plan, or disapprove it as not being in conformity with the general plan.

The California legislature granted school districts the power to exempt school property from county and city zoning requirements, provided the school district complies with the terms of Government Code Section 53094.<sup>459</sup> As lead agency for the SUP, it is anticipated that the District will comply with Government Code Section 53094 to render the local county and city zoning ordinances inapplicable to site-specific school projects under the SUP to the extent such ordinances would not otherwise permit the proposed school use for these projects. Following a two-thirds vote of the Board of Education, the District can exempt a school site from such local zoning requirements. Within 10 days of the action, the Board must provide the affected county and/or cities with notice of this action. On February 19, 2019, the LAUSD Board of Education Adopted a Resolution to exempt all LAUSD school sites from local land use regulations under Government Code Section 53094.<sup>460</sup>

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<sup>458</sup> Government Code Section 65402(c)

<sup>459</sup> Government Code Section 53094.

(a) Notwithstanding any other provision of this article, this article does not require a school district to comply with the zoning ordinances of a county or city unless the zoning ordinance makes provision for the location of public schools and unless the city or county has adopted a general plan.

(b) Notwithstanding subdivision (a), the governing board of a school district, that has complied with the requirements of Section 65352.2 of this code and Section 21151.2 of the Public Resources Code, by a vote of two-thirds of its members, may render a city or county zoning ordinance inapplicable to a proposed use of property by the school district. The governing board of the school district may not take this action when the proposed use of the property by the school district is for non-classroom facilities, including, but not limited to, warehouses, administrative buildings, and automotive storage and repair buildings.

(c) The governing board of the school district shall, within 10 days, notify the city or county concerned of any action taken pursuant to subdivision (b).

<sup>460</sup> Regular Meeting Stamped Order of Business, Board of Education Report No. 256-18/19. LAUSD Board of Education, February 19, 2019.

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Cities and communities within the District attendance boundaries have General Plans or community plans that guide development. Where a proposed LAUSD school project is inconsistent with a local General Plan policy or zoning ordinance, LAUSD school sites are exempt under Government Code Section 53094, pending a two-thirds vote of the Board of Education. Although LAUSD school sites are exempt from local land use regulations, many of these general plans or community plans establish goals and policies providing applicable references for discussion.

### *Los Angeles County*

The Los Angeles County 2035 General Plan provides the policy framework for how and where the unincorporated County will grow through the year 2035, while recognizing and celebrating the County's wide diversity of cultures, abundant natural resources, and status as an international economic center. The Los Angeles County 2035 General Plan accommodates new housing and jobs within the unincorporated areas in anticipation of population growth in the County and the region.

Community-based plans are components of the Los Angeles County General Plan and are intended to provide focused goals, policies, and maps to guide the regulation of development within specified areas of unincorporated portions of the county.<sup>461</sup>

The following county community plan areas are within the District:

#### ■ North Region

- Santa Monica Mountains North Area Plan (part)
- Twin Lakes Community Plan<sup>462</sup> Santa Clarita Valley Area Plan (part)

#### ■ West Region

- Santa Monica Mountains North Area Plan (part)
- Marina Del Rey Land Use Plan and Marina Del Rey Specific Plan
- West Athens/Westmont Community Plan<sup>463</sup>

#### ■ East Region

- East Los Angeles Community Plan
- Walnut Park Neighborhood Plan<sup>464</sup>

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<sup>461</sup> Los Angeles County Long Range Planning. Accessed April 20, 2023. <https://planning.lacounty.gov/long-range-planning/>.

<sup>462</sup> The Community of Twin Lakes in unincorporated Los Angeles County is in the San Fernando Valley near the junction of the State Route 118 freeway (SR-118) and Topanga Canyon Boulevard (SR-27).

<sup>463</sup> Los Angeles County Long Range Planning. Community-Based Plans. Accessed April 20, 2023 <https://planning.lacounty.gov/long-range-planning/>.

<sup>464</sup> The Community of Walnut Park in unincorporated Los Angeles County is bounded by the City of Huntington Park to the north and east and the City of South Gate to the south.

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The Los Angeles County Zoning Code is in Title 22, *Planning and Zoning*, of the Los Angeles County Code of Ordinances.<sup>465</sup>

### ***OurCounty***

OurCounty is a forward-looking, regional sustainability strategic plan that establishes a common sustainability vision for Los Angeles County. OurCounty does not supersede land use plans adopted by the Regional Planning Commission and Board of Supervisors, including the General Plan and various community, neighborhood, and area plans. OurCounty sets forth 12 goals for a shared vision for sustainability in Los Angeles County, including:

Goal 1: Resilient and healthy community environments where residents thrive in place.

Goal 2: Buildings and infrastructure that support human health and resilience.

Goal 3: Equitable and sustainable land use and development without displacement.

Goal 4: A prosperous LA County that provides opportunities for all residents and businesses and supports the transition to a green economy.

Goal 5: Thriving ecosystems, habitats, and biodiversity.

Goal 6: Accessible parks, beaches, recreational waters, public lands, and public spaces that create opportunities for respite, recreation, ecological discovery, and cultural activities.

Goal 7: A fossil fuel-free LA County.

Goal 8: A convenient, safe, clean, and affordable transportation system that enhances mobility while reducing car dependency.

Goal 9: Sustainable production and consumption of resources.

Goal 10: A sustainable and just food system that enhances access to affordable, local, and healthy food.

Goal 11: Inclusive, transparent, and accountable governance that facilitates participation in sustainability efforts, especially by disempowered communities.

Goal 12: A commitment to realize OurCounty sustainability goals through creative, equitable, and coordinated funding and partnerships.<sup>466</sup>

### ***Community Standards Districts***

CSDs are established as supplemental districts to provide a means of implementing special development standards contained in adopted neighborhood, community, area, specific and local coastal plans within the unincorporated areas of Los Angeles County, or to provide a means of addressing special problems which are

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<sup>465</sup> Los Angeles County Code of Ordinances. Accessed April 22, 2023: <https://library.municode.com/index.aspx?clientId=16274>.

<sup>466</sup> Los Angeles County. OurCounty: The Los Angeles Countywide Sustainability Plan. Accessed April 20, 2023: <https://ourcountyla.lacounty.gov/>.



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unique to certain geographic areas within the unincorporated areas of Los Angeles County. CSD regulations supplement the countywide zoning and subdivision regulations. CSDs within the LAUSD service area include:

- East Los Angeles CSD
- Walnut Park CSD
- West Rancho Dominguez – Victoria CSD
- Willow Brook CSD
- West Athens – Westmont CSD
- Baldwin Hills CSD
- Stonyvale CSD<sup>467</sup>

### ***Airport Land Use Plans***

The Regional Planning Commissioners serve as the Los Angeles County ALUC. Fourteen airports within unincorporated Los Angeles County are within the ALUC's jurisdiction. Five airports are County-owned, eight airports are owned by other public entities, and one airport is privately owned. Los Angeles County ALUC has adopted the comprehensive Los Angeles County Airport Land Use Compatibility Plan (ALUCP) that covers all the airports within its jurisdiction. ALUC has adopted separate ALUCPs for Fox Airfield and Brackett Field Airport. An individual airport ALUCP supersedes the Countywide ALUCP.

### ***City of Los Angeles***

The City of Los Angeles General Plan, adopted in 2001, consists of 12 elements, including the seven state-mandated elements. Community plans guide the physical development of neighborhoods by establishing the goals and policies for land use. The land use element is one of the state-required elements of a city's general plan and is required to be updated periodically. The general plan sets out a long-range vision and guide to future development for the City of Los Angeles, and 35 community plans provide the specific, neighborhood-level detail, relevant policies, and implementation strategies necessary to achieve the general plan objectives.

Community plan areas by LAUSD Region are listed in Table 5.11-1. Where a community plan area spans two or more Regions – and the majority of the community plan area is in one Region – it is listed under the Region with the greatest portion of the community plan area.

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<sup>467</sup> Los Angeles County: Community Standards Districts. Accessed on April 20, 2023: <https://planning.lacounty.gov/tag/community-standards-districts/>.

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**Table 5.11 Community Plan Area by Region**

North	West	East	South
Granada Hills - Knollwood	Brentwood – Pacific Palisades	No–theast Los Angeles	Southeast Los Angeles
Chatsworth - Porter Ranch	Bel Air – Beverly Crest	Central City North	South Los Angeles
Northridge–	Hollywood–Boyle Heights	Ha–bor Gateway	
Canoga Park - Winnetka - Woodland Hills - West Hills	Westwood		Wilmington – Harbor City–
Reseda – West Van Nuys	Wilshire		San Pedro
Encino - Tarzana	West Los Angeles		Port of Los Angel–s
Mission –ills – Panorama City – North Hills	Palms - Mar Vista - Del Rey		
Sylmar	Silver Lake - Echo Park -El–sian Vall–y		
–Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon	Central City		
Van Nuys – North Sherman Oaks	South Los Angeles		
North Hollywood – V–lley Village	Southeast Lo– Angeles		
Sherman Oaks - Studio Ci–y –Toluca Lake - Cahuenga Pass	Venice		
Sun Valley - La T–na Canyon	Westc–ester – Playa del Rey		
	West Adams - Baldwin Hills - Leimert		
	South Los Angeles		

Chapter 1 of the Los Angeles Municipal Code, *General Provisions and Zoning*, describes the powers and duties of the city’s planning department and specifies the city’s zoning districts and permitted land uses and development standards within each district.

### ***Neighborhood Councils***

Neighborhood councils are city-certified local groups made up of people who live, work, own property, or have some other connection to a neighborhood. Neighborhood council board members are elected or selected for their positions by the neighborhoods themselves. Neighborhood council board size varies from seven to over 30 persons. They hold regular meetings—at least one every three months. A neighborhood council can adopt community impact statements that summarize its official position on city issues and have them printed directly on the agendas for meetings of the city council and city agencies. There are 99 neighborhood councils in the City of Los Angeles.<sup>468</sup>

<sup>468</sup> City of Los Angeles Department of Neighborhood Empowerment (DONE). 2023, April 13. About Neighborhood Councils. <https://empowerla.org/about-neighborhood-councils/>.

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### *Other Cities*

Each of the other cities wholly or partly in the District has an adopted general plan. The year of adoption of each city's general plan is listed below.<sup>469</sup> Where various elements of a city's general plan were adopted in different years, the year listed is when the land use element was adopted.

#### ■ North Region

- City of San Fernando 1987

#### ■ West Region

- City of Santa Monica 2021
- City of Beverly Hills 2010
- City of West Hollywood 2011
- City of El Segundo 1992
- City of Inglewood 1980
- City of Hawthorne 1989

#### ■ East Region

- City of Monterey Park 2001
- City of Montebello 1973
- City of Commerce 2008
- City of Vernon 2007
- City of Maywood 2009
- City of Huntington Park 1991
- City of Bell 1996
- City of Cudahy 1992
- City of South Gate 2009
- City of Commerce 2008
- City of Bell Gardens 1995
- City of Downey 2005

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<sup>469</sup> Governor's Office of Planning and Research (OPR). Annual Planning Survey 2020 Report. <https://opr.ca.gov/publications.html#pubs-D-E>.

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- City of Lynwood 2003

### ■ South Region

- City of Lynwood 2003
- City of Carson 2004
- City of Gardena 2006
- City of Lomita 1989
- City of Long Beach 1989
- City of Rancho Palos Verdes 1975
- City of Torrance 2010

### 5.11.2 Existing Conditions

The District extends north to the San Gabriel Mountains in the Angeles National Forest; west to the Ventura County boundary and to the Pacific Ocean, including the communities of Venice, Marina Del Rey, and Playa Del Rey in the City of Los Angeles; east to the community of East Los Angeles in unincorporated Los Angeles County; and south to the community of San Pedro in the City of Los Angeles, and parts of the cities of Rancho Palos Verdes and Rolling Hills Estates in the Palos Verdes Peninsula. This includes most of the city of Los Angeles, along with all or portions of 31 cities and unincorporated areas of Los Angeles County (see Figure 3-2, Local Vicinity).

Existing land uses served by the district include, but are not limited to: residential, industrial, transportation, commercial and services, educational institutions, open space and recreation, and public facilities. Analysis of impacts under CEQA for Land Use focuses on the effects of new uses or changes of use that alter the land use patterns of a community, or conflict with a community's plans, policies or regulations. All LAUSD schools are developed as schools, even schools that are presently closed.

### 5.11.3 Thresholds of Significance

The CEQA Guidelines Section 15125(d) requires that an EIR discuss any inconsistencies with applicable general plans, specific plans, and regional plans adopted for the purpose of avoiding or mitigating an environmental impact. This analysis describes consistency of the SUP Update with the applicable goals and policies of the identified regional and local plans, to determine the approximate consistency of the SUP Update with current land use policies.

According to CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project would:

LU-1 Physically divide an established community.

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- LU-2 Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.
- LU-3 Conflict with any applicable habitat conservation plan or natural community conservation plan.

### 5.11.4 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.11-1: SUP implementation would not divide established communities. [Threshold LU-1]**

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#### 5.11.1.1 New Construction on New Properties

Property acquisition under the SUP would improve campuses serving the students and staff at that school. When expansion is proposed, the LAUSD considers the extent that the expanded campus would affect the established community. School sites, unlike highways, transmission lines, and other aboveground infrastructure, do not have a physical presence that would divide established communities. Moreover, schools already are attended by members of the community and would therefore continue to serve as important places of community interaction. Neighborhood schools are an integral part of the surrounding community, and therefore do not create or constitute physical divisions.

Impacts would be less than significant.

#### 5.11.1.2 New Construction and Modernizations on Existing School Campus

New construction, modernization, repair, replacement, upgrade, remodel, renovation, and installation projects would be located on existing developed campuses. Projects on existing school campuses would not divide established communities surrounding the schools, and no impact would occur.

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**Impact 5.11-2: SUP implementation would not conflict with applicable plans adopted for the purpose of avoiding or mitigating an environmental effect. [Threshold LU-2]**

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#### 5.11.1.3 All SUP Projects

Selected goals of the Regional Transportation Plan/Sustainable Communities Strategy—and SUP consistency with such goals—are shown in Table 5.11-2. The SUP would be consistent with the RTP/SCP, as shown in the Table 5.11-2.

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**Table 5.11-2 SUP Consistency with Regional Transportation Plan/Sustainable Communities Program Goals**

RTP/SCS Goal	SUP Consistency
Encourage regional planning strategies to reduce motorized vehicle miles traveled and greenhouse gas emissions, particularly in environmental justice communities where there is the highest need for air quality improvements;	One of the objectives of the SUP is to provide school capacity in neighborhoods so that children in existing residential areas can attend schools within walking and/or bicycling distance of home.  FSD Guiding Principles include schools designed to operate as centers of their communities, including community use of school facilities after school hours and joint use partnerships.
Support a resilient region that looks at climate adaptation and public health preparedness as key strategies to address community prosperity, transportation safety, economic recovery, and sustainability.	All SUP projects would meet California Code of Regulations Title 24 energy-efficiency standards.  FSD Guiding Principles include Integration of Districtwide goals in the planning, design, and delivery of projects.
Promote, address, and ensure health and equity in regional land use and transportation planning and close the gap of racial injustice and better serve communities of color	SUP objectives include providing schools in neighborhoods within walking and/or bicycling distance of students' homes.  FSD Guiding Principles include meaningful community engagement with various constituencies including the school community, non-profit organizations, neighborhood councils, faith-based groups, city and state agencies, and elected officials through all project stages.
Source: SCAG. 2023, April. Sustainable Communities Program: <a href="https://scag.ca.gov/scp">https://scag.ca.gov/scp</a> .	

SUP consistency with other regional plans adopted for the purpose of avoiding or mitigating environmental effects to specific resource areas are evaluated in other sections of Chapter 5 of this Subsequent Program EIR addressing specific resources: for instance, consistency with the South Coast Air Quality Management District's air quality management plan is assessed in Section 5.3, *Air Quality*.

At this time, no new sites for expanded schools to be developed under the SUP Update and Measure RR Implementation have been identified. However, in compliance with CDE site selection standards, LAUSD would consider the surrounding land uses and compatibility with a school campus. Because the safety of the students and staff is essential, schools would not be expanded in areas where the school would conflict with existing plans that avoid or mitigate an environmental effect.

Development projects within the Coastal Zone are required to conform to the requirements of the California Coastal Act generally, and Chapter 3, Section 6 (Development) specifically. To comply with the Coastal Zone Management Act, localities develop LCPs <sup>470</sup>. Local Coastal Plans in the District boundaries are shown on Figure 5.11-1:

### ■ West Region

- Santa Monica Mountains Local Coastal Program Amendment, Los Angeles County)
- Marina Del Rey/Ballona Local Coastal Program, Los Angeles County
- Playa Vista A Segment, Los Angeles County

<sup>470</sup> CCC. 2021, December 15. Summary Of LCP Program Activity In FY 20-21. <https://documents.coastal.ca.gov/assets/rflg/LCPStatusSummaryChart.pdf>.

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- City of Santa Monica Local Coastal Program
- Pacific Palisades, City of Los Angeles
- Venice, City of Los Angeles
- Playa Vista, City of Los Angeles
- Del Rey Lagoon Segment, City of Los Angeles
- Airport/El Segundo Dunes Segment, City of Los Angeles
- City of El Segundo Local Coastal Program
- **South Region**
  - City of Torrance Local Coastal Program
  - City of Long Beach Local Coastal Program
  - San Pedro Local Coastal Program, City of Los Angeles

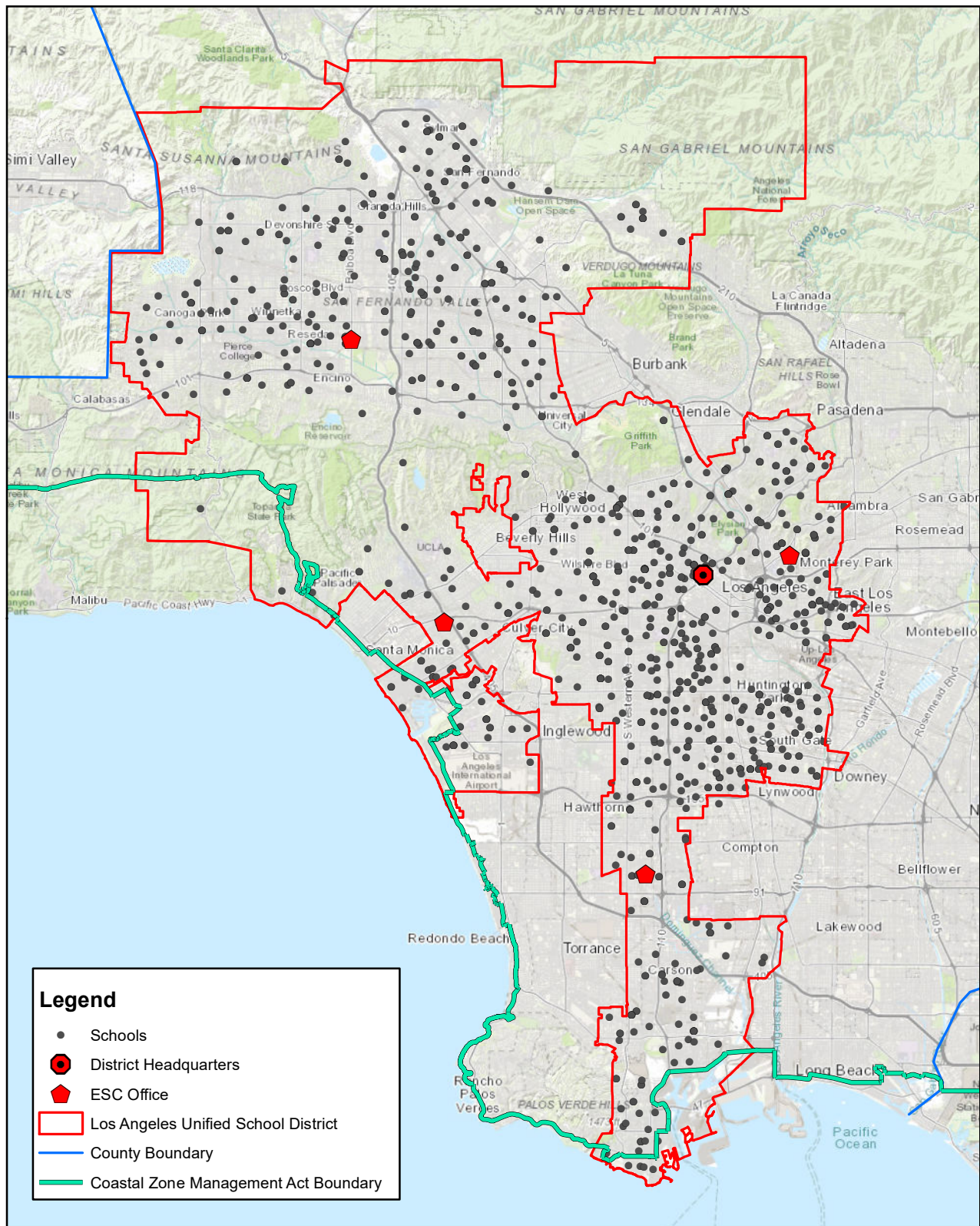
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Figure 5.11-1 Coastal Zone Management Act



Source: California Coastal Commission GIS/Mapping Unit, 2016

0 3 6 Miles



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As previously discussed, although most school property is owned by the District, the underlying city or county zoning can be residential, industrial, commercial, or other designations and may also have LCP designations. Potential new school properties typically are zoned for residential or other uses. Additionally, potential adjacent parcels that may be acquired for school expansion may have LCP designations.

There are 14 District schools within the Coastal Zone that would be subject to LCP designations (see Figure 5.11-1). These schools, along with the distance to the school from the shoreline are shown in Table 5.11-3.

**Tab<sup>le</sup> 5.11-3**

<b>LAUSD School Name</b>	<b>Distance to Shoreline</b>
15th St Elementary School	0.47
Point Fermin Elementary School	0.56
Coeur D'Alene Elementary School	1.14
Topanga Elementary School	3.68
Westside Leadership Magnet	0.19
Palisades Charter High School	0.86
Olguin, John Sh	0.39
Fort Macarthur Annex	0.38
Canyon Elementary	0.54
Westminster Elementary School	0.36
White Point Elementary School	0.25
Animo Venice Charter High School	1.02
Marquez Elementary School	0.45
Broadway Elementary School	1.06

The California legislature granted school districts the power to exempt school property from county and city zoning requirements, provided the school district complies with the terms of Government Code Section 53094.<sup>471</sup> As lead agency for the SUP, it is anticipated that the District will comply with Government Code Section 53094 to render the local county and city zoning ordinances inapplicable to site-specific school projects under the SUP to the extent such ordinances would not otherwise permit the proposed school use for

<sup>471</sup> Government Code Section 53094.

- (a) Notwithstanding any other provision of this article, this article does not require a school district to comply with the zoning ordinances of a county or city unless the zoning ordinance makes provision for the location of public schools and unless the city or county has adopted a general plan.
- (b) Notwithstanding subdivision (a), the governing board of a school district, that has complied with the requirements of Section 65352.2 of this code and Section 21151.2 of the Public Resources Code, by a vote of two-thirds of its members, may render a city or county zoning ordinance inapplicable to a proposed use of property by the school district. The governing board of the school district may not take this action when the proposed use of the property by the school district is for non-classroom facilities, including, but not limited to, warehouses, administrative buildings, and automotive storage and repair buildings.
- (c) The governing board of the school district shall, within 10 days, notify the city or county concerned of any action taken pursuant to subdivision (b).

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these projects. Following a two-thirds vote of the Board of Education, the District can exempt a school site from such local zoning requirements. Within 10 days of the action, the Board must provide the affected County and/or cities with notice of this action. On February 19, 2019, in accordance with Government Code Section 53094, the LAUSD Board of Education adopted a Resolution to exempt all LAUSD school sites from local land use regulations.<sup>472</sup> LAUSD school sites are exempt from all local ordinances, such as those pertaining to building height, parking, preservation and replacement of trees, construction permits (except those in the public right of way), recordation of parcel maps, signage, site plan review, and inspection. Within 10 days of this action, notices were sent to the county and cities within the District's boundaries. Following this process, SUP-related projects would not conflict with plans or policies for projects on existing school grounds. New Construction on New Property would comply with Section 53094.

If property acquisition and building construction is planned within the LCP, the District is required to apply for and obtain a Coastal Development Permit through the City or County. Following this process, SUP-related projects in the coastal zone would not conflict with plans or policies.

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**Impact 5.11-3: The SUP would not conflict with the adopted Habitat Natural Communities Conservation Plan. [Threshold LU-3]**

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### 5.11.1.1.4 All SUP Projects

Small parts of the southwest corner of the District are in the Palos Verdes Peninsula NCCP/HCP<sup>473</sup>. No habitat reserves established under the HCCP/NCP are within the District, and no other habitat conservation plans are in the District. SUP and Measure RR implementation would not conflict with the Palos Verdes Peninsula NCCP/HCP, and no impact would occur.

## 5.11.5 Applicable Regulations and Standard Conditions

### 5.11.1.1.5 State

- Education Code Section 17251
- California Code of Regulations, Title 5, Section 14001 through 14012
- California Education Code Section 38131.b: Civic Center Act
- California Coastal Act of 1976, PRC Section 30000 et seq.

## 5.11.6 Level of Significance Before Mitigation

Upon implementation of regulatory requirements listed above, the following impacts would be less than significant: 5.11-1, 5.11-2, and 5.11-3.

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<sup>472</sup> LAUSD Board of Education Report Rep-256-18/19

<sup>473</sup> <https://rpvca.gov/490/Palos-Verdes-Nature-Preserve-NCCP-PUMP-H>.

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### **5.11.7 Mitigation Measures**

No mitigation measures are required.

### **5.11.8 Level of Significance After Mitigation**

Impacts would be less than significant.

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### 5.12 MINERAL RESOURCES

This section of the program EIR evaluates the potential for implementation of the SUP to impact mineral resources in the District. This section discusses plans and policies from several jurisdictional agencies along with the existing mineral resources throughout the SUP area, and possible environmental impacts that may occur as SUP-related site-specific projects are implemented.

#### TERMINOLOGY

**Minerals** are defined as any naturally occurring chemical elements or compounds, formed from inorganic processes and organic substances.

**Minable minerals** or an “ore deposit” is defined as a deposit of ore or mineral having a value materially in excess of the cost of developing, mining, and processing the mineral and reclaiming the project area.

**Fossil Fuel Resources.** Fossil fuel resources are oil, natural gas, and coal. There are no coal mines in Los Angeles County; thus, the discussion of fossil fuel resources in this section focuses on oil and natural gas.

**Mineral Resources.** Natural mineral deposits are nonrenewable resources that cannot be replaced once they are depleted. Mineral resources include rock, sand, gravel, and fossil fuel resources such as oil and natural gas. The primary mineral resources within the Los Angeles Basin are oil and gas, and rock, gravel, and sand deposits.

**Mineral Resource Sectors.** Areas where mineral resources of regional or statewide significance are considered to be present or likely to be present and that have current land uses deemed compatible with potential mining.

**Mineral Resource Zones (MRZ).** Land classification by presence, potential presence, or absence of sand and gravel—that is, aggregate mineral resources.

**Portland Cement Concrete (PCC)-Grade Aggregate.** An aggregate suitable for use in Portland Cement Concrete (PCC), the type of concrete most often used in construction. Portland cement, the cement used in such concrete, consists of a ground-up mixture of limestone, gypsum, and clay.

**Production-Consumption Region (P-C Region).** An aggregate production district plus the market or consumption area for the aggregate produced.

**Portland Cement Concrete (PCC)-Grade Aggregate Reserves.** Aggregate that has been determined to be acceptable for commercial use, is in properties owned or leased by aggregate-producing companies, and for which permits have been issued allowing mining and processing of the material.

**Portland Cement Concrete (PCC)-Grade Aggregate Resources.** Include reserves and all of the potentially usable aggregate materials that may be mined in the future, but for which no permit allowing mining has been issued, or for which marketability has not yet been established.

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### *Mineral Resource Classification*

The California Geological Survey Mineral Resources Project provides information about California's nonfuel mineral resources. The Mineral Resources Project classifies lands throughout the state that contain regionally significant mineral resources as mandated by the Surface Mining and Reclamation Act (SMARA) of 1975.<sup>474</sup> Nonfuel mineral resources include metals such as gold, silver, iron, and copper; industrial metals such as boron compounds, rare-earth elements, clays, limestone, gypsum, salt, and dimension stone; and construction aggregate including sand, gravel, and crushed stone. Development generally results in a demand for minerals, especially construction aggregate. SMARA requires all cities and counties to incorporate in their general plans the mineral designations approved by the State Mining and Geology Board.

The classification process involves the determination of Production-Consumption (P-C) Region boundaries, based on identification of active aggregate operations (Production) and the market area served (Consumption). The P-C Regional boundaries are modified to include only the portions of the region that are urbanized or urbanizing and are classified for their aggregate content. An aggregate appraisal further evaluates the presence or absence of significant sand, gravel, or stone deposits that are suitable sources of aggregate. The classification of these mineral resources is a joint effort of the state and the local governments. It is based on geologic factors and requires that the State Geologist classify the mineral resources area as one of the four Mineral Resource Zones (MRZs), Scientific Resource Zones (SZ), or Identified Resource Areas (IRAs), described as follows.

- **MRZ-1:** An MRZ where adequate information indicates that no significant mineral deposits are present or likely to be present.
- **MRZ-2:** An MRZ where adequate information indicates that significant mineral deposits are present or a likelihood of their presence and development should be controlled.
- **MRZ-3:** An MRZ where the significance of mineral deposits cannot be determined from the available data.
- **MRZ-4:** An MRZ where there is insufficient data to assign any other MRZ designation.
- **SZ Areas:** Scientific Resource Zones containing unique or rare occurrences of rocks, minerals, or fossils that are of outstanding scientific significance shall be classified in this zone.
- **IRA Areas:** County or State Division of Mines and Geology Identified Resource Areas where adequate production and information indicates that significant minerals are present.

As part of the classification process, an analysis of site specific conditions is utilized to calculate the total volume of aggregates within individually identified Resource Sectors. Resource Sectors are those MRZ-2 areas identified as having regional or statewide significance. Anticipated aggregate demand in the P-C Regions for the next 50 years is then estimated and compared to the total volume of aggregate reserves identified within the P-C Region.

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<sup>474</sup> California Public Resources Code, Sections 2710–2796.



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### 5.12.1 Environmental Setting

#### 5.12.1.1 REGULATORY FRAMEWORK

State and local laws and regulations are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to minerals in the District. Many site-specific projects have not been identified, and there may be local jurisdictional plans and policies that are applicable depending on the project site. Specific requirements of these laws, regulations, plans, and guidelines might not be up to date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. Although these are not directly applicable to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. See *Applicable Regulations and Standard Conditions* at the end of this chapter for those that require District compliance.

##### 5.12.1.1.1 State

###### 5.12.1.1.1.1 *California Public Resources Code, Sections 2710 et seq.*

The Surface Mining and Reclamation Act of 1975 (SMARA) is the primary regulator of on-shore surface mining in the state. It delegates specific regulatory authority to local jurisdictions. The act requires the state geologist (California Geological Survey) to identify all mineral deposits within the state and to classify them as: (1) containing little or no mineral deposits; (2) significant deposits; or (3) deposits identified but further evaluation needed; lands where such deposits are identified are designated MRZ 1, 2, or 3, respectively. Local jurisdictions are required to enact specific procedures to guide mineral conservation and extraction at particular sites and to incorporate mineral resource management policies into their general plans. A particular concern of the state legislators in enacting SMARA was premature loss of minerals and protection of sites threatened by development practices that might preclude future mineral extraction.

##### 5.12.1.1.2 Local

Cities and communities within the District attendance boundaries have General Plans or community plans that guide development. Where a proposed LAUSD school project is inconsistent with a local General Plan policy or zoning ordinance, LAUSD school sites are exempt under Government Code Section 53094[1], pending a two-thirds vote of the Board of Education. On February 19, 2019, the LAUSD Board of Education Adopted a Resolution (Res 256-18/19)[2] to exempt all LAUSD school sites from local land use regulations under Government Code Section 53094. Although LAUSD school sites are exempt from local land use regulations, many of these general plans or community plans establish goals and policies providing applicable references for discussion.

###### 5.12.1.1.2.1 *City of Los Angeles Municipal Code, Section 13.03*

The City of Los Angeles adopted Section 13.03 'G' Surface Mining Operations Districts supplemental use provisions in 1975, which, with subsequent amendments, have brought the city's provisions into consistency with new state requirements. The 'G' provisions are land use, not mineral conservation regulations. They regulate the establishment of sand and gravel districts, extraction operations, mitigation of potential noise, dust,

## 5. Environmental Analysis

traffic, and other potential impacts, as well as post-extraction site restoration. Other conditions may be imposed by the city if deemed appropriate.<sup>475</sup>

### 5.12.1.2 EXISTING CONDITIONS

#### 5.12.1.2.1 Regional Setting

The state geologist classified MRZ-2 sites within Los Angeles. MRZ-2 sites contain potentially significant sand and gravel deposits that are to be conserved. Any proposed development plan must consider access to the deposits for purposes of extraction. Much of the area within the MRZ-2 sites in Los Angeles was developed with structures prior to the MRZ-2 classification, and therefore is unavailable for extraction.<sup>476</sup>

##### 5.12.1.2.1.1 Mineral Production

California is divided into 12 districts for the purpose of reporting minerals production statistics in the Minerals Yearbook published by USGS. The most recent yearbook available is for 2012–2013, published in June 2018. Los Angeles County, Ventura County, and Orange County make up District 11. The construction sand and gravel sold or used in District 11 in 2013 is summarized in Table 5.12-1.<sup>477</sup>

**Table 5.12-1 District 11 Construction Sand and Gravel Sold or Used in 2013**

Mineral Type	Production, metric tons	Production, dollar value
Concrete aggregate and concrete products	5,060,000	\$67,500,000
Asphaltic concrete aggregates and road base materials	1,130,000	\$15,600,000
Fill	928,000	\$9,940,000
Other miscellaneous uses	483,000	\$4,790,000
Unspecified (Reported)	3,740,000	\$42,000,000
Unspecified (Estimated)	4,080,000	\$42,000,000
<b>Total</b>	<b>15,400,000</b>	<b>\$182,000,000</b>

Source: USGS. 2018, June 2018 Minerals Yearbook: California, Table 9. <https://www.usgs.gov/centers/national-minerals-information-center/mineral-industry-california>.

One metric ton is 2,205 pounds.

##### 5.12.1.2.1.2 Aggregate Reserves Compared to Aggregate Demand

The Los Angeles Unified School District is within four Production-Consumption (P-C) Regions as defined by the California State Mining and Geology Board (SMGB); the Simi Valley P-C Region, Saugus-Newhall P-C

<sup>475</sup> City of Los Angeles 2001.

<sup>476</sup> City of Los Angeles. 2001, September 26. Conservation Element of the City of Los Angeles General Plan. [https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation\\_Element.pdf](https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf).

<sup>477</sup> USGS. 2018, June 2018 Minerals Yearbook: California. <https://www.usgs.gov/centers/national-minerals-information-center/mineral-industry-california>.

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Region, San Fernando P-C Region, and the San Gabriel Valley P-C Region (Figure 5-12).<sup>478, 479, 480</sup> The aggregate reserves and aggregate demand for each of these P-C regions is discussed in the following sections.

**5.12.1.2.1.2.1 2022 Mineral Land Classification: Portland Cement Concrete Aggregate in the Western Ventura County and Simi Valley Production-Consumption Regions**

The 2022 Mineral Land Classification: Portland Cement Concrete Aggregate in the Western Ventura County and Simi Valley Production-Consumption Regions identifies the PCC-grade aggregate resources, reserves, and forecast 50-year demands in the Western Ventura County and Simi Valley Production-Consumption Regions in Table 5.12-2. As shown, PCC-grade aggregate reserves in the Western Ventura County and Simi Valley PC regions are forecast to be depleted by 2039.

**Table 5.12-2 Western Ventura County and Simi Valley Aggregate Supply and Production**

Category	Tons
Total Permitted Portland Cement Concrete (PCC) Aggregate Reserves	118 million
All Grades Permitted Reserves	235 million
Projected 50-Year Demand for Aggregate (All Grades)	281 million
Years Until Depletion of PCC Resources	<23 (Year 2039)

Source: California Geological Survey (CGS). 2022 Special Report 253 Mineral Land Classification: Portland Cement Concrete Aggregate in the Western Ventura County and Simi Valley Production-Consumption Regions

**5.12.1.2.1.2.2 2021 Update of the Mineral Land Classification for Portland Cement Concrete Aggregate Resources in the San Fernando Valley and Saugus-Newhall Production-Consumption Regions**

The 2021 Update of the Mineral Land Classification for Portland Cement Concrete Aggregate Resources in the San Fernando Valley and Saugus-Newhall Production-Consumption Regions identifies the aggregate reserves, resources, and average annual production for 2018 in Table 5.12-3.

**Table 5.12-3 San Fernando Valley and Saugus-Newhall Aggregate Supply and Production**

Category	San Fernando Valley	Saugus-Newhall
Permitted Portland Cement Concrete (PCC) Aggregate Reserves	Confidential	Confidential
Total PCC-Aggregate Resources	416 million tons	10,492 million tons
Average Annual Production	2.6 million tons/year (1990-2018)	530,000 million tons/year (1990-2018)

Source: CGS. 2021. Special Report 254 Update of the Mineral Land Classification for Portland Cement Concrete Aggregate Resources in the San Fernando Valley and Saugus-Newhall Production-Consumption Regions.

<sup>478</sup> CGS. 2022. Special Report 253 Mineral Land Classification: Portland Cement Concrete Aggregate in the Western Ventura County and Simi Valley Production-Consumption Regions. <https://maps.conservation.ca.gov/mineralresources/#webmaps>.

<sup>479</sup> CGS. 2021. Special Report 254 Update of the Mineral Land Classification for Portland Cement Concrete Aggregate Resources in the San Fernando Valley and Saugus-Newhall Production-Consumption Regions. <https://maps.conservation.ca.gov/mineralresources/#webmaps>.

<sup>480</sup> CGS. 2010. Special Report 209 Update of the Mineral Land Classification for Portland Cement Concrete Aggregate Resources in the San Gabriel Valley Production-Consumption Region. <https://maps.conservation.ca.gov/mineralresources/#webmaps>.

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### 5.12.1.2.1.2.3 2010 Mineral Land Classification, San Gabriel Valley Production-Consumption Region

PCC-grade aggregate resources, reserves, and forecast 50-year demands in the San Gabriel Valley P-C Region are summarized in Table 5.12-4. As shown, PCC-grade aggregate reserves in that production consumption region are forecast to be depleted by 2028.

**Table 5.12-4 San Gabriel Valley Aggregate Supply and Demand**

Category	Tons
PCC-grade aggregate reserves	328 million
50-year demand, PCC-grade aggregate	638 million
Estimated Depletion of PCC-Grade Aggregate Reserves	Year 2028

Source: CGS. 2010a. Update of Mineral Land Classification for Portland Cement Concrete-Grade Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California.

### 5.12.1.2.1.3 Oil and Natural Gas Production

Combined onshore and offshore oil production in Los Angeles County in 2018 was approximately 18.6 million barrels (1 barrel = 42 U.S. gallons). Natural gas production in Los Angeles County in 2018 was about 7.15 billion cubic feet. There were 2,750 active oil and gas wells in Los Angeles County in 2018.<sup>481</sup>

### 5.12.1.2.2 District Setting

#### 5.12.1.2.2.1 Mineral Resource Zones

The District is in the San Gabriel Valley, San Fernando Valley, Simi Valley, and Saugus-Newhall P-C Regions (see Figure 5.12-1, *Mineral Zones*). There are MRZ-2 areas in the following parts of the District:

- In the San Gabriel Valley P-C Region in the central Los Angeles area along the Los Angeles River.
- In the San Fernando Valley P-C Region in a swath of the east-central San Fernando Valley extending from the City of San Fernando south through North Hollywood, along the Los Angeles River to the east of Griffith Park, and along the Arroyo Seco to the City of Pasadena boundary. The northern end of this area has two branches, one extending north along Pacoima Wash and the other extending east along Tujunga Wash.<sup>482, 483</sup>

There are no MRZ-2 areas in the parts of the Saugus-Newhall or Simi Valley P-C Regions that are in the District.

<sup>481</sup> Division of Oil, Gas, and Geothermal Resources (DOGGR). 2018, October. Oil, Gas, and Water Production and Well Count by County - 2018. [https://longbeach.pub/2023/photos/2018\\_annual\\_production\\_well\\_count\\_by\\_county.pdf](https://longbeach.pub/2023/photos/2018_annual_production_well_count_by_county.pdf).

<sup>482</sup> CGS. 2021 Special Report 254 Update of the Mineral Land Classification for Portland Cement Concrete Aggregate Resources in the San Fernando Valley and Saugus-Newhall Production-Consumption Regions. <https://maps.conservation.ca.gov/mineralresources/#webmaps>.

<sup>483</sup> CGS. 2010 Special Report 209 Update of the Mineral Land Classification for Portland Cement Concrete Aggregate Resources in the San Gabriel Valley Production-Consumption Region. <https://maps.conservation.ca.gov/mineralresources/#webmaps>.

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### 5.12.1.2.2.2 *Mineral Resource Sectors*

No mineral resource sectors are designated in the part of the San Gabriel Valley P-C Region in the District. Three sectors are designated in the part of the San Fernando Valley P-C Region in the District:

- Sector A in the Tujunga Valley in and west of the community of Lake View Terrace in the City of Los Angeles.
- Sector B in the Hansen Dam Flood Control Basin in the City of Los Angeles.
- Sector C centered around the Tujunga Wash between Hansen Dam and Interstate 5 in the Community of Sun Valley in the City of Los Angeles.

Much of Sectors A, B, and C are mapped as lost to urbanization.<sup>484</sup> No schools were identified within the portions of the three sectors not mapped as lost to urbanization on Google Earth in January 2022.

### 5.12.1.2.2.3 *Active Mines*

There are four active aggregate quarries in the District within the San Fernando Valley P-C Region: CalMat DBA Vulcan's Sheldon, Boulevard, and Sun Valley operations, and Borges Rock Products' Hansen Dam operation (Figure 5-12-1).<sup>485</sup> CalMat's three quarry operations have vested rights, and the quarry operation behind Hansen Dam is exempt from SMARA.

### 5.12.1.2.2.4 *Oil and Gas Fields*

Oil fields in the District include the Wilmington Field in the City of Los Angeles communities of Wilmington, Harbor City, and Harbor Gateway, and the City of Lomita; the Dominguez Field in the City of Carson; the Rosecrans and Howard Townsite fields in the City of Gardena; the Hyperion Field in Playa Del Rey; the Playa Del Rey field in Marina Del Rey; the Bandini Field in the cities of Commerce and Vernon and the Community of East Los Angeles; the Los Angeles Downtown, Union Station, Las Cienagas, Los Angeles City, Inglewood, Salt Lake, Beverly Hills, Cheviot Hills, and Sawtelle fields, all in the City of Los Angeles; and the Aliso Canyon and Oat Mountain fields in the Santa Susana Mountains in unincorporated Los Angeles County (see Figure 5.12-1).<sup>486</sup>

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<sup>484</sup> CGS. 1994c. Mineral Land Classification of the Greater Los Angeles Area. Designated Areas Urbanized, San Fernando Valley Production-Consumption Region.: Open File Report 94-14, Plate 4. <https://maps.conservation.ca.gov/mineralresources/#webmaps>. (The Mineral Resource Sectors map showing those three Sectors was prepared in 1979.)

<sup>485</sup> CGS. 2021. Special Report 254 Update of the Mineral Land Classification for Portland Cement Concrete Aggregate Resources in the San Fernando Valley and Saugus-Newhall Production-Consumption Regions. <https://maps.conservation.ca.gov/mineralresources/#webmaps>.

<sup>486</sup> CalGEM 2023, May 12, Well Finder. <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.47731/34.26893/12>.

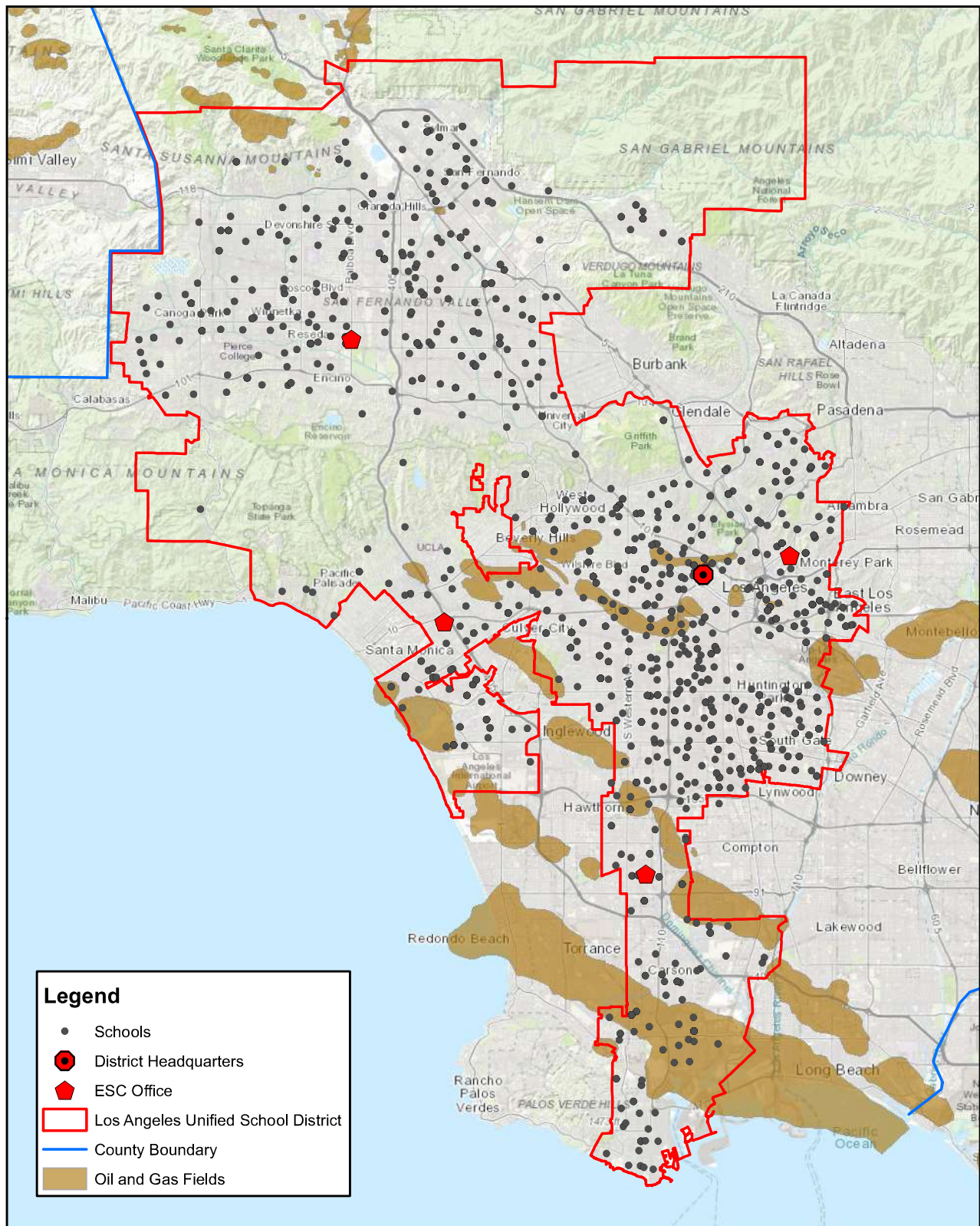
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## 5. Environmental Analysis

### Figure 5.12-1 Mineral Zones



Source: California Geological Survey, 2015

0 3 6 Miles



## 5. Environmental Analysis

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## 5. Environmental Analysis

### 5.12.2 Thresholds of Significance

According to CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project would:

- M-1 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.
- M-2 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.

### 5.12.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.12-1: SUP implementation would not result in the loss of availability of any known mineral resource or recovery site. [Thresholds M-1 and M-2]**

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#### 5.12.3.1.1 New Construction on New Properties

Two regions in the District are designated MRZ-2: one in central Los Angeles, and the other in the east-central San Fernando Valley. Four aggregate quarries were identified in the Tujunga Alluvial Fan in the Lake View Terrace–Sun Valley area (Figure 5-12-1).<sup>487</sup> If schools were expanded and new facilities were constructed in areas designated MRZ-2, they could have an effect on the availability of mineral resources. However, there are no school sites located in areas designated MRZ-2. Additionally, there are no school sites proximal to regions designated MRZ-2 and aggregate quarries, therefore no impacts to mineral resources will occur.

#### 5.12.3.1.2 New Construction and Modernization on Existing Schools

All of these projects would occur at existing schools. School campuses are not available as mining sites. No impact would occur.

### 5.12.4 Applicable Regulations and Standard Conditions

- None

### 5.12.5 Level of Significance Before Mitigation

Impact 5.12-1 would be less than significant.

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<sup>487</sup> CGS. 2021. Special Report 254 Update of the Mineral Land Classification for Portland Cement Concrete Aggregate Resources in the San Fernando Valley and Saugus-Newhall Production-Consumption Regions.  
<https://maps.conservation.ca.gov/mineralresources/#webmaps>.

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### **5.12.6 Mitigation Measures**

No mitigation measures are required.

### **5.12.7 Level of Significance After Mitigation**

Impacts would be less than significant.

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### 5.13 NOISE AND VIBRATION

This section of the Subsequent Program EIR evaluates the potential for implementation of the SUP Update and Measure RR Implementation to impact the noise environment in the District in light of changing information and conditions since the 2015 Program EIR. The section regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions used in the 2015 EIR), along with the existing noise environment throughout the SUP area, and possible environmental impacts that may occur as the SUP update-related site-specific projects are implemented.

#### TERMINOLOGY

Noise is most often defined as unwanted sound. Although sound can be easily measured, the perception of noise and the physical response to sound complicate the analysis of its impact on people. People judge the relative magnitude of sound sensation in subjective terms such as “noisiness” or “loudness.” The following are brief definitions of terminology used in this chapter:

**Sound.** A disturbance created by a vibrating object, which, when transmitted by pressure waves through a medium such as air, is capable of being detected by a receiving mechanism, such as the human ear or a microphone.

**Noise.** Sound that is loud, unpleasant, unexpected, or otherwise undesirable.

**Decibel (dB).** A unitless measure of sound on a logarithmic scale.

**A-Weighted Decibel (dBA).** An overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.

**Equivalent Continuous Noise Level ( $L_{eq}$ ).** The mean of the noise level, energy-averaged over the measurement period.

**Day-Night Level ( $L_{dn}$ ).** The energy-average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to sound levels from 10:00 PM to 7:00 AM.

**Community Noise Equivalent Level (CNEL).** The energy-average of the A-weighted sound levels occurring during a 24-hour period, with 5 dB added to the levels from 7:00 PM to 10:00 PM and 10 dB added from 10:00 PM to 7:00 AM.

#### *Characteristics of Sound*

Sound is a pressure wave transmitted through the air. It is described in terms of loudness or amplitude (measured in decibels), frequency or pitch (measured in hertz [Hz] or cycles per second), and duration (measured in seconds or minutes). The standard unit of measurement of the loudness of sound is the dB. A 3 dB change in noise levels is considered the minimum change that is detectable with human hearing in outside environments. A change of 5 dB is readily discernable to most people in an exterior environment, and a 10 dBA change is perceived as a doubling (or halving) of the sound.

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The human ear is not equally sensitive to all frequencies. Sound waves below 16 Hz are not heard at all and are “felt” more as a vibration. Similarly, though people with extremely sensitive hearing can hear sounds as high as 20,000 Hz, most people cannot hear above 15,000 Hz. In all cases, hearing acuity falls off rapidly above about 10,000 Hz and below about 200 Hz.

Noise is defined as unwanted sound and is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known adverse effects, the federal government, State of California, and many local governments have established criteria to protect public health and safety and to prevent disruption of certain human activities.

### *Measurement of Sound*

Sound is typically measured through the A-weighted measure to correct for the relative frequency response of the human ear. That is, an A-weighted noise level deemphasizes low and very high frequencies of sound similar to the human ear’s deemphasis of these frequencies.

Unlike linear units of measure that are computed with arithmetic functions (such as adding or subtracting numbers), decibels are measured and processed on a logarithmic scale. On a logarithmic scale, an increase of 10 dB is 10 times more intense than 1 dB, a 20 dB increase is 100 times more intense, and 30 dB is 1,000 times more intense. A sound as soft as human breathing is about 10 times greater than 0 dB. The decibel system of measuring sound gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear. Sounds generally range from 30 dBA (very quiet) to 100 dBA (very loud). Table 5.13-1 shows the subjective effect of changes in sound pressure levels.

**Table 5.13-1      Change in Apparent Loudness**

± 3 dB	Threshold of human perceptibility
± 5 dB	Clearly noticeable change in noise level
± 10 dB	Half or twice as loud
± 20 dB	Much quieter or louder

Source: Bies, David A. and Colin H. Hansen. 2009. *Engineering Noise Control: Theory and Practice*. 4th ed. New York: Spon Press.

Sound levels decrease as the distance from their source increases. Sound dissipates exponentially with distance from the noise source. This phenomenon is known as “spreading loss.” For a single point source, sound levels decrease by approximately 6 dB for each doubling of distance from the source. This attenuation rate is appropriate for noise generated by onsite operations from stationary equipment or activity at a project site. If noise is produced by a line source, such as highway traffic, the sound decreases by 3 dB for each doubling of distance in a hard site environment.<sup>488</sup>

Time variation in noise exposure is typically expressed in terms of a steady-state energy level equal to the energy content of the time varying period (called  $L_{eq}$ ), or alternately, as a statistical description of the sound level that

<sup>488</sup> Surface type or ground cover is defined as the “hardness” or “softness” of the surrounding area. “Hard site environment” is areas with acoustically hard ground (e.g., pavement or water). Distance attenuation from a line source (i.e., roadway or railway) with a hard site environment is 3 dB per doubling of distance (dB/DD). “Soft site environment” is areas with acoustically soft ground (e.g., lawn or loose dirt or agricultural uses) where greater sound attenuation can occur.

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is exceeded over some fraction of a given observation period. For example, the  $L_{50}$  noise level represents the noise level that is exceeded 50% of the time. Half the time the noise level exceeds this level and half the time the noise level is less than this level. Other values typically noted during a noise survey are the  $L_{\min}$  and  $L_{\max}$ . These values represent the minimum and maximum root-mean-square noise levels obtained over the measurement period.

The CNEL and  $L_{dn}$  are 24-hour noise descriptors used to take into account that community receptors are more sensitive to unwanted noise intrusion during the evening and night. The CNEL descriptor requires that an artificial increment of 5 dBA be added to the actual noise level for the hours from 7:00 PM to 10:00 PM and 10 dBA for the hours from 10:00 PM to 7:00 AM. The  $L_{dn}$  descriptor uses the same methodology except that there is no artificial increment added to the hours between 7:00 PM and 10:00 PM. Both descriptors give roughly the same 24-hour level, with the CNEL being only slightly more restrictive (i.e., higher).

### *Psychological and Physiological Effects of Noise*

Physical damage to human hearing begins at prolonged exposure to noise levels higher than 85 dBA. Exposure to high noise levels affects our entire system, with prolonged noise exposure in excess of 75 dBA increasing body tensions and thereby affecting blood pressure, functions of the heart, and the nervous system. In comparison, extended periods of noise exposure above 90 dBA could result in permanent hearing damage.<sup>489</sup>

### *Vibration Fundamentals*

Vibration is a trembling, quivering, or oscillating motion of the earth. Like noise, vibration is transmitted in waves, but in this case through the earth or solid objects. Unlike noise, vibration is typically of a frequency that is felt rather than heard.

Vibration can be either natural as in the form of earthquakes, volcanic eruptions, sea waves, landslides, or man-made as from explosions, the action of heavy machinery or heavy vehicles such as trains. Both natural and man-made vibration may be continuous such as from operating machinery, or transient as from an explosion.

As with noise, vibration can be described by both its amplitude and frequency. Amplitude may be characterized in three ways, including displacement, velocity, and acceleration. Particle displacement is a measure of the distance that a vibrated particle travels from its original position and, for the purposes of soil displacement, is typically measured in inches or millimeters. Particle velocity is the rate of speed at which soil particles move in inches per second or millimeters per second. Particle acceleration is the rate of change in velocity with respect to time and is measured in inches per second or millimeters per second. Typically, particle velocity (measured in inches or millimeters per second) and/or acceleration (measured in gravities) are used to describe vibration. Table 5.13-2 shows the human reaction to various levels of vibration.

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<sup>489</sup> Center for Disease Control and Prevention, Noise and Occupational Hearing loss. <https://www.cdc.gov/niosh/topics/noise/default.html>. Accessed May 10, 2023.

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**Table 5.13-2 Human Reaction to Typical Vibration Levels**

Vibration Level Peak Particle Velocity (in/sec)	Human Reaction	Effect on Buildings
0.006–0.019	Threshold of perception, possibility of intrusion	Vibrations unlikely to cause damage of any type
0.08	Vibrations readily perceptible	Recommended upper level of vibration to which ruins and ancient monuments should be subjected
0.10	Level at which continuous vibration begins to annoy people	Virtually no risk of “architectural” (i.e., not structural) damage to normal buildings
0.20	Vibrations annoying to people in buildings	Threshold at which there is a risk to “architectural” damage to normal dwelling – houses with plastered walls and ceilings
0.4–0.6	Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges	Vibrations at a greater level than normally expected from traffic, but would cause “architectural” damage and possibly minor structural damage

Source: Caltrans, Division of Environmental Analysis. 2002, February. *Transportation Related Earthborne Vibration (Caltrans Experiences)*. Technical Advisory, Vibration. TAV-02-01-R9601. Prepared by Rudy Hendricks.

Vibration also varies in frequency, and this affects perception. Typical construction vibrations fall in the 10 to 30 Hz range, usually around 15 Hz. Traffic vibrations exhibit a similar range of frequencies; however, due to their suspension systems, buses often generate frequencies around 3 Hz at high vehicle speeds. It is less common, but possible, to measure traffic frequencies above 30 Hz.

The way in which vibration is transmitted through the earth is called propagation. Propagation of groundborne vibrations is complicated and difficult to predict because of the endless variations in the soil through which waves travel. There are three main types of vibration propagation: surface, compression, and shear waves. Surface waves, or Raleigh waves, travel along the ground’s surface. These waves carry most of their energy along an expanding circular wave front, similar to ripples produced by throwing a rock into a pool of water. P-waves, or compression waves, are body waves that carry their energy along an expanding spherical wave front. The particle motion in these waves is longitudinal (i.e., in a “push-pull” fashion). P-waves are analogous to airborne sound waves. S-waves, or shear waves, are also body waves that carry energy along an expanding spherical wave front. However, unlike P-waves, the particle motion is transverse or “side-to-side and perpendicular to the direction of propagation.”

As vibration waves propagate from a source, the energy is spread over an ever-increasing area, such that the energy level striking a given point is reduced with the distance from the energy source. This geometric spreading loss is inversely proportional to the square of the distance. Wave energy is also reduced with distance as a result of material damping in the form of internal friction, soil layering, and void spaces. The amount of attenuation provided by material damping varies with soil type and condition as well as the frequency of the wave.

### 5.13.1 Environmental Setting

#### 5.13.1.1 REGULATORY FRAMEWORK

National, state, regional, and local laws, regulations, plans, and guidelines are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to noise in the District. Many site-specific projects have not been identified, and there may be local jurisdictional plans and policies that are

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applicable depending on the project site. Specific requirements of these laws, regulations, plans, and guidelines might not be up to date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP projects. Although some of these may not directly apply to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standard Conditions of Approval are also listed. See *Applicable Regulations and Standard Conditions* at the end of this chapter for those that require District compliance.

### 5.13.1.1.1 Federal

#### 5.13.1.1.1.1 *United States Environmental Protection Agency*

The U.S. EPA (U.S. EPA 1974) has developed and published criteria for environmental noise levels with a directive to protect public health and welfare with an adequate margin of safety. This U.S. EPA criterion (Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety) was developed to be used as an acceptable guideline when no other local, county, or State standard has been established. However, the U.S. EPA criterion is not meant to substitute for agency regulations or standards in cases where States and localities have developed criteria according to their individual needs and situations.

#### 5.13.1.1.1.2 *United States Code of Regulations Title 14, Part 150*

The United States Code of Regulations Title 14 (Aeronautics and Space), Part 150, **Airport Noise Compatibility Planning**, has procedures, standards, and methodology governing the development, submission, and review of airport noise exposure maps and airport noise compatibility programs, including the process for evaluating and approving or disapproving those programs.<sup>490</sup> It prescribes methods to determine exposure of individuals to noise from the operations of an airport and also identifies land uses that are normally compatible with various levels of exposure to noise. For schools, an  $L_{dn}$  exposure greater than 65 dBA is considered incompatible. Development of schools exposed to annual 65 dBA  $L_{dn}$  noise levels due to aircraft noise should be prohibited.

#### 5.13.1.1.1.3 *Federal Transit Administration*

**Vibration.** The City of Los Angeles and most jurisdictions do not have specific limits or thresholds for vibration. The United States Department of Transportation Federal Transit Administration (FTA) provides criteria for acceptable levels of ground-borne vibration for various types of special buildings that are sensitive to vibration. The FTA criteria are often used to evaluate vibration impacts during construction.<sup>491</sup>

**Vibration-Related Human Annoyance.** The human reaction to various levels of vibration is highly subjective and varies from person to person. Table 5.13-3 shows the FTA's vibration criteria to evaluate vibration-related

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<sup>490</sup> U.S. Code of Regulations Title 14 (Aeronautics and Space), Part 150 – *Airport Noise Compatibility Planning*. <https://www.ecfr.gov/current/title-14/chapter-I/subchapter-I/part-150>.

<sup>491</sup> United States Department of Transportation Federal Transit Administration, 2006, Transit Noise and Vibration Impact Assessment, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA\\_Noise\\_and\\_Vibration\\_Manual.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf).

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annoyance due to resonances of the structural components of a building. These criteria are based on extensive research that suggests humans are sensitive to vibration velocities in the range of 8 to 80 Hz.

**Table 5.13-3 Groundborne Vibration Criteria: Human Annoyance**

Land Use Category	Max Lv (VdB)	Description
Workshop	90	Distinctly felt vibration. Appropriate to workshops and nonsensitive areas
Office	84	Felt vibration. Appropriate to offices and nonsensitive areas.
Residential – Daytime	78	Barely felt vibration. Adequate for computer equipment.
Residential – Nighttime	72	Vibration not felt, but groundborne noise may be audible inside quiet rooms.

Source: FTA. 2006, May. *Transit Noise and Vibration Impact Assessment*. United States Department of Transportation. FTA-VA-90-1003-06.  
Note: Max Lv (VdB): Lv is the velocity level in decibels, as measured in 1/3-octave bands of frequency over the frequency ranges of 8 to 80 Hz.

**Vibration-Related Architectural Damage.** Structures amplify groundborne vibration, and wood-frame buildings such as typical residential structures are more affected by ground vibration than heavier buildings. The level at which groundborne vibration is strong enough to cause architectural damage has not been determined conclusively. The most conservative estimates are reflected in the FTA standards, shown in Table 5.13-4.

**Table 5.13-4 Groundborne Vibration Criteria: Architectural Damage**

Building Category	PPV (in/sec)	Lv (VdB)
I. Reinforced concrete, steel, or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Non-engineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90

Source: FTA. 2006, May. *Transit Noise and Vibration Impact Assessment*. United States Department of Transportation. FTA-VA-90-1003-06.  
Note: Lv (VdB): Lv is the velocity level in decibels, as measured in 1/3-octave bands of frequency over the frequency ranges of 8 to 80 Hz.

### 5.13.1.1.2 State

#### 5.13.1.1.2.1 California Code of Regulations, Title 5, Section 14010I(q)

Under Title 5,<sup>492</sup> the CDE requires the District to consider noise in the site selection process. Section 14010(e) states a sound level study shall be done if the proposed site is adjacent to a road or freeway to determine if vehicle noise will adversely affect the educational program. Section 14010(d) goes on to state that the District shall consider environmental noise in its site selection process.

#### 5.13.1.1.2.2 California Code of Regulations, Title 24, Part 2

Current law states that every local agency enforcing building regulations, such as cities and counties, must adopt the provisions of the CBC within 180 days of its publication. The publication date of the CBC is established by the California Building Standards Commission. The most recent building standard adopted by the legislature

<sup>492</sup> Title 5. Education, Division 1. California Department of Education, Chapter 13. School Facilities and Equipment, Subchapter 1. School Housing, Article 2. School Sites, 14010. Standards for School Site Selection. <http://government.westlaw.com/linkedslice/default.asp?SP=CCR-1000>.



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and used throughout the state is the 2022 version, often with local, more restrictive amendments that are based on local geographic, topographic, or climatic conditions.<sup>493</sup> The State of California's noise insulation standards are codified in the CBC.

Section 1206.5, Acoustical Control, references California Green Building Standards Code, Chapter 5, Division 5.5 for sound transmission requirements.

Section 1207, Enhanced Classroom Acoustics, references Section 808 of ICC A117.1.

### **5.13.1.1.2.3** *California Green Building Standards Code, Chapter 5, Division 5.5*

California Code of Regulations, Title 24, Part 11 is referred to as CALGreen and has requirements for insulation that affect exterior-interior noise transmission for non-residential structures. Pursuant to CALGreen Section 5.507.4.1, Exterior Noise Transmission, wall and roof-ceiling assemblies exposed to the noise source making up the building or addition envelope or altered envelope shall meet a composite sound transmission class (STC) rating of at least 50 or a composite outdoor-indoor transmission class (OITC) rating of no less than 40 with exterior windows of a minimum STC of 40 or OITC of 30 within a 65 dBA CNEL or Ldn noise contour of an airport, freeway or expressway, railroad, industrial source or fixed-guideway source. Where noise contours are not readily available, buildings exposed to a noise level of 65 dBA Leq during any hour of operation shall have building, addition or alteration exterior wall and roof-ceiling assemblies exposed to the noise source meeting a composite STC rating of at least 45 (or OITC 35), with exterior windows of a minimum of STC 40 (or OITC 30).

Pursuant to CALGreen Section 5.507.4.2, Performance Method, wall and roof-ceiling assemblies exposed to the noise source making up the building or addition envelope or altered envelope shall be constructed to provide an interior noise environment attributable to exterior sources that does not exceed an hourly equivalent noise level (Leq-1Hr) of 50 dBA in occupied areas during any hour of operation within a 65 dBA CNEL or Ldn noise contour of an airport, freeway or expressway, railroad, industrial source or fixed-guideway source.

Section 5.507.4.2.2, Documentation of Compliance, goes on to state an acoustical analysis documenting complying interior sound levels shall be prepared by personnel approved by the architect or engineer of record.

### **5.13.1.1.2.4** *ICC A117.1 Accessible and Usable Buildings and Facilities, Section 808*

Section 808, Enhanced Acoustics for Classrooms, states that classrooms not exceeding 20,000 cubic feet and required to provide enhanced acoustics shall comply with Section 808. Classroom ambient sound levels shall comply with Sections 808.3.1 and 808.3.2. Ambient sound levels from sources outside and inside the classroom shall be evaluated individually. The greatest one-hour averaged sound levels shall be evaluated at the loudest usable location in the room at a height of 36 inches to 42 inches above the floor and no closer than 36 inches from any wall, window, or object. The ambient sound level limits shall apply to fully-furnished, unoccupied classrooms, and with only permanent HVAC, electrical and plumbing systems functioning. Classroom

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<sup>493</sup> The 2022 CBC took effect on January 1, 2023.

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equipment, including, but not limited to, computers, printers and fish tank pumps shall be turned off during these measurements.

Section 808.3.1 states that classroom ambient sound levels shall not exceed 35 dBA and 55 dBC due to intruding noise from sound sources outside of the classroom, whether from the exterior or from other interior spaces. While Section 808.3.2 states that classroom ambient sound levels shall not exceed 35 dBA and 55 dBC from sound sources inside the classroom.

### 5.13.1.1.2.5 California Code of Regulations, Title 21

The Department of Transportation shall object to the acquisition of a proposed school site that would be within a 65 dB annual CNEL aircraft noise contour, according to Title 21, Division 2.5, Chapter 2.1, School Site Evaluation Criteria (d)(1)(B). Additionally, public and private schools of standard construction for which an aviation easement for noise has not been acquired by the airport proprietor, or that do not have adequate acoustic performance to ensure an interior CNEL of 45 dB or less in all classrooms due to aircraft noise will be deemed as an incompatible land use under Title 21, Division 2.5, Chapter 6, Article 1, Section 5014, Incompatible Land Uses Within the Noise Impact Boundary, (b).

### 5.13.1.1.2.6 California Office of Noise Control

The land use compatibility chart for community noise prepared by the California Office of Noise Control is shown in Table 5.13-5. This table provides a tool to gauge the compatibility of land uses relative to existing and future noise levels. Table 5.13-5 identifies normally acceptable, conditionally acceptable, and clearly unacceptable noise levels for various land uses. A conditionally acceptable designation implies new construction or development should be undertaken only after detailed analysis of the noise reduction requirements for each land use and needed noise insulation features are incorporated in the design. By comparison, a normally acceptable designation indicates that standard construction can occur with no special noise reduction requirements.

**Table 5.13-5 Community Noise and Land Use Compatibility**

Land Uses	CNEL (dBA)					
	55	60	65	70	75	80
Residential-Low Density Single Family, Duplex, Mobile Homes	Normally Acceptable	Normally Acceptable	Normally Acceptable	Normally Acceptable	Normally Acceptable	Normally Acceptable
	Conditionally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Conditionally Acceptable
	Clearly Unacceptable	Clearly Unacceptable	Clearly Unacceptable	Clearly Unacceptable	Clearly Unacceptable	Clearly Unacceptable
Residential- Multiple Family	Normally Acceptable	Normally Acceptable	Normally Acceptable	Normally Acceptable	Normally Acceptable	Normally Acceptable
	Conditionally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Conditionally Acceptable
	Clearly Unacceptable	Clearly Unacceptable	Clearly Unacceptable	Clearly Unacceptable	Clearly Unacceptable	Clearly Unacceptable
Transient Lodging: Hotels and Motels	Normally Acceptable	Normally Acceptable	Normally Acceptable	Normally Acceptable	Normally Acceptable	Normally Acceptable
	Conditionally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Conditionally Acceptable
	Clearly Unacceptable	Clearly Unacceptable	Clearly Unacceptable	Clearly Unacceptable	Clearly Unacceptable	Clearly Unacceptable
Schools, Libraries, Churches, Hospitals, Nursing Homes	Normally Acceptable	Normally Acceptable	Normally Acceptable	Normally Acceptable	Normally Acceptable	Normally Acceptable
	Conditionally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Conditionally Acceptable
	Clearly Unacceptable	Clearly Unacceptable	Clearly Unacceptable	Clearly Unacceptable	Clearly Unacceptable	Clearly Unacceptable

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Land Uses	CNEL (dBA)					
	55	60	65	70	75	80
Auditoriums, Concert Halls, Amphitheaters						
Sports Arena, Outdoor Spectator Sports						
Playground, Neighborhood Parks						
Golf Courses, Riding Stables, Water Recreation, Cemeteries						
Office Buildings, Businesses, Commercial and Professional						
Industrial, Manufacturing, Utilities, Agricultural						
Explanatory Notes						
	Normally Acceptable: With no special noise reduction requirements assuming standard construction.			Normally Unacceptable: New construction is discouraged. If new construction does not proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.		
	Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirement is made and needed noise insulation features included in the design.			Clearly Unacceptable: New construction or development should generally not be undertaken.		

Source: California Office of Noise Control. Guidelines for the Preparation and Content of Noise Elements of the General Plan. February 1976. Adapted from the US EPA Office of Noise Abatement Control, Washington D.C. Community Noise. Prepared by Wyle Laboratories. December 1971.

### 5.13.1.1.3 Local

Cities and communities within the District attendance boundaries have General Plans or community plans that guide development. Where a proposed LAUSD school project is inconsistent with a local General Plan policy or zoning ordinance, LAUSD school sites are exempt under Government Code Section 53094[1], pending a two-thirds vote of the Board of Education. On February 19, 2019, the LAUSD Board of Education Adopted a Resolution (Res 256-18/19)[2] to exempt all LAUSD school sites from local land use regulations under Government Code Section 53094. Although LAUSD school sites are exempt from local land use regulations, many of these general plans or community plans establish goals and policies providing applicable references for discussion.

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### 5.13.1.1.3.1 County of Los Angeles

#### 5.13.1.1.3.1.1 Exterior Noise Standards

The County of Los Angeles regulates noise through the county municipal code, Title 12, Chapter 12.08 (Noise Control). These standards do not gauge the compatibility of development, but restrict the amount and duration of noise generated, as measured at the property line of the noise receptor. The noise standards in Table 5.13-6, unless otherwise indicated, apply to all property within a designated noise zone. It is also noted that the levels presented in Table 5.13-6 shall be reduced by 5 decibels for any source of sound which emits a pure tone or impulsive noise. However, under Section 12.08.570, outdoor activities conducted on public or private school grounds are exempt from the Chapter 12.08 restrictions.

**Table 5.13-6 County of Los Angeles Exterior Noise Standards**

Noise Zone	Time Period	Maximum Permissible Noise Level (dBA)				
		Standard 1 (L <sub>50</sub> )	Standard 2 (L <sub>25</sub> )	Standard 3 (L <sub>8</sub> )	Standard 4 (L <sub>2</sub> )	Standard 5 (L <sub>max</sub> )
Noise-Sensitive Area	Anytime	45	50	55	60	65
Residential Properties	10:00 PM to 7:00 AM	45	50	55	60	65
	7:00 AM to 10:00 PM	50	55	60	65	70
Commercial Properties	10:00 PM to 7:00 AM	55	60	65	70	75
	7:00 AM to 10:00 PM	60	65	70	75	80
Industrial Properties	Anytime	70	75	80	85	90

Source: County of Los Angeles Municipal Code, Section 12.08.390. <https://library.municode.com/index.aspx?clientId=16274>.

Notes: Maximum Permissible Noise Level (dBA):

- According to Section 12.08.390, if the ambient noise levels exceed the exterior noise standards then the ambient noise level becomes the noise standard. If the source of noise emits a pure tone or impulsive noise, the exterior noise levels limits shall be reduced by five decibels.
- If the measurement location is on a boundary property between two different zones, the noise limit shall be the arithmetic mean of the maximum permissible noise level limits of the subject zones; except when an intruding noise source originates on an industrial property and is impacting another noise zone, the applicable exterior noise level shall be the daytime exterior noise level for the subject receptor property.

According to the County Municipal Code, Title 12, Chapter 12.08:

- **Standard No. 1** shall be the exterior noise level which may not be exceeded for a cumulative period of more than 30 minutes in any hour. Standard No. 1 shall be the applicable L<sub>50</sub> noise level shown above; or, if the ambient L<sub>50</sub> exceeds the foregoing level, then the ambient L<sub>50</sub> becomes the exterior noise level for Standard No. 1.
- **Standard No. 2** shall be the exterior noise level which may not be exceeded for a cumulative period of more than 15 minutes in any hour. Standard No. 2 shall be the applicable L<sub>50</sub> noise level shown above plus 5 dB; or, if the ambient L<sub>25</sub> exceeds the foregoing level, then the ambient L<sub>25</sub> becomes the exterior noise level for Standard No. 2.
- **Standard No. 3** shall be the exterior noise level which may not be exceeded for a cumulative period of more than five minutes in any hour. Standard No. 3 shall be the applicable L<sub>50</sub> noise level shown above plus 20 dB; or, if the ambient L<sub>8</sub> exceeds the foregoing level, then the ambient L<sub>8</sub> becomes exterior noise level for Standard No. 3.

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- **Standard No. 4** shall be the exterior noise level which may not be exceeded for a cumulative period of more than one minute in any hour. Standard No. 4 shall be the applicable  $L_{50}$  noise level shown above plus 15 dB; or, if the ambient  $L_2$  exceeds the foregoing level, then the ambient  $L_2$  becomes the exterior noise level for Standard No. 4.
- **Standard No. 5** shall be the exterior noise level which may not be exceeded for any period of time. Standard No. 5 shall be the applicable  $L_{50}$  noise level shown above plus 20 dB; or, if the ambient  $L_0$  exceeds the foregoing level then the ambient  $L_{max}$  becomes the exterior noise level for Standard No. 5.

**5.13.1.1.3.1.2 Construction Noise**

County construction noise is restricted by “Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of 7:00 PM and 7:00 AM, or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real-property line, except for emergency work of public service utilities or by variance issued by the health officer is prohibited.”<sup>494</sup> The county also sets maximum noise levels at residential structures from mobile equipment (unscheduled, intermittent, short-term operations for less than 10 days) as shown in Table 5.13-7.

**Table 5.13-7 County of Los Angeles Mobile Construction Equipment Noise Limits**

	Single-Family Residential	Multifamily Residential	Semi-residential/ Commercial
Daily, except Sundays and legal holidays, 7:00 AM to 8:00 PM	75 dBA	80 dBA	85 dBA
Daily, 8:00 PM to 7:00 AM and all day Sunday and legal holidays	60 dBA	64 dBA	70 dBA

Source: County of Los Angeles Municipal Code, Section 12.08.440. <https://library.municode.com/index.aspx?clientId=16274>.

Maximum noise levels at residential structures from stationary equipment (scheduled daily and long-term operations of 10 days or more) are summarized in Table 5.13-8.

**Table 5.13-8 County of Los Angeles Stationary Construction Equipment Noise Limits**

	Single-Family Residential	Multifamily Residential	Semi-residential/ Commercial
Daily, except Sundays and legal holidays, 7:00 AM to 8:00 PM	60 dBA	65 dBA	70 dBA
Daily, 8:00 PM to 7:00 AM and all day Sunday and legal holidays	50 dBA	55 dBA	60 dBA

Source: County of Los Angeles Municipal Code, Section 12.08.440. <https://library.municode.com/index.aspx?clientId=16274>.

The maximum noise levels at business structures from mobile equipment (unscheduled, intermittent, short-term operations for less than 10 days) is 85 dBA. This limit applies every day, including Sunday and legal holidays, and at all hours.

Chapter 12.08.440 also stipulates that all mobile or stationary internal-combustion-engine powered equipment or machinery shall be equipped with suitable exhaust and air-intake silencers in proper working order. In case

<sup>494</sup> County of Los Angeles Municipal Code, Section 12.08.440. <https://library.municode.com/index.aspx?clientId=16274>.

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of a conflict between this chapter and any other ordinance regulating construction activities, provisions of any specific ordinance regulating construction activities shall control.

### 5.13.1.1.3.1.3 *Los Angeles County Airport Land Use Plan*

In Los Angeles County the Regional Planning Commission has the responsibility for acting as the Airport Land Use Commission (ALUC) and coordinating the airport planning of public agencies within the county. The currently adopted plan is the Los Angeles County Airport Land Use Plan.<sup>495</sup> Noise-sensitive land uses in locations where the aircraft exterior noise level does not exceed 65 dBA CNEL are compatible as long as interior habitable rooms remain below 45 dBA CNEL.

The California Public Resources Code, Section 21096, requires that when preparing an environmental impact report for any project within an airport influence area, as defined by an Airport Land Use Plan (ALUP), the lead agency shall utilize the California Airport Land Use Planning Handbook as a technical resource with respect to airport noise and safety compatibility. The basis for airport compatibility zone delineation is the CNEL contours created with the FAA Integrated Noise Model for private and public airports. The ALUP includes a Land Use Compatibility chart to guide the compatibility of a proposed use in relation to the level of exposure to aircraft noise, as shown in Table 5.13-9.

**Table 5.13-9 ALUP Land Use Compatibility**

Land Uses	Community Noise Exposure CNEL (dBA)					
	55	60	65	70	75	80
Residential						
Education Facilities						
Commercial						
Industrial						
Agriculture						
Recreation						
Explanatory Notes						
	Satisfactory		Avoid Land Use Unless Related to Airport Services			
	Caution. Review Noise Insulation Needs					

Source: Los Angeles County Department of Regional Planning 2004.

The ALUP is a land use compatibility plan that is intended to protect the public from adverse effects of aircraft noise. In most instances, the airport influence area is designated by the ALUC as its planning area boundary for the airport, and the two terms can be considered synonymous. Aircraft noise contours used for planning purposes by the County of Los Angeles and Airport Land Use Commission are found in the ALUP. The ALUP

<sup>495</sup> Los Angeles County Airport Land Use Plan, Los Angeles Department of Regional Planning. 2004. <https://planning.lacounty.gov/wp-content/uploads/2022/10/Los-Angeles-County-Airport-Land-Use-Plan.pdf>.

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identifies noise impact zones based on the airport noise contours. ALUP policies and programs relevant to noise are listed below:

- **G-1** Require new uses to adhere to the Land Use Compatibility table.
- **G-2** Encourage the recycling of incompatible land uses to uses which are compatible with the airport, pursuant to the Land Use Compatibility Chart.
- **G-3** Consider requiring dedication of an aviation easement to the jurisdiction owning the airport as a condition of approval on any project within the designated planning boundaries.
- **G-4** Airport proprietors should achieve airport/community land use compatibility by adhering to the guidelines of the California Noise Standards.
- **N-1** Use the CNEL method for measuring noise impacts near airports in determining suitability for various types of land uses
- **N-2** Require sound insulation to insure a maximum interior 45 dBA CNEL in new residential, educational, and health-related uses in areas subject to exterior noise levels of 65 dBA CNEL or greater.
- **N-3** Utilize the table listing Land Use Compatibility for Airport Noise Environments in evaluating projects within planning boundaries.
- **N-4** Encourage local agencies to adopt procedures to ensure that prospective property owners in aircraft noise exposure areas above a current or anticipated 60 dBA CNEL are informed of these noise levels and of any land use restriction associated with high noise exposure.

### **5.13.1.1.3.1.4      *Vibration Standards***

The County of Los Angeles Municipal Code, Section 12.08.560, prohibits the operation of any device that creates vibration that is above 0.01 in/sec over the range of 1 to 100 Hz at or beyond the property boundary of the source on private property or at 150 feet from the source on a public space or right-of-way. This criterion is often utilized to evaluate vibration-annoyance impacts from industrial uses to nearby sensitive receptors.

### **5.13.1.1.3.2      *City of Los Angeles***

#### **5.13.1.1.3.2.1      *General Plan Noise Element***

The City of Los Angeles includes noise standards and guidelines in its general plan noise element and the municipal code, as discussed below. The city's noise element is the guiding document for the city's noise policy. The City classifies land uses for noise compatibility as acceptable, conditionally acceptable, normally unacceptable, and unacceptable depending on the noise level and land use. Noise levels of less than 60 dBA CNEL are classified as acceptable for land uses that are sensitive to noise. Noise-sensitive land uses include residential, schools, libraries, churches, nursing homes, hospitals, and open space/recreation areas. Noise levels from 60 to 70 dBA CNEL are "conditionally acceptable" for noise-sensitive uses, meaning a detailed analysis of noise mitigation is required and noise insulation features should be included in the project design. Noise

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levels above 70 dBA CNEL are considered by the city to be “normally unacceptable” or “unacceptable” for noise sensitive land uses.<sup>496</sup>

### 5.13.1.1.3.2.2 *Municipal Code*

The city’s noise ordinance, codified in its municipal code, is designed to protect people from objectionable non-transportation noise sources such as music, machinery, pumps, and air conditioners.<sup>497</sup> These standards do not gauge the compatibility of developments in the noise environment, but provide restrictions on the amount and duration of noise generated at a property, as measured at the property line of the noise receptor. According to the city’s noise ordinance, stationary noise sources such as radios, television sets, and similar devices (Section 112.01), and air conditioning, refrigeration, heating, pumping, and filtering equipment (Section 112.02) are prohibited from causing the ambient noise level to increase by more than 5 dB. However, Section 111.02 states that 5 dB shall be added to the offending noise if it is a repeated impulse noise or has any steady tone with an audible fundamental frequency or overtones of 200 Hz. The section also states that 5 dB shall be subtracted from the offending noise if it occurs for more than 5 but less than 15 minutes in any period of 60 consecutive minutes between the hours of 7:00 AM and 10:00 PM of any day, or if it occurs for 5 minutes or less in any period of 60 consecutive minutes, between the hours of 7:00 AM and 10:00 PM of any day.

Where actual ambient levels are lower than shown in Table 5.13-10, the presumed ambient noise levels in the table are used as the baseline.<sup>498</sup>

**Table 5.13-10 City of Los Angeles Ambient Noise Criteria**

Zoning Categories	Time Period	Exterior Noise Limits (dBA L <sub>eq</sub> )
Residential: A1, A2, RA, RE, RS, RD, RW1, RW2, R1, R2, R3, R4, and R5	10:00 PM to 7:00 AM	40
	7:00 AM to 10:00 PM	50
Commercial: P, PB, CR, C1, C1.5, C2, C4, C5, and CM	10:00 PM to 7:00 AM	55
	7:00 AM to 10:00 PM	60
Industrial: M1, MR1, and MR2	10:00 PM to 7:00 AM	55
	7:00 AM to 10:00 PM	60
Industrial: M2 and M3	10:00 PM to 7:00 AM	65
	7:00 AM to 10:00 PM	65

**Notes:**

**Residential:** A1 and A2: Agriculture; RA and RS: Suburban; RE Residential Estate; RD: Restricted Density Multiple Dwelling; RW1 and RW2: Residential Waterways; R1: One-family; R2: Two-family; R3, R4, and R5: Multiple Dwelling. **Commercial:** P: Automobile Parking; PB Parking Building; CR, C1, and C1.5: Limited Commercial; C2, C4, and C5: Commercial Zone; CM: Commercial Manufacturing. **Light Industrial:** M1: Limited Industrial; MR1: Restricted Industrial; MR2: Restricted Light Industrial, M2: Light Industrial; M3: Heavy Industrial.

<sup>496</sup> City of Los Angeles General Plan Noise Element, City of Los Angeles Department of City Planning, 1999.

<sup>497</sup> City of Los Angeles Municipal Code, Chapter XI, Noise Regulation [https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lamc/0-0-0-193741](https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-193741).

<sup>498</sup> City of Los Angeles Municipal Code, Chapter XI, Noise Regulation, Article 1, Section 111.03, Minimum Ambient Noise Levels.



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Trash collecting within 200 feet of a residential building is prohibited between the hours of 9:00 PM and 6:00 AM.<sup>499</sup> In addition, loading/unloading of commercial vehicles is prohibited between the hours of 10:00 PM and 7:00 AM within 200 feet of a residential building.<sup>500</sup>

### **5.13.1.1.3.2.3 Construction Noise Standards**

Section 41.40 and Section 112.05 of the City of Los Angeles Municipal Code govern noise limits and the hours of construction activities in the city.

Section 41.40 of the municipal code specifies hours allowed for construction activities for the purposes of noise control.<sup>501</sup> Construction activities are constrained to the daytime hours from 7:00 AM to 9:00 PM Monday through Friday, 8:00 AM to 6:00 PM on Saturdays and national holidays, and prohibited on Sundays.

Chapter XI, Noise Control, Section 112.05, of the Los Angeles Municipal Code also specifies the maximum noise level for construction equipment.<sup>502</sup> In accordance with this section and Section 41.40, construction equipment, including augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors, and pneumatic or other powered equipment items shall not produce a maximum noise level exceeding 75 dBA at a distance of 50 feet between the hours of 7:00 AM and 9:00 PM. The city allows construction noise exceeding these noise limits if compliance is technically infeasible. However, the burden of proving that compliance is technically infeasible includes showing that noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment.

### **5.13.1.1.3.2.4 City of Los Angeles CEQA Thresholds Guide**

The Los Angeles CEQA thresholds guide provides criteria to determine noise impacts.

A project would have a significant **construction-related noise impact** if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;
- Construction activities lasting more than 10 days in a three month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or

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<sup>499</sup> City of Los Angeles Municipal Code, Chapter XI, Noise Regulation, Article 1, Section 113.01, Rubbish and Garbage Collection and Disposal.

<sup>500</sup> City of Los Angeles Municipal Code, Chapter XI, Noise Regulation, Article 1, Section 114.03, Vehicles-Loading and Unloading.

<sup>501</sup> City of, Los Angeles, City of Los Angeles Municipal Code, Chapter IV, Public Welfare, Article 1, Disorderly Conduct, Section 41.40, Noise Due to Construction, Excavation Work – When Prohibited. Available: [https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lamc/0-0-0-128777](https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-128777).

<sup>502</sup> City of Los Angeles Municipal Code, Chapter XI, Noise Regulation, Article 2, Section 112.05, Maximum Noise Level of Powered Equipment or Powered Hand Tools.

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- Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 PM and 7:00 AM Monday through Friday, before 8:00 AM or after 6:00 PM on Saturday, or at any time on Sunday.

A project would have a long-term **operational noise impact** if noise levels during operation “causes the ambient noise levels at the property line of affected uses to increase by three dBA CNEL to or within the ‘normally unacceptable’ or ‘clearly unacceptable’ category, or any five dBA or greater increase.”<sup>503</sup>

### 5.13.1.1.4 Other Jurisdictional Noise Standards

#### 5.13.1.1.4.1 Other Cities within the LAUSD

The District has considered local plans and policies for the communities surrounding its facilities. The boundaries of the LAUSD spread over 720 square miles and include the City of Los Angeles as well as all or parts of 31 other municipalities plus several unincorporated areas of Los Angeles County. The noise standards of the municipality where a project is located will be used in future CEQA analysis for each site-specific project.

#### 5.13.1.1.4.2 American National Standards Institute

The American National Standards Institute (ANSI), along with efforts of the U.S. Access Board and the Acoustical Society of America (ASA), created the ANSI S12.60-2002 standard, Acoustical Performance Criteria, Design Requirements and Guidelines for Schools. Through specific design requirements and acoustical performance criteria, the standard creates a classroom environment that optimizes speech understanding. Compliance with the ANSI standard is voluntary, but many school districts and state and local agencies have adopted the standard as a part of their construction and renovation requirements for schools.<sup>504</sup>

#### 5.13.1.1.4.3 American Speech-Language-Hearing Association

In 2004, the American Speech-Language-Hearing Association’s (ASHA’s) Working Group on Classroom Acoustics recommended that an appropriate acoustical environment be established in all classrooms and learning spaces. ASHA endorses the ANSI standard for classroom acoustics and recommends the following acoustical criteria:<sup>505</sup>

1. Unoccupied classroom levels must not exceed 35 dBA.
2. The signal-to-noise ratio (the difference between the teacher’s voice and the background noise) should be at least +15 dB at the child’s ears.

<sup>503</sup> City of Los Angeles CEQA Thresholds Guide, 2006.  
<https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf>.

<sup>504</sup> American National Standards Institute (ANSI).  
[https://global.ihf.com/doc\\_detail.cfm?&csf=ASA&input\\_doc\\_number=%20&input\\_doc\\_title=%20&item\\_s\\_key=00585043](https://global.ihf.com/doc_detail.cfm?&csf=ASA&input_doc_number=%20&input_doc_title=%20&item_s_key=00585043).

<sup>505</sup> American Speech-Language-Hearing Association. American National Standard on Classroom Acoustics.  
<https://www.asha.org/practice-portal/professional-issues/classroom-acoustics/>.

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3. Unoccupied classroom reverberation must not surpass 0.6 seconds in smaller classrooms or 0.7 seconds in larger rooms.

**LAUSD***Standard Conditions of Approval*

This table lists the noise-related standard conditions that will be included as part of each SUP-related project, as appropriate.

Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
SC-N-1	Exterior Campus Noise	Exterior noise levels are or would be greater than 67 dBA $L_{eq}$	During project design	LAUSD shall include features such as sound walls, building configuration, and other design features in order to attenuate exterior noise levels on a school campus to less than 67 dBA $L_{eq}$ .
SC-N-2	Interior Classroom Noise	Interior classroom noise levels would be greater than 45 dBA $L_{eq}$	During project design	<p>LAUSD shall analyze the acoustical environment of the site (such as traffic) and the characteristics of planned building components (such as heating, ventilation, and air conditioning [HVAC]), and design to achieve interior classroom noise levels of less than 45 dBA <math>L_{eq}</math> with a target of 40 dBA <math>L_{eq}</math> (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.</p> <ul style="list-style-type: none"> <li>• New construction should achieve classroom acoustical quality consistent with the current School Design Guide and CHPS (California High Performance Schools) standard of 45 dBA <math>L_{eq}</math>.</li> <li>• 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 <math>L_{eq}</math>.</li> <li>• Modernization of existing facilities and/or HVAC replacement projects should improve the sound performance of the HVAC system over the existing system.</li> <li>• The District's purchase of new units should give preference to HVAC manufacturers that sell the lowest noise level units at the lowest cost.</li> <li>• Existing HVAC units operating in excess of 45 dBA <math>L_{eq}</math> inside classrooms should be modified.</li> </ul>
SC-N-3	Operational Noise	Operational noise levels from new source exceeds local noise standards, policies, or ordinances at adjacent noise-sensitive land uses	During project design and construction (Planning, Construction)	<p>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:</p> <ul style="list-style-type: none"> <li>• Buffer Zones;</li> <li>• Berms;</li> <li>• Sound barriers;</li> <li>• Buildings;</li> <li>• Masonry walls;</li> </ul>

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
				<ul style="list-style-type: none"> <li>Enclosed bleacher foot wells; and/or</li> <li>Other site-specific project design features.</li> </ul>
SC-N-4	Construction Noise and Vibration (Annoyance)	Construction on an existing school campus	Prior to and during construction	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	Vibration (Structural Damage)	Rock blasting	During construction (Construction)	LAUSD shall require the Construction Contractor to minimize blasting for all demolition and construction activities, where feasible.
SC-N-6	Vibration (Structural Damage)	Pile driving or heavy vibration activities	During construction (Construction)	For projects where pile driving activities are required within 150 feet of a structure, a detailed vibration assessment shall be provided by an acoustical engineer to analyze potential impacts related to vibration to nearby structures and to determine feasible mitigation measures to eliminate potential risk of architectural damage.
SC-N-7	Vibration (Structural Damage)	Vibration intensive activities are planned within 25 feet of a historic building or structure	Prior to and during demolition and construction	<p>LAUSD shall meet with the Construction Contractor to discuss alternative methods of demolition and construction for activities within 25 feet of a historic building to reduce vibration impacts. During the preconstruction meeting, the Construction Contractor shall identify demolition methods not involving vibration-intensive construction equipment or activities. For example: sawing into sections that can be loaded onto trucks results in lower vibration levels than demolition by hydraulic hammers.</p> <ul style="list-style-type: none"> <li>Prior to construction activities, the Construction Contractor shall inspect and report on the current foundation and structural condition of the historic building.</li> <li>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.</li> <li>The Construction Contractor shall avoid use of vibratory rollers and packers adjacent to a historic building.</li> <li>During demolition, the Construction Contractor shall not phase any ground-impacting operations near a historic building to occur at the same time as any ground impacting operation associated with demolition and construction of a new building.</li> <li>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.</li> </ul>
SC-N-8	Construction Noise	Use of large, heavy or noisy construction equipment within 500 feet of a non-LAUSD sensitive receptor	During construction (Construction)	<p>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.</p> <p>The Construction Contractor shall implement project specific noise reduction measures</p>

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
				<p>identified by OEHS. Noise reduction measures may include, but are not limited to, the following:</p> <p><u>Source Controls</u></p> <ul style="list-style-type: none"> <li>• Time Constraints – prohibiting work during sensitive nighttime hours</li> <li>• 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)</li> <li>• Equipment Restrictions – restricting the type of equipment used</li> <li>• Substitute Methods – using quieter methods and/or equipment</li> <li>• Exhaust Mufflers – ensuring equipment have quality mufflers installed</li> <li>• Lubrication &amp; Maintenance – well maintained equipment is quieter</li> <li>• Reduced Power Operation – use only necessary size and power</li> <li>• Limit Equipment On-Site – only have necessary equipment on-site</li> <li>• Noise Compliance Monitoring – technician on site to ensure compliance</li> <li>• Quieter Backup Alarms – manually-adjustable or ambient sensitive types</li> </ul> <p><u>Path Controls</u></p> <ul style="list-style-type: none"> <li>• Noise Barriers – semi-permanent or portable wooden or concrete barriers</li> <li>• Noise Curtains – flexible intervening curtain systems hung from supports</li> <li>• Enclosures – encasing localized and stationary noise sources</li> <li>• Increased Distance – perform noisy activities farther away from receptors, including operation of portable equipment, storage and maintenance of equipment</li> </ul> <p><u>Receptor Controls</u></p> <ul style="list-style-type: none"> <li>• Window Treatments – reinforcing the building's noise reduction ability</li> <li>• Community Participation – open dialog to involve affected residents</li> <li>• Noise Complaint Process – ability to log and respond to noise complaints. Advance notice of the start of construction shall be delivered to all noise sensitive receptors adjacent to the project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the contractor and the District. In the event of noise complaints the LAUSD shall monitor noise from the construction activity to ensure that construction noise does not exceed limits specified in the noise ordinance.</li> </ul>
SC-N-9	Construction Noise	Use of large, heavy or noisy construction equipment on an	During construction (Construction)	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

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
		operating LAUSD campus		<p>necessary.<sup>5</sup> Noise control measures may include, but are not limited to:</p> <p><u>Path Controls</u></p> <p>Noise Attenuation Barriers – 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. (Note: 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).</p> <p><u>Source Controls</u></p> <ul style="list-style-type: none"> <li>• 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).</li> <li>• Substitute Methods – using quieter methods and/or equipment.</li> <li>• Exhaust Mufflers – ensuring equipment has quality mufflers installed.</li> <li>• Lubrication &amp; Maintenance – well-maintained equipment is quieter.</li> <li>• Reduced Power Operation – use only necessary size and power.</li> <li>• Limit Equipment On-Site – only have necessary equipment on-site.</li> <li>• Quieter Backup Alarms – manually adjustable or ambient sensitive types.</li> </ul> <p>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:</p> <p><u>Receptor Controls</u></p> <ul style="list-style-type: none"> <li>• Temporary Window Treatments – temporarily reinforcing the building's noise reduction ability.</li> </ul> <p>Temporary Relocation – in extreme otherwise unmitigable cases, students shall be moved to temporary classrooms / facilities away from the construction activity.</p>

### 5.13.1.2 EXISTING CONDITIONS

Within Los Angeles County, the major noise sources are generally transportation-related (i.e., vehicles, railroads, and aircraft). In addition, stationary noise sources (air conditioning units, loading docks, mechanical equipment, rail yards, machinery, etc.) from commercial and industrial activity also contribute to the county's existing noise environment. Table 5.13-11 shows typical noise levels from various noise sources in Los Angeles County.

**Table 5.13-11 Typical Noise Levels**

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Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	110	Rock Band
Jet Flyover at 1,000 feet	105	
Gas Lawn Mower at three feet	95	
Diesel Truck at 50 feet, at 50 mph	85	Food Blender at 3 feet
	80	Garbage Disposal at 3 feet
Noisy Urban Area, Daytime	75	
	70	Vacuum Cleaner at 10 feet
Commercial Area	65	Normal speech at 3 feet
Heavy Traffic at 300 feet	60	
	55	Large Business Office
Quiet Urban Daytime	50	
	45	Dishwasher Next Room
Quiet Urban Nighttime	40	Theater, Large Conference Room (background)
Quiet Suburban Nighttime	35	
	30	Library
Quiet Rural Nighttime	25	Bedroom at Night, Concert Hall (background)
	15	Broadcast/Recording Studio
Lowest Threshold of Human Hearing	0	Lowest Threshold of Human Hearing

Source: Caltrans. 2009, November. *Technical Noise Supplement ("TeNS")*. Prepared by ICF International.

## 5.13.1.2.1.1 North Region

Major freeways in the North Region are Interstates 5, 405, and 210, and State Routes 101, 118, 134, and 170 (see Chapter 3, Figure 3-2, for Region boundaries). Major roads such as Roscoe Boulevard, Sharman Way, Ventura Boulevard, Victory Boulevard, Van Nuys Boulevard, San Fernando Road, and others generate high levels of traffic noise.

Freight and passenger rail lines are in the North Region. Metrolink and Amtrak passenger service is provided on lines that link Los Angeles, Ventura County, and Antelope Valley, and travels through the San Fernando Valley.

Van Nuys Airport, a general aviation airport; Bob Hope Airport, a commercial airport; and Whiteman Airport, a general aviation airport, are in the North Region.

Stationary noise is generated by all types of land uses. Residential uses generate noise from landscaping, maintenance activities, and air conditioning systems. Commercial and industrial uses generate noise from HVAC systems, loading docks, machinery, parking lots, and other operational sources. Noise generated by residential and commercial uses are generally short and intermittent. Industrial uses typically generate noise on a continual basis due to the nature of their activities.

## 5.13.1.2.1.2 West Region

Freeways in the West Region include Interstates 10, 105, and 405 and state routes 90 and 101.

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Union Pacific freight railroad tracks pass through the southeast part of the West Region. The Expo Light Rail Line connects central Los Angeles with Culver City; and is scheduled to begin operation to Santa Monica in early 2016.

The major airport that provides international and domestic service is LAX. In addition, the general aviation airports such as Hawthorne and Santa Monica are just outside the West Region.

Stationary noise generation by urban land uses is similar to that in other Regions. In particular, several industrial areas are in the vicinity of LAX.

### 5.13.1.2.1.3 *East Region*

Major freeways in the East Region are interstates 5, 10, 110, and 710, and state routes 2, 101, 110, 134, and 60.<sup>506</sup> Major roads such as Alameda Street, Cesar Chavez Avenue, and others generate high levels of traffic noise.

Freight railroads pass along the east edge of the central part of the East Region, and along the east edge of the Region east of Interstate 5. Union Station, the largest passenger rail station in the Los Angeles region, is in the Central City North community of Los Angeles. There are several major freight railroad yards in the East Region including the Union Pacific Los Angeles Transportation Center near the Community of Lincoln Heights in the City of Los Angeles; the Union Pacific Commerce Railyard in the City of Commerce; and the BNSF Hobart Railyard in the City of Commerce.

There are no airports in or next to the East Region.

Stationary noise generation by urban land uses is similar to that in other Regions. The major concentrations of commercial and civic land uses in downtown Los Angeles are in the East Region.

### 5.13.1.2.1.4 *South Region*

Major freeways in the South Region are Interstates 110, 405, and 710 and State Routes 47 and 91. Major roads such as Pacific Coast Highway, Rosecrans Avenue, Sepulveda Boulevard, Alameda Street, and others generate high levels of traffic noise (see Chapter 3, Figure 3-2, for Region boundaries).

Several freight and passenger rail lines are in the South Region. Major freight train activities are associated with industrial and warehouse uses and the Port of Los Angeles. Freight lines operated by Union Pacific and BNSF are along the Alameda Corridor that crosses the South Region. The Port of Los Angeles also contains many stationary and mobile noise sources.

The major airport that provides domestic commercial service is Long Beach Airport east of the Region. In addition, several general aviation airports such as Torrance and Hawthorne are west of the South Region.

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<sup>506</sup> Interstate 110 extends from State Route 101 south to the Community of San Pedro in the City of Los Angeles; State Route 110 extends north from State Route 101 to the City of Pasadena.



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As previously discussed, stationary sources of noises may occur with all types of land uses. In particular, several industrial areas are in the vicinity of the Port of Los Angeles, along the 110 freeway, and in the City of Vernon. The Port of Long Beach and related industrial uses are next to the southeast Region boundary.

### 5.13.1.2.2 Sensitive Receptors

Certain land uses are particularly sensitive to noise and vibration. These uses include schools, residences, hospital facilities, religious facilities, and open space/recreation areas where quiet environments are necessary for the enjoyment, public health, and safety of the community. Commercial and industrial uses are not considered noise- and vibration-sensitive uses.

### 5.13.2 Thresholds of Significance

According to CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project would result in:

#### 5.13.2.1 CEQA GUIDELINES THRESHOLDS

- N-1 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 applicable standards of other agencies.
- N-2 Generation of excessive groundborne vibration or groundborne noise levels.
- N-3 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.

#### 5.13.2.2 FEDERAL THRESHOLDS

Development of schools exposed to annual 65 dBA  $L_{dn}$  noise levels due to aircraft noise should be prohibited.<sup>507</sup>

#### 5.13.2.3 STATE THRESHOLDS

For new schools that include classrooms not exceeding 20,000 cubic feet and required to provide enhanced acoustics, the interior noise threshold for new construction is 35 dBA and 55 dBC.

For new schools within a 65 dB annual CNEL aircraft noise contour, the interior CNEL must be 45 dB or less in all classrooms.

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<sup>507</sup> The federal 65 dBA  $L_{dn}$  is based on the annual average flight operations taking into account seasonal arrival/depart activity, weather, etc. The annual CNEL, in decibels, is the average (on an energy basis) of the daily CNEL over a 12-month period. On any given day, the noise contour map may be different than the annual because of weather-related flight pattern variations, fewer flights, etc.

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The land use compatibility chart for community noise prepared by the California Office of Noise Control is shown in Table 5.13-5. This table provides a tool to gauge the compatibility of land uses relative to existing and future noise levels.

### 5.13.2.4 LOCAL THRESHOLDS

#### 5.13.2.4.1 County of Los Angeles

##### 5.13.2.4.1.1 *Operational Stationary Noise*

The county applies the noise control ordinance standards summarized in Table 5.13-6.

##### 5.13.2.4.1.2 *Construction Noise*

The county prohibits construction noise weekdays between 7:00 PM and 7:00 AM, or at any time on Sundays or holidays. The county also sets maximum noise levels from mobile and stationary equipment, summarized in Tables 5.13-7 and 5.13-8.

##### 5.13.2.4.1.3 *Vibration*

The County prohibits the operation of any device that creates vibration that is above 0.01 in/sec over the range of 1 to 100 Hertz at or beyond the property boundary of the source on private property or at 150 feet from the source on a public space or right-of-way.

#### 5.13.2.4.2 City of Los Angeles

A project would have a long-term operational noise impact if noise levels from project operations cause the ambient noise levels at the property line of affected uses to increase by 3 dBA CNEL, and noise levels reach or are within the “normally unacceptable” or “clearly unacceptable” category or increase by 5 dBA or greater.

##### 5.13.2.4.2.1 *Operational Noise*

Stationary noise sources are prohibited from causing the ambient noise level to increase by more than 5 dB. Where actual ambient levels are lower than shown in Table 5.13-10, the presumed ambient noise levels in the table are used as the baseline.

A project would have a long-term operational noise impact if noise levels from project operations cause the ambient noise levels at the property line of affected uses to increase by 3 dBA CNEL, and noise levels reach or are within the “normally unacceptable” or “clearly unacceptable” category or increase by 5 dBA or greater.

##### 5.13.2.4.2.2 *Construction Noise*

Construction equipment cannot produce noise exceeding 75 dBA at a distance of 50 feet between the hours of 7:00 AM and 9:00 PM. Construction activities are constrained to the daytime hours from 7:00 AM to 9:00 PM Monday through Friday, 8:00 AM to 6:00 PM on Saturdays and national holidays, and prohibited on Sundays.

## 5. Environmental Analysis

A project would have a significant construction-related noise impact if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;
- Construction activities lasting more than 10 days in a three month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or
- Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 PM and 7:00 AM Monday through Friday, before 8:00 AM or after 6:00 PM on Saturday, or at any time on Sunday.

### 5.13.2.5 OTHER JURISDICTIONS' THRESHOLDS

LAUSD uses the noise standards of the municipality where a project is located for each site-specific project CEQA analysis.

### 5.13.2.6 LAUSD THRESHOLDS

- Maximum exterior noise level: 67 dBA  $L_{eq}$ .
- Maximum interior classroom noise level: 45 dBA  $L_{eq}$ .
- Classroom acoustical performance: 45 dBA  $L_{eq}$  background noise level (unoccupied) or better with maximum (unoccupied) 0.6 second reverberation time.
- Maximum permanent increase noise levels at nearby noise-sensitive land uses: 3 dB over ambient.

## 5.13.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.13-1: SUP implementation may result in 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 applicable standards of other agencies. [Thresholds N-1]**

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### 5.13.3.1.1 All SUP Projects

#### 5.13.3.1.1.1 Construction Noise

Construction activities associated with the SUP could cause substantial short-term noise from the use of stationary and mobile construction equipment. Table 5.13-12 lists maximum construction equipment noise levels at 50 feet away and the percentage of time each piece of equipment is used.<sup>508</sup>

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<sup>508</sup> Duty cycles (see table) are related to the percentage of utilization of each piece of equipment at typical construction phases for development projects such as schools, and are used to calculate average noise levels in a given period.

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**Table 5.13-12 Construction Equipment Noise Levels**

Equipment	Noise Level (dBA) at 50 ft	Typical Duty Cycle
Auger Drill Rig	85	20%
Backhoe	80	40%
Blasting	94	1%
Chain Saw	85	20%
Clam Shovel	93	20%
Compactor (ground)	80	20%
Compressor (air)	80	40%
Concrete Mixer Truck	85	40%
Concrete Pump	82	20%
Concrete Saw	90	20%
Crane (mobile or stationary)	85	20%
Dozer	85	40%
Dump Truck	84	40%
Excavator	85	40%
Front End Loader	80	40%
Generator (25 KVA or less)	70	50%
Generator (more than 25 KVA)	82	50%
Grader	85	40%
Hydra Break Ram	90	10%
In situ Soil Sampling Rig	84	20%
Jackhammer	85	20%
Mounted Impact Hammer (hoe ram)	90	20%
Paver	85	50%
Impact Pile Driver	95	20%
Pneumatic Tools	85	50%
Pumps	77	50%
Rock Drill	85	20%
Scraper	85	40%
Tractor	84	40%
Vacuum Excavator	85	40%
Vibratory Concrete Mixer	80	20%

Source: Thalheimer, E., 2000, Construction Noise Control Program and Mitigation Strategy as the Central Artery/Tunnel Project. Institute of Noise Control Engineering.

Note: KVA = kilovolt amps

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The County of Los Angeles has established noise limits for construction activities; however, most jurisdictions exempt noise associated with construction, repair, remodeling, demolition, and grading, as long as these activities occur during the hours established in the jurisdiction's municipal code.

SUP-related project construction would be localized and would occur intermittently for varying periods of time. Potentially affected noise-sensitive land uses include residential, schools, libraries, churches, nursing homes, hospitals, and open space/recreation areas.

All project types throughout the District would have the potential to cause some kind of temporary noise during construction. However, many site-specific school projects have not been identified under the SUP. Information regarding specific projects, construction equipment type, length, and the location of receptors is required to quantify the level of impact associated with construction activity. Even relatively small projects with the operation of a backhoe and a loader in close proximity to a sensitive receptor would generate a combined 83 dBA  $L_{max}$  at 50 feet away, having the potential to exceed the County of Los Angeles 75 dBA  $L_{max}$  daytime standard for a residential use. Projects that require substantial site preparation and excavation would likely require several pieces of earthmoving equipment that, operating simultaneously, could generate much higher noise levels.

Incorporation of SC-N-4, SC-N-8, and SC-N-9 would reduce noise impacts during construction by limiting the construction schedule, implementing feasible noise attenuation measures, and providing advance notice to nearby noise receptors. Although compliance with local regulations and incorporation of the LAUSD Standard Conditions into each individual project would reduce noise levels at nearby sensitive receptors, construction noise may still result in a substantial increase over the ambient noise or exceed local noise standards for some SUP-related projects. Thus, construction-related noise impacts are considered potentially significant, and potentially may not be feasibly mitigated to a level of insignificance.

### 5.13.3.1.1.2 Operational Noise

Schools can generate noise from sports events, athletic fields, playgrounds, parking lot activity, mechanical equipment operations, and vehicles. School projects could include features that have the potential to cause substantial noise increases at nearby receptors. LAUSD SCs SC-N-1 and SC-N-2 require exterior noise levels of less than 67 dBA  $L_{eq}$ , and interior classroom spaces should achieve noise levels of no more than 45 dBA  $L_{eq}$ , and no greater than 0.6 seconds for reverberation time (in furnished but unoccupied spaces).

Schools are typically located in residential areas, and noise generated on both the weekdays (by physical education classes and sports programs and games) and weekends (by use of the fields by youth organizations) can elevate noise levels. A worst-case scenario for a noise-generating project would be a new football stadium. Events at a stadium can generate noise levels up to 71 dBA  $L_{max}$  at about 350 feet from the field.<sup>509</sup> This could exceed the noise ordinance of the city where a new stadium is located. There are multiple jurisdictions located either entirely within or partially within the LAUSD boundaries, however, each jurisdiction has adopted its own

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<sup>509</sup> Noise level data measured at a football game with attendance of approximately 4,500 total spectators at La Quinta High School on October 11, 2002. Stadium had aluminum bleachers with closed foot wells. Public address system was 'partially localized' (i.e., few speakers mounted on poles approximately 40 feet above the ground) pointing toward the bleachers on each side of the stadium. Noise measurement location was approximately 350 feet from the center of the field, to the side of the field and behind one set of bleachers.

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noise standards. To illustrate, for Los Angeles County, the noise ordinance limits the exterior noise at residential uses to 65 dBA  $L_{\max}$  from 10:00 PM to 7:00 AM and 70 dBA  $L_{\max}$  from 7:00 AM to 10:00 PM (see Table 5.13-6 above). Outdoor activities on public playgrounds and public or private school grounds, including but not limited to school athletic and school entertainment events, are typically exempt from jurisdictional municipal codes. However, under CEQA the increase in ambient noise levels would have the potential to exceed municipal code standards.

To determine if an increase in traffic from the project would cause a noise impact, consideration must be given to the magnitude of the increase and the affected receptors. Traffic-related noise impacts are that which would cause the ambient noise levels at the property line of affected uses to increase by 3 dBA C<sub>NEL</sub>, and noise levels reach or are within the “normally unacceptable” or “clearly unacceptable” category or increase by 5 dBA or greater.

Noise from rooftop HVAC systems and other mechanical equipment should be taken into consideration when determining the operational noise impact. Under LAMC Sections 112.02 and 112.05, noise attributable to school-related mechanical equipment (such as HVAC systems or any pumping, filtering, or heating equipment) should not exceed the ambient noise level by more than 5 decibels

Incorporation of LAUSD SC- N-3 would include design features such as buffer zones or sound barriers such as masonry walls between playgrounds, stadiums, or other noise-generating school areas and adjacent noise-sensitive land uses to reduce noise levels. As a general rule, interrupting the noise source with a solid block wall would reduce offsite noise levels by approximately 5 dBA. There are some measures that can be incorporated into a stadium project, such as enclosing the foot wells or installing a solid back to the bleachers and installing block walls; however, there is no guarantee that these measures would reduce noise to less than significant levels. Future SUP-related projects, such as stadiums, stadium lights, playfields, etc., would have a noise assessment conducted to determine impacts to the surrounding community. In the worst-case scenario, a 5 dBA reduction and adjacent residential property may still exceed the 70 dBA  $L_{\max}$  standard. While the level of noise at the residents could exceed either the daytime or nighttime standards, school-related noise is typically exempt under the jurisdictional municipal codes and in this respect does not represent a significant impact. This does not, however, exempt this noise from a significance determination under CEQA. Therefore, school operation and/or stadium noise impacts are considered potentially significant and may not be feasibly mitigated to a level of insignificance.

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### **Impact 5.13-2 SUP-related project construction activities may result in generation of excessive ground borne vibration. [Threshold N-2]**

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***School operations do not involve sources that cause substantial groundborne vibration.*** Construction activities associated with the SUP would cause short-term vibration from activities, such as the use of heavy construction equipment, pile driving, and/or rock blasting.

#### **5.13.3.1.2 All SUP Projects**

The effect on buildings in the vicinity of a construction site varies depending on soil type, ground strata, and receptor-building construction. The results from vibration can range from no perceptible effects at the lowest

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vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures, but groundborne vibration and groundborne noise can reach perceptible and audible levels in buildings that are close to the construction site. Construction, improvements, and renovation of individual school facilities that may include demolition, excavation, grading, paving, and building construction may result in groundborne vibrations that could be perceptible at adjacent uses or result in architectural damage of structures. The greatest potential for vibration comes from pile driving and rock blasting, which is rarely if ever used for school buildings. Table 5.13-13 lists vibration levels for construction equipment.

**Table 5.13-13 Construction Equipment Vibration Levels**

Equipment	Approximate RMS Velocity at 25 feet (VdB)	Approximate PPV Velocity at 25 feet (in/sec)
Impact Pile Driver – upper range	112	1.518
Impact Pile Driver – typical	104	0.644
Vibratory Roller	94	0.210
Large Bulldozer	87	0.089
Caisson Drilling	87	0.089
Jackhammer	79	0.035
Small Bulldozer	58	0.003
Loaded Trucks	86	0.076
FTA Criteria – Human Annoyance (Daytime)	78	—
FTA Criteria – Architectural Damage	—	0.300

Source: FTA. 2006, May. *Transit Noise and Vibration Impact Assessment*. United States Department of Transportation. FTA-VA-90-1003-06.

Note: RMS velocity calculated from vibration level (VdB) using the reference of 1 microinch/second and a crest factor of 4.

As shown in Table 5.13-13, vibration generated by construction equipment has the potential to be substantial. However, groundborne vibration is almost never annoying to people who are outdoors, so it is usually evaluated in terms of indoor environments.<sup>510</sup>

### 5.13.3.1.2.1 Vibration Annoyance

Vibration is typically noticed nearby when objects in a building generate noise from rattling windows or picture frames. The effect on buildings near a construction site varies depending on soil type, ground strata, and receptor building construction. The generation of vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight damage at the highest levels. For human annoyance, the criteria of 0.1 PPV in/sec is the level at which continuous vibration begins to annoy people. Small construction equipment generates vibration levels less than 0.1 PPV in/sec at 25 feet away. However, large equipment such as vibratory roller or pile driver would generate significant vibration at 25 feet. Although vibration dissipates quickly with distance, the maximum construction-related vibration level and close distance of residential units or classrooms, vibration may exceed the 0.1 PPV in/sec threshold for annoyance. District contractors work closely with schools and nearby land uses, scheduling

<sup>510</sup> Federal Transit Administration (FTA). 2006, May. *Transit Noise and Vibration Impact Assessment*. United States Department of Transportation. FTA-VA-90-1003-06.

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demolition activities while school is not in session, (see LAUSD SC-N-4) and avoid heavy noise and vibration activities directly adjacent to noise and vibration-sensitive land uses.

### 5.13.3.1.2.2 *Vibration-Induced Structural Damage*

Construction of SUP-related projects would be site specific and would occur intermittently for varying periods of time. Grading and demolition activities typically generate the highest vibration levels. Impact pile driving and rock blasting can generate high levels in excess of 100 PPV at 25 feet away. However, typical construction projects do not require these methods, or if necessary, they can be mitigated with alternate methods, such as nonexplosive rock breaking instead of rock blasting and drilled piles instead of impact pile driving. The threshold at which there is a risk of architectural damage to normal houses with plastered walls and ceilings is 0.2 in/sec. Building damage is not a factor for typical LAUSD projects, unless demolition and construction is planned directly adjacent to a building with fragile wall treatment or an older historic building. LAUSD SC-N-5, SC-N-6, and SC-N-7 would reduce structural vibration impacts during demolition and construction activities.

Construction activities would occur at discrete locations in the District's boundaries, and vibration from such activity may impact existing buildings that are close enough. If alternative methods cannot be used, there is no feasible mitigation available that would reduce potential vibration impacts if receptors are in close proximity and equipment generates high vibration levels, such as pile driving. Although incorporation of the LAUSD Standard Conditions into SUP-related projects would reduce vibration levels at nearby uses, demolition and/or construction vibration may still cause annoyance and architectural damage. Thus, demolition/construction-related vibration impacts would be potentially significant and may not be feasibly mitigated to a level of insignificance.

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**Impact 5.13-3: If a SUP-related project is 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, the project would expose people residing or working in the project area to excessive noise levels. [Thresholds N-3]**

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### 5.13.3.1.3 **New Construction on New Property**

The California Public Resources Code, Section 21096, requires that when preparing an environmental impact report for any project within an airport influence area defined by an ALUP, the lead agency shall utilize the California Airport Land Use Planning Handbook as a technical resource with respect to airport noise and safety compatibility issues. The basis for compatibility zone delineation for airports is the CNEL contours created with the FAA Integrated Noise Model for private and public airports. Airport noise in the vicinity of airports is produced from takeoffs, flyovers/overflights, approaches, and landings. Each of these events results in noise exposure to noise-sensitive receptors within close proximity to an airport.

Noise-sensitive land uses in locations where the aircraft exterior noise level does not exceed 65 dBA CNEL are compatible as long as interior habitable rooms or interior areas where quiet is a requirement (such as classrooms, labs, libraries, private offices, and meeting rooms) remain below 45 dBA CNEL.



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Based on the most recent, publicly available, Los Angeles County ALUP, portions of the District are exposed to noise levels due to airport operations above 65 dBA CNEL.

SUP-related construction and modernization projects may occur within the vicinity of an existing airport, including LAX, Van Nuys Airport, Whiteman Airport, Bob Hope Airport, or Santa Monica Airport. There are only a few schools within the 65 dBA CNEL of LAX, Van Nuys, and Bob Hope Airports (see Figure 5.13-1, *Airport Noise*). Per Education Code Section 17215, the District must receive approval from the CDE and California Department of Transportation (Caltrans or DOT) before acquiring title to property for a school site if it is within two nautical miles of an airport runway. As part of the SUP, property may be acquired directly adjacent to existing schools to accommodate new buildings. The consideration of a proposed site in relation to airports is part of the District's CCR Title 5 and CEQA site review procedures.

According to CDE regulations,<sup>511</sup> the responsibilities of the school district; the California Department of Education; and the Caltrans, Aeronautics Program, Office of Airports, concerning the school site's proximity to runways are in Education Code Section 17215.<sup>512,513</sup> As a part of the site selection prescreening process, the school district should determine the proximity of the site to runways. If the site is within two nautical miles of an existing airport runway or a potential runway included in an airport master plan, as measured by direct air line from the part of the runway that is nearest to a proposed school site, the following procedures must be followed before the site can be approved:

1. The governing board of the school district, including any district governed by a city board of education, shall give the Department [CDE] written notice of the proposed acquisition and shall submit any information that is required by the Department. The Department will notify the DOT Aeronautics Program, Office of Airports.
2. The Division of Aeronautics shall investigate the proposed site and, within 30 working days after receipt of the notice, shall submit to the local governing board a written report and its recommendations concerning acquisition of the site. As a part of the investigation, the Aeronautics Program shall give notice to the owner and operator of the airport, who shall be granted the opportunity to comment on the proposed school site.
3. The governing board of the school district shall not acquire title to the property until the report of the DOT Aeronautics Program has been received. If the report favors the acquisition of the property for a school site or an addition to a present school site, the governing board shall hold a public hearing on the matter before acquiring the site.
4. If the report does not favor the acquisition of the property for a school site or an addition to a present school site, the governing board may not acquire title to the property. If the report does not favor acquisition of a proposed site, no state funds or local funds shall be apportioned or expended for the

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<sup>511</sup> School Site Selection and Approval Guide. <http://www.cde.ca.gov/ls/fa/sf/schoolsiteguide.asp#Noise>.

<sup>512</sup> CCR, Title 5, Section 14011(k).

<sup>513</sup> As amended by AB 747, Chapter 837, Statutes of 1999.

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acquisition of that site, construction of any school building on that site, or the expansion of any existing site to include that site.

5. The requirements noted above do not apply to sites acquired before January 1, 1966, or to any additions or extensions to those sites.

By following these procedures and state regulations, the LAUSD would not acquire title to a property that would conflict with findings of the DOT Aeronautics Program, which has regulations limiting the exterior and interior noise exposure to sensitive uses in the vicinity of airports. Therefore, impacts associated with airport noise would be less than significant.

### 5.13.3.1.4 New Construction and Modernization on Existing Campus

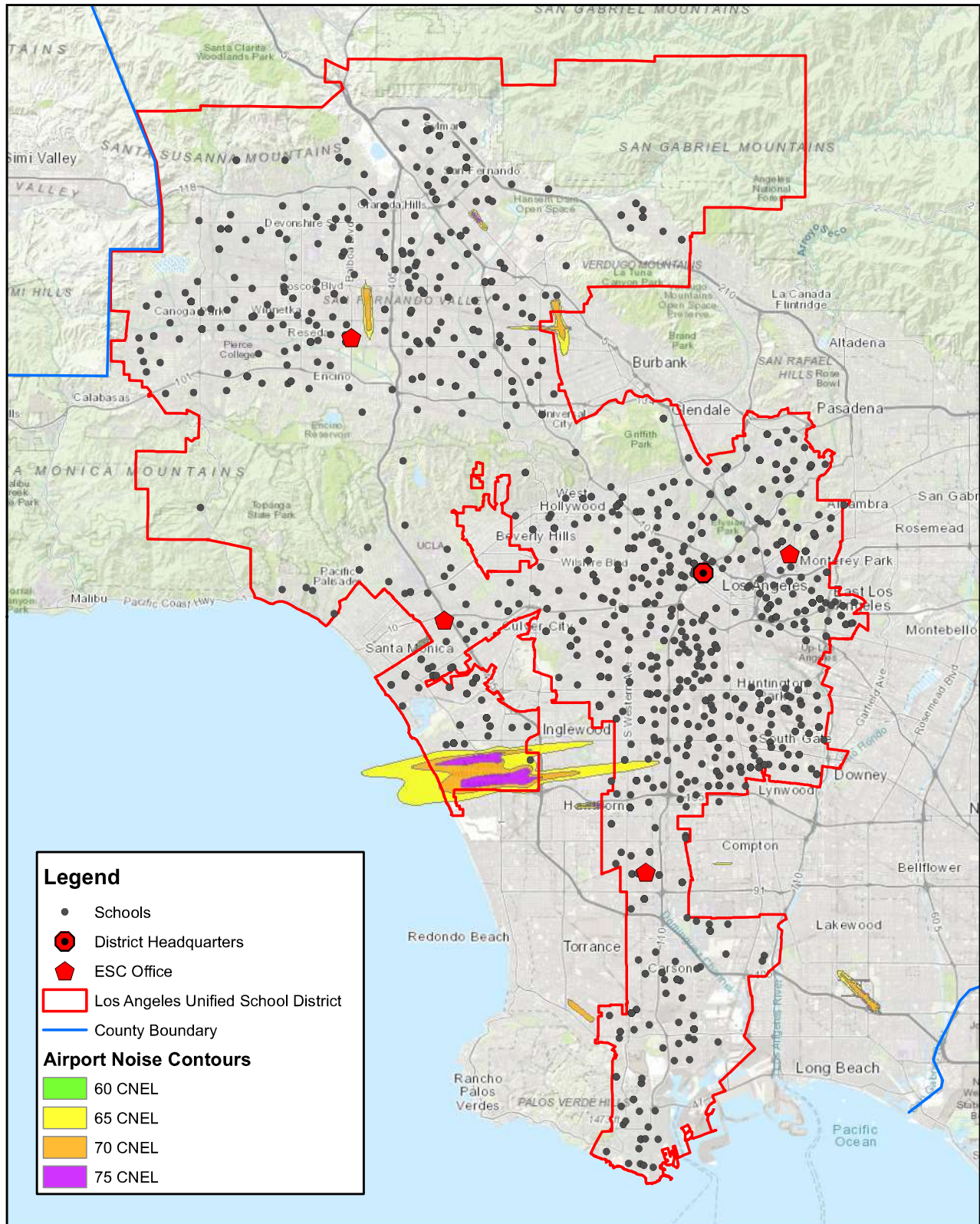
New construction, modernization, repair, replacement, upgrade, remodel, renovation and installation would occur on existing school campuses. Several District schools are within two nautical miles of an airport. However, projects conducted on existing campuses that do not involve acquisition of new property would not need to be reviewed for airport noise. It should also be noted that Education Code Section 17215 does not apply to school sites acquired prior to January 1, 1966, nor to any additions or extensions to those sites. However, noise limits would still apply to new construction, such as a classroom on an existing campus:

- Maximum exterior noise level: 67 dBA  $L_{eq}$ .
- Maximum interior classroom noise level: 45 dBA  $L_{eq}$ .
- Classroom acoustical performance: 45 dBA  $L_{eq}$  background noise level (unoccupied) or better with maximum (unoccupied) 0.6 second reverberation time.

Implementation of LAUSD SC-N-2 would ensure that interior noise standards related to airport noise are identified and properly addressed prior to project construction. Measures such as upgraded windows and wall and roof design would ensure that sufficient building insulation would be provided to meet the interior noise standards. Exterior areas at existing school campuses are already exposed to airport noise, therefore new SUP-related projects would not exacerbate the airport noise. Impacts would be less than significant.

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### Figure 5.13-1 Airport Noise



Source: LA County DRP, 2023

0 3 6 Miles



## 5. Environmental Analysis

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## 5. Environmental Analysis

### 5.13.4 Applicable Regulations and Standard Conditions

#### 5.13.4.1.1 State

- Education Code Section 17215: notification and review by California Department of Transportation, Aeronautics Program, Office of Airports
- California Code of Regulations, Title 5
- California Code of Regulations, Title 24, Part 2 and Part 11
- California Code of Regulations, Title 21, Airport Noise Standards

#### 5.13.4.1.2 Local

- Jurisdictional Municipal Codes with Community Noise standards
- Jurisdictional General Plan Noise Elements or noise related policies

#### 5.13.4.1.3 LAUSD Standard Conditions of Approval

- SC-N-1 through SC-N-9

### 5.13.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standard Conditions listed above, the following impacts would be less than significant: 5.13-3

Even with implementation of regulatory requirements and LAUSD Standard Conditions the following impacts would be **potentially significant**:

- **Impact 5.13-1** Implementation of the SUP could result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance.
- **Impact 5.13-2** Construction activities could result in excessive groundborne vibration at nearby sensitive buildings or structures.

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### 5.13.6 Mitigation Measures

#### 5.13.6.1.1 Impact 5.13-1

No additional mitigation measures would ensure that construction noise impacts would be reduced to less than significant.

#### 5.13.6.1.2 Impact 5.13-2

No additional mitigation measures would ensure that vibration annoyance and architectural damage impacts would be reduced to less than significant.

### 5.13.7 Level of Significance After Mitigation

#### 5.13.7.1.1 Impact 5.13-1

Implementation of LAUSD SC-N-3 would include measures such as buffer zones, sound barriers such as masonry walls, or building orientation improvements between playgrounds and adjacent residential uses, or other special design features to reduce noise levels at nearby noise-sensitive land uses to no more than 3 dBA CNEL. However, there is no guarantee that these measures would reduce noise to less than significant levels. Therefore, outdoor noise may be significant and unavoidable.

#### 5.13.7.1.2 Impact 5.13-2

Demolition and construction for activities within 25 feet of a historic building or where pile driving activities are within 150 feet of a structure may cause vibration annoyance and/or architectural damage. For these types of projects, a detailed vibration assessment would be provided by an acoustical engineer to analyze potential vibration impacts to nearby structures and to determine feasible alternatives to eliminate potential risk of annoyance and architectural damage. Implementation of LAUSD SC-N-4, SC-N-5, SC-N-6, and SC-N-7 would reduce construction-related vibration impacts, but for some projects these LAUSD Standard Conditions may not be enough to avoid the impact. No additional measures are available to reduce impacts. Therefore, Impact 5.13-2 would remain significant and unavoidable.

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### 5.14 PEDESTRIAN SAFETY

This section of the program EIR evaluates the potential for implementation of the SUP to impact pedestrian safety in the District. This section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions); general existing pedestrian and bicycle facility conditions throughout the SUP area; and possible environmental impacts that may occur as SUP-related site-specific projects are implemented.

#### 5.14.1 Environmental Setting

##### 5.14.1.1 REGULATORY FRAMEWORK

National, state, regional, and local laws, regulations, plans, and guidelines are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to pedestrian safety in the District. Many site-specific projects have not been identified, and there may be local jurisdictional plans and policies that are applicable depending on the project site. Specific requirements of these laws, regulations, plans, and guidelines might not be up to date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. Although some of these may not directly apply to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standard Conditions of Approval are also listed. See *Applicable Regulations and Standard Conditions* at the end of this chapter for those that require District compliance.

##### Federal

###### 5.14.1.1.1 *United States Code, Title 42, Chapter 126*

**Americans with Disabilities Act** of 1990 (ADA). The United States Code is divided into titles and chapters that classify laws according to their subject matter. Titles I, II, III, and V of the original law are codified in Title 42, Chapter 126 (Equal Opportunity for Individuals with Disabilities) beginning at Section 12101. Chapter 126, Subchapter III (formerly Title III) prohibits discrimination on the basis of disability in “places of public accommodation” (businesses and non-profit agencies that serve the public) and “commercial facilities” (other businesses). The regulation includes standards for accessible design establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travel way, and a vibration-free zone for pedestrians.

###### 5.14.1.1.2 State

###### 5.14.1.1.2.1 *California Manual of Uniform Traffic Control Devices, Part 7: Traffic Control for School Areas*

The California Manual on Uniform Traffic Control Devices (MUTCD), issued by Caltrans, provides uniform standards and specifications for all official traffic control devices in California, pursuant to the provisions of

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CVC Section 21400. Part 7 of the California MUTCD sets standards for traffic control for school areas, including standards for signs, road markings, and crossing supervision.<sup>514</sup>

The following sections of the California Vehicle Code, Division 11, Chapter 2, require a city to implement traffic control devices requested by a school district if they are meant to mitigate safety risks for students traveling to and from school:

Article 1, Section 21372, Guidelines for Traffic Control Devices near Schools<sup>515</sup>

Article 1, Section 21373, School Board Request for Traffic Control Device<sup>516</sup>

Article 1, Section 21368, Crosswalks near Schools

Article 2, Section 21400, Official Traffic Control Devices

### 5.14.1.1.2.2 *California Government Code, Sections 65040.2 and 65302*

Assembly Bill 1358, the **Complete Streets Act**, was signed into law by Governor Arnold Schwarzenegger in September 2008. As of January 1, 2011, the law requires cities and counties, when updating the part of a local general plan that addresses roadways and traffic flows, to ensure that those plans account for the needs of all roadway users. Specifically, the legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians, and transit riders, as well as motorists. At the same time, Caltrans unveiled a revised version of Deputy Directive 64, an internal policy document that now explicitly embraces Complete Streets as the policy covering all phases of state highway projects, from planning to construction to maintenance and repair.

### 5.14.1.1.2.3 *California Vehicle Code*

California law requires the city or county to implement traffic control devices requested by a school district if they are meant to mitigate safety risks for students traveling to and from school, as described below.

#### 5.14.1.1.2.3.1 *California Vehicle Code, Division 11, Chapter 2, Article 1, Section 21372, Guidelines for Traffic Control Devices near Schools*

The Department of Transportation and local authorities shall, with respect to highways under their respective jurisdictions, establish and promulgate warrants to be used as guidelines for the placement of traffic control devices near schools for the purpose of protecting students going to and from school. Such devices may include flashing signals. Such warrants shall be based upon, but need not be limited to, the following items: pedestrian volumes, vehicle volumes, width of the roadway, physical terrain, speed of vehicle traffic, horizontal and vertical alignment of the roadway, the distance to existing traffic control devices, proximity to the school, and the degree of urban or rural environment of the area.<sup>517</sup>

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<sup>514</sup> California MUTCD, Part 7: Traffic Control for School Area. <http://mutcd.fhwa.dot.gov/pdfs/2009/part7.pdf>.

<sup>515</sup> Amended Ch. 545, Stats. 1974. Effective January 1, 1975.

<sup>516</sup> Amended Ch. 1061, Stats. 1969. Effective November 10, 1969.

<sup>517</sup> Amended Ch. 545, Stats. 1974. Effective January 1, 1975.



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### **5.14.1.1.2.3.2      *California Vehicle Code, Division 11, Chapter 2, Article 1, Section 21373, School Board Request for Traffic Control Devices***

The governing board of any school district may request the appropriate city, county, city and county, or state agency to install traffic control devices in accordance with the warrants established pursuant to Section 21372. Within 90 days thereafter, the city, county, city and county, or state agency involved shall undertake an engineering and traffic survey to determine whether the requested crossing protection meets the warrants established pursuant to Section 21372. The city, county, city and county, or state agency involved may require the requesting school district to pay an amount not to exceed 50% of the cost of the survey. If it is determined that such requested protection is warranted, it shall be installed by the city, county, city and county, or state agency involved.<sup>518</sup>

### **5.14.1.1.2.3.3      *California Vehicle Code, Division 11, Chapter 2, Article 1, Section 21368, Crosswalks near Schools***

Whenever a marked pedestrian crosswalk has been established in a roadway contiguous to a school building or the grounds, it shall be painted or marked in yellow. Other established marked pedestrian crosswalks may be painted or marked in yellow if either (a) the nearest point of the crosswalk is not more than 600 feet from a school building or the grounds thereof, or (b) the nearest point of the crosswalk is not more than 2,800 feet from a school building or the grounds thereof, there are no intervening crosswalks other than those contiguous to the school grounds, and it appears that the facts and circumstances require special painting or marking of the crosswalks for the protection and safety of persons attending the school. There shall be painted or marked in yellow on each side of the street in the lane or lanes leading to all yellow marked crosswalks the following words, "SLOW-SCHOOL XING," except that such words shall not be painted or marked in any lane leading to a crosswalk at an intersection controlled by stop signs, traffic signals, or yield right-of-way signs. A crosswalk shall not be painted or marked yellow at any location other than as required or permitted in this section.

### **5.14.1.1.2.3.4      *2010 California Vehicle Code, Division 11, Chapter 2, Article 2, Section 21400, Official Traffic Control Devices***

This code authorizes Caltrans to adopt rules and regulations for uniform standards and specifications for all official traffic control devices, including, but not limited to, stop signs, yield right-of-way signs, speed restriction signs, railroad warning approach signs, street name signs, and lines and markings on the roadway.

## **Los Angeles Department of Transportation (LADOT)**

LADOT pedestrian safety projects including the following.

### ***Vision Zero***

The City of Los Angeles Vision Zero<sup>519</sup> program is a citywide effort and roadway safety policy that "promotes smart behaviors and roadway design that anticipates mistakes such that collisions do not result in severe injury or death." Two primary goals of the program include the reduction of citywide traffic deaths by 20% by 2017

<sup>518</sup> Amended Ch. 1061, Stats. 1969. Effective November 10, 1969.

<sup>519</sup> Vision Zero Los Angeles 2015-2025. 2015, August.

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and elimination of traffic deaths citywide by 2025. According to the 2018 Progress Report,<sup>520</sup> hundreds of Vision Zero improvements have been installed, resulting in a 6% decrease in traffic deaths between 2017 and 2016. The program continues to safety improvements, including new scramble crosswalks, protected left turns, and complete streets projects, as well as on-going community engagement, education, and enforcement.

### *Safe Routes to School Action Plan*

The City of Los Angeles Safe Routes to School Program (SRTS)<sup>521</sup> is a partnership between the City of Los Angeles and the LAUSD to improve traffic safety for youth in Los Angeles. The SRTS couples other City of Los Angeles initiatives, such as Vision Zero and the High-Injury Network (HIN), with multi-disciplinary expertise from LAUSD, the City's engineering and police departments, the County of Los Angeles Department of Public Health, local schools, community-based organizations, and community leaders.

Based on review of collision data and the City's High-Injury Network, the SRTS includes an Implementation section that outlines key action items to improve pedestrian and bicycle safety for school children and achieve Vision Zero goals. The SRTS implementation plan includes the following elements:

- Create Safe Streets for All: Develop Safe Routes to Schools Plans, construct near-term safety improvements, install high-visibility crosswalks, and install demonstration projects.
- Develop a Culture of Safety: Launch and maintain a multi-media safety campaigns, support safety trainings, support Walk to School Day, develop "Keep Walking!" activity guides, and establish a Safety Valet and Patrol Program.
- Adopt New Policy and Legislation to Address Safety: Sign and adopt a Memorandum of Understanding between the City of Los Angeles and LAUSD regarding Vision Zero and SRTS policy. Implement School Safety Zones for reduced 15-mile-per-hour speed limits on school-adjacent streets that qualify.
- Respond to Relevant Data: Track and analyze youth-involved collisions and complete travel surveys.

### **LAUSD**

#### *RES 040-19/20 Safety First*

On October 6, 2020, the LAUSD Governing Board adopted Resolution 040-19/20 "Safety First: Leveraging Partnerships and Advocacy to Create Safe Routes and Passages to School for All LA Unified Students." Among other issues, the resolution calls on the City of Angeles to strengthen its commitment to ensure Safe Routes to School by increasing the number of LAUSD's allotted infrastructure improvements, prioritize maintenance and safety services, and increase crossing guards. The resolution also calls for evaluation of the feasibility of a Safe Passages pilot program, which has since been implemented.

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<sup>520</sup> Vision Zero Los Angeles 2015-2025, 2018 Action Plan + Progress Report.

<sup>521</sup> Vision Zero Los Angeles 2015-2025, Safe Routes to School Action Plan and Progress Report. 2016, November.

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### Safe Passages

The Safe Passages program was adopted by LAUSD to further promote safe routes to and from school, also known as “Safe Passages”. The program establishes a protocol for school-site administrators to report unsheltered homeless encampments and identify safety needs to prevent vehicular-pedestrian accidents. The latest report summarizes actions taken to date, including meeting with LADOT about pedestrian safety projects, and future actions, including ongoing analysis of incident reports and review of School Experience Survey data for assistance in decision-making on safe passage needs.<sup>522</sup>

### Standard Conditions of Approval

This table lists the pedestrian safety related standard conditions that will be included as part of each SUP-related project, as appropriate.

Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
SC-PED-1	Pedestrian Safety Analysis	Increase student capacity by more than 25% or 10 classrooms	During project design (Planning)	LAUSD shall participate in the Safe Routes to School (SR2S) program.  <b>Caltrans SR2S program.</b> 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	Pedestrian Safety Analysis	New campus, new pedestrian/vehicular rights-of-way, or an increase in student capacity by more than 25% or 10 classrooms	During project design (Planning)	LAUSD shall implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program.  <b>OEHS Safe School Traffic Program</b> 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	Pedestrian Safety Analysis	New campus, new pedestrian/vehicular rights-of-way, or an increase in student capacity by more	During project design (Planning)	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:

<sup>522</sup> LAUSD. Assess: Analyze Safe Passages to and from School Report. 2022, June 15.

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
		than 25% or 10 classrooms		<ul style="list-style-type: none"> <li>Clearly designate passenger loading areas with the use of signage, painted curbs, etc.</li> <li>Install new walkway and/or sidewalk segments where none exist.</li> <li>Substandard walkway/sidewalk segments shall be improved to a minimum of eight feet wide.</li> </ul> <p>Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades.</p>
SC-PED-4	Pedestrian Safety Analysis	New campus, new pedestrian/vehicular rights-of-way, or an increase in student capacity by more than 25% or 10 classrooms	During project design (Planning)	<p>LAUSD shall design the project to comply with the traffic and pedestrian guidelines in the School Traffic Safety Reference Guide.</p> <p><b>School Traffic Safety Reference Guide REF- 4492.2</b></p> <p>This Reference Guide replaces Reference Guide 4492.1, School Traffic Safety, July 23, 2012. Updated information is provided pertaining to current program processes for traffic requests and compliance of passenger loading zones. 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.</p>
SC-PED-5	Safe Access to School	Construct bus loading area, student drop-off/pick-up area, and/or parking	During project design (Planning)	<p>LAUSD shall design new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide.</p> <p><b>School Design Guide.</b></p> <p>The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.</p>
SC-PED-6	Safe Access to School	Construct student drop-off/pick-up area	Operation	<p>LAUSD shall develop and implement a Safety Valet Program in accordance with guidelines in the Safety Valet Program guide.</p> <p><b>Implementing a Safety Valet Program at Schools REF- 5496.1</b></p> <p>The guide provides instructions for coordination with OEHS to identify possible locations for valet drop-off areas, training volunteers, obtaining proper traffic signage and valet kits, and traffic enforcement. Related resources include the Safety Valet Program, Safety Alert No. 11-04 (OEHS, 2011) and School Traffic Safety, RE-4492.0 (OEHS, 2008).</p>
SC-T-3	Traffic Analysis	Increase student capacity by more than 25% or 10 classrooms and/or generate additional traffic or shifts traffic patterns	Prior to project approval (Planning, Pre-Construction)	Implementation of SC-T-3.

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
SC-T-4	Construction Traffic	Large construction equipment required to use public roadways	Prior to construction (Construction)	Implementation of SC-T-4.

### 5.14.1.2 EXISTING CONDITIONS

Most District schools are in urban neighborhoods. Over 30% of school children in Los Angeles County live within walking distance (i.e., one-half mile) of school, compared to 16.6% nationwide and 27.6% statewide.<sup>523</sup> Pedestrian and bicycle facilities surrounding District schools vary by location.

#### 5.14.1.2.1 Roadway Network

This circulation system includes an extensive network of local streets. LAUSD covers an area totaling 710 square miles, which includes most of the City of Los Angeles, along with all or portions of 25 cities and unincorporated areas of Los Angeles County. Most roadways are aligned on a grid system providing multiple route options for walking or biking throughout the area. The area within LAUSD boundaries has several thousands of miles of public streets and paths that accommodate a variety of nonmotorized vehicles: sidewalks, pathways, horse trails, and bike lanes.

#### 5.14.1.2.2 Public Transit

The area is served by multiple transit operators with networks connecting different communities within and outside of the District boundaries. The primary transit operator within Los Angeles County is the Los Angeles County Metropolitan Transportation Authority (Metro). Metro provides bus, light rail, and heavy rail (subway) services. There are two Metro heavy rail lines (B and D) that operate in a dedicated subway. Metro's four light rail lines (A, C, L, and E) use light rail trains that run along rights-of-way ranging from complete grade separation to at-grade operation in mixed-flow traffic. Metro operates several types of bus service, including the Metro Liner service, which operates either in an exclusive right-of-way or along high occupancy vehicle (HOV) lanes, and bus routes in mixed traffic on its Rapid, Express, Limited Stop, Local, and Shuttle services. These bus services vary considerably in speed, frequency, and capacity.

There are several other transit operators that provide transit services within District boundaries. These transit operators include Santa Monica Municipal Bus Lines (Big Blue Bus); Culver City Transit; Santa Clarita Transit; Gardena Transit; Torrance Transit; and Montebello Bus Lines.<sup>524</sup>

In addition, commuter rail services in the area are provided by Metrolink and Amtrak. Metrolink covers six counties in Southern California with seven routes. Amtrak also serves communities along the coast in Southern

<sup>523</sup> Safe Routes to School National Partnership. *Travel to School in Los Angeles County*. September 24, 2012. [http://saferoutescalifornia.org/2012/09/24/19percent\\_lac/](http://saferoutescalifornia.org/2012/09/24/19percent_lac/). This is an analysis brief summarized from Travel to School in California: Findings from the California - National Household Travel Survey. <http://www.travelbehavior.us/Nancy-pdfs/Travel%20to%20School%20in%20California.pdf>.

<sup>524</sup> City of Los Angeles Mobility Plan 2035 Draft EIR.

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California. Passengers on Metrolink and Amtrak are served by stations in the San Fernando Valley and in downtown Los Angeles at Union Station, from which connecting services to their destinations are provided by Metro or LADOT. Metrolink and Amtrak trains both consist of bi-level passenger cars pulled by diesel-electric locomotives and operate on tracks shared with freight rail traffic.

### 5.14.1.2.3 Bicycle and Pedestrian Facilities

Pedestrians and bicyclists are important users of the local roadway network traveling to and from school. Most city streets have sidewalks. The existing bicycle network is a series of interconnected streets and pathways on which bicycling is encouraged. Pursuant to the California Vehicle Code, bicycles are allowed on any street. Standard bicycle facilities are designated Class I, Class II, Class III, and Class IV Bikeways.

A **Class I Bikeway** (Bicycle Path) is a paved pathway separated from motorized vehicular traffic by an open space or barrier either within the highway right-of-way or within an independent alignment. Bicycle paths can be used by bicyclists, skaters, wheelchair users, joggers, and other nonmotorized users.

A **Class II Bikeway** (Bicycle Lane) is a striped lane for one-way bicycle travel on a street.

A **Class III Bikeway** (Bicycle Route) is a shared roadway specifically identified for use by bicyclists, identified by signs only, providing a superior route based on traffic volumes and speeds, street width, directness, and/or cross-street priority.

A **Class IV Bikeway** (Separated Bikeway) is a bikeway for the exclusive use of bicycles and includes a separation required between the separated bikeway and the through vehicular traffic. The separation may include, but is not limited to, grade separation, flexible posts, inflexible posts, inflexible barriers, or on-street parking.

Bicycle lane networks within the City of Los Angeles are identified in the Bicycle Enhanced Network and Bicycle Lane Network maps within the City's General Plan Mobility Plan 2035.<sup>525</sup> Pedestrian Enhanced Districts map of the City's General Plan Mobility Plan 2035 depicts targeted areas on arterial streets prioritized for pedestrian safety enhancement.

The majority of the District area is heavily developed, but development patterns and streetscape conditions vary considerably. Parts of Downtown Los Angeles, Koreatown, Hollywood, and Westwood Village, for example, are very dense with heavy traffic and few bike facilities. Some residential portions of the San Fernando Valley have narrower street widths and less-connected residential streets but have wide shoulders and horse trails. Still other parts of the District are characterized by industrial land uses offering little in the way of pedestrian amenities.<sup>526</sup>

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<sup>525</sup> City of Los Angeles Mobility Plan 2035. Adopted September 7, 2016.

<sup>526</sup> City of Los Angeles Mobility Plan 2035 Draft EIR.

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### 5.14.1.2.4 Rail Crossings

There are about 304 miles of freight and Metrolink commuter railroad tracks in the District, as well as about 50 miles of Metro Rail subway and light-rail lines.<sup>527, 528</sup> Most of the freight and Metrolink tracks are at ground level. Metrolink trains operate on about 56 miles of the 304 miles of tracks, mostly in the San Fernando Valley. Approximately 30 miles of Metro light rail lines—on the Blue, Gold, and Expo Lines—are at ground level.<sup>529</sup> The remaining approximately 20 miles of Metro Rail lines in the District are subway or in the median of I-105.<sup>530</sup>

### 5.14.1.2.5 School Travel Modes

According to a school survey conducted by the Safe Routes to School National Partnership, compared to the State of California and the nation as a whole, children in Los Angeles County were much more likely to walk to school, likely because the county is urbanized and more children live within walking distance.<sup>531</sup> In Los Angeles County there are about 1.5 million children aged 5 to 15, and 79 school districts; LAUSD is by far the largest. Over half (51%) of these children usually traveled to school in a private vehicle, and almost one-third (32.3%) usually walked to school. In Los Angeles County, 7.7% of school children usually rode in a school bus (in LAUSD, this percentage is much lower because busing is only provided for Special Needs students),<sup>532</sup> 3.8% used some kind of transit, 1.1% reported riding a bike, and another 4% did not report how they usually traveled to school or were home-schooled (see Table 5.17-3 in Chapter 5.17). Although not part of the study, high school students age 16 to 18 are anticipated to have approximately the same travel modes, with possibly higher transit riders and private vehicles.

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<sup>527</sup> Federal Railroad Administration (FRA). 2014, April 4. FRA's GIS Application. [http://fragis.fra.dot.gov/GISFRA\\_Safety/default.aspx](http://fragis.fra.dot.gov/GISFRA_Safety/default.aspx).

<sup>528</sup> Six Metrolink lines pass through the District. All six lines originate at Los Angeles Union Station in central Los Angeles. The lines and the location each line exits the District are: Ventura County Line, west of the Community of Chatsworth in the City of Los Angeles; the Antelope Valley Line, north of the Community of Sylmar in the City of Los Angeles; the San Bernardino Line, in the Community of East Los Angeles in unincorporated Los Angeles County; Riverside Line, City of Commerce; and Orange County and 91 Lines, in the City of Vernon.

<sup>529</sup> The segment of the Blue Line in the District extends from downtown Los Angeles to the Community of Southeast Los Angeles in the City of Los Angeles. The segment of the Gold Line in the District extends from the Community of Highland Park in the City of Los Angeles to the Community of East Los Angeles in unincorporated Los Angeles County. The segment of the Expo Line in the District extends from downtown Los Angeles to the Community of West Adams in the City of Los Angeles.

<sup>530</sup> Subways are the Red Line from Los Angeles Union Station (LAUS) to the Community of North Hollywood in the City of Los Angeles; the Purple Line from LAUS to Wilshire Boulevard at Western Avenue in the City of Los Angeles; and a segment of the Gold Line light rail line in the Community of Boyle Heights in the City of Los Angeles. The segment of the Green Line in the District is the median of the I-105 freeway, mostly in the Community of Southeast Los Angeles in the City of Los Angeles.

<sup>531</sup> Safe Routes to School National Partnership. *Travel to School in Los Angeles County*. September 24, 2012. [http://saferoutescalifornia.org/2012/09/24/19percent\\_lac/](http://saferoutescalifornia.org/2012/09/24/19percent_lac/). This is an analysis brief summarized from *Travel to School in California: Findings from the California - National Household Travel Survey*. <http://www.travelbehavior.us/Nancy-pdfs/Travel%20to%20School%20in%20California.pdf>.

<sup>532</sup> Additionally, even at the height of LAUSD bussing (2002-2004) when overcrowding required bussing students to schools that had seats, only 1.1% of students rode the bus (source: 2004 Program Environment Impact Report Traffic Impact Study. Traffic study prepared by Meyer, Mohades and Associates, Inc. January 2004). Since then, LAUSD has constructed 130 new schools and bussing has been eliminated at all but one school.

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Over 30% of school children in Los Angeles County live within ½ mile of school (10.7% between ¼ and ½ mile, and 19.4% live less than ¼ mile), compared to 16.6% for the nation as a whole and 27.6% for the state.

For elementary and middle school students that live less than ¼ mile from school, 73% usually walked and 24.2% rode in a private vehicle.<sup>531</sup> For children whose schools were ¼ to ½ mile away, about half usually walked and the other half rode in a private vehicle. Children who live over one mile from school usually rode in a private vehicle (63.4%), but a significant portion walked (19.6%). Just under 9% of the school children in Los Angeles County attend private school, and they are likely to live farther from school.

The population of school aged children (5-19 age group) declined by the most of all age categories between 2010 and 2021, with a 4.1% drop. Over the next 10 years, LAUSD projections show that student enrollment is forecast to decline by 18% by 2033 (see Chapter 4, *Project Description*, for more information on enrollment trends).

### 5.14.2 Thresholds of Significance

LAUSD has developed criteria for determining student pedestrian safety impacts. A proposed SUP-related project could result in a significant pedestrian safety impact if it would:

- PED-1 Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses;
- PED-2 Create unsafe routes to schools for students walking from local neighborhoods; and
- PED-3 Be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard.

### 5.14.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

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#### **IMPACT 5.14-1: SUP-related project implementation would not substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses. [Threshold PED-1]**

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Some SUP-related projects would increase capacity of a school. While implementation of the SUP would not increase enrollment districtwide, projects developed pursuant to the SUP could result in increased enrollment on some campuses. Therefore, SUP implementation could increase vehicular traffic as well as pedestrian and bicycle traffic to and from some schools. Traffic impacts are analyzed in further detail in Section 5.18, *Transportation and Traffic*, of this EIR.

#### **5.14.3.1.1 All SUP Projects That Generate Additional Trips**

As individual projects are proposed and implemented, design development would include the use of standard engineering practices, such as standard driveway widths and turning radii and provision of adequate line of



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sight to avoid design elements that could result in hazards. “Sight Distance Standards” from the Caltrans Highway Design Manual relates minimum sight distance values to a range of design speeds.<sup>533</sup>

Implementation of LAUSD OEHS CEQA Specification Manual, Appendix C, Traffic and Pedestrian Safety Requirements for New Schools and the School Design Guide (SC-PED-2), requires new school projects be designed so that bus loading areas that do not overlap with car loading areas, which would reduce the potential for conflicts between cars and buses arriving and departing, especially during the busiest drop-off and pick-up periods.

Under the School Design Guide, Section 2.3 (Vehicular Access and Parking) (SC-PED-5), LAUSD will:

- Ensure adequate and safe access for students, staff and visitors walking, entering, and circulating on the campus. Vehicle traffic patterns shall not interfere with major pedestrian traffic patterns. Foot traffic shall not pass through entrance driveways.
- Provide safe and clearly indicated student drop-off and pick-up provisions by car and bus.
- Delivery and utility vehicles shall have direct access from the street without crossing playgrounds or fields.

In addition, projects are required to accommodate ingress and egress of emergency vehicles as required by the City of Los Angeles Fire Department or other affected emergency service vehicles. All access features are subject to and must satisfy fire department code in each affected jurisdiction. New school construction and modernization projects would conform to local ordinances to ensure that adequate emergency access is provided.

Additionally, pursuant to California Vehicle Code Sections 21272 and 21273, local jurisdictions must install traffic control devices required to mitigate hazards for students traveling to and from school. Local jurisdictions may request the District to reimburse the City up to 50% of the cost of installing such devices. Impacts would be less than significant.

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**Impact 5.14-2: SUP implementation would not create unsafe routes to schools for students walking from local neighborhoods. [Threshold PED-2].**

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### 5.14.3.1.2 All SUP Projects That Generate Additional Trips

All SUP-related projects would be carried out on existing District owned property and would be implemented in accordance with LAUSD Standard Conditions. All projects that increase student capacity or attendance would include installation of any missing signs and roadway markings pursuant to Part 7, School Area Traffic Controls, of the California MUTCD. Impacts would be less than significant.

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<sup>533</sup> Caltrans. 2022, May 20. Highway Design Manual. Table 201.1: Sight Distance Standards.  
<http://www.dot.ca.gov/hq/oppd/hdm/pdf/english/chp0200.pdf>.

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**Impact 5.14-3: SUP-related projects would not pose a safety hazard if adjacent to or near a major arterial roadway or freeway. [Threshold PED-3]**

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### 5.14.3.1.3 All SUP Projects That Generate Additional Trips

LAUSD Standard Conditions require that school entrances be located whenever possible on secondary highways or collector streets, not on major highways. The California Air Resources Board's *Air Quality and Land Use Handbook* recommends that sensitive land uses, including schools, be 500 feet or more from freeways or from urban roads carrying traffic volumes of 100,000 or more vehicles per day.<sup>534</sup> Some schools, however, were built prior to the freeways and/or regulations for siting schools, so LAUSD has some schools near high-traffic roads. If adjacent property is acquired for school expansion, the new facilities would also be near the high traffic roads. Students already walk and bike to existing schools, and safety devices—such as crosswalks, traffic lights, and signage—are already in place; therefore, additional facilities would not exacerbate any current conditions. If, however, a new facility generates a significant number of pedestrians, the District would conduct a pedestrian safety analysis to analyze the requirement for additional safety features.

All projects implemented pursuant to the SUP would implement LAUSD Standard Conditions, including School Design Guide; Traffic Safety Reference Guide; OEHS CEQA Specification Manual, Appendix C, Traffic and Pedestrian Safety Requirements for New School and Appendix D, Sidewalk Requirements for New Schools as required under SC-PED-1 through SC-PED-6, and SC-T-3 and SC-T-4. Impacts would be less than significant.

## 5.14.4 Applicable Regulations and Standard Conditions

### 5.14.4.1.1 Federal

- United States Code, Title 42, Section 12101 et seq.: Americans with Disabilities Act

### 5.14.4.1.2 State

- Street and Highways Code Sections 2331 et seq.: Safe Routes to Schools
- Government Code Sections 65040.2 and 65302: Complete Streets Act
- California Vehicle Code
  - Section 21372: Guidelines for Traffic Control Devices Near Schools
  - Section 21373: School Board Request for Traffic Control Devices
  - Section 21368: Crosswalks Near Schools
  - Section 21400: Official Traffic Control Devices
- California Manual of Uniform Traffic Control Devices, Part 7: Traffic Control for School Areas

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<sup>534</sup> CARB. 2005, April. *Air Quality and Land Use Handbook*. <http://www.arb.ca.gov/ch/handbook.pdf>.

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- Highway Design Manual

### 5.14.4.1.3 LAUSD Standard Conditions of Approval

- SC-PED-1 through SC-PED-6
- SC-T-3 and SC-T-

### 5.14.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standard Conditions listed in the previous subsection, the following impacts would be less than significant: 5.14-1, 5.14-2, and 5.14-3.

### 5.14.6 Mitigation Measures

No mitigation measures are required.

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### 5.15 POPULATION AND HOUSING

This section of the Subsequent Program EIR evaluates the potential for implementation of the SUP Update and Measure RR Implementation, to impact population and housing in the District in light of changing information and conditions since the 2015 Program EIR. This section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions), along with the updated existing population, employment, housing, and student projections throughout the SUP area, and any possible environmental impacts that may occur as SUP update-related site-specific projects are implemented.

#### 5.15.1 Environmental Setting

##### 5.15.1.1 REGULATORY FRAMEWORK

State laws and regulations are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to displacement of population and housing in the District. Many site-specific projects have not been identified, and there may be local jurisdictional plans and policies that are applicable depending on the project site. Specific requirements of these laws, regulations, plans, and guidelines might not be up to date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. Although some of these may not directly apply to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standard Conditions of Approval are also listed. See *Applicable Regulations and Standard Conditions* at the end of this chapter for those that require District compliance.

##### 5.15.1.1.1 State

###### 5.15.1.1.1.1 *California Government Code, Sections 7260 et seq.*

The **California Relocation Assistance Law** establishes requirements governing relocation assistance and replacement housing for persons displaced due to public agency projects in California. The relocation statute is intended for the benefit of displaced persons in order to ensure that they receive fair and equitable treatment and do not suffer disproportionately as a result of programs designed for the benefit of the public as a whole.

In the acquisition of real property by a public entity, the Relocation Assistance Law ensures consistent and fair treatment for tenants and property owners. It encourages acquisition by agreement with owners and tenants, rather than condemnation, to avoid litigation, relieve congestion in courts, and promote confidence in public land acquisition.

###### 5.15.1.1.1.2 *California Code of Regulations, Title 25, Division 1, Chapter 6*

The **California State Relocation Assistance and Real Property Acquisition Guidelines** implement the California Relocation Assistance Law. The guidelines are intended to establish only minimum requirements for relocation assistance and payments. They shall not be construed to limit any other authority or obligation that a public entity may have to provide additional assistance and payments.

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### LAUSD

#### *Standard Conditions of Approval*

This table lists the population and housing related standard condition that will be included as part of each SUP-related project, as appropriate.

Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
SC-PH-1	Property Displacement	Residential or business property acquisition	Prior to construction	<b>Relocation Assistance Advisory Program</b> 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).

#### 5.15.1.2 EXISTING CONDITIONS

##### 5.15.1.2.1 Population

The 2020 population within the District boundaries was 4,645,252, slightly less than half of the 10,014,009 population of Los Angeles County.<sup>535</sup> The population forecast includes the nine cities entirely within the District, three cities mostly within the District, and unincorporated areas within the District (see Table 5.15-1).

##### *5.15.1.2.1.1 Population Forecast Methodology for Unincorporated County Areas in District*

The 2035 and 2040 general population forecast in the District was calculated using the growth forecast from the SCAG 2016 Regional Transportation Plan/Sustainable Communities Strategy.

Nine communities in unincorporated Los Angeles County are included in the population projections in Table 5.15-1: East Los Angeles in the Region East; Marina Del Rey, West Athens, and Westmont in the Region West; and Willowbrook, Florence-Graham, Walnut Park, West Carson, and West Rancho Dominguez in the Region South. Population projections are not broken down by individual County communities. Therefore, population growth between 2020 and 2040 was forecast by using the same growth rate for the county census data as the SCAG 2040 population projections for the 12 cities that are entirely in the District boundary. That growth rate is 17.86%, shown in Table 5.15-1 under "Cities Subtotal".

<sup>535</sup> U.S. Census Bureau (USCB). 2020. <https://data.census.gov/>.

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**Table 5.15-1 Population Projections, 2020 to 2040**

Area within District Boundaries	US Census	SCAG Projections		Change, 2020-2040	Percent Change, 2020- 2040
	2020	2035	2040		
Cities					
Los Angeles*	3,898,747	4,442,500	4,609,400	710,653	18.23%
San Fernando*	23,946	26,200	26,900	2,954	12.34%
West Hollywood*	35,757	40,500	41,800	6,043	16.90%
Bell	33,559	36,400	36,900	3,341	9.96%
Carson	95,558	104,200	107,900	12,342	12.92%
Cudahy*	22,811	23,800	23,800	989	4.34%
Gardena*	61,027	66,800	68,700	7,673	12.57%
Huntington Park*	54,883	65,400	67,400	12,517	22.81%
Lomita*	20,921	20,900	21,200	279	1.33%
Maywood*	25,138	28,400	28,900	3,762	14.97%
South Gate	92,726	107,300	111,800	19,074	20.57%
Vernon*	222	300	300	78	35.14%
Cities Subtotal	4,365,295	4,962,700	5,145,000	779,705	17.86%
Unincorporated Los Angeles County**	322,174	365,333	379,719	57,545	17.86%
Total	4,687,469	5,328,033	5,524,719	837,250	17.86%

Source: SCAG. Subarea Forecasting Analysis. <https://scag.ca.gov/subarea-forecasting>. Accessed April 14, 2023.

USCB 2020 United States Census. <https://data.census.gov/all?q=Los+Angeles+city,+California&t=001>. Accessed April 14, 2023.

Notes:

\* Cities entirely within the District boundaries.

\*\* Population growth in unincorporated areas of the District between 2020 and 2040 was forecast by multiplying the 2020 US Census count by the average percent growth of the 12 cities combined over the 2020-2040 period. 2020 US Census counts for the nine unincorporated communities are:

Unincorporated Area within District Boundaries	US Census	Projections based on average incorporated area growth rates		Change, 2020-2040	Percent Change, 2020- 2040
	2020	2035	2040		
East Los Angeles	118,786	134,699	140,003	21,217	17.86%
West Athens	9,393	10,651	11,071	1,678	17.86%
Westmont	33,913	38,456	39,970	6,057	17.86%
Willowbrook	24,295	27,550	28,634	4,339	17.86%
Florence-Graham	61,983	70,286	73,054	11,071	17.86%
Walnut Park	15,214	17,252	17,931	2,717	17.86%
West Carson	22,870	25,934	26,955	4,085	17.86%
West Rancho Dominguez	24,347	27,609	28,696	4,349	17.86%
Marina Del Rey	11,373	12,897	13,404	2,031	17.86%
<b>Total</b>	<b>322,174</b>	<b>365,333</b>	<b>379,719</b>	<b>57,545</b>	<b>17.86%</b>

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As shown in Table 5.15-1, the population of the District is estimated to increase by about 837,250 between 2020 and 2040 (17.86%).

### 5.15.1.2.2 Student Population

#### 5.15.1.2.2.1 By Grade Level

Projected student population by grade level for the entire District is shown in Table 5.15-2.

**Table 5.15-2 District Student Population by Grade Level 2020-2033**

Grade Level	2020-21	2025-26	2030-31	2032-33	2020-2033 Change	13-Year Percent Change
TK-5	252,464	228,732	207,912	195,195	-57,269	-22.68%
6-8	124,196	103,671	95,156	92,663	-31,533	-25.39%
9-12	167,797	155,477	134,665	134,125	-33,672	-20.07%
Ungraded	26,938	25,126	22,543	21,732	-5,206	-19.33%
<b>Total</b>	<b>571,395</b>	<b>513,006</b>	<b>460,276</b>	<b>443,715</b>	<b>-127,680</b>	<b>-22.35%</b>
Source: LAUSD, 2023. Enrollment Projections.						

## Housing

### 5.15.1.2.2.2 2020 US Census

Counts of housing units, households, and vacant housing units in the District are presented in Table 5.15-3. About 73% of the occupied housing units in the District are renter occupied.

**Table 5.15-3 Housing Units and Households within District, 2020 US Census**

Housing Units	Households (occupied units)			Vacant Units	Vacancy Rate	Average Household Size
	Total	Owner Occupied	Renter Occupied			
1,736,559	1,640,849	444,250	1,196,599	95,710	5.50%	3.51
Source: 2020 United States Census. <a href="https://data.census.gov/all?q=los+angeles+unified+school+district">https://data.census.gov/all?q=los+angeles+unified+school+district</a> . Accessed April 17, 2023						

#### 5.15.1.2.2.3 2020 Households and Projections for 2035 and 2040

The number of households contained within the District according to the US 2020 Census, and household projections for 2035 and 2040 from SCAG (2016) are shown in Table 5.15-4. The percent change of households available between 2020 and 2040 ranged from a low of -4.34% in Cudahy, to a high of +28.21% in Vernon. The combined average household growth projection between 2020 and 2040 was 12.45%. Since growth rates are not broken down by SCAG for the unincorporated areas within District boundaries, projections for the unincorporated areas were calculated from the 2020 US Census and using the combined growth rate for the 12 cities over the 20-year period, as described under *Population Projections*.



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**Table 5.15-4 Households Projections, 2020-2040**

Area	Households				
	US Census	Projections, Southern California Association of Governments		Change, 2020-2040	Percent Change, 2020-2040
	2020	2035	2040		
<b>Cities</b>					
Los Angeles	1,496,453	1,618,900	1,690,300	193,847	12.95%
San Fernando	6,503	6,800	7,000	497	7.64%
West Hollywood	25,821	26,800	27,800	1,979	7.66%
Bell	9,468	9,100	9,200	-268	-2.83%
Carson	27,699	29,800	30,800	3,101	11.20%
Cudahy	5,854	5,600	5,600	-254	-4.34%
Gardena	22,393	23,500	24,200	1,807	8.07%
Huntington Park	15,494	16,900	17,400	1,906	12.30%
Lomita	8,068	8,300	8,400	332	4.12%
Maywood	6,696	6,800	6,900	204	3.05%
South Gate	25,084	27,200	27,300	2,216	8.83%
Vernon	78	100	100	22	28.21%
<b>Cities Subtotal</b>	<b>1,649,611</b>	<b>1,779,800</b>	<b>1,855,000</b>	<b>205,389</b>	<b>12.45%</b>
<b>Unincorporated Areas of Los Angeles County*</b>	<b>94,128</b>	<b>102,918</b>	<b>105,848</b>	<b>11,720</b>	<b>12.45%</b>
<b>Total</b>	<b>1,743,739</b>	<b>1,882,718</b>	<b>1,960,848</b>	<b>217,109</b>	<b>12.45%</b>

Unincorporated Area within District Boundaries	US Census	Projections based on Average incorporated area Growth Rates		Change, 2020-2040	Percent Change, 2020-2040
	2020	2035	2040		
East Los Angeles	32,589	35,632	36,647	4,058	12.45%
West Athens	2,942	3,217	3,308	366	12.45%
Westmont	10,990	12,016	12,358	1,368	12.45%
Willowbrook	5,958	6,514	6,700	742	12.45%
Florence-Graham	14,975	16,373	16,840	1,865	12.45%
Walnut Park	3,818	4,175	4,293	475	12.45%
West Carson	8,139	8,899	9,152	1,013	12.45%
West Rancho Dominguez	6,652	7,273	7,480	828	12.45%
Marina Del Rey	8,065	8,818	9,069	1,004	12.45%
<b>Total</b>	<b>94,128</b>	<b>102,918</b>	<b>105,848</b>	<b>11,720</b>	<b>12.45%</b>

Source: 2020 US Census, 2020; <https://data.census.gov/all?q=Los+angeles.+ca>

SCAG, [https://scag.ca.gov/sites/main/files/file-attachments/f2016rtpscs\\_demographicgrowthforecast.pdf?1606073557](https://scag.ca.gov/sites/main/files/file-attachments/f2016rtpscs_demographicgrowthforecast.pdf?1606073557).

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### 5.15.1.2.3 Employment

#### 5.15.1.2.3.1 2020 US Census Bureau Estimates

The total number of people employed in the City of Los Angeles in 2020 was 1,968,851. The total number of unemployed people was 162,380. The employment rate within LAUSD boundaries was 58.7% and the estimated unemployment rate in the City of Los Angeles was 4.4% in March 2023.<sup>536</sup>

#### 5.15.1.2.3.2 Projections: 2020 to 2040

Employment projections for 2020, 2035 and 2040 from SCAG (2016) are shown in Table 5.15-5. Employment projections range from a 0.00% increase in Cudahy, to an increase in employment opportunities of 16.25% in Huntington Park, with an average overall projected increase in employment opportunities within the 12 cities, of 13.38%. Employment projections for the unincorporated areas within District boundaries were not available at the time of this writing. However, for the purpose of this analysis, the number of jobs for the unincorporated areas within the District was assumed to be 6.5% of the total number of jobs available in the cities within District boundaries. This estimate was based on the percentages of population and housing units within the unincorporated areas compared to those in the Cities.

**Table 5.15-5 Employment Projections, 2020-2040**

Area	Employment				
	SCAG 2016 Growth Forecast	Projections, Southern California Association of Governments		Change	Percent Change
	2020	2035	2040	2020-2040	2020-2040
<b>Cities</b>					
Los Angeles	1,899,500	2,104,100	2,169,100	269,600	14.19%
San Fernando	11,800	12,400	12,700	900	7.63%
West Hollywood	34,600	36,300	37,300	2,700	7.80%
Bell	13,000	13,400	13,700	700	5.38%
Carson	64,000	67,400	69,400	5,400	8.44%
Cudahy	2,900	2,900	2,900	0	0.00%
Gardena	31,200	32,600	33,500	2,300	7.37%
Huntington Park	16,000	18,000	18,600	2,600	16.25%
Lomita	5,000	5,200	5,400	400	8.00%
Maywood	3,800	3,900	4,000	200	5.26%
South Gate	22,100	23,200	24,000	1,900	8.60%

<sup>536</sup> United States Census. [https://data.census.gov/profile/Los\\_Angeles\\_Unified\\_School\\_District\\_California?g=9700000US0622710](https://data.census.gov/profile/Los_Angeles_Unified_School_District_California?g=9700000US0622710). Accessed May 1, 2023:

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Area	Employment				
	SCAG 2016 Growth Forecast	Projections, Southern California Association of Governments		Change	Percent Change
	2020	2035	2040	2020-2040	2020-2040
<b>Cities</b>					
Vernon	45,300	45,700	46,100	800	1.77%
<b>Cities Subtotal</b>	<b>2,149,200</b>	<b>2,365,100</b>	<b>2,436,700</b>	<b>287,500</b>	<b>13.38%</b>
<b>Unincorporated Areas of Los Angeles County**</b>	<b>139,698</b>	<b>153,732</b>	<b>158,386</b>	<b>18,688</b>	<b>13.38%</b>
<b>Total</b>	<b>2,288,898</b>	<b>2,518,832</b>	<b>2,595,086</b>	<b>306,188</b>	<b>13.38%</b>

Source: SCAG. 2016 Subarea Forecasting Analysis. <https://scag.ca.gov/subarea-forecasting>. Accessed April 14, 2023.

Note:

\* Employment projections for Cities are taken from the SCAG 2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction table. Employment projections for unincorporated areas within District boundaries were not available. The number of jobs for the unincorporated areas within the District were assumed to be 6.5% of the total number of jobs available in the cities within District boundaries, based on an average of the percentages of population and housing units within the unincorporated areas compared to those in the Cities.

### 5.15.2 Thresholds of Significance

According to CEQA Guidelines Appendix G, a project would normally have a significant effect on the environment if the project would:

- PH-1 Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).
- PH-2 Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.

### 5.15.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

**Impact 5.15-1: SUP-related projects would not directly or indirectly induce substantial population growth in the District. [Threshold PH-1]**

#### 5.15.3.1.1 New Construction on New Property or Existing Campus

New construction projects could expand the total student capacity of individual schools by constructing new classrooms or installation of portables; however, total District enrollment is forecast to decrease. Over the next 10 years, student enrollment is anticipated to decrease by approximately 18%. New classroom seats under the

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SUP would meet the existing and future school housing needs of the District and would accommodate students that are currently attending District schools. Impacts would be less than significant.

### 5.15.3.1.2 Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation

Modernization, repair, upgrade, and renovation projects would not expand capacity and would not expand operational employment. Such projects would generate short-term construction employment; however, such construction employment is expected to be absorbed from the regional labor force rather than attracting new workers into the region. Impacts would be less than significant.

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**Impact 5.15-2: SUP implementation would not displace substantial numbers of existing housing, necessitating the construction of replacement housing. [Threshold PH-2]**

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### 5.15.3.1.3 New Construction on New Property

Because most District schools are in built-out urban areas with little vacant land available for new development, new construction on new properties may displace existing land uses on parcels adjacent to existing schools. Some existing land uses on prospective school expansion sites may consist of residential uses. SUP-related projects do not include new school construction on stand-alone sites; therefore, new property acquisition would only be for expansion of existing school campuses. The scale of potential residential displacement due to the SUP would be relatively limited. Impacts on displacement of housing would be analyzed in subsequent project-specific CEQA review. SUP implementation would not displace substantial numbers of existing housing. Due to the steep declines in projected student enrollment Districtwide, the probability of new property acquisition and tenant displacement is very unlikely. Impacts would be less than significant.

### 5.15.3.1.4 New Construction and Modernization on Existing Campus

New construction, modernization, repair, replacement, upgrade, remodel, renovation, and installation on existing campuses would not displace any housing. No impacts would occur.

### 5.15.3.1.5 All SUP Projects

The analysis of impacts to housing in Impact 5.15-2 above also applies to displacement of residents. New construction on new property may displace some residents; however, because of the small amount of property acquisitions anticipated these projects would not displace substantial numbers of people. If required, the District would implement their Relocation Assistance Program. Impacts would be less than significant.

## 5.15.4 Applicable Regulations and Standard Conditions

### 5.15.4.1.1 State

- California Government Code, Sections 7260, et seq.: California Relocation Assistance Law
- California Code of Regulations, Title 25, Division 1, Chapter 6, Sections 6000 et seq.: California State Relocation Assistance and Real Property Acquisition Guidelines

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### 5.15.4.1.2 LAUSD Standard Conditions of Approval

- SC-PH-1

### 5.15.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and the District's Relocation Assistance Program, the following impacts would be less than significant: 5.15-1, 5.15-2, and 5.15-3.

### 5.15.6 Mitigation Measures

No mitigation measures are required.

### 5.15.7 Level of Significance After Mitigation

Impacts would be less than significant.

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## 5. Environmental Analysis

### 5.16 PUBLIC SERVICES

This section of the program EIR evaluates the potential for implementation of the SUP to create a significant impact related to public services in the District, including fire protection and emergency, police protection, schools, and libraries. Park services are addressed in Section 5.17, *Recreation*. This section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions), along with the existing public services currently provided in the District and possible environmental impacts that may occur as SUP-related site-specific projects are implemented.

State regulations are summarized below. The regulatory framework discussion under each service area does not include all plans and policies that relate to public services in the District. Many site-specific projects have not been identified, and there may be local jurisdictional plans and policies that are applicable depending on the type of project and the location. Specific requirements of these laws, regulations, plans, policies, and guidelines might not be up to date when a proposed site-specific school project undergoes review; therefore, this section provides a general discussion of the most important ones. Some of these are not directly applicable to the SUP or site-specific projects implemented under the SUP; however, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standard Conditions of Approval are also listed. See *Applicable Regulations and Standard Conditions* at the end of each service section for those that require District compliance.

#### 5.16.1 Fire Protection and Emergency Services

##### 5.16.1.1 REGULATORY FRAMEWORK

###### 5.16.1.1.1 State

###### 5.16.1.1.1.1 *California Code of Regulations, Title 24, Part 9*

Requirements in the **California Fire Code** (CFC) are for building and equipment design, such as fire-rated construction, alarm systems, sprinkler systems, and means of egress; requirements for specific land uses, including airports, dry cleaners, gas stations, and automotive service businesses; hazardous materials; fire flow requirements; and fire hydrant spacing. The CFC is updated on a three-year cycle, and the 2023 CFC took effect on January 1, 2023.

###### 5.16.1.1.1.2 *California Code of Regulations, Title 24, Part 2*

Current law states that every local agency enforcing building regulations, such as cities and counties, must adopt the provisions of the **California Building Code** (CBC) within 180 days of its publication date, which is established by the California Building Standards Commission. The most recent building standard adopted by the legislature and used throughout the state is the 2022 version of the CBC, often with local, more restrictive amendments that are based on local geographic, topographic, or climatic conditions. The CBC includes requirements for fire and smoke protection features, fire protection systems, and means of egress. The CBC is updated on a three-year cycle, and the 2022 CBC took effect on January 1, 2023.

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Requirements for structures in Fire Hazard Severity Zones are in Chapter 7A of the California Building Code, “Materials and Construction Methods for Exterior Wildfire Exposure,” and Chapter 49 of the California Fire Code, “Requirements for Wildland-Urban Interface Fire Areas.” Requirements in these two chapters cover roofing; attic ventilation; exterior walls; exterior windows and glazing; exterior doors; decking; protection of underfloor, appendages, and floor projections; and ancillary structures.

### 5.16.1.1.2 LAUSD

#### 5.16.1.1.2.1 Standard Conditions of Approval

This table lists the public service-related standard conditions that will be included as part of each SUP-related project, as appropriate.

Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
SC-PS-1	Emergency Protection Services	- New building, new school, change in campus traffic circulation	Prior to construction (Planning, Construction)	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; and 2) provide a full site plan for the local review, including all buildings, both existing and proposed, fences, drive gates, retaining walls, and other construction affecting emergency vehicle access, with unobstructed fire lanes for access indicated.
SC-PS-2	Emergency Preparedness & Response	New building, new school, change in campus traffic circulation	During school operation	LAUSD shall implement emergency preparedness and response procedures in all schools as required in LAUSD References, Bulletins, Safety Notes, and Emergency Preparedness Plans.

### 5.16.1.2 EXISTING CONDITIONS

Fire protection agencies in the District are listed in Table 5.16-1.

**Table 5.16-1 Fire Protection by Jurisdiction**

Local Regions	Jurisdictions	Fire Department
Portions of North, West, East, and South	City of Los Angeles	Los Angeles Fire Department
North	City of San Fernando	Los Angeles Fire Department
West	City of Gardena	Los Angeles County Fire Department
	City of West Hollywood	
	City of Hawthorne	
	City of Inglewood	
	Unincorporated Los Angeles County community of Marina Del Rey,	
West	City of Santa Monica	Santa Monica Fire Department
	City of Beverly Hills	Beverly Hills Fire Department
	City of El Segundo	El Segundo Fire Department
East	City of Bell	Los Angeles County Fire Department
	City of Bell Gardens	
	City of Commerce	



## 5. Environmental Analysis

Local Regions	Jurisdictions	Fire Department
	City of Cudahy City of Huntington Park City of Lynwood City of Maywood City of South Gate Unincorporated Los Angeles County: East Los Angeles	
	City of Downey	Downey Fire Department
	City of Monterey Park	Monterey Park Fire Department
	City of Montebello	Montebello Fire Department
	City of Vernon	Vernon Fire Department
South	Unincorporated Los Angeles County communities of: - Willowbrook - Florence-Graham - West Carson - West Rancho Dominguez - West Athens - Westmont	Los Angeles County Fire Department
	City of Long Beach	Long Beach Fire Department
	City of Torrance	Torrance Fire Department

Sources: Los Angeles Fire Department (LAFD). Fire Stations. <http://lafd.org/find-a-fire-station>.  
Los Angeles County Fire Department (LACoFD). Fire Station Locator. <http://www.fire.lacounty.gov/index.php/about/fire-station-locator/>.  
Santa Monica Fire Department (SMFD). <http://santamonicafire.org/>.  
Beverly Hills Fire Department (BHFD). <http://www.beverlyhills.org/citygovernment/departments/firedepartment/>.  
El Segundo Fire Department. <http://www.elsegundo.org/depts/fire/>.  
Monterey Park Fire Department. <http://www.ci.monterey-park.ca.us/index.aspx?page=26>.  
Montebello Fire Department. <http://www.cityofmontebello.com/depts/fire/>.  
Downey Fire Department. <http://www.downeyca.org/gov/fire/about/default.asp>.  
Vernon Fire Department. <http://www.cityofvernon.org/departments/fire-department>.  
Long Beach Fire Department. <http://www.longbeach.gov/fire/>.  
Torrance Fire Department. <https://www.torranceca.gov/108.htm>.

### 5.16.1.3 THRESHOLDS OF SIGNIFICANCE

According to CEQA Guidelines Appendix G, a project would normally have a significant effect on the environment if the project would:

- FP-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered fire protection and emergency facilities, need for new or physically altered fire facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection and emergency services.

## 5. Environmental Analysis

### 5.16.1.4 ENVIRONMENTAL IMPACTS

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**Impact 5.16-1: SUP-related projects would not require the construction of new or physically altered fire protection and emergency facilities. [Threshold FP-1]**

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#### 5.16.1.4.1 All SUP Projects

New construction projects, both those on new properties and those on existing schools, could expand the total number of buildings and amount of building area, consequently generating some increase in demands for fire protection. However, the SUP would not increase District enrollment (see Chapter 4, *Project Description*). In fact, overall District enrollment is forecast to decrease over 18% over the next 10 years. Implementation of the SUP would not generate increased demands for fire protection and emergency services due to a significant increase in people on District campuses.

Additionally, individual school projects would be required to comply with fire department and department of building and safety regulations for water availability and fire hydrant pressure, and accessibility for firefighting equipment to minimize any threat of a fire. Individual projects carried out pursuant to the SUP would comply with standard design requirements in accordance with the CBC, CFC, and local fire department requirements, which include fire sprinklers, fire alarm devices, emergency access, and evacuation procedures.

Modernization, repair, replacement, upgrade, remodel, renovation, and installation projects would include installation of new and upgraded fire alarms, safety and technology upgrades, and life safety and seismic safety upgrades.

All fire hazard severity zones are within wildland-urban interface areas. Any new construction or modifications to District campuses in fire hazard severity zones would comply with requirements of Chapter 7A of the CBC and Chapter 49 of the CFC. Prior to project approval, site plans would be reviewed by local fire departments to ensure safety and access as outlined in SC-PS-1. Additionally, LAUSD has several emergency procedures in place to ensure the safety of people on and around schools as outlined in SC-PS-2 (also see Chapter 5.8, *Hazards and Hazardous Materials* for detailed discussion of hazard procedures). Since school enrollment populations are projected to significantly decrease over the next 10 years, no new or expanded fire protection services or facilities would be required. Impacts to fire protection providers are considered less than significant.

#### 5.16.1.5 APPLICABLE REGULATIONS AND STANDARD CONDITIONS

##### 5.16.1.5.1 State

- California Code of Regulations Title 24 Part 2: California Building Code
- California Code of Regulations Title 24 Part 9: California Fire Code

##### 5.16.1.5.2 LAUSD Standard Conditions of Approval

- SC-PS-1 (Fire Dept. review)
- SC-PS-2 (Emergency Preparedness & Response)

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### 5.16.1.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements and LAUSD Standard Conditions, Impact 5.16-1 would be less than significant.

### 5.16.1.7 MITIGATION MEASURES

No mitigation measures are required.

### 5.16.1.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant.

## 5.16.2 Police Protection Services

### 5.16.2.1 REGULATORY FRAMEWORK

#### LAUSD Standard Conditions of Approval

The police service-related standard conditions that will be included as part of each SUP-related project, as appropriate, is the same as the table in Fire Protection Services above.

### 5.16.2.2 EXISTING CONDITIONS

The Los Angeles School Police Department (LASPD) is the primary provider of police protection to District schools. The Los Angeles Police Department (LAPD) and Los Angeles County Sheriff's Department (LASD) are secondary providers. Police agencies in the District by jurisdiction are listed in Table 5.16-2.

**Table 5.16-2 Police Protection by Jurisdiction**

Local Regions	Jurisdiction	Police Department
Portions of North, West, East, and South	City of Los Angeles	Los Angeles Police Department
North	City of San Fernando	San Fernando Police Department
West	City of West Hollywood	Los Angeles County Sheriff's Department
	Unincorporated Los Angeles County communities of: - Marina Del Rey	
	City of Gardena	
	City of Hawthorne	
	City of Inglewood	
	City of Santa Monica	
	City of Beverly Hills	
	City of El Segundo	
East	City of Commerce	Los Angeles County Sheriff's Department
	City of Lynwood	
	City of Maywood	
	Unincorporated Los Angeles County: East Los Angeles	
	City of Bell	Bell Police Department
	City of Bell Gardens	Bell Gardens Police Department

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Local Regions	Jurisdiction	Police Department
	City of Cudahy	Cudahy Police Department
	City of Huntington Park	Huntington Park Police Department
	City of Montebello	Montebello Police Department
	City of Monterey Park	Monterey Park Police Department
	City of South Gate	South Gate Police Department
South	City of Carson City of Lomita City of Rancho Palos Verdes Unincorporated Los Angeles County communities of: - Florence-Graham - West Carson - West Rancho Dominguez - Willowbrook - West Athens - Westmont	Los Angeles County Sheriff's Department
	City of Long Beach	Long Beach Police Department
	City of Torrance	Torrance Police Department

Sources: LAPD. 2023, April 27. Our Communities. [http://www.lapdonline.org/our\\_communities](http://www.lapdonline.org/our_communities).  
San Fernando Police Department. 2023, April 27. [http://www.ci.san-fernando.ca.us/city\\_government/departments/police/](http://www.ci.san-fernando.ca.us/city_government/departments/police/).  
LASD. Patrol Stations. <http://sheriff.lacounty.gov/wps/portal/lasd/residents/patrolstations>.  
Gardena Police Department. <http://www.gardenapd.org/>.  
Hawthorne Police Department. <http://hawthornepolice.com/>.  
Inglewood Police Department. <http://www.inglewoodpd.org/>.  
Santa Monica Police Department. <http://www.santamonicapd.org/>.  
Beverly Hills Police Services. <http://www.beverlyhills.org/search/website/?Q=services%20police&NFR=1>.  
El Segundo Police Department. <http://www.elsegundo.org/depts/police/default.asp>.  
Monterey Park Police Department. <http://www.ci.monterey-park.ca.us/index.aspx?page=31>.  
Montebello Police Department. <http://www.cityofmontebello.com/depts/police/>.  
Bell Police Department. <http://www.cityofbell.org/?navid=106>.  
Bell Gardens Police Department. <http://www.bellgardens.org/GOVERNMENT/PublicSafety/PoliceDepartment.aspx>.  
Cudahy Police Department. <http://www.cudahy-wi.gov/cudahy/Departments/police/default.asp>.  
Huntington Park Police Department. <http://www.huntingtonparkpd.org/>.  
South Gate Police Department. <http://www.sogate.org/index.cfm/fuseaction/nav/navid/19/>.  
Long Beach Police Department. <http://www.longbeach.gov/police/>.  
Torrance Police Department. <http://www.torranceca.gov/97.htm>.

### 5.16.2.2.1.1 Los Angeles Police Department

The City of Los Angeles is divided into 21 LAPD divisions, each with its own community police station.<sup>537</sup> Currently, the LAPD has approximately 9,236 sworn officers and 2,660 civilian employees.<sup>538</sup>

### 5.16.2.2.1.2 Los Angeles County Sheriff's Department

The Los Angeles County Sheriff's Department patrols over 3,100 of the county's 4,083 square miles; its service area has a population of over four million. The LASD has 23 patrol stations. Budgeted positions in 2022 included 9,972 total sworn officers and 7,954 non-sworn members.<sup>539</sup>

<sup>537</sup> LAPD. Our Communities. [http://www.lapdonline.org/our\\_communities](http://www.lapdonline.org/our_communities).

<sup>538</sup> LAPD. COMPSTAT Plus. [http://www.lapdonline.org/inside\\_the\\_lapd/content\\_basic\\_view/6364](http://www.lapdonline.org/inside_the_lapd/content_basic_view/6364).

<sup>539</sup> LASD. [http://file.lacounty.gov/lasd/cms1\\_207718.pdf](http://file.lacounty.gov/lasd/cms1_207718.pdf).

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### 5.16.2.2.1.3 District Police

The **Los Angeles School Police Department** (LASPD) is a recognized independent school police department, with over 211 sworn police officers, 25 nonsworn school safety officers (SSO), and 32 civilian support staff dedicated to serving LAUSD. Most District high schools are assigned a full-time LASPD officer who provides on-campus security. A sufficient number of officers are available to respond to the remaining schools in the LAUSD. In the event of an emergency that would require additional officers, a back-up LASPD patrol force is also available. LASPD's headquarters are in central Los Angeles near the District headquarters. LASPD operates out of four additional division offices: Valley West, in the Community of Van Nuys in the City of Los Angeles; Valley East, in the Community of Pacoima in the City of Los Angeles; West, in the Community of Venice in the City of Los Angeles; and South, in the Community of Willowbrook in unincorporated Los Angeles County.

An SSO is a civilian, unarmed employee of the LASPD that receives additional training and equipment, enabling them to provide a safe educational environment when assigned to a school campus or other LAUSD site. Some SSOs may work at a location by themselves or with school police officers.

### 5.16.2.3 THRESHOLDS OF SIGNIFICANCE

According to CEQA Guidelines Appendix G, a project would normally have a significant effect on the environment if the project would:

- PP-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered police facilities, need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services.

### 5.16.2.4 ENVIRONMENTAL IMPACTS

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**Impact 5.16-2: SUP-related projects would not require the construction of new or physically altered police protection facilities. [Threshold PP-1]**

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#### 5.16.2.4.1 New Construction on New Properties and Existing Campus

Demands for police protection are generated more by the number of people in a service area than by numbers of buildings or total building area.

The SUP would not increase District enrollment. In fact, overall District enrollment is forecast to decrease by 18% over the next 10 years. Implementation of the SUP would not generate increased demands for police services due to a significant increase in people on District campuses.

Individual school projects would include both design features and provisions for LASPD police officers in order to ensure a high level of safety and security at future school projects and in the immediately surrounding area. The entries and boundaries of school campuses are fenced, secured, and carefully controlled by the LAUSD staff and the LASPD. Marked LASPD police vehicles patrol high schools on a regular basis. LAUSD

## 5. Environmental Analysis

maintains a cooperative working relationship between the LASPD and affected local and regional law enforcement agencies who act as backup. Prior to project approval, site plans would be reviewed by local police departments to ensure safety and access as outlined in SC-PS-1. Additionally, LAUSD has several emergency procedures in place to ensure the safety of people on and around schools as outlined in SC-PS-2 (also see Chapter 5.8, *Hazards and Hazardous Materials* for detailed discussion of hazard procedures). Impacts to police services would be less than significant.

### 5.16.2.4.2 Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

Modernizations and upgrade-type projects would not expand capacity and would not expand District enrollment. These types of projects would not cause an increase in demands for police protection or emergency medical services, and no impact would occur.

### 5.16.2.5 APPLICABLE REGULATIONS AND STANDARD CONDITIONS

#### 5.16.2.5.1 LAUSD Standard Conditions of Approval

- SC-PS-1 (Police Review)
- SC-PS-2 (Emergency Preparedness & Response)

### 5.16.2.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of LAUSD Standard Condition, Impact 5.16-2 would be less than significant.

### 5.16.2.7 MITIGATION MEASURES

No mitigation measures are required.

### 5.16.2.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant.

## 5.16.3 School Services

### 5.16.3.1 ENVIRONMENTAL SETTING

The regional and local environmental setting of the LAUSD, including District geographic distribution, number and types of schools, and District enrollment figures, are provided in Section 3 of this document, *Environmental Setting*.

### 5.16.3.2 THRESHOLDS OF SIGNIFICANCE

According to CEQA Guidelines Appendix G, a project would normally have a significant effect on the environment if the project would:

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SS-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools.

### 5.16.3.3 ENVIRONMENTAL IMPACTS

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**Impact 5.16-3: SUP-related projects would not require the construction of new or physically altered school facilities. [Threshold SS-1]**

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#### 5.16.3.3.1 All SUP Projects

Implementation of the SUP would make improvements at District schools but would not necessarily result in an increase in the population in the District and would not generate new students. The SUP would develop new and expanded buildings at existing schools if necessary. However, with forecasted declines in enrollment over the next 10 years, these new and expanded buildings are less likely to be constructed. Impacts of such developments are analyzed throughout this Subsequent Program EIR. No school service impacts would occur.

### 5.16.3.4 APPLICABLE REGULATIONS AND STANDARD CONDITIONS

- None.

### 5.16.3.5 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Impact 5.16-3 would be less than significant.

### 5.16.3.6 MITIGATION MEASURES

No mitigation measures are required.

### 5.16.3.7 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant.

## 5.16.4 Library Services

### 5.16.4.1 ENVIRONMENTAL SETTING

The District is served by two library systems, the Los Angeles Public Library and the County of Los Angeles Public Library.

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### 5.16.4.1.1 Los Angeles Public Library

The Los Angeles Public Library (LAPL) has 72 branch libraries, including the Central Library in downtown Los Angeles.<sup>540</sup> The LAPL's collection consists of over six million books, audiobooks, periodicals, DVDs, and CDs.<sup>541</sup>

### 5.16.4.1.2 County of Los Angeles Public Library

The County of Los Angeles Public Library (CLAPL) operates 85 county libraries; its collection currently includes over 7.5 million books, magazines, DVDs, audiobooks, eBooks, downloadable eBooks and audiobooks, and CDs.<sup>542,543</sup>

The Los Angeles Public Library and County of Los Angeles Public Library are both members of the Southern California Library Cooperative (SCLC), a consortium of 38 independent city, county, and special district public libraries in Los Angeles and Ventura counties that cooperate in providing library service to the residents of all participating jurisdictions. SCLC members extend loan privileges to members of other SCLC libraries.<sup>544</sup>

### 5.16.4.2 THRESHOLDS OF SIGNIFICANCE

According to CEQA Guidelines Appendix G, a project would normally have a significant effect on the environment if the project would:

- LS-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for library services.

### 5.16.4.3 ENVIRONMENTAL IMPACTS

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**Impact 5.16-4: SUP-related projects would not require the construction of new or physically altered library facilities. [Threshold LS-1]**

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#### 5.16.4.3.1 All SUP Projects

Demands for library services and facilities are generated by the population in the libraries' service areas. Due to the District's declining enrollment projected over the next ten years, implementation of the SUP would not increase the population in the District and would not generate new students. Therefore, the SUP would not generate increased demands on public library services. Most LAUSD schools have a library that is used by students. Impacts would be less than significant.

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<sup>540</sup> LAPL. 2012, November 29. Library Directory. [http://www.lapl.org/sites/default/files/media/pdf/about/branch\\_map.pdf](http://www.lapl.org/sites/default/files/media/pdf/about/branch_map.pdf).

<sup>541</sup> LAPL. Collections & Resources. <http://www.lapl.org/collections-resources>.

<sup>542</sup> CLAPL. Find Your Library. <http://www.colapublib.org/libs/>.

<sup>543</sup> CLAPL. About Us. <http://www.colapublib.org/aboutus/index.html>.

<sup>544</sup> SCLC. <http://www.socallibraries.org/>.



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### 5.16.4.4 APPLICABLE REGULATIONS AND STANDARD CONDITIONS

- None.

### 5.16.4.5 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Impact 5.16-4 would be less than significant.

### 5.16.4.6 MITIGATION MEASURES

No mitigation measures are required.

### 5.16.4.7 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant.

## 5.16.5 Parks Facilities

### 5.16.5.1 ENVIRONMENTAL SETTING

The regional and local environmental setting of parks facilities within District boundaries, including geographic distribution are provided in Chapter 5-17 of this document, *Recreation*.

### 5.16.5.2 THRESHOLDS OF SIGNIFICANCE

According to CEQA Guidelines Appendix G, a project would normally have a significant effect on the environment if the project would:

- LS-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered parks facilities, need for new or physically altered parks facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks services.

### 5.16.5.3 ENVIRONMENTAL IMPACTS

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**Impact 5.16-5: SUP-related projects would not require the construction of new or physically altered parks facilities. [Threshold PF-1]**

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#### 5.16.5.3.1 All SUP Projects

Demands for parks facilities are generated by the population in the parks' service areas. Due to the District's declining enrollment projected over the next 10 years, implementation of the SUP would not increase the population in the District and would not generate new students. Therefore, the SUP would not generate increased demands on public parks facilities. Most LAUSD schools have fields and outdoor recreation areas used by students. Impacts would be less than significant.

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### **5.16.5.4 APPLICABLE REGULATIONS AND STANDARD CONDITIONS**

- None.

### **5.16.5.5 LEVEL OF SIGNIFICANCE BEFORE MITIGATION**

Impact 5.16-5 would be less than significant.

### **5.16.5.6 MITIGATION MEASURES**

No mitigation measures are required.

### **5.16.5.7 LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Impacts would be less than significant.

## 5. Environmental Analysis

### 5.17 RECREATION

This section of the Subsequent Program EIR evaluates the potential for implementation of the SUP Update and Measure RR Implementation Plan to impact recreation facilities and parks in the District. The section discusses plans and policies from the Education Code, along with the existing recreation facilities throughout the SUP area and possible environmental impacts that may occur as SUP-related site-specific projects are implemented.

#### 5.17.1 Environmental Setting

##### 5.17.1.1 REGULATORY FRAMEWORK

State regulations are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to recreation in the District. Many site-specific projects have not been identified, and there may be local jurisdictional plans and policies that are applicable depending on the type of project and the location. Specific requirements might not be up to date when a proposed site-specific school project undergoes review; therefore, this section provides a general discussion of the regulatory framework encompassing the LAUSD plan area.

##### 5.17.1.1.1 State

###### 5.17.1.1.1.1 *California Education Code Section 38131.b*

The **Civic Center Act** permits public use of school facilities or grounds by a nonprofit organization or by a club or an association organized to promote youth and school activities. In addition to the mandatory authorization above, the Civic Center Act also allows school districts to grant the use of school facilities or grounds as a civic center, upon the terms and conditions the Board of Education deems proper, for supervised recreational activities, or meetings open to the public to discuss subjects and questions that pertain to the educational, political, economic, artistic, and moral interests of the citizens of the community. School facilities available for Civic Center use include gyms, playing fields, stadiums, auditoriums, multipurpose rooms, cafeterias, and classrooms. Facilities are available within designated time frames outside school hours. Organizations wishing to use a school location for a Civic Center use must apply for a permit from the District. A variety of rules, regulations, and restrictions governing the use of school facilities and grounds for civic center purposes appear in detail on the permit and the application.

###### *State Public Park Preservation Act*

The primary instrument for protecting and preserving parkland is the State Public Park Preservation Act. Under the Public Resource Code, cities and counties may not acquire any real property that is in use as a public park for any non-park use unless compensation or land, or both, are provided to replace the parkland acquired. This provides no net loss of parkland and facilities.

##### 5.17.1.1.1 Regional Laws, Regulations, and Policies

There are no regional laws, regulations, and/or policies that are specifically applicable to recreation.

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### 5.17.1.1.1 Local Laws, Regulations, and Policies

Cities and communities within the District attendance boundaries have General Plans or community plans that guide development. Where a proposed LAUSD school project is inconsistent with a local General Plan policy or zoning ordinance, LAUSD school sites are exempt under Government Code Section 53094[1], pending a two-thirds vote of the Board of Education. On February 19, 2019, the LAUSD Board of Education Adopted a Resolution (Res 256-18/19)[2] to exempt all LAUSD school sites from local land use regulations under Government Code Section 53094. Although LAUSD school sites are exempt from local land use regulations, many of these general plans or community plans establish goals and policies providing applicable references for discussion.

#### *Los Angeles County Code*

The Los Angeles County Code (County Code) contains regulations governing operation of park facilities, and regulations for the provision of parklands for new subdivisions, in accordance with the Quimby Act. County Code Section 21.24.340 (Residential Subdivisions, Local Park Space Obligation, Formula) provides the methodology to determine the amount of parkland required to be dedicated by the subdivider as a part of the subdivision map approval process. Section 21.28.140 also states the developer may also choose to pay a fee in-lieu of the provision of parkland or may choose to provide less than the required amount of parkland but provide amenities equal to the value of what the in-lieu fee would be. As a condition of zone change approvals, General Plan amendments, specific plan approvals, or development agreements, the County may require a subdivider to dedicate land according to the General Plan goal of four acres of local parkland per 1,000 residents, and six acres of regional parkland per 1,000 residents. Once the local park space obligation is determined, County Code Section 21.24.350 (Residential Subdivisions, Provision, or Local Park Sites) contains regulations pertaining to the siting of park facilities as well as provisions that give the option to subdividers of 50 units or less to choose to provide the obligatory amount of parkland, any excess of which would be credited to the subdivision, or otherwise allow any remaining obligation to be satisfied by the payment of park fees in accordance with the provisions of Section 21.28.140 (Park Fees Required When, Computation and Use). It is the County's DPR responsibility to develop a schedule specifying how, when, and where it will use the parkland and/or fees, from each subdivision to develop park or recreational facilities within the applicable park planning area.

#### *Los Angeles County General Plan*

The **Land Use Element** of the General Plan provides the following goals and policies potentially relevant to the Project:

**Goal LU 5:** Vibrant, livable, and healthy communities with a mix of land uses, services and amenities.

Policy LU 5.7: Direct resources to areas that lack amenities, such as transit, clean air, grocery stores, bikeways, parks, and other components of a healthy community.

The Parks and Recreation Element of the General Plan provides the following goals and policies potentially relevant to the Project:

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**Goal P/R 1:** Enhanced active and passive park and recreation opportunities for all users.

Policy P/R 1.2: Provide additional active and passive recreation opportunities based on a community's setting, and recreational needs and preferences.

Policy P/R 1.3: Consider emerging trends in parks and recreation when planning for new parks and recreation programs.

Policy P/R 1.4: Promote efficiency by building on existing recreation programs.

Policy P/R 1.5: Ensure that County parks and recreational facilities are clean, safe, inviting, usable and accessible.

Policy P/R 1.6: Improve existing parks with needed amenities and address deficiencies identified through the park facility inventories.

Policy P/R 1.7: Ensure adequate staffing, funding, and other resources to maintain satisfactory service levels at all County parks and recreational facilities.

Policy P/R 1.8: Enhance existing parks to offer balanced passive and active recreation opportunities through more efficient use of space and the addition of new amenities.

**Goal P/R 2:** Enhanced multi-agency collaboration to leverage resources.

Policy P/R 2.1: Develop joint-use agreements with other public agencies to expand recreation services.

Policy P/R 2.2: Establish new revenue generating mechanisms to leverage County resources to enhance existing recreational facilities and programs.

Policy P/R 2.3: Build multiagency collaborations with schools, libraries, nonprofit, private, and other public organizations to leverage capital and operational resources.

Policy P/R 2.4: Utilize school and library facilities for County sponsored and community sponsored recreational programs and activities.

Policy P/R 2.5: Support the development of multi-benefit parks and open spaces through collaborative efforts among entities such as cities, the county, state, and federal agencies, private groups, schools, private landowners, and other organizations

Policy P/R 2.6: Participate in joint powers authorities (JPAs) to develop multi-benefit parks as well as regional recreational facilities.

**Goal P/R 3:** Acquisition and development of additional parkland.

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Policy P/R 3.1: Acquire and develop local and regional parkland to meet the following County goals: four acres of local parkland per 1,000 residents in the unincorporated areas and six acres of regional parkland per 1,000 residents of the total population of the County.

Policy P/R 3.2: For projects that require zone change approvals, general plan amendments, specific plans, or development agreements, work with developers to provide for local and regional parkland above and beyond their Quimby obligations.

Policy P/R 3.3: Provide additional parks in communities with insufficient local parkland as identified through the gap analysis.

Policy P/R 3.4: Expand the supply of regional parks by acquiring land that would: 1) provide a buffer from potential threats that would diminish the quality of the recreational experience; 2) protect watersheds; and 3) offer linkages that enhance wildlife movements and biodiversity.

Policy P/R 3.5: Collaborate with other public, nonprofit, and private organizations to acquire land for parks.

Policy P/R 3.6: Pursue a variety of opportunities to secure property for parks and recreational facilities, including purchase, grant funding, private donation, easements, surplus public lands for park use, and dedication of private land as part of the development review process.

Policy P/R 3.9: The Department of Parks and Recreation does not accept undeveloped park sites from developers. Developers are required to provide a developed park to the County on a “turn-key” basis and receive credit for the costs of developing the public park up to and against any remaining Quimby obligation, after accounting for the net acreage dedicated to the County.

**Goal P/R 4:** Improved accessibility and connectivity to a comprehensive trail system including rivers, greenways, and community linkages.

Policy P/R 4.1: Create multi-use trails to accommodate all users.

Policy P/R 4.3: Develop a network of feeder trails into regional trails.

Policy P/R 4.5: Collaborate with other public, nonprofit, and private organizations in the development of a comprehensive trail system.

Policy P/R 4.6: Create new multi-use trails that link community destinations including parks, schools, and libraries.

**Goal P/R 5:** Protection of historical and natural resources on County park properties.

Policy P/R 5.1: Preserve historic resources on County park properties, including buildings, collections, landscapes, bridges, and other physical features.

## 5. Environmental Analysis

Policy P/R 5.3: Protect and conserve natural resources on County park properties, including natural areas, sanctuaries, and open space preserves.

Policy P/R 5.4: Ensure maintenance, repair, rehabilitation, restoration, or reconstruction of historical resources in County parks and recreational facilities are carried out in a manner consistent with the most current Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings.

**Goal P/R 6:** A sustainable parks and recreation system.

Policy P/R 6.3: Prolong the life of existing buildings and facilities on County park properties through preventative maintenance programs and procedures.

Policy P/R 6.5: Ensure the routine maintenance and operations of County parks and recreational facilities to optimize water and energy conservation

### *Los Angeles City Board of Education Resolution: Green Schools for All: Equitable Funding and Expansion of Green Spaces across District Campuses (Res-002-22/23)*

With the adoption of Los Angeles City Board of Education Resolution: Green Schools for All: Equitable Funding and Expansion of Green Spaces across District Campuses (Res-002-22/23), the District commits to a long-term effort to ensure all school facilities have adequate nature-based, climate-appropriate green spaces where students recreate, play, and spend time. The District intends to deepen partnerships with City and County to expand the community school parks program, significantly increasing the number of community school parks in the schools with low green space based on the District's 2022 Greening Index and in communities most affected by extreme heat and climate change. The District will also explore other avenues to expand community access to schoolyards beyond traditional school hours.

### 5.17.1.2 EXISTING CONDITIONS

#### Major Recreational Facilities

Major recreational facilities in the District are described by Region as follows. Major recreational areas listed are limited to federal, state, and county facilities.

#### *North Region*

- Hansen Dam Recreational Area
- San Gabriel Mountains National Monument
- Sepulveda Basin Recreation Center<sup>545</sup>

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<sup>545</sup> <https://www.laparks.org/reccenter/sepulveda-basin-area>.

## 5. Environmental Analysis

- Santa Susana Pass State Historic Park
- Angeles National Forest: about 700,000 acres; 50 campgrounds; 557 miles of hiking and equestrian trails.<sup>546, 547</sup>
- Verdugo Mountains State Park property
- El Cariso Community Regional Park
- Veterans Memorial Community Regional Park
- Santa Clarita Woodlands Park (portions owned and operated by City of Los Angeles and Los Angeles County)

### *East Region*

- Rio de Los Angeles State Park
- Ernest E. Debs Regional Park
- Los Angeles State Historic Park
- Belvedere Community Regional Park

### *West Region*

- Griffith Park<sup>548</sup>
- Elysian Park<sup>549</sup>
- Santa Monica Mountains National Recreation Area (includes Topanga State Park)
- Santa Monica State Beach
- Dockweiler State Beach
- Kenneth Hahn State Recreation Area.<sup>550</sup>
- Jesse Owens Community Regional Park
- Will Rogers State Historic Park

### *South Region*

- Ken Malloy Harbor Regional Park

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<sup>546</sup> The southwest boundary of the San Gabriel Mountains National Monument, established in 2014, is just outside the northeast District boundary. The San Gabriel Mountains National Monument spans about 346,000 acres, 99% of which is in the Angeles National Forest.

<sup>547</sup> Angeles National Forest. Hiking. <http://www.fs.usda.gov/activity/angeles/recreation/hiking>. Accessed May 3, 2023.

<sup>548</sup> <https://www.laparks.org/griffithpark/>.

<sup>549</sup> <https://www.laparks.org/park/elysian>.

<sup>550</sup> Part of the Kenneth Hahn State Recreation Area is in the City of Los Angeles; the Community of Ladera Heights is in unincorporated Los Angeles County.



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- Deane Dana Friendship Park and Nature Center
- Earvin Magic Johnson County Recreation Area
- Victoria Community Regional Park

### *Rim of the Valley Corridor Special Resource Study*

A Special Resource Study and Environmental Assessment for a 400,000-acre area including the Santa Monica Mountains, western San Gabriel Mountains, Santa Susana Mountains, and Simi Hills was completed by the National Park Service in 2016.<sup>551</sup> The National Park Service's final study recommendation, or "selected alternative" proposed a 170,000-acre boundary adjustment to Santa Monica Mountains National Recreation Area, which would include portions of the Los Angeles River and Arroyo Seco corridors, the Verdugo Mountains-San Rafael Hills, the San Gabriel Mountains foothills, the Simi Hills, the Santa Susana Mountains, and the Conejo Mountain area. Existing parks such as Griffith Park, Hansen Dam Recreation Area, Sepulveda Basin (recreation areas and wildlife reserve), Los Encinos State Historic Park, Debs Park, El Pueblo de Los Angeles Historical Monument, and Los Angeles State Historic Park would serve as major portals into the Rim of the Valley Corridor area. The recommended area does not include any areas of the Angeles National Forest or San Gabriel Mountains National Monument.

#### **5.17.1.2.1 City Parks**

##### *Los Angeles*

The City of Los Angeles stewards 559 parks, totaling approximately 16,000 acres. The largest city park, Griffith Park, spans 4,282 acres in the West and Central Local Districts.<sup>552</sup> Notable facilities in Los Angeles city parks include the Griffith Observatory in Griffith Park, the iconic Greek Theatre, famous Hollywood sign, Venice Beach and the Cabrillo Marine Aquarium in San Pedro. Major recreational facilities, include Hansen Dam Recreation Area and Sepulveda Dam Recreation Area. Los Angeles Parks and Recreation department maintains and operates hundreds of athletic fields, 411 playgrounds, 319 tennis courts, 123 recreation centers, over 130 outdoor fitness areas, 59 swimming pools and aquatic centers, 29 senior centers, 27 skate parks, 13 golf courses, 12 museums, 13 dog parks, 187 summer youth camps and help support the Summer Night Lights gang reduction and community intervention program. Additionally, the Parks and Recreation department oversees 13 lakes and 92 miles of hiking trails.<sup>553</sup>

##### *Other Cities*

##### *Northeast Local District*

- San Fernando: eight parks<sup>554</sup>

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<sup>551</sup> National Park Service. <https://parkplanning.nps.gov/projectHome.cfm?projectID=31945>. Accessed April 24, 2023.

<sup>552</sup> City of Los Angeles Department of Recreation and Parks. Who We Are. <https://www.laparks.org/departments/who-we-are>. Accessed April 18, 2023.

<sup>553</sup> City of Los Angeles Department of Recreation and Parks. Website. <https://www.laparks.org/departments/who-we-are>. Accessed April 24, 2023.

<sup>554</sup> City of San Fernando. Park Facilities. <https://ci.san-fernando.ca.us/sfrecreation/#park-facilities>. Accessed April 18, 2023.

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### ***West Local District***

- West Hollywood: 14 parks<sup>555</sup>

### ***East Local District***

- Bell: 10 parks<sup>556</sup>
- Cudahy: four parks<sup>557</sup>
- Huntington Park: six parks, total over 31 acres<sup>558</sup>
- Maywood: five parks<sup>559</sup>
- South Gate: 10 parks, total about 172 acres<sup>560</sup>

### ***South Local District***

- Carson: 23 parks, total over 110 acres<sup>561</sup>
- Gardena: seven parks<sup>562</sup>
- Lomita: seven parks<sup>563</sup>

In addition to city parks summarized above, the County of Los Angeles Department of Parks and Recreation provides local parks in unincorporated areas: for instance, 12 county parks in the Community of East Los Angeles.<sup>564</sup>

### 5.17.2 Thresholds of Significance

According to CEQA Guidelines Appendix G, a project would normally have a significant effect on the environment if the project:

REC-1 Would 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.

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<sup>555</sup> City of West Hollywood. Parks and Facilities. <https://www.weho.org/community/recreation-services>. Accessed April 24, 2023.

<sup>556</sup> City of Bell. Accessed April 24, 2023: <https://www.cityofbell.org/?NavID=2596>.

<sup>557</sup> City of Cudahy. About the City. <https://www.cityofcudahy.com/182/Parks-Recreation>. Accessed April 24, 2023.

<sup>558</sup> City of Huntington Park. City Parks. <http://www.huntingtonpark.org/index.aspx?NID=28>. Accessed April 24, 2023.

<sup>559</sup> City of Maywood. Parks & Recreation Description. <https://www.cityofmaywood.com/338/City-Parks>. Accessed April 24, 2023.

<sup>560</sup> City of South Gate. City Parks. <https://www.cityofsouthgate.org/Government/Departments/Parks-and-Recreation>. Accessed April 24, 2023.

<sup>561</sup> City of Carson. Parks. <https://www.carson.org/government/departments-g-z/parks-recreation-open-space/parks-and-places>. Accessed April 24, 2023.

<sup>562</sup> City of Gardena. Facilities. <https://cityofgardena.org/gardena-facilities-2/>. Accessed April 24, 2023.

<sup>563</sup> City of Lomita. <https://lomitacity.com/wp-content/uploads/2021/10/Parks-Map.pdf>. Accessed April 24, 2023.

<sup>564</sup> County of Los Angeles Department of Parks and Recreation. <https://parks.lacounty.gov/>. Accessed April 24, 2023.

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REC-2 Includes recreational facilities or requires the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

### 5.17.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.17-1: Updated SUP implementation would not increase the use of existing neighborhood and regional parks or other recreational facilities causing substantial physical deterioration in parks or recreational facilities. [Threshold REC-1]**

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#### 5.17.3.1.1 All SUP Projects

Demands for parks are generated by the populations in the parks' service areas. The Updated SUP and implementation of Measure RR would not increase population in the District (see Section 5.15, *Population and Housing*). Thus, the updated SUP would not create increased demands for parks and recreational facilities. The updated SUP would expand existing schools; replace, modernize, and repair existing buildings at existing schools; and make other improvements at existing schools, including upgrade of scholastic recreational and sports facilities. Many schools make these recreational facilities available to the communities they serve under the Civic Center Act (See Table 5.17-1). The SUP Update would include upgrades to facilities that may effectively provide additional recreational opportunities to the community, potentially alleviating demand for parks facilities in their service areas.

No impact would occur.

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**Impact 5.17-2: Updated SUP implementation would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. [Threshold REC-2]**

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#### 5.17.3.1.2 All SUP Projects

The SUP Update would not develop recreational facilities outside District-owned property and would not convert any existing parkland to non-park use. District schools include athletic and recreational facilities that are periodically updated or upgraded. The SUP Update would include repair, modernization, upgrade, and replacements of athletic facilities, including play equipment, and replacement of natural turf with synthetic turf. Further, development of new recreational facilities adjacent to existing campuses, or expansion and/or improvement of recreation facilities on existing or expanded school sites would provide, for example, via joint-use, a positive impact on the availability of recreational facilities in communities served by schools. Any construction or modernization of recreational facilities would be considered to have a primarily educational use. Potential future expansion or development of recreational athletic facilities would be subject to site specific evaluation for environmental impacts and design standards to avoid environmental impacts. No physically adverse environmental impacts to community recreational facilities would result from development or expansion of school recreational facilities.

Impacts to the environment would remain less than significant.

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### 5.17.3.2 Applicable Regulations and Standard Conditions

#### 5.17.3.2.1 State

- California Education Code Section 38131.b: Civic Center Act

### 5.17.4 Level of Significance Before Mitigation

Upon implementation of Civic Center Act requirements, the following impacts would be less than significant: 5.17-1 and 5.17-2.

### 5.17.5 Mitigation Measures

No mitigation measures are required.

### 5.17.6 Level of Significance After Mitigation

Impacts would be less than significant.

## 5. Environmental Analysis

## 5.18 TRANSPORTATION AND TRAFFIC

This section of the program EIR evaluates the potential for implementation of the SUP to impact transportation facilities and traffic within the District. This section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions), along with the existing major transportation facilities throughout the SUP area, and possible environmental impacts that may occur as SUP-related site-specific projects are implemented. This section also identifies significance thresholds that will be applied during site-specific review and possible mitigation measures that may be employed to avoid or reduce significant impacts.

## TERMINOLOGY

**Vehicle Miles Traveled.** The amount and distance of automobile travel attributable to a project or geographic area is described as VMT. VMT is generally calculated as the number of trips generated by a project times the average trip length, or the sum of all trip lengths. The term “automobile” refers to on-road passenger vehicles, specifically cars and light trucks. Heavy-duty truck VMT may be included in VMT calculations for modeling convenience but is generally excluded from the requirements of CEQA Guidelines § 15064.3, subdivision (b). Additionally, VMT can be calculated by trip purpose, such as home-based VMT associated with residential land uses, and is commonly normalized by population, employment, or service population (i.e., population plus employment).

**Level of Service.** Traffic operations of roadway facilities are described as LOS. LOS is a qualitative description of traffic flow based on such factors as speed, travel time, delay, and freedom to maneuver. Although LOS no longer constitutes a significant environmental effect under CEQA, Table 5.18-1 summarizes the volume/capacity (V/C) ranges for LOS “A” through “F” based on the V/C ranges designated in the Los Angeles County Congestion Management Program (CMP).

Table 5.18-1 Volume/Capacity and Corresponding Level of Service

LOS	Interpretation	V/C Ratio
A	There are no cycles that are fully loaded, and few are close to loaded. No approach phase is fully utilized by traffic and no vehicle waits longer than one red indication. Typically, the approach appears quite open, turning movements are easily made, and nearly all drivers find freedom of operation.	0.00 – 0.60
B	Represents stable operation. An occasional approach phase is fully utilized, and a substantial number are approaching full use. Many drivers begin to feel somewhat restricted within platoons of vehicles.	0.61 – 0.70
C	Stable operation continues. Full signal cycle loading is still intermittent, but more frequent. Occasional drivers may have to wait through more than one red signal intersection, and backups may develop behind turning vehicles.	0.71 – 0.80
D	Encompasses a zone of increasing restriction approaching instability. Delays to approaching vehicles may be substantial during short peaks with the peak period, but enough cycles with lower demand occur to permit periodic clearance of developing queues, thus preventing excessive backups.	0.81 – 0.90
E	Represents the most vehicles that any particular intersection approach can accommodate. At capacity (V/C = 1.00), there may be long queues of vehicles waiting upstream of the intersection and delays may be great (up to several signal cycles).	0.90 – 1.00
F	Represents jammed conditions. Backups from locations downstream or on the cross street may restrict or prevent movement of vehicles out of the approach under consideration; hence, volumes carried are not predictable. V/C values are highly variable because full utilization of the approach may be prevented by outside conditions.	>1.00

## 5. Environmental Analysis

**Table 5.18-1 Volume/Capacity and Corresponding Level of Service**

LOS	Interpretation	V/C Ratio
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Source: Transportation Research Board. Highway Capacity Manual, 2000.

### 5.18.1 Environmental Setting

#### 5.18.1.1 REGULATORY FRAMEWORK

State and local laws, regulations, plans, and guidelines are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to transportation and traffic in the District. Many site-specific projects have not been identified, and there may be local jurisdictional plans and policies that are applicable depending on the project site. Specific requirements of these laws, regulations, plans, and guidelines might not be up to date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. Some of these are not directly applicable to the SUP or site-specific projects implemented under the SUP; however, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standard Conditions of Approval are also listed. See *Applicable Regulations and Standard Conditions* at the end of this chapter for those that require District compliance.

#### State

##### *Government Code Sections 65040.2 and 65302*

Assembly Bill 1358, the **Complete Streets Act** (Government Code Sections 65040.2 and 65302), was signed into law by Governor Arnold Schwarzenegger in September 2008. As of January 1, 2011, the law requires cities and counties, when updating the part of a local general plan that addresses roadways and traffic flows, to ensure that those plans account for the needs of all roadway users. Specifically, the legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians, and transit riders, as well as motorists. At the same time, Caltrans unveiled a revised version of Deputy Directive 64, an internal policy document that now explicitly embraces Complete Streets as the policy covering all phases of state highway projects, from planning to construction to maintenance and repair.

##### *Senate Bill 743*

California Senate Bill 743 (SB 743), which was codified in Public Resources Code section 21099, directs the State OPR to amend the CEQA Guidelines for evaluating transportation impacts to provide alternatives to Level of Service that “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” In December 2018, the California Natural Resources Agency certified and adopted the updated CEQA Guidelines package. The amended CEQA Guidelines, specifically Section 15064.3, recommend the use of VMT as the primary metric for the evaluation of transportation impacts associated with land use and transportation projects. All agencies and projects State-wide are required to utilize the updated CEQA guidelines recommending use of VMT for evaluating transportation impacts as of July 1, 2020. With the California Natural Resources Agency’s certification and adoption of the changes to the CEQA Guidelines, automobile delay, as measured by “level of service” and

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other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3)).

The updated CEQA Guidelines allow for lead agency discretion in establishing methodologies and thresholds provided there is substantial evidence to demonstrate that the established procedures promote the intended goals of the legislation. Where quantitative models or methods are unavailable, Section 15064.3 allows agencies to assess VMT qualitatively using factors such as availability of transit and proximity to other destinations. The OPR *Technical Advisory on Evaluating Transportation Impacts in CEQA* (State of California, December 2018) (“OPR Technical Advisory”) provides technical considerations regarding methodologies and thresholds with a focus on office, residential, and retail developments as these projects tend to have the greatest influence on VMT.

### Local

#### *County and City General Plans*

LAUSD is not subject to municipal regulations, such as the county and city general plans. Nevertheless, the District has considered local plans and policies for the communities surrounding its facilities. LAUSD covers an area of 710 square miles which includes most of the City of Los Angeles, along with all or portions of 25 cities and unincorporated Los Angeles County. For the purpose of this analysis, the City of Los Angeles and the County of Los Angeles traffic regulations are described. If an LAUSD project would affect transportation facilities at any other municipality, consideration would be given to the standards and level of service standards of that municipality.

### Regulatory Agencies

#### *County of Los Angeles*

Per the County of Los Angeles guidelines,<sup>565</sup> a development project is generally considered to cause a significant impact if it does not adequately reduce VMT, in accordance with CEQA Guidelines section 15064.3, subdivision (b). Per the County of Los Angeles guidelines, the following development projects generally reduce VMT or have a negligible effect and may be presumed to cause a less than significant impact:

- Non-retail projects that generate a net increase of less than 110 daily vehicle trips.<sup>566</sup>
- Retail projects less than 50,000 square feet of gross floor area.

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<sup>565</sup> County of Los Angeles Department of Public Works, Transportation Impact Analysis Guidelines (July 2020), p. 5-8.

<sup>566</sup> This threshold ties directly to the OPR Technical Advisory and notes that CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area. (CEQA Guidelines, § 15301, subd. (e)(2)). Typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract an additional 110-124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact.

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- Projects located within one-half mile radius of a major transit stop or an existing stop along a high-quality transit corridor, except if the project:
  - Has a Floor Area Ratio (FAR) greater than 0.75.
  - Provides more parking than required by the County Code.
  - Is inconsistent with the SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).
  - Replaces residential units set aside for lower income households with a smaller number of market-rate residential units.
- Residential projects with 100% of the units set aside for lower income households.

For projects that do not satisfy any of the above screening criteria, the County of Los Angeles guidelines establish the following VMT impact criteria:

- Residential Projects: Project VMT exceeds 16.8% below the existing residential VMT per capita for the applicable North or South County Baseline.
- Office Projects: Project VMT exceeds 16.8% below the existing employment VMT per employee for the applicable North or South County Baseline.
- Regional Serving Retail Projects: Project causes a net increase in VMT.
- Land Use Plans: The plan VMT exceeds 16.8% below the existing total VMT per service population for the applicable North or South County Baseline.
- For other land use types, the appropriate threshold of significance is to be determined in consultation with the County of Los Angeles Department of Public Works. Generally, school uses that primarily serve the immediate community are considered local-serving and may be potentially screened from further VMT analysis.

The County of Los Angeles guidelines also establish requirements for site access studies, which evaluate operational considerations relating to site access and circulation that are generally not considered environmental effects under CEQA.

### *Los Angeles County Metropolitan Transportation Authority*

Los Angeles County Metropolitan Transportation Authority (Metro) serves as transportation planner and coordinator, designer, builder, and operator for Los Angeles County. Metro funds improvements to all modes of transportation through several programs, including the Transportation Improvement Program (TIP), the CMP, and Bicycle Transportation Strategic Plan. Metro operates rail and bus transit services throughout Los Angeles County.



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### *Los Angeles County Congestion Management Program*

The CMP has been implemented locally by Metro. The CMP involves monitoring traffic conditions and performance measures on the designated transportation network, analyzing the impact of land use decisions on the transportation network, and implementing mitigation measures to reduce impacts on the network. The CMP for Los Angeles County requires that the traffic impact of individual development projects of potentially regional significance be analyzed. A specific system of arterial roadways plus all freeways compose the CMP system. New projects within the County of Los Angeles must comply with the CMP, which was adopted by the Metro pursuant to state law.<sup>567</sup>

Based on the CMP criteria, the following locations must be analyzed:

- Mainline freeway monitoring locations where a project will add 150 or more trips, in either direction, during either AM or PM weekday peak hours.
- All CMP arterial monitoring intersections, including freeway on- and off-ramp intersections, where a proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).

Appendix D of the CMP includes Transportation Impact Analysis (TIA) guidelines. It requires a TIA for any project that impacts CMP highways and intersections. If a project does not add, but merely shifts trips at a given monitoring location, a CMP analysis is not required.

CMP impact analysis may be performed for CMP compliance; however, as previously noted, automobile delay, as measured by “level of service” and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3)) A CMP impact occurs when a project increases traffic demand on a CMP facility by 2% of capacity ( $V/C \geq 0.02$ ), causing LOS F ( $V/C > 1.00$ ); if the facility is already at LOS F, a significant impact occurs when a project increases traffic demand on a CMP facility by 2% of capacity ( $V/C \geq 0.02$ ).

### **LAUSD**

#### *Standard Conditions of Approval*

This table lists transportation and traffic related standard conditions that will be included as part of each SUP-related project, as appropriate.

Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
SC-T-1	Traffic Analysis	Increase student capacity by more than 25% or 10 classrooms and additional traffic	During project design (Planning)	LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process.  <b>Traffic and Pedestrian Safety Requirements for New Schools</b>

<sup>567</sup> Los Angeles County Metropolitan Transportation Authority. *Congestion Management Program for Los Angeles County*. 2010. [http://www.metro.net/projects/congestion\\_mgmt\\_pgm/](http://www.metro.net/projects/congestion_mgmt_pgm/).

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
				<p>Requirements identify performance requirements for the selection and design of school sites to minimize potential pedestrian safety risks:</p> <ul style="list-style-type: none"> <li>• Site Selection</li> <li>• Bus and Passenger Loading Areas</li> <li>• Vehicle Access</li> <li>• Pedestrian Routes to School</li> </ul> <p>Requirements also state school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.</p>
SC-T-2	Vehicular Access and Parking	Construction of parking, and/or vehicular or pedestrian access	During project design (Planning)	<p>LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process.</p> <p><b>School Design Guide</b></p> <p>Vehicular access and parking shall comply with the Vehicular Access and Parking guidelines of the School Design Guide. The Design Guide contains the following regulations related to traffic:</p> <ul style="list-style-type: none"> <li>• Parking Space Requirements</li> <li>• General Parking Guidelines</li> <li>• Vehicular Access and Pedestrian Safety</li> <li>• Parking Structure Security</li> </ul>
SC-T-3	Traffic Analysis	Increase student capacity by more than 25% or 10 classrooms and/or generates additional traffic or shifts traffic patterns	Prior to project approval (Planning, Pre-Construction)	<p>LAUSD shall coordinate with the local City or County jurisdiction and agree on the following:</p> <ul style="list-style-type: none"> <li>• Compliance with the local jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project.</li> <li>• Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds.</li> <li>• Implementation of SR2S, traffic control and pedestrian safety devices.</li> <li>• Fair share contribution and/or other mitigation measures for potential traffic impacts.</li> <li>• Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events.</li> <li>• Traffic study will use the latest version of Institute of Transportation Engineer's (ITE) Trip Generation manual (or comparable guidelines) to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility and the specific school type (e.g., Magnet, Charter, etc.), unless otherwise required by local jurisdiction.</li> <li>• Loading zones will be analyzed to determine the adequacy as pick-up and drop-off points.</li> </ul>

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
				Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.
SC-T-4	Construction Traffic	Large construction equipment required to use public roadways	Prior to construction (Construction)	LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.
SC-T-5	Vehicle Miles Traveled	Large-scale new construction (10,000 square feet or more) on new property or existing campus	During project design (Planning)	Prior to project approval of large-scale new construction (10,000 square feet or more) on new property or existing campus, LAUSD shall prepare a VMT assessment that documents the project trip generation, whether the project is expected to serve the immediate community or a broader area, and the expected net effect on VMT for the region. If necessary, the VMT assessment shall identify transportation demand management (TDM) measures to reduce VMT impacts.

The most widely recognized source to estimate the amount of trips generated by a land use or project is the Institute of Transportation Engineers (ITE) *Trip Generation Manual*. The ITE manual is a compilation of results from surveys performed at several land use types across the United States. The rates are based on empirical data, which has led to the conclusion that the number of trips generated by school faculty, students, and visitors is based on the number of student seats. The use of this methodology allows total school-related trips to be defined (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility. LAUSD currently uses the latest version of the ITE manual.

### 5.18.1.2 EXISTING CONDITIONS

LAUSD covers an area of 710 square miles which includes most of the City of Los Angeles, along with all or portions of 25 cities and unincorporated Los Angeles County. The largest portions of LAUSD fall within the City of Los Angeles and the County of Los Angeles jurisdictions. The area within the LAUSD boundaries is served by a circulation system that facilitates travel by multiple modes, walking, bicycling, public transit, and motor vehicles.

#### Roadway Network

This circulation system includes an extensive network of freeways, highways, and local streets. Regional access is provided by Interstates 5, 10, 105, 110, 210, 405, and 101. The area has several state highways—1, 2, 47, 60, 90, 91, 103, 110, 118, 134, 170, and 187. The area within LAUSD boundaries has several thousand miles of public streets that accommodate a variety of motorized vehicles, including transit vehicles. Most of LAUSD is in the City of Los Angeles. Most roadways are aligned on a grid system providing multiple route options for traveling throughout the area.

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### Public Transit

The study area is served by multiple transit operators, with networks connecting different communities within and outside of the LAUSD boundaries. The primary transit operator in Los Angeles County is Metro, which provides bus, light rail, and heavy rail (subway) services throughout the county. In addition, LADOT operates local and commuter bus routes, which mainly connect the City of Los Angeles downtown area and the remaining parts of the city. There are also several regional rail and municipal bus operators that provide regional transit services between the City of Los Angeles and municipalities in the outer region.

Metro has two heavy rail lines (B and D) that operate in a dedicated subway. Metro's four light rail lines (A, C, L, and E) use light rail trains that run along rights-of-way, ranging from complete grade separation to at-grade operation in mixed-flow traffic. Metro operates several types of bus service, including the Metro Liner service that operates either in an exclusive right-of-way or along HOV lanes, and bus routes in mixed traffic on its Rapid, Express, Limited Stop, Local, and Shuttle services. These bus services vary considerably in speed, frequency, and capacity.

There are several other transit operators that provide transit services within LAUSD boundaries. These transit operators include Santa Monica Municipal Bus Lines (Big Blue Bus); Culver City Transit; Santa Clarita Transit; Gardena Transit; Torrance Transit; and Montebello Bus Lines.<sup>568</sup>

In addition, commuter rail services in the area are provided by Metrolink and Amtrak. Metrolink covers six counties in Southern California with seven lines. Amtrak also serves communities along the coast in Southern California. Passengers on Metrolink and Amtrak are served by stations in the San Fernando Valley and in downtown Los Angeles at Union Station, from which connecting services are provided by Metro or LADOT.

### Bicycle and Pedestrian Facilities

Pedestrians and bicyclists are also important users of the local roadway network. The existing bicycle network is a series of interconnected streets and pathways on which bicycling is encouraged. Pursuant to the California Vehicle Code, bicycles are allowed on any street in the local street system. Designations of Non-Motorized Streets include Class I, Class II, Class III, and Class IV Bikeways, and Commuter Bikeways.

The majority of the LAUSD area is heavily developed, but development patterns and streetscape conditions vary considerably. Parts of Downtown Los Angeles, Koreatown, Hollywood, and Westwood Village, for example, have a variety of pedestrian-oriented uses fronting the sidewalk. Some residential portions of the San Fernando Valley have narrower street widths and less-connected residential streets than other parts of the City of Los Angeles, while other areas of the Valley are characterized by long blocks fronted by surface parking lots. Still other parts of the City are characterized by industrial land uses offering little in the way of pedestrian amenities.<sup>569</sup>

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<sup>568</sup> Obtained from the City of Los Angeles MP 2035 Draft EIR.

<sup>569</sup> According to the City of Los Angeles MP 2035 Draft EIR.

## 5. Environmental Analysis

### School Travel Modes

According to a school survey conducted by the Safe Routes to School National Partnership, compared to the State of California and the nation as a whole, children in Los Angeles County were much more likely to walk to school, likely because the county is urbanized and more children live within walking distance.<sup>570</sup> In Los Angeles County, there are about 1.5 million children aged 5 to 15 and 79 school districts; LAUSD is by far the largest. Over half of these children usually traveled to school in a private vehicle and almost one-third usually walked to school. In Los Angeles County 7.7% of school children usually rode in a school bus (in LAUSD this percentage is much lower because busing is only provided for special needs students<sup>571</sup>), 3.8% used some kind of transit, 1.1% reported riding a bike, and another 4% did not report how they usually traveled to school or were home schooled (see Table 5.18-2). Although not part of the study, high school students age 16 to 18 are anticipated to have approximately the same travel modes, with possibly more transit riders and private vehicles.

**Table 5.18-2 Travel Modes by Students Aged 5 to 15**

Usual Mode of Travel to School	National	Statewide	LA County
Private Vehicle	43.6%	53.7%	51.0%
School Bus	37.1%	13.1%	7.7%
Walk	10.7%	24.3%	32.3%
Any Transit <sup>a</sup>	2.1%	2.7%	3.8%
Bike	1.0%	2.0%	1.1%
Travel Mode not Reported <sup>b</sup>	5.5%	4.2%	4.0%

Source: <http://saferoutescalifornia.files.wordpress.com/2012/09/travel-to-school-in-la-county1.pdf>.

Note: sample sizes: 372 reported private vehicle, 139 reported walk, 37 reported school bus, 16 reported transit, and only 5 children in the LA County sample reported biking to school.

<sup>a</sup> Any Transit<sup>a</sup> includes public and private buses, subway, Metrolink and Amtrak, shuttle bus, and dial-a-ride.

<sup>b</sup> Includes home schooled and don't know/refused.

Over 30% of school children in Los Angeles County live with  $\frac{1}{2}$  mile of school (19.4% less than  $\frac{1}{4}$  mile and another 10.7% between  $\frac{1}{4}$  and  $\frac{1}{2}$  mile), compared to 16.6% for the nation as a whole and 27.6% for the state—both of which include rural areas where children often live far from school. For more detailed discussion on pedestrian and bicycle modes, please refer to Chapter 5.14, *Pedestrian Safety*.

<sup>570</sup> Safe Routes to School National Partnership. Safe Routes to School in California. Travel in Los Angeles County per 2009 National Household Travel Survey. September 24, 2012. [http://saferoutescalifornia.org/2012/09/24/19percent\\_lac/](http://saferoutescalifornia.org/2012/09/24/19percent_lac/). This is an Analysis Brief summarized from Travel to School in California. Findings from the California - National Household Travel Survey. <http://www.travelbehavior.us/Nancy-pdfs/Travel%20to%20School%20in%20California.pdf>.

<sup>571</sup> Additionally, even at the height of LAUSD busing (2002–2004) when overcrowding required busing students to schools that had seats, only 1.1% of students rode the bus (source: Program Environment Impact Report Traffic Impact Study, Meyer, Mohades and Associates, Inc. January 2004). Since then, LAUSD has constructed 130 new schools.

## 5. Environmental Analysis

### 5.18.2 Thresholds of Significance

According to CEQA Guidelines Appendix G, a project would normally have a significant effect on the environment if it would:

- T-1 Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.
- T-2 Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).
- T-3 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- T-4 Result in inadequate emergency access.

### 5.18.3 Environmental Impacts

Impacts to pedestrian and bicycle paths are analyzed in Chapter 5.14, *Pedestrian Safety*. The SUP is a program-level action, which must necessarily be evaluated differently than a site-specific project. At this time, it is only possible to make generalized estimates of the types of projects that would be implemented under the SUP. The specific location and intensity of the projects throughout the LAUSD is unknown. Therefore, a broader standard for measuring impacts is appropriate for this long-range, program-level impact analysis.

The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.18-1: SUP-related projects would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle or pedestrian facilities. [Threshold T-1]**

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#### All SUP Projects

##### *Regional Transit System*

Appendix D.8.4 of the CMP<sup>572</sup> provides methodology for estimating the number of transit trips expected to result from a project based on the projected number of vehicle trips. This methodology assumes an average vehicle ridership (AVR) factor of 1.4 in order to estimate the number of person trips to and from the project and then provides guidance regarding the percentage of person trips assigned to public transit depending on the type of use (commercial/other versus residential) and the proximity to transit services. As shown on Table 5.18-2, the use of public transportation is mostly related to high schools. It is anticipated that the stronger demand occurs in the AM peak hour, as in general school activities end before the PM peak hours. Because a relatively small fraction of students utilize transit, it is not anticipated that SUP-related new construction

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<sup>572</sup> Los Angeles County Metropolitan Transportation Authority. *Congestion Management Program for Los Angeles County*. 2010. [http://www.metro.net/projects/congestion\\_mgmt\\_pgm/](http://www.metro.net/projects/congestion_mgmt_pgm/).

## 5. Environmental Analysis

projects would generate a significant number of riders or cause a substantial impact on the transit system. Impacts would be less than significant.

### *Roadway System*

As previously noted, automobile delay, as measured by “level of service” and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3).) While a variety of SUP projects would have the potential to affect the levels of service at transportation facilities (e.g., a change in student capacity associated with classroom loading or grade structure, reconfiguration of the school or construction of new classrooms, installation of portable classrooms, etc.), any conflicts with level of service targets established by the affected local agencies would not constitute a significant impact under CEQA. The SUP will not conflict with policies, plans, or programs for the roadway system; therefore, impacts are less than significant.

Notwithstanding the above, LAUSD would provide safe and appropriate loading and access areas, with incorporation of SC-T-1 and SC-T-2. As part of each project that increases student capacity and/or generates additional traffic or shifts traffic patterns, LAUSD considers site-specific traffic impacts employing the applicable traffic impact study guidelines from the local jurisdiction. As part of LAUSD SC-T-3, the local jurisdiction traffic department would determine the scope and methodology used in the traffic and pedestrian safety study.

### *Nonmotorized Facilities*

LAUSD is located mostly on a mature network of pedestrian facilities. In the vicinity of schools, pedestrian safety features are usually present, including sidewalks, crosswalks, signage, and crossing guards. Prior to development of school facilities, the LAUSD implements Caltrans’ “Safe Routes to School”, where specific measures based on the particular conditions for each site are identified to ensure separation between vehicles and pedestrians thru designated pedestrian routes and bike paths. Pedestrian routes are implemented via designation of sidewalks, crosswalks, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian measures. LAUSD encourages ride-sharing programs for students and teachers. Also, students that travel to school may walk or ride bikes; therefore, the SUP would not conflict with policies, plans, or programs for nonmotorized transportation modes.

Overall, implementation of the SUP would not result in conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, or pedestrian facilities; therefore, impacts are less than significant.

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**Impact 5.18-2: Large-scale SUP projects may increase VMT. [Threshold T-2]**

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### **New Construction on New Property or Existing Campus**

Based on the local-serving nature of school uses, the majority of SUP projects are expected to serve the immediate community and therefore can be presumed to result in a less than significant VMT impact; however, large-scale SUP projects have the potential to increase VMT. School construction and modernization have the

## 5. Environmental Analysis

potential to increase traffic, and thus VMT, if a project includes a new or expanded stadium or public-use building. For SUP projects that are large in scale and are expected to attract people from a broader area, such as major administrative centers or athletic facilities, VMT impacts would need to be further evaluated at the project level. As part of LAUSD SC-T-5, LAUSD would prepare a VMT assessment at the project level that documents the project's net effect on VMT for the region. These types of projects have the potential to increase VMT for the region. Therefore, VMT impacts for large-scale new construction (10,000 square feet or more) on new property or existing campus are considered potentially significant, and may not be feasibly mitigated to a level of insignificance.

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**Impact 5.18-3: SUP-related circulation improvements would not create potentially hazardous conditions (sharp curves, etc.), incompatible uses, or inadequate emergency access. [Thresholds T-3 and T-4]**

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### All SUP Projects

As individual projects are proposed and implemented, design development would include the use of standard engineering practices, such as standard driveway widths and turning radii and provision of adequate line of sight to avoid design elements that could result in hazards. "Sight Distance Standards" from the Caltrans Highway Design Manual relate minimum sight distance values to a range of design speeds.<sup>573</sup> Vehicular access and parking shall comply with Section 2.3, Vehicular access and parking, of the School Design Guide. In addition, projects are required to accommodate ingress and egress of emergency vehicles, as required by the affected jurisdiction where the individual project would be implemented. All access features are subject to and must satisfy the fire department at the affected jurisdiction.

LAUSD coordinates with the local jurisdiction while selecting locations and has specifications for provision of adequate access, parking, and circulation in the vicinity of a school site.<sup>574</sup> These specifications require that the District:

- Locate schools on secondary highways or collector streets, not on major highways.
- Locate entrances to the school buildings or grounds as close as possible to a pedestrian route to school, or on a minor street near an intersection, or at an existing signalized crosswalk.
- Provide adequate loading areas close to school entry points, and eliminate the need for double-parking
- Provide adequate space for school bus loading and unloading with curb cuts.
- Provide street dedications and improvements, including required traffic control signals, along school site frontage in accordance with state and city standards.

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<sup>573</sup> Highway Design Manual, California Transportation Department, July 2020.

<sup>574</sup> LAUSD OEHS CEQA Specification Manual. December 2005, revised June 2007. Appendix C, Traffic and Pedestrian Safety Requirements for New Schools.



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- Prepare a preliminary “Pedestrian Routes to School” map to be completed for the ¼-mile radius or the proposed school’s attendance area, whichever is less.
- Inventory the pedestrian system (including existing sidewalks, crosswalks, and other pedestrian elements) within ¼ mile of a proposed school site and identify necessary safe routes for providing access to and from school.
- Identify potential safety concerns for pedestrian access.
- LADOT will engineer pedestrian route maps identifying controlled intersections and recommended pedestrian routes.
- LAUSD shall coordinate with LADOT the installation of traffic controls, school warning and speed limit signs, school crosswalks, and pavement markings.

In addition, as stated previously, projects are required to accommodate ingress and egress of emergency vehicles. All access features are subject to and must satisfy the fire department at the affected jurisdiction. New construction and modernization projects would conform to local ordinances to ensure that adequate emergency access is provided. Impacts would be less than significant.

### 5.18.4 Applicable Regulations and Standard Conditions

#### State

- Education Code Section 17215: notification and review by California Department of Transportation, Aeronautics Program, Office of Airports
- ADA
- AB 1358, Complete Streets Act
- California Vehicle Code (CVC)
- SB 743

#### Local

- Los Angeles County Metropolitan Transportation Authority Congestion Management Plan
- Jurisdictional municipal codes, vehicular and traffic regulations
- Jurisdictional general plan circulation element or related policies

#### LAUSD Standard Conditions of Approval

- SC-T-1 through SC-T-4

## 5. Environmental Analysis

### 5.18.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standard Conditions listed above, the following impacts would be less than significant: 5.18-1 and 5.18-3.

Even with implementation of regulatory requirements and LAUSD Standard Conditions, the following impact would be **potentially significant**:

- **Impact 5.18-2** Large-scale SUP projects may increase VMT.

### 5.18.6 Mitigation Measures

#### Impact 5.18-2

No additional mitigation measures would ensure that traffic impacts would be reduced to less than significant.

### 5.18.7 Level of Significance After Mitigation

#### Impact 5.18-2

VMT impacts may occur for some large-scale projects, such as major administrative centers or athletic centers, associated with the SUP. Implementation of SC-T-5 would further evaluate the significance of potential VMT impacts and, if necessary, identify TDM measures to reduce VMT impacts. Possible TDM measures could include priced workplace parking, transit subsidies, voluntary travel behavior change programs, commute trip reduction programs, shared mobility programs, and improved bicycle/pedestrian infrastructure. Most SUP projects are expected to have a less than significant VMT impact; however, it may be infeasible to implement TDM measures that would fully mitigate VMT impacts for large-scale projects that are expected to attract people from a broader area. Therefore, Impact 5.18-2 would remain significant and unavoidable.

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### 5.19 TRIBAL CULTURAL RESOURCES

This section of the Subsequent Program EIR evaluates the potential for implementation of the SUP Update and Measure RR Implementation Plan to impact tribal cultural resources in the District in light of changing information and conditions since the 2015 Program EIR. This section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions), along with the existing tribal cultural resource conditions throughout the SUP area used in the 2015 EIR, and possible new environmental impacts that may occur as SUP update-related site-specific projects are implemented.

#### TERMINOLOGY

**Tribal cultural resources.** PRC Section 21074 defines tribal resources as follows (also see regulatory setting below): Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

- (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
  - (A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.
  - (B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- (2) 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
  - (b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
  - (c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

### 5.19.1 Environmental Setting

#### 5.19.1.1 REGULATORY FRAMEWORK

National, state, regional and local laws, regulations, plans, and guidelines are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to cultural resources in the District. Many site-specific projects have not been identified, and there may be local jurisdictional plans and policies that are applicable depending on the project site. Specific requirements of these laws, regulations, plans, and guidelines might not be up to date when a proposed site-specific school project undergoes review.

## 5. Environmental Analysis

Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. Although some of these may not be directly applicable to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standard Conditions of Approval are also listed. See *Applicable Regulations and Standard Conditions* at the end of this chapter for those that require District compliance.

Also see Section 5.5 Cultural Resource Regulatory Setting for federal regulations and additional laws and regulations.

### 5.19.1.1.1 State

#### 5.19.1.1.1.1 California Environmental Quality Act

**CEQA** (Section 21084.1) requires a lead agency determine whether a project could have a substantial adverse change in the significance of a historical resource or tribal cultural resources (Section 21084.2).

Under CEQA (Section 15064.5 (a)), a historical resource (e.g., building, structure, or archaeological resource) shall include resource that is listed in, or determined to be eligible for listing in, the CRHR, or a resource listed in a local register or landmark, identified as significant in a historical resource survey (meeting the requirements of Section 5024.1(g) of the PRC), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California (Section 15064.5[a][3]). Under the California Code of Regulations, Title 14, Chapter 11.5, properties listed on or formally determined to be eligible for listing in the NRHP are automatically listed in the CRHR. A resource is generally considered to be historically significant under CEQA if it meets the following criteria for listing in the CRHR (PRC SS5024.1, Title 14, Code of Regulations, Section 4852):

- A. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States (Criterion 1).
- B. Associated with the lives of persons important to local, California or national history (Criterion 2).
- C. Embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values (Criterion 3).
- D. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation (Criterion 4).

Under PRC Section 21074, (a) tribal cultural resources are:

- 1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are either of the following:
  - (A) Included or determined to be eligible for the inclusion in the CRHR, or;

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- (B) Included in a local register of historical resources as defined by subdivision (k) of Section 5020.1 (designated or recognized historically significant by a local government pursuant to local ordinances or resolution).
- 2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Idivision (c) of Section 5024.1. In applying the criteria set forth Isubdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
  - (A) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
  - (B) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

### 5.19.1.1.1.2 *California Health and Safety Code, Section 7050.5*

Section 7050.5 (a) states that it is a misdemeanor (except as provided in Section 5097.99, see below) to knowingly mutilate or disinter, wantonly disturb, or willfully remove any human remains in or from any location other than a dedicated cemetery without the authority of law. The provisions of this subdivision shall not apply to any person carrying out an agreement developed pursuant to subdivision (l) of Section 5097.94 of the Public Resources Code or to any person authorized to implement Section 5097.98 of the Public Resources Code. Section 7050.5 (b) requires that construction or excavation be stopped in the vicinity of discovered human remains until the coroner of the County (in which the human remains are discovered) can determine whether the remains are subject to the coroner’s authority. The coroner shall make their determination within two working days from the time the person responsible for the excavation, or that person’s authorized representative, notifies the coroner of the discovery of human remains. Per Section 7050.5 (c), if the coroner determines the remains are not subject to their authority and recognizes the remains to be Native American, or has reason to believe they are those of a Native American, the coroner shall contact, by telephone within 24 hours, the California Native American Heritage Commission (NAHC).

### 5.19.1.1.1.3 *California Public Resources Code, Sections 5097.9–5097.991*

Section 5097.5 of the Code states:

No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

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As used in this section, “public lands” means lands owned by, or under the jurisdiction of the state or any city, county, district, authority, public corporation, or any agency thereof.

Section 5097.99 of the Code states:

(a) No person shall obtain or possess any Native American artifacts or human remains which are taken from a Native American grave or cairn on or after January 1, 1984, except as otherwise provided by law or in accordance with an agreement reached pursuant to subdivision (l) of Section 5097.94 or pursuant to Section 5097.98.

(b) Any person who knowingly or willfully obtains or possesses any Native American artifacts or human remains which are taken from a Native American grave or cairn after January 1, 1988, except as otherwise provided by law or in accordance with an agreement reached pursuant to subdivision (l) of Section 5097.94 or pursuant to Section 5097.98, is guilty of a felony which is punishable by imprisonment pursuant to subdivision (h) of Section 1170 of the Penal Code.

(c) Any person who removes, without authority of law, any Native American artifacts or human remains from a Native American grave or cairn with an intent to sell or dissect or with malice or wantonness is guilty of a felony which is punishable by imprisonment pursuant to subdivision (h) of Section 1170 of the Penal Code.

### 5.19.1.1.1.4 Assembly Bill 52 (Chapter 532, Statutes 2014: Gatto, 2014)

The **Native American Historic Resource Protection Act** (AB 52) took effect July 1, 2015 and incorporates tribal consultation and analysis of impacts to tribal cultural resources (TCR) into the CEQA process. It requires TCRs to be analyzed like any other CEQA topic and establishes a consultation process for lead agencies and California tribes. A project with an effect that may cause a substantial adverse change in the significance of a TCR, may have a significant effect on the environment (PRC 21084.2). As specified in the PRC Section 21080.31, as amended by AB 52, a lead agency is required to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. Consultations must include discussing the type of environmental review necessary, the significance of TCRs, the significance of the project’s impacts on the TCRs, and alternatives and mitigation measures recommended by the tribe (PRC 21080.3.1 (a) and 20184.3(b)(a)), and Government Code 65352.4). Projects that require a Notice of Preparation of an EIR or Notice of Intent to adopt a ND or MND are subject to AB52. Consultation must take place prior to the determination of whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project (PRC 21080.3.1.)

Public Resource Code Section 21074 defines tribal resources as follows:

(a) “Tribal cultural resources” are either of the following:

(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

## 5. Environmental Analysis

(A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.

(B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

(2) 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

(b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

TCRs must have certain characteristics:

1) Sites, features, places, cultural landscapes (must be geographically defined), sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historic Resources or included in a local register of historical resources.

2) The lead agency, supported by substantial evidence, chooses to treat the resource as a TCR.

The first category requires that the TCR qualify as a historical resource according to PRC Section 5024.1. The second category gives the lead agency discretion to qualify that resource—under the conditions that it support its determination with substantial evidence and consider the resource’s significance to a California tribe. The following is a brief outline of the process.

Provisions in the PRC set out specific steps and timelines for the notice and consultation process:

1) A California Native American tribe asks agencies in the geographic area with which it is traditionally and culturally affiliated to be notified about projects. Tribes must ask in writing (PRC 21080.3.1 (b)).

2) Within 14 days of deciding to undertake a project or determining that a project application is complete, the lead agency must provide formal written notification to all tribes who have requested it. The 14-day notification must include a description of the project, its location, and must state that the tribe has 30 days to request consultation.

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- 3) A tribe must respond within 30 days of receiving the notification if it wishes to engage in consultation.
- 4) The lead agency must initiate consultation within 30 days of receiving the request from the tribe.
- 5) Consultation concludes when either: 1) the parties agree to measures to mitigate or avoid significant effects on the tribal cultural resources; or 2) a party, acting in good faith and after reasonable effort, concludes that a mutual agreement cannot be reached (PRC 21080.3.2 (b)(1) & (2)).
- 6) Regardless of the outcome of consultation, the CEQA document must disclose significant impacts on TCRs and discuss feasible alternatives or mitigation that avoid or lessen the impact.

Environmental documents must not include information about the location of a TCR, archeological site or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records Act. Cal. Code Regs. 15120 (d). Native American graves, cemeteries, and sacred places and records of Native American places, features, and objects are also exempt from disclosure. PRC 5097.9, 5097.993. Confidential cultural resource inventories or reports generated for environmental documents should be maintained by the lead agency under separate cover and shall not be available to the public.

In addition, the PRC include additional rules governing confidentiality during triI consultation (PRC 21082.3 (c).) Information submitted by a California Native American tribe during the environmental review process may not be included in the environmental document or disclosed to the public without the prior written consent of the tribe. However, confidential information may be included in a confidential appendix or exchanged confidentially with other public agencies that have jurisdiction over the environment review documents. PRC 21082.3 (c)(1). This confidentiality protection extends to a tribe's comment letter on an environmental document. A lead agency can write general summaries of tribal comment letters without violating this confidentiality mandate.

### 5.19.1.1.1.5 Senate Bill 18

**Traditional Tribal Cultural Places Act** was signed into law in September 2004 and went into effect on March 1, 2005. The law institutes a process which requires a city or county to consult with the NAHC and any appropriate Native American tribe for the purpose of preserving relevant traditional tribal cultural places (TTCP) prior to the adoption, revision, amendment, or update of a city or county's general plan. While SB 18 does not specifically mention consultation or notice requirements for adoption or amendment of specific plans, the Tribal Guidelines advises that SB 18 requirements extend to specific plans as well, as state planning law requires local governments to use the same process for amendment or adoption of specific plans as general plans (defined in California Government Code Section 65453). The Office of Planning and Research Tribal Guidelines recommends that the NAHC provide written information as soon as possible but no later than 30 days to inform the Lead Agency if the proposed project is determined to be in proximity to a TTCP and another 90 days for tribes to respond to a local government if they want to consult on possible adverse impacts on the TTCP. There is no statutory limit on the consultation duration. The CEQA public distribution list may include tribes listed by the NAHC who have requested consultation, or it may not. If the NAHC, the tribe, and interested parties agree upon the mitigation measures necessary for the proposed project, they would be



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included in the project's EIR. If both the City and the tribe agree that adequate mitigation or preservation measures cannot be taken, then neither party is obligated to take action.

SB 18 requires that a Native American TTCP must be shown to actually have been used for activities related to traditional beliefs, cultural practices, or ceremonies. The law also amended Civil Code Section 815.3 and adds California Native American tribes to the list of entities that can acquire and hold conservation easements for the purpose of protecting their cultural places.

### 5.19.1.1.2 Local

#### 5.19.1.1.2.1 *City of Los Angeles Cultural Heritage Department*

The City of Los Angeles Cultural Heritage Department is authorized under Administrative Code Title 22 Chapter 7 (Sections 22.101 et seq.), and the City Cultural Heritage Commission is authorized under Administrative Code Title 22 Chapter 9 Article 1 (Sections 22.171 et seq.).

In addition, the Los Angeles City Planning's (LACP) provides *Guidance for the Preparation of Technical Reports and Studies* relating to the Tribal Cultural Resources to assist environmental consultants in addressing the history of Native Americans, one of many marginalized and disenfranchised communities, in the City of Los Angeles.

As LACP consults with Native American tribes under AB 52, technical reports and studies that are prepared to supplement an analysis under CEQA are of critical importance to the City's obligations under CEQA, but also have informational and educational value to the broader public. As such, technical reports and studies that are prepared to supplement CEQA documents on behalf of Los Angeles City Planning must be honest in their representations of events, policies, and activities involving Native Americans in Los Angeles, recognizing the detrimental effects these policies and programs have had to these communities, but also the important history and contributions Native Americans have made and continue to make to the development of Los Angeles.<sup>575</sup>

#### 5.19.1.1.2.2 *Other Cities*

Of the cities either entirely or partially within the district's boundaries, only the City of Los Angeles has a historic preservation element in its general plan. However, the following cities do have historic preservation ordinances or regulations governing historic properties: Bell Gardens, Carson, El Segundo, Gardena, Huntington Park, Long Beach, Montebello, Monterey Park, Rancho Palos Verdes, San Fernando, Santa Monica, South Gate, Torrance, and West Hollywood.

#### 5.19.1.1.2.3 *Los Angeles County*

County of Los Angeles historic preservation policies include local designation processes, commissions, or boards established to review historic properties, and zoning or other variances or special provisions for historic properties. Los Angeles County programs for protections for historic properties include the county Mills Act Program, which provides incentives for owners of qualified historical properties within the unincorporated

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<sup>575</sup> Los Angeles City Planning Department 2023. *Guidance for the Preparation of Technical Reports* electronic document [https://planning.lacity.org/odocument/ab9e5647-1d96-4db7-aab1-2905984fbd1e/TechnicalReports\\_Studies-TribalCulturalResources.pdf](https://planning.lacity.org/odocument/ab9e5647-1d96-4db7-aab1-2905984fbd1e/TechnicalReports_Studies-TribalCulturalResources.pdf). Accessed May 1, 2023.

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areas of the county to preserve, restore, and rehabilitate the historic character of such properties. The county Landmarks and Records Commission recommends to the county board of supervisors that local historical landmarks defined to be worthy of registration by the State of California Department of Parks and Recreation, either as “California Historical Landmarks” or as “Points of Historical Interest,” and may consider and comment for the board on applications relating to the NRHP. The Mills Act Program is authorized under Los Angeles County Code of Ordinances Sections 22.168 et seq., and the Landmarks and Records Commission is authorized under Sections 3.30.010 et seq.<sup>576</sup>

### LAUSD

In an effort to proactively reach out to tribes with a traditional and/or cultural affiliation within the LAUSD boundary, LAUSD initiates the AB 52 consultation process on each project to all contacts who have previously requested Project notification. Additionally, LAUSD requests consultation with California Native American Tribal representatives, who are traditionally or culturally affiliated with the geographic area, from the NAHC. LAUSD shall comply with AB 52 (Gatto 2014) and PRC SS5024.1, Title 14, Code of Regulations, Section 4852 and PRC Section 21074 for project under this Subsequent PEIR. Program.

As part of this Subsequent PEIR process, the LAUSD sent AB52 consultation letters in December 2022 to tribes who have previously requested Project notification and tribes who are traditionally or culturally affiliated with the geographic area, as provided by NAHC. The letters informed the respective tribes that LAUSD was evaluating the potential environmental consequences associated with the Subsequent PEIR and requested consultation. Both tribes responded, and consultation continued throughout 2023. The outcome of the LAUSD and tribal consultation efforts include the following:

The Fernandeño Tataviam Band of Mission Indians, Cultural Resource Division requests formal consultation notification on future LAUSD projects within their ancestral territory that would involve the disturbance of either native soil or undocumented fill.

The–Gabrieleno Band of Mission Indians - Kizh Nation also request formal consultation notification on future LAUSD project.

### *Standard Conditions of Approval*

This table lists the tribal cultural resource related standard conditions that will be included as part of each SUP-related project, as appropriate.

Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
SC-TCR-1		Evidence of Native American resources is uncovered	During ground-disturbing activities (Construction)	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been assessed by a qualified archaeologist. Based on this initial assessment the affiliated Native American Tribal

<sup>576</sup>

[https://library.municode.com/ca/los\\_angeles\\_county/codes/code\\_of\\_ordinances?nodeId=TTT22PLZO\\_DIV8PERELEAC\\_CH22\\_168LOANCOMIACPR](https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TTT22PLZO_DIV8PERELEAC_CH22_168LOANCOMIACPR). Accessed May 9, 2023.

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
				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		Evidence of Native American resources is uncovered	During grading, excavation, or other ground-disturbing activities (Construction)	<p>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:</p> <ul style="list-style-type: none"> <li>• At least one year of experience providing Native American monitoring support during similar construction activities.</li> <li>• Be designated by the Tribe as capable of providing Native American monitoring support.</li> <li>• Have a combination of education and experience with Tribal cultural resources.</li> </ul> <p>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).</p> <p>Subsequently, the Monitor shall remain on-site for the duration of the ground-disturbing activities to ensure the protection of any other potential resources.</p> <p>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.</p>

### 5.19.1.2 EXISTING CONDITIONS

#### 5.19.1.2.1 Natural Setting

California has been divided into 11 geomorphic provinces, that is, regions defined by characteristic landforms. The District spans parts of two geomorphic provinces: the Transverse Ranges Geomorphic Province, an east-west-trending series of steep mountain ranges and valleys; and the Peninsular Ranges Geomorphic Province, a series of northwest-trending mountain ranges and valleys. The boundary between the two geomorphic provinces within the District is the southern base of the Santa Monica Mountains and the Hollywood Hills.

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Nearly all the southern half of the District is in the Los Angeles Basin; the southwest corner of the District is in the Palos Verdes Hills. Major landforms in Region North include: Santa Susana Mountains, San Fernando Valley, Simi Hills, and Santa Monica Mountains. San Gabriel Mountains, San Fernando Valley, Verdugo Mountains, Santa Monica Mountains, and Hollywood Hills. The San Rafael Hills and Repetto Hills are in the Region East; and portions of the Los Angeles Basin are in the Region East, West, and South. Landforms in the District are described further in Section 5.7, *Geology and Soils*, of this EIR.

Much of the District is urbanized. The California Resources Agency has divided California into 10 bioregions, that is, ecologically and geographically defined areas. Bioregions are defined based on geology, landforms, soils, climate, vegetation, land use, and wildlife. The District is in the South Coast Bioregion, which extends from the southern half of Ventura County to the Mexican border and east to the edge of the Mojave desert. The climate of most of the South Coast Bioregion is mild year-round with warm dry summers and wet winters. Habitat varies widely, from chaparral, juniper-pinyon woodland, and grasslands at lower elevations to mixed hardwood forest, southern oak, southern Jeffrey pine, and southern yellow pine at higher levels.<sup>577</sup> Much of the South Coast Bioregion is urbanized.

Vegetation types in the part of the District in the San Gabriel Mountains include mixed chaparral, montane hardwood, chamise-redshank chaparral, and coastal scrub.<sup>578</sup> Vegetation types in the Santa Monica Mountains include coastal oak woodland and annual grassland.<sup>579</sup> The aforementioned vegetation types are described in Section 5.4, *Biological Resources*, of this EIR.

### 5.19.1.2.2 Tribal Cultural Setting (also see Section 5.5)

#### 5.19.1.2.2.1 Cultural Context

The following is a general brief ethnographic and current context for the area within the District. Additional ethnographic and current tribal information may be acquired during consultation with the appropriate tribes for specific SUP related projects.

The District is within the ancestral territory traditionally inhabited by the Gabrieliño (Tongva) people. The Tongva and their ancestors occupied the entire Los Angeles Basin for at least 7000 years, including the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers, to the Santa Monica and Santa Ana mountains, along the coast from Aliso Creek in the south to Topanga Creek in the north, and the islands of San Clemente, San Nicolas, and Santa Catalina (Bean and Smith 1978b; Kroeber 1925). The name Gabrieliño was derived from the San Gabriel Spanish mission located along the coast within Tongva territory. Settlement patterns on the mainland were located near water sources and exhibit a logistical mobility with large villages and smaller satellite camps occupied seasonally. Structures were domed, circular structures with tule, fern, or Carrizo thatching and sweathouses were small, semicircular, earth-covered buildings. The Tongva were fisher-hunter-gatherers and exploited a variety of coastal bay, littoral, riverine, and inland floral and faunal resources

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<sup>577</sup> CRA. 1998, December. South Coast Bioregion.

<sup>578</sup> NPS. 2013, April. San Gabriel Watershed and Mountains: Special Resource Study. <https://parkplanning.nps.gov/document.cfm?parkID=422&projectID=12203&documentID=53350>.

<sup>579</sup> California State Parks. 2012, September 28. Topanga State Park General Plan and Environmental Impact Report. Chapter Two: Existing Conditions and Issues. <http://www.parks.ca.gov/pages/21299/files/02finalgp-ch2.pdf>.

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available within the diverse ecological zones of their ancestral land (i.e., coastal plain, rivers, foothills, mountains, and ocean). Subsistence resources included items such as several species of oak trees, grasses, sage bushes, rabbits, deer, fish, shellfish, and other terrestrial and marine mammals (Bean and Smith 1978). The Tongva would move seasonally throughout the region, between mountain and coastal locales, to hunt terrestrial and sea mammals and to collect terrestrial flora and intertidal species. Currently, the Gabrieliño-Tongva Tribe (historically known as the San Gabriel Band of Mission Indians) are a state of California recognized tribe and their tribal office is located in Los Angeles, California (Gabrielino-Tongva Indian Tribe 2023).

The first recorded contact between California natives and Europeans occurred in 1542, when the Juan Rodriguez Cabrillo expedition traveled along the west coast of California. In 1769, long-term interaction with the Tongva people began with the Gaspar De Portolá overland expedition (Bean and Smith 1978). The Spanish Colonization and Mission Period (between 1769 and 1821) designates the time when the Spanish settled and established 21 missions along the California coast (California Missions Foundation 2023). The Spanish priest's directive was to convert the indigenous population to Catholicism and exploit them as an enslaved labor force (Castillo 1978). The local Tongva population was forcibly indoctrinated into the mission system and were baptized as neophytes (Bean and Smith 1978). By the 1800s, the mental and physical health of the Tongva suffered and many people died due to introduced disease, dietary deficiencies, conflict, or forceful reduction, and many fled or escaped to other areas.

Following the Mexican American War and secularization of the nearby missions in 1834, the region was transferred to private Mexican landowners (ranchos) who established a primary economy of cattle ranching. Most Tongva people were once again used as an enslaved labor force on the ranchos. After the fall of the rancho system around 1846, many European settlers purchased land holdings in the ancestral lands of the Tongva and operated farms and ranches, often under indentured servitude.

During the 1840s to 1850s, several different native Californian tribal people were in the Los Angeles Basin as a result of Mission integration. The Tongva that remained in the Los Angeles Basin still spoke their language and continued practicing their cultural rituals (Gabrielino-Tongva Indian Tribe 2023). From 1851 to 1853, U.S. Government Treaty commissioners signed 18 treaties that recognized the Gabrielino-Tongva. The treaties were never ratified by the U.S. Senate and were considered shelved (Shipeck 1989). The 18 treaties were discovered in 1905, initiating a series of efforts to address the unceded lands of the Tongva (Gabrielino-Tongva Indian Tribe 2023). Between 1860 to 1890, a smallpox epidemic decimates many Tongva people. In 1892, the Perris Indian School (later renamed Sherman Institute [1903] and Sherman Indian High School [1992]) was founded in Perris, California and later moved to Riverside in 1910 (Sherman Indian Museum 2023). Children of local tribes were forced to attend the school so that they would be “assimilated in Euro-American white society.” The students at the school were punished if they used their native language or practiced their cultural traditions (Gabrielino-Tongva Indian Tribe 2023).

The California Jurisdiction Act of 1928 authorized the California Attorney General (K-344) to represent the Tongva (among other California tribes) before the U.S. Court of Claims, to compensate the tribes for the U.S. Senate's failure of ratify 18 treaties in 1852 (Shipek 1989; Gabrielino-Tongva Indian Tribe 2023). From the 1940s through the 1960s, several laws and practices of the U.S. were directed to disband Native American traditional lifeways and assimilate Native people into mainstream society. As part of these practices, tribes were

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stripped of recognition, sovereignty, the removal of the rancherias from tribes, among many other enacted atrocities, 53 Native rancherias were dissolved (Gabrielino-Tongva Indian Tribe 2023). By 1994, the State of California officially recognized the Gabrielino-Tongva Tribe. On August 31, 1994, the state of California passed the Bill of Assembly Joint Resolution (AJR) No. 96 Relative to the Gabrielino-Tongva Nation (California Legislative Information 2023). This Bill recognizes the Gabrielino-Tongva Nations as the aboriginal tribe of the Los Angeles Basin and Channel Islands of Santa Catalina, San Nicolas, San Clemente, and Santa Barbara. Their land runs from Topanga in the west, to Laguna in the south, and to the base of the San Bernardino Mountains in the east, and the elected tribal council of the Gabrielino-Tongva Nation as the legal and traditional governing body of the Gabrielino-Tongva Indian people (Gabrielino-Tongva Indian Tribe 2023).

### 5.19.2 Thresholds of Significance

CEQA Guidelines Section 15064.5 provides direction on determining significance of impacts to tribal and cultural resources, and historical resources. Generally, a resource shall be considered “historically significant” if the resource meets the criteria for listing on the CRHR as discussed in Section 5.19.1.1.1.1. and PRC SS5024.1, Title 14, Code of Regulations, Section 4852 and PRC Section 21074.

According to CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project would cause adverse change in the significance of a tribal cultural resource, defined in PRC section 21074 as either a site, feature, place, cultural landscape that is geologically defined in terms of the size and scope of the landscape, sacred plan, or object with cultural value to a California Native American tribe that is:

- 1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code 5020.1(k), or
- 2) 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 Resources Code section 5024.1, as the CEQA lead agency, has considered the significance of the resource to a California Native American tribe.

#### CEQA Process and Tribal Consultation Steps

AB52 proscribe specific steps and timelines governing the tribal notice and consultation process.

- 1) The Native American Heritage Commission will provide each tribe with a list of all public agencies that may be lead agencies under CEQA within the geographic area with which the tribe is traditionally and culturally affiliated, the contact information of those public agencies, and information on how the Tribe may request consultation. This list must be provided on or before July 1, 2016.
- 2) If a tribe wishes to be notified of projects within its traditionally and culturally affiliated area, the tribe must submit a written request to the relevant lead agency.
- 3) Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a

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tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.

- 4) If a tribe wishes to engage in consultation on a project, the tribe must respond to the lead agency within 30 days of receipt of the formal notification described in step 3, above. The tribe's response must designate a lead contact person. If the tribe does not designate a lead contact person, or designates multiple people, the lead agency shall defer to the individual listed on the contact list maintained by the NAHC.
- 5) The lead agency must begin the consultation process with the tribes that have requested consultation within 30 days of receiving the request for consultation.
- 6) Consultation concludes when either: 1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. Note that consultation can also be ongoing throughout the CEQA process.

The NAHC also recommends, but does not require that agencies should also include with their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential effect (APE), such as:

- The results of any record search that may have been conducted at a California Historical Resources Information System (CHRIS) center, including, but not limited to:
- A listing of any and all known cultural resources that have already been recorded on or adjacent to a SUP Project area, such as known archaeological sites;
- Copies of any and all cultural resource records and study reports that may have been provided by the CHRIS center as part of the records search response;
- Whether the records search indicates a low, moderate, or high probability that unrecorded cultural resources are located in the SUP Project area;
- If a survey is recommended by the CHRIS Center, to determine whether previously unrecorded cultural resources are present.
- The results of any archaeological inventory survey that was conducted, including:
  - Any report that may contain site forms, site significance, and suggested mitigation measures.
  - All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code section 6254.10.

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- The result of any Sacred Lands File (SLF) check conducted through NAHC.
- Any ethnographic studies conducted for any area including all or part of the SUP Project area; and
- Any geotechnical reports regarding all or part of the SUP Project area.

### 5.19.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.19-2: SUP implementation would not cause a substantial adverse change in the significance of tribal cultural resource;**

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- |     |   |
|-----|---|
| I)  | <b>Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code 5020.1(k) and:</b>   |
| II) | <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 Resources Code section 5024.1, as the CEQA lead agency, has considered the significance of the resource to a California Native American tribe.</b> |
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#### 5.19.3.1.1 All Projects Involving Grading, Excavation, or Other Ground-Disturbing Activities

Grading, excavation, or other ground-disturbing activities during construction could damage previously undiscovered archaeological resources. Site-specific impacts cannot be determined until a location is identified for a project. However, the potential for significant impacts does exist. Based on this potential this analysis describes: (1) the methodology for site-specific determinations for presence or absence of tribal cultural resources or archeological resources; (2) project design features or other LAUSD procedures that apply performance standards to reduce impacts when a site is identified as having the potential to affect tribal cultural resources.

Once a new school site is identified for acquisition or an existing school site is identified for modification, LAUSD initiates tribal consultation under AB52 and an archeological resource review as discussed in Section 5.5, Cultural Resources. The procedures ensure that unique tribal resources would be identified through a tribal consultation and a phased investigation using qualified professional consultants (or tribal consultants, if requested) and a consistent methodology.

When tribal consultation, or a Cultural Resource Phase I investigation (records check, NAHC SLF check, background research, consultation, a field survey) identifies possible tribal cultural resources on a project site, the tribal cultural resource will be avoided, or the project site will be abandoned or further consultation with tribes will occur to come to a consensus for mitigation of the resource.



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**Impact 5.19-4: Grading activities are not anticipated to disturb human remains or Tribal Cultural Resources. [Threshold i, ii]**

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### 5.19.3.1.2 All Projects Involving Grading, Excavation, or Other Ground-Disturbing Activities

CEQA Guidelines Section 15064.5(d) outlines the required process for evaluating, treating, and mitigating impacts based on discovery of human remains. LAUSD would follow the measures specified in the CEQA Guidelines to determine early in the process of project review whether or not there is the potential for human remains.

In the event of accidental discovery of human remains the District and its construction contractors would comply with California Health and Safety Code Section 7050.5 and California Public Resources Code Sections 5097.9 et seq. California Health and Safety Code Section 7050.5 requires that construction activity stop until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommends treatment and disposition of the human remains. If the coroner determines that the remains are not subject to their authority and if the human remains are Native American, within 24 hours the coroner will contact the NAHC.

TCRs can be identified through AB 52 consultation (ii above), a cultural resources records search, NAHC SLF search, and a Cultural Resource Phase I investigation (as applicable) (i above). Additionally, each project that may impact Tribal Cultural Resources will implement, as appropriate and in consultation with tribes, LAUSD SC-TCR-1 through SC-TCR-2 and SC-CUL-6 through SC-CUL-10 for protection and mitigation of tribal cultural resources. Impacts would be less than significant.

## 5.19.4 Applicable Regulations and Standard Conditions

### 5.19.4.1.1 Federal

- National Historic Preservation Act
- Archaeological Resources Protection Act
- Native American Graves Protection and Repatriation Act
- National Register Federal Program Regulations: Qualifications for and nomination of properties to the NRHP

### 5.19.4.1.2 State

- California Public Resources Code Sections 5079–5079.65: Qualifications for and nomination of properties to the CRHR.
- California Public Resources Code Sections 5097.9–5097.99: Protections for Native American historical and cultural resources and sacred sites.
- California Health and Safety Code Section 7050.5: Procedures in the event of accidental discovery of human remains.

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- Traditional Tribal Cultural Places Act (SB18)
- Native American Historic Resource Protection Act (AB 52)

### 5.19.4.1.3 LAUSD Standard Conditions of Approval

- SC-TCR-1 through SC-TCR-2
- SC-CUL-6 through SC-CUL-10.

### 5.19.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standard Conditions listed above, the following impacts would be less than significant.

### 5.19.6 Mitigation Measures

#### 5.19.6.1.1 Impact 5.19-1

SC-TCR-1 and SC-TCR-2 and SC-CUL-6 through SC-CUL-10, as applicable and in consultation with tribes to reduce impacts to less than significant.

#### 5.19.6.1.2 Impact 5.19-1 and 5.19-2

SC-TCR-1 and SC-TCR-2 and SC-CUL-6 through SC-CUL-10, as applicable and in consultation with tribes to reduce impacts less than significant.

### 5.19.7 Level of Significance After Mitigation

#### 5.19.7.1.1 Impact 5.19-1 and 5.19.2

Each project that may impact a TCR will include implementation of SC-TCR-1 and SC-TCR-2, and in consultation with tribes SC-CUL-1 and SC-CUL-12 through 18 (as applicable) to reduce impacts of a tribal cultural resource. LAUSD Standard Conditions would reduce impacts to the extent feasible to less than significance with mitigation.

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### 5.20 UTILITIES AND SERVICE SYSTEMS

This section of the Subsequent Program EIR evaluates the potential for implementation of the SUP Update and Measure RR Implementation, to impact public utilities and service systems in the District. This section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions), along with the existing utilities and drainage conditions throughout the SUP area, and possible environmental impacts that may occur as SUP-related site-specific projects are implemented.

#### TERMINOLOGY

Terms in *italics* are other entries in this section.

**Acre-Foot (af).** An **acre-foot** is a unit of volume—approximately 325,851 gallons—commonly used in the United States in reference to large-scale water resources, such as reservoirs, aqueducts, canals, sewer flow capacity, and river flows.

**Acre-Foot per Year (afy).** A flow rate used to measure water and wastewater flows; one acre-foot per year is approximately 892.2 gallons per day or 0.62 gallons per minute.

**Megawatt (MW).** One million watts.

**Catch Basin.** A basin underneath a storm drain inlet designed to remove some pollutants, including trash and sediment.

**Debris Basin.** A basin impounded by a dam and designed to catch debris flowing down a waterway during flood flows.

**Gigawatt (GW).** One billion watts.

**Primary [Wastewater] Treatment.** Removal of solids using settling tanks.

**Recycled Water.** *Tertiary-treated wastewater* used for nonpotable uses such as landscape irrigation, industrial uses, and groundwater recharge.

**Secondary [Wastewater] Treatment.** Reduction of organic matter using bacteria and oxygen; followed by further removal of solids.

**Tertiary [Wastewater] Treatment.** Filtration of wastewater to remove any solids remaining after the first two phases of treatment.

**Volatile Organic Compounds (VOC).** hydrocarbons and hydrocarbon compounds containing chlorine, bromine, and/or fluorine, which evaporate readily.

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### 5.20.1 Environmental Setting

#### 5.20.1.1 REGULATORY FRAMEWORK

State, regional, and local laws, regulations, plans, and guidelines are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to utilities and service systems in the District. Many site-specific projects have not been identified, and there may be local jurisdictional plans and policies that are applicable depending on the project site. Specific requirements of these laws, regulations, plans, and guidelines might not be up to date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. Although some of these may not directly apply to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standard Conditions of Approval are also listed. See *Applicable Regulations and Standard Conditions* at the end of this chapter for those that require District compliance.

##### 5.20.1.1.1 Water

###### 5.20.1.1.1.1 Federal

###### *Federal Clean Water Act*

The federal CWA establishes regulatory requirements for the raw and treated water quality used as potable water supplies. The Cities within the project boundaries are required to monitor water quality and conform to the regulatory requirements of the CWA.

###### *Federal Safe Drinking Water Act*

The federal Safe Drinking Water Act (SDWA) establishes standards for contaminants in drinking water supplies. Maximum contaminant levels and treatment techniques are established for each of the contaminants, which include metals, nitrates, asbestos, total dissolved solids, and microbes.

###### 5.20.1.1.1.2 State

###### *Executive Order N-5-23 Governor's Drought Restriction Easing*

With Executive Order N-5-23, issued on March 24, 2023, Governor Gavin Newsom rolled back some drought emergency provisions that are no longer needed due to current water conditions, while maintaining other measures that support regions and communities still facing water supply challenges, and continue building long-term water resilience. Amid climate-driven irregularities, the state has taken action to boost water supplies through groundwater recharge, stormwater capture, reservoir storage, and more.

The action came as the state announced increased water deliveries to 29 public water agencies that serve 27 million Californians, now expecting to deliver 75% of requested water supplies – up from 35% announced in February 2023, and the highest since 2017.

The order is responsive to current conditions while preserving smart water measures:

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- Ends the voluntary 15% water conservation target, while continuing to encourage that Californians make conservation a way of life;
- Ends the requirement that local water agencies implement level 2 of their drought contingency plans;
- Maintains the ban on wasteful water uses, such as watering ornamental grass on commercial properties;
- Preserves all current emergency orders focused on groundwater supply, where the effects of the multi-year drought continue to be devastating;
- Maintains orders focused on specific watersheds that have not benefited as much from recent rains, including the Klamath River and Colorado River basins, which both remain in drought;
- Retains a state of emergency for all 58 counties to allow for drought response and recovery efforts to continue.<sup>580</sup>

### ***California Safe Drinking Water Act SDWA***

California's SDWA was enacted in 1976. The SWRCB, Division of Drinking Water (DDW) has been granted primary enforcement responsibility for the SDWA. Title 22 of the California Administrative Code stipulates drinking water quality and monitoring standards; standards are equal to or more stringent than federal standards.

### ***California Water Code - Urban Water Management Planning Act***

Pursuant to the Urban Water Management Planning Act (California Water Code §§ 10610 - 10656) urban water suppliers having more than 3,000 service connections or water use of more than 3,000 AFY for retail or wholesale uses are required to submit an Urban Water Management Plan (UWMP) every 5 years to the CDWR. UWMPs are prepared to support long-term resource planning and to ensure that reliable and adequate water supplies are available to meet existing and future demands over a 20-year planning horizon during normal, single-dry, and multiple-dry year periods.

### ***California Water Conservation Act***

The Water Conservation Act of 2009 (often referred to as SBX7-7) requires increased emphasis on water demand management and requires the state to achieve a 20% reduction in urban per capita water use by December 31, 2020. Retail urban water suppliers are required to report baseline and compliance data in their UWMPs in accordance with the requirements of SBX7-7. The City of Los Angeles adopted its current UWMP in 2020.

### ***California Public Utilities Code***

Public utilities are under the jurisdiction of the California Public Utilities Commission. According to California Public Utilities Code, Section 451, public utilities have an obligation to serve the public and are required by law to "furnish and maintain...service as necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public." As a result, utility providers are required by law to provide service to any

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<sup>580</sup> Office of Governor Gavin Newsom. <https://www.gov.ca.gov/2023/03/24/governor-newsom-eases-drought-restrictions/>. Accessed April 14, 2023.

## 5. Environmental Analysis

member of the public living within the utility's service area who has applied for service, is willing to pay for the service, and will comply with the applicable rules and regulations.

### ***California Model Floodplain Management Ordinance***

The California State Water Resources Control Board (SWRCB) provides and encourages communities to adapt the California Model Floodplain Management Ordinance to deal with the deficiencies identified in the FEMA FIRM flood zone maps.

#### **5.20.1.1.2 Wastewater**

##### **5.20.1.1.2.1 Federal**

Wastewater treatment before effluent is discharged to Waters of the United States is required by the federal Clean Water Act, United States Code, Title 33, Sections 1251 et seq.<sup>581</sup>

#### **5.20.1.1.3 Solid Waste**

##### **5.20.1.1.3.1 State**

***Integrated Solid Waste Management Act*** of 1989. Public Resources Code 40050 et seq. (Assembly Bill 939) (California Department of Resources Recycling and Recovery [CalRecycle]) established an integrated waste-management system that focused on source reduction, recycling, composting, and land disposal of waste. AB 939 required every California city and county to divert 50% of its waste from landfills by the year 2000. Compliance with AB 939 is measured in part by comparing solid waste disposal rates for a jurisdiction with target disposal rates; actual rates at or below target rates are consistent with AB 939. AB 939 also requires California counties to show 15 years of disposal capacity for all jurisdictions in the county or show a plan to transform or divert its waste.

***Mandatory Commercial Recycling (AB 341)*** The Mandatory Commercial Recycling (MCR) law went into effect in June 2012 and requires public entities that generate a certain threshold of solid waste per week to reuse, recycle, compost, or otherwise divert solid waste from disposal.

***Mandatory Commercial Organics Recycling (AB 1826)*** Mandatory Organics Recycling (MORE) requires regulated entities to implement an organic waste recycling program to divert food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

***AB 827*** Effective on July 1, 2020, AB 827 supports AB 341 and AB 1826 by making recycling and organic recycling containers available to customers. Wherever recycling or organic waste is generated, a school must provide an appropriate container adjacent to the solid waste container to capture and divert recycling and organic waste. Containers must be easily accessible, visible, and clearly labeled. CalRecycle has customizable labels available for download.

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<sup>581</sup> The federal Clean Water Act is described in further detail in Section 5.9, *Hydrology and Water Quality*, of this EIR.

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***Short-Lived Climate Pollutants: Organic Waste Methane Emissions Reduction (SB 1383)*** Effective on January 1, 2022, schools and local education agencies are required to prevent, reduce the generation of, and recycle organic waste. Additionally, effective on January 1, 2024, schools and local education agencies with an on-site food facility will be required to recover edible food. Information on these requirements can be found on the Short-Lived Climate Pollutants (SLCP): Organic Waste Methane Emissions Reductions website for schools and local education agencies.

California Green Building Standards Code (California Code of Regulations, Title 24, Part 11, Section 5.408) requires that at least 50% of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.<sup>582</sup>

### **5.20.1.1.4 Electricity and Natural Gas**

#### ***5.20.1.1.4.1 2019 California Green Building Standards Code, Title 24, Part 11***

The California Green Building Standards Code (CGBSC) is also referred to as CALGreen. This code features regulations for energy efficiency, water efficiency and conservation, material conservation and resource efficiency and environmental quality, along with mandatory provisions for commercial, residential, and public-school buildings.

#### ***5.20.1.1.4.2 Collaborative for High Performance Schools***

The CHPS is a school design standards-setting organization associated with the LEED group. The District requires that CHPS criteria be incorporated to the extent feasible into its school construction program.

#### ***5.20.1.1.4.3 California Public Utilities Commission***

Established in 1911, CPUC regulates privately owned electric, natural gas, telecommunications, water, railroad, rail transit, and passenger transportation companies. The commission is organized into several advisory units, an enforcement division, and a strategic planning group. Electricity and natural gas companies are both regulated by the CPUC.

#### ***5.20.1.1.4.4 Regulation of Municipal Utilities***

The Los Angeles Department of Water and Power is regulated by the City of Los Angeles Board of Water and Power Commissioners. Municipal utilities are not regulated by the CPUC.

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<sup>582</sup> ICC. 2023, April 14. California Green Building Standards Code (CALGreen) California Code of Regulations, Title 24, Part 11. <https://codes.iccsafe.org/content/CAGBC2022P1>.

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### 5.20.1.1.5 LAUSD

#### 5.20.1.1.5.1 Standard Conditions of Approval

Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
SC-USS-1	Construction Waste Management	Generate demolition debris and/or construction waste	Prior to and during construction (Construction)	<p>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:</p> <p><b>School Design Guide.</b> Establishes a minimum non-hazardous C&amp;D debris recycling requirements of 75% by weight. Construction and demolition waste shall be recycled to the maximum extent feasible.</p> <p><b>Construction &amp; Demolition Waste Management.</b> 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&amp;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&amp;D waste generated by weight.</p>
SC-USS-2	Water Supply	Excavation near water lines	During construction	LAUSD shall coordinate with the City of Los Angeles Department of Water and Power or other appropriate jurisdiction and department prior to the relocation or upgrade of any water facilities to reduce the potential for disruptions in service.
SC-USS-3	Solid Waste (operation)	New school or new school construction on existing campus	During operation	Provide easily accessible area serving the entire school that are dedicated to the collection and storage of materials for recycling including (at a minimum) paper, cardboard, glass, plastics, metals and landscaping waste. There shall be at least one centralized collection point (loading dock), and ability for separation of recyclables where waste is disposed of for classrooms and common areas such as cafeteria's, gyms or multi-purpose rooms.
SC-GHG-1	Water Use and Efficiency	Work on water pumps, valves, piping, and/or tanks	During school operation	During school operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
SC-GHG-2	Water Use and Efficiency	Work on landscape irrigation system	Prior to full operation of irrigation system	LAUSD shall set automatic sprinklers to irrigate landscaping during the early morning (overhead and drip) and evening (drip only) to reduce water loss from evaporation.
SC-GHG-3	Water Use and Efficiency	Work on landscape irrigation system	Prior to full operation of irrigation system	LAUSD shall reset automatic sprinkler timers to water less during cooler months and during the rainy season.
SC-GHG-4	Water Use and Efficiency	Work on landscape	Prior to full operation of irrigation system	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



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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
		and/or irrigation system.		local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources.
SC-GHG-5	Energy Efficiency	Building construction	Prior to occupancy	LAUSD shall ensure that the time dependent valued energy of the proposed project design is 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.
2003 LAUSD Waste Reduction Resolution	Waste Reduction and Recycling	New school or new school construction on existing campus	During operation	The Board of Education of the City of Los Angeles directs the Office of Environmental Health and Safety and the Business Services Division to work with District schools and offices to increase recycling participation rates among these District facilities, and identify additional waste reduction and recycling opportunities in consultation with vendors, product manufacturers, and appropriate State and local agencies, and specifically attempt to reestablish a recycling program for Styrofoam <sup>583</sup> .
2005 Adoption of New Waste Reduction and Recycling Goal	Waste Reduction and Recycling	New school or new school construction on existing campus	During operation	That the Board of Education of the City of Los Angeles adopt a new goal to reduce the amount of waste the District disposed in landfills by 70% during the period 1990 to 2020, increasing from the current 50% goal adopted in 1989, making our goal consistent with that established by the City of Los Angeles; and be it Resolved further, That the Board direct the Office of Environmental Health and Safety and the Business Services Division to work collaboratively with State and local agencies, including the City of Los Angeles to identify additional waste reduction and recycling opportunities, increase recycling participation rates among District facilities, and specifically make recycling programs consistent whether implemented at home or in school. <sup>584</sup>

<sup>583</sup> Motion/Resolution Presented to the Los Angeles City Board of Education for Consideration. Presented for Action 12-9-03. <https://learninggreen.laschools.org/uploads/8/0/0/0/8000811/wastereductionandrecycling2003.pdf>.

<sup>584</sup> LAUSD Board of Education Resolutions. <https://learninggreen.laschools.org/waste-reduction-policy.html>.

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### 5.20.1.2 WATER PROVISION

#### 5.20.1.2.1 Water Providers

Water providers by jurisdiction in the LAUSD are listed in Table 5.20-1.

**Table 5.20-1 Water Providers**

Local Region	Jurisdiction	Water Provider
Portions of North, West, East, and South	City of Los Angeles <sup>585</sup>	City of Los Angeles Department of Water and Power
North	San Fernando <sup>586</sup>	City of San Fernando Water Department
West	City of West Hollywood <sup>587</sup>	City of Los Angeles Department of Water and Power City of Beverly Hills Public Works Services Department
	Unincorporated Los Angeles County community of Marina Del Rey	Los Angeles County Waterworks District 29
East	Bell <sup>588</sup>	California Water Company Golden State Water Company Maywood Mutual Water Company Tract 349 Water Company Tract 180 Water Company
	Cudahy <sup>589</sup>	Golden State Water Company Tract 349 Water Company Tract 180 Water Company
	Huntington Park <sup>590</sup>	City of Huntington Park Water & Sewer Division Maywood Mutual Water Company Walnut Park Mutual Water Company Golden State Water Company
	Maywood <sup>591</sup>	Maywood Mutual Water Co. No. 1 Maywood Mutual Water Co. No. 2 Maywood Mutual Water Co. No. 3
	South Gate <sup>592</sup>	City of South Gate Water Division Golden State Water Company
	Unincorporated Los Angeles County: East Los Angeles	California Water Service Company
South	Carson <sup>593</sup>	California Water Service Company Golden State Water Company

<sup>585</sup> City of Los Angeles Department of Water and Power. 2023, April. 20. Water. [https://www.ladwp.com/ladwp/faces/ladwp?\\_afrcLtrState=t0ht0n9vc\\_4&\\_afrcLoop=141362212252962](https://www.ladwp.com/ladwp/faces/ladwp?_afrcLtrState=t0ht0n9vc_4&_afrcLoop=141362212252962).

<sup>586</sup> City of San Fernando. 2023, April. 20. Water Department. <https://ci.san-fernando.ca.us/utilities/>.

<sup>587</sup> City of West Hollywood. 2023, April 20. Water Conservation. <http://www.weho.org/city-hall/city-departments/public-works/environmental-services/water-conservation>.

<sup>588</sup> City of Bell. 2023, April 20. Utility Providers. <http://www.cityofbell.org/?navid=271>.

<sup>589</sup> City of Cudahy. 2023, April 20. Cudahy Water Utility. <https://www.cityofcudahy.com/BusinessDirectoryII.aspx?lngBusinessCategoryID=39>.

<sup>590</sup> City of Huntington Park. 2023, April 20. <https://www.hpca.gov/DocumentCenter/View/9067/Final-Draft-2020-Urban-Watershed-Management-Plan>.

<sup>591</sup> City of Maywood. 2023 April 20. Utilities. <http://www.cityofmaywood.com/277/Utilities>.

<sup>592</sup> City of South Gate. 2023 April 20. <https://www.cityofsouthgate.org/Government/Departments/Administrative-Services/Utilities-Water>.

<sup>593</sup> City of Carson. 2023 April 20. <https://ci.carson.ca.us/publicworks/EWMP.aspx>.

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Local Region	Jurisdiction		Water Provider
	Cudahy <sup>594</sup>		Cudahy Water Utility
	Gardena <sup>595</sup>		Golden State Water Company
	Huntington Park <sup>596</sup>		City of Huntington Park Water & Sewer Division
	Lomita <sup>597</sup>		City of Lomita Water Department
	Maywood <sup>598</sup>		Maywood Mutual Water Co. No. 1 Maywood Mutual Water Co. No. 2 Maywood Mutual Water Co. No. 3
	South Gate <sup>599</sup>		City of South Gate Water Division Golden State Water Company
	Unincorporated Los Angeles County <sup>600</sup>	Willowbrook	Golden State Water Company
		Florence-Graham	Sativa Los Angeles County Water District Park Water Company Southern California Water Company
		West Rancho Dominguez, West Athens	Golden State Water Company
		West Carson	California Water Service Company
		Westmont	West Basin Municipal Water District

<sup>594</sup> City of Cudahy. 2023 April 20. <https://www.cityofcudahy.com/BusinessDirectoryII.aspx?lngBusinessCategoryID=39>.

<sup>595</sup> City of Gardena. 2023 April 20. Utility Providers. <https://cityofgardena.org/utility-providers/>.

<sup>596</sup> City of Huntington Park. 2023 April 20. [chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.hpcg.org/DocumentCenter/View/9067/Final-Draft-2020-Urban-Watershed-Management-Plan](https://www.hpcg.org/DocumentCenter/View/9067/Final-Draft-2020-Urban-Watershed-Management-Plan).

<sup>597</sup> City of Lomita. 2023 April 20. <https://www.lomitawater.com>.

<sup>600</sup> Los Angeles County Waterworks Districts. 2023 April 20. Los Angeles County Waterworks Districts. <http://dpw.lacounty.gov/wwd/web/>.

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### 5.20.1.3 EXISTING CONDITIONS

#### 5.20.1.3.1 Water Supplies

##### 5.20.1.3.1.1 *Types of Water Sources*

Water agencies supplying the District have four types of water supply sources:

- **Imported Water**

- **From Northern California via the State Water Project.** The delivery capacity of the State Water Project is currently 4.173 million acre-feet annually (LADWP 2020). The State Water Project has delivered water to 29 water agencies along the route, including the Antelope Valley-East Kern Water Agency, Castaic Lake Water Agency, Metropolitan Water District, and the San Gabriel Valley Municipal Water District. The Metropolitan Water District of Southern California (MWD) wholesales most of the water imported into Southern California by the State Water Project to the MWD's 26 member agencies.
- **From the Colorado River via the Colorado River Aqueduct.** The 242-mile long Colorado River Aqueduct has a total capacity of 1.2 million AFY. Los Angeles County relies on the Colorado River Aqueduct for some of its water supply. California, along with a number of other states, shares water that is diverted from the Colorado River. Over the past few decades, California has been utilizing more than its allocation of 4.4 million acre-feet of water annually from the Colorado River. Water agencies throughout California, including the Metropolitan Water District, are implementing programs to reduce water drawn from this source to the initial allocation agreement, through water banking, conservation, and recycling. Sold by the MWD to its member agencies.
- **From the Owens Valley and eastern Sierra Nevada via the Los Angeles Aqueduct.** The 233-mile-long Los Angeles Aqueduct (LAA) conveys water from the eastern Sierra Nevada and Owens Valley to the City of Los Angeles.
  - Water deliveries to the City of Los Angeles from the LAA are dependent on snowfall in the Eastern Sierra Nevada. The average annual long-term LAA delivery is based on the 30-year median hydrology from FY 1985/86 to 2014/15, which projects average deliveries to the City totaling approximately 192,000 AFY. Under average year weather conditions, the long-term average LAA supply of 192,000 AFY is projected to slightly decrease to 190,400 AFY in 2025, and to 184,000 AFY in 2045 as a result of forecasted modeling results based on LADWP's 2011 Climate Change Study on the Eastern Sierra Nevada region and its impacts to the imported water supply of the City (LADWP 2020). As of April 2023, the Central and Southern Sierra, the regions from which the LAA draws its water supply, were at 251% and 322% of normal for the date (CA DWP 2023 <https://cdec.water.ca.gov/snowapp/sweq.action>). Based on the above-average snowfall received during the 2022/2023 winter, water allocations are likely to be toward the higher end of the allocation range.

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- **Groundwater from local groundwater basins.** Groundwater basins are recharged naturally through stormwater and rainfall, and artificially recharged in recharging basins with imported water, stormwater, and recycled water.
- **Recycled Water:** treated and disinfected municipal wastewater. Uses include landscape and agricultural irrigation, groundwater recharge, and industrial uses

**Desalination of ocean water** - Seawater desalination, the process of removing salts and other impurities from seawater, is an established water supply technology around the world. LADWP's current water resource strategy does not include seawater desalination as a water supply due to its high cost and challenging environmental impacts<sup>601</sup>

### 5.20.1.3.1.2 City of Los Angeles

#### 5.20.1.3.1.2.1 Water Sources

The Los Angeles Department of Water and Power obtains water supplies from four sources:

- The Los Angeles Aqueduct importing water from the eastern Sierra Nevada
- Water imported from northern California, via the State Water Project, and from the Colorado River, by the Metropolitan Water District of Southern California (MWD)
- Local groundwater from the San Fernando, Sylmar, Santa Monica, Hollywood, Verdugo, and Eagle Rock groundwater basins, and the Central, and West Coast subbasins of the Coastal Plain of Los Angeles groundwater basin.
- Recycled water; uses include irrigation, industrial uses, and groundwater recharge.<sup>602</sup>

#### 5.20.1.3.1.2.2 Forecast Water Supplies and Demands

Forecast Los Angeles Department of Water and Power water supplies and demands from 2025 through 2045 are shown below in Table 5.20-2. Projections are based on “Average Year” rainfall. Reliability estimates for “Single-Dry Year” and “Multiple-Dry Year” projections can be found in the LA DWP UWMP.<sup>603</sup>

**Table 5.20-2 Forecast Water Supplies and Demands, Los Angeles Department of Water and Power**

Source	2025	2030	2035	2040	2045
<b>Total Water Demand*</b>	<b>642,600</b>	<b>660,200</b>	<b>678,800</b>	<b>697,800</b>	<b>71,500</b>
<b>Existing / Planned Supplies</b>					
<b>Imported Water</b>					
Los Angeles Aqueduct	190,400	188,000	187,300	185,800	184,200

<sup>601</sup> LADWP, 2021. Urban Water Management Plan 2020. <https://www.ladwp.com/cs/groups/ladwp/documents/pdf/mdaw/nzyy/~edisp/opladwpccb762836.pdf>.

<sup>602</sup> Ibid.

<sup>603</sup> Ibid.

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Source	2025	2030	2035	2040	2045
<b>Total Water Demand*</b>	<b>642,600</b>	<b>660,200</b>	<b>678,800</b>	<b>697,800</b>	<b>71,500</b>
MWD Water Purchases - With Existing/Planned Supplies	181,400	180,200	183,700	204,100	216,800
<b>Subtotal</b>	<b>371,800</b>	<b>369,100</b>	<b>371,000</b>	<b>389,900</b>	<b>401,000</b>
<b>Local Water Sources</b>					
Groundwater					
- Entitlements	109,400	109,400	109,400	108,800	108,800
- Groundwater Replenishment	7,000	11,000	11,000	11,000	11,000
- Stormwater Recharge	4,000	8,000	15,000	15,000	15,000
<b>Source</b>	<b>2025</b>	<b>2030</b>	<b>2035</b>	<b>2040</b>	<b>2045</b>
<b>Total Water Demand*</b>	<b>642,600</b>	<b>660,200</b>	<b>678,800</b>	<b>697,800</b>	<b>71,500</b>
<b>Local Water Sources</b>					
Recycled Water - Irrigation and Industrial Use	17,300	29,200	29,700	29,800	30,000
Conservation (Additional Active and Passive after FYE14)	133,100	133,500	142,700	143,300	144,700
<b>Subtotal</b>	<b>270,800</b>	<b>291,100</b>	<b>307,800</b>	<b>307,900</b>	<b>309,500</b>
<b>Total Water Supplies</b>	<b>642,600</b>	<b>660,200</b>	<b>678,800</b>	<b>697,800</b>	<b>710,500</b>
<b>Post-Conservation Demand</b>	<b>509,500</b>	<b>526,700</b>	<b>536,100</b>	<b>554,500</b>	<b>565,800</b>

Source: LADWP. Adopted May 3, 2021. Urban Water Management Plan.

[http://www.water.ca.gov/urbanwatermanagement/2010uwmps/Los%20Angeles%20Department%20of%20Water%20and%20Power/LADWP%20UWMP\\_2010\\_LowRes.pdf](http://www.water.ca.gov/urbanwatermanagement/2010uwmps/Los%20Angeles%20Department%20of%20Water%20and%20Power/LADWP%20UWMP_2010_LowRes.pdf)

Numbers taken from Exhibit 11E, page 11-8.

Most of the portions of the District outside the City of Los Angeles—in Region South and West, and most of Region East—are in the service areas of two water wholesalers that purchase MWD imported water and resell it to local water purveyors: the Central Basin Municipal Water District (CBMWD) and West Basin Municipal Water District (WBMWD). The CBMWD, WBMWD, and LADWP are all member agencies of the MWD.

### 5.20.1.3.1.2.3 Central Basin Municipal Water District

Cities and communities within the District and CBMWD's service area include the cities of Vernon, Maywood, Huntington Park, Bell, Cudahy, South Gate, part of the City of Carson; the communities of East Los Angeles, Florence-Graham, and Walnut Park in unincorporated Los Angeles County, and part of the Community of Willowbrook in Los Angeles County.

CBMWD's water supplies include water imported from northern California and the Colorado River by MWD; local groundwater from the Central subbasin of the Coastal Plain of Los Angeles Groundwater Basin; and recycled water.<sup>604</sup>

Water supplies and demands in CBMWD's service area are summarized in Table 5.20-3.

<sup>604</sup> CBMWD, June 2021. 2020 Urban Water Management Plan.

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**Table 5.20-3 Forecast Water Supplies and Demands, Central Basin Municipal Water District**

Source		2025	2030	2035	2040	2045
Water Supplies	Local Groundwater	174,925	179,298	183,685	187,340	189,183
	Purchased or Imported Water (MWD)	71,770	71,770	71,770	71,770	71,770
	Recycled Water	6,759	6,928	7,101	7,279	7,461
	Other (GW Recharge/Montebello Forebay)	54,579	55,944	57,342	58,776	60,245
	<b>West Basin Service Area Supply Total</b>	<b>308,033</b>	<b>313,940</b>	<b>319,898</b>	<b>325,165</b>	<b>328,659</b>
<b>Net Retail Water Demand</b>		256,250	262,705	263,736	264,774	266,072
<b>Surplus</b>		51,783	51,235	56,162	60,391	62,587

**5.20.1.3.1.2.4 West Basin Municipal Water District**

Cities and communities within the District and WBMWD's service area include the cities of Carson, Gardena, and Lomita; parts of the cities of Rancho Palos Verdes, Hawthorne, and Inglewood; and communities of West Carson, West Rancho Dominguez, West Athens, and Westmont in unincorporated Los Angeles County.<sup>605</sup> WBMWD's water sources are generally similar to those of CBMWD, except that WBMWD also obtains water from desalinated groundwater. In recent years, production from the desalination facility (Desalter) has declined. The volume of water produced at the Desalter from 2016 to 2020 went from 779 AFY to 124 AFY. WBMWD is currently planning to divest the Desalter from its supply portfolio in the near term; therefore, WBMWD's supply from the Desalter by 2025 is zero (WBUWMP 2020).

WBMWD water supplies and demands are summarized in Table 5.20-4.

**Table 5.20-4 Forecast Water Supplies and Demands, West Basin Municipal Water District**

Source		2025	2030	2035	2040	2045
Water Supplies	Local Groundwater	25,330	30,100	30,100	30,100	30,100
	Imported Water	95,890	89,460	89,750	89,360	89,460
	Recycled Water	20,000	29,000	39,000	44,600	44,600
	<b>West Basin Service Area Supply Total</b>	<b>141,220</b>	<b>148,560</b>	<b>158,850</b>	<b>164,060</b>	<b>164,160</b>
<b>Net Retail Water Demand</b>		126,190	121,160	121,450	121,060	121,160
<b>Surplus</b>		15,030	27,400	37,400	43,000	43,000

Source: CBMWD. 2020, May 2021. Urban Water Management Plan. <https://www.westbasin.org/wp-content/uploads/2021/08/West-Basin-2020-Urban-Water-Management-Plan.pdf>.

**5.20.1.3.1.3 Water Supply Reliability**

The Southern California region faces a challenge satisfying its water requirements and securing firm water supplies. Increased environmental regulations and competition for water from outside the region have resulted

<sup>605</sup> WBMWD. 2021 June 28 West Basin Municipal Water District Urban Water Management Plan, Figure 3-3.

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in reduced supplies of imported water. Continued population and economic growth correspond to increased water demands in the region, putting an even larger burden on local supplies. A number of important factors affecting delivery reliability are discussed below. Major sources of uncertainty include Sacramento Delta pumping restrictions, organism decline, climate change and sea level rise, and levee vulnerability to floods and earthquakes.

**MWD's 2020 Regional Urban Water Management Plan.** MWD's 2020 Regional Urban Water Management Plan (UWMP) reports on its water reliability and identifies projected supplies to meet the long-term demand within its service area. It presents MWD's supply capacities from 2021 through 2025: single dry year, multiple dry years, and average year.

**Colorado River Supplies.** The Colorado River Aqueduct (CRA) supplies include water from existing and committed programs and from implementation of agreements to transfer water from agricultural agencies to urban uses. The Colorado River has the potential to supply additional water up to the CRA capacity of 1.25 million af on an as-needed basis.<sup>606</sup>

**State Water Project Supplies.** MWD intends to undertake several major actions in coming years to improve SWP reliability:

- Delta Conveyance Project (DCP)– Planning for a Delta conveyance project to address declining populations of sensitive fish species and increasingly restrictive permit conditions.

On January 15, 2020, DWR issued a Notice of Preparation of an Environmental Impact Report for the DCP stating:

DWR's underlying, or fundamental, purpose in proposing the project is to develop new diversion and conveyance facilities in the Delta necessary to restore and protect the reliability of State Water Project (SWP) water deliveries and, potentially, Central Valley Project (CVP) water deliveries south of the Delta, consistent with the State's Water Resilience Portfolio.

The above stated purpose, in turn, gives rise to several project objectives. In proposing to make physical improvements to the SWP Delta conveyance system, the project objectives are:

- To address anticipated rising sea levels and other reasonably foreseeable consequences of climate change and extreme weather events.
- To minimize the potential for public health and safety impacts from reduced quantity and quality of SWP water deliveries, and potentially CVP water deliveries, south of the Delta resulting from a major earthquake that causes breaching of Delta levees and the inundation of brackish water into the areas in which the existing SWP and CVP pumping plants operate in the southern Delta.

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<sup>606</sup> MWD, June 2021. 2020 MWD Urban Water Management Plan. <https://www.mwdh2o.com/media/21641/2020-urban-water-management-plan-june-2021.pdf>.



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- To protect the ability of the SWP, and potentially the CVP, to deliver water when hydrologic conditions result in the availability of sufficient amounts, consistent with the requirements of state and federal law, including the California and federal Endangered Species Acts and Delta Reform Act, as well as the terms and conditions of water delivery contracts and other existing applicable agreements.<sup>607</sup>
- To provide operational flexibility to improve aquatic conditions in the Delta and better manage risks of further regulatory constraints on project operations.

**Storage.** Metropolitan established general long-term storage guidelines in its Water Surplus and Drought Management (WSDM) Plan. The WSDM Plan provides for flexibility during dry years, allowing Metropolitan to use storage for managing water quality, hydrology, SWP, and Colorado River issues. In addition to surface reservoirs in the region, storage capacity in the region's groundwater basins allows for conjunctive use programs. In 2000, the Association of Ground Water Agencies (AGWA) published Groundwater and Surface Water in Southern California: A Guide to Conjunctive Use that estimated the potential for dry year or long-term conjunctive use in Metropolitan's service area at approximately 4.0 million acre-feet (MAF). In 2007, Metropolitan published the Groundwater Assessment Study that estimated 3.2 MAF of space in groundwater basins available for storage within Metropolitan's service area. Surface water storage reservoirs include Diamond Valley Lake, with a capacity of 810 TAF, and SWP Terminal Reservoirs Castaic Lake (153,940 af), and Lake Perris (65,000 af).<sup>608</sup>

Many local groundwater storage programs have been implemented over the years to maximize the use of local water supplies. These programs have included the diversion of water flows into percolation ponds for recharging groundwater basins and the recovery of degraded groundwater. For many years, flood control agencies within Metropolitan's service area have captured and spread stormwater for groundwater replenishment. Local runoff and reclaimed water have been conserved via spreading grounds, injection wells, reservoirs, and unlined river channels. In addition, flood control agencies have operated seawater barrier projects in Los Angeles and Orange Counties to prevent seawater intrusion into the coastal groundwater basins. Water quality issues have raised serious concerns about the ability to sustain average annual production levels in some groundwater basins. For example, recently recognized threats to groundwater basins posed by emerging contaminants such as per- and polyfluoroalkyl substances (PFAS) have affected groundwater production in many areas.

Conjunctive use of the aquifers offers an important source of dry year supplies. Unused storage in Southern California groundwater basins can be used to optimize imported water supplies, and the development of groundwater storage projects allows effective management and regulation of the region's major imported supplies from the Colorado River and SWP.<sup>609</sup>

**Supply Reliability.** MWD anticipates being able to meet water demands with adequate supplies across the single driest year and droughts lasting five consecutive water years scenarios through the year 2045. MWD's Drought Risk Assessment (DRA). anticipates no water service reliability concerns or shortfall mitigation

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<sup>607</sup> Ibid.

<sup>608</sup> Ibid.

<sup>609</sup> Ibid.

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measures will be needed over the five year period analyzed within the 2020 UWMP, under a repeat of the historic driest five-year sequence of Metropolitan's water supply.

Any future shortage response actions would be customized to meet the circumstances for the particular shortage. Because circumstances can change at any time, MWD's shortage responses actions would be adjusted accordingly throughout the year. To determine specific actions that would be taken at each standard shortage level, MWD would evaluate conditions specific to cost, timing, distribution needs and capabilities, and other variables that include SWP allocation, Colorado River conditions, preexisting demand reduction measures, supply program take capacities, and storage balances.<sup>610</sup>

**Water Supply Allocation Plan.** Due to drought conditions and the uncertainty regarding future pumping operations from the SWP, MWD adopted a water supply allocation plan (WSAP) in 2008 that allocates water to members based on the regional shortage level in MWD's service area. The WSAP has been implemented three times since its inception. For future years in which MWD's supplies are insufficient to meet firm demands, imported supplies to member agencies will be managed in accordance with the WSAP.

### 5.20.1.3.1.1 Groundwater Reliability

Groundwater basins are managed so that groundwater pumping does not exceed the total of natural and intentional recharge into a basin; such sustainable rate of groundwater pumping is the *safe operating yield*.

Agencies managing groundwater pumping and intentional groundwater recharge for three of the major groundwater basins underlying the District are listed in Table 5.20-5. All three basins are managed pursuant to court judgments; for each basin, the judgment specifies an agency (Watermaster) responsible for implementing the judgment.

**Table 5.20-5 Groundwater Basins Management and Safe Yields**

Groundwater Basin	Watermaster	Safe Operating Yield, afy
Coastal Plain of Los Angeles Basin, West Coast Subbasin	Department of Water Resources (DWR)	64,478 pumping rights <sup>1</sup>
Coastal Plain of Los Angeles Basin, Central Subbasin	DWR	217,367 adjudicated water rights <sup>2</sup>
San Fernando Valley Basin	Upper Los Angeles River Area Watermaster	87,000 consisting of 43,660 natural recharge plus 43,000 intentional recharge with imported water <sup>3</sup>

Sources: US BOR Los Angeles Basin Groundwater Adjudication Study, July 2014. <sup>1</sup> RMC 2011; <sup>2</sup> CBMWD 2012; <sup>3</sup> Upper Los Angeles River Area Watermaster, Accessed 2023, April 24. [http://ularawatermaster.com/index.html?page\\_id=914](http://ularawatermaster.com/index.html?page_id=914).

### 5.20.1.3.2 Water Treatment Facilities

Water treatment facilities filter and/or disinfect water before it is delivered to customers.

<sup>610</sup> Ibid.

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### 5.20.1.3.2.1 *Metropolitan Water District of Southern California*

MWD owns and operates five water treatment facilities. Only one of the five facilities, the Joseph Jensen Treatment Plant in the Community of Granada Hills in the City of Los Angeles, is in or near the District. The Joseph Jensen Treatment Plant has capacity of 750 million gallons per day.<sup>611</sup> The remaining four treatment plants have total capacity of about 1.9 billion gallons per day. Two of the four remaining plants are in western Riverside County, one is in eastern Los Angeles County, and one in Orange County. MWD's distribution system links all five treatment plants, and in the event of a shortage of potable water in the District, could convey treated water to the District from the other four treatment plants.<sup>612,613</sup>

### 5.20.1.3.2.2 *City of Los Angeles Department of Water and Power*

The LADWP draws potable water from over 100 drinking water wells throughout the San Fernando groundwater basin. In 1998 there were 58 reliable wells in the system. By 2002 the number of reliable wells had decreased to 49. By 2018 only 23 reliable groundwater production wells were left in the system due to groundwater contamination. The U.S. EPA and the DWP began remedial investigations for identifying contaminants in drinking water in the 1980s. The DWP implemented the San Fernando Groundwater Basin Remediation Program for the purpose of protection of human health and the environment and to restore and protect the full use of the San Fernando Groundwater Basin as a source of water (LADWP 2018). The remedial action objectives of the program is to:

- Protect human health and the environment by reducing the potential for exposure to chemicals of concern (COCs) in groundwater at concentrations exceeding clean up goals.
- Limit the migration of COCs in groundwater in the applicable Operable Unit (OU) at concentrations that prevent the beneficial use of the San Fernando Basin (SFB).
- Remove COCs from groundwater in the applicable OU to maintain the beneficial uses of the SFB and restore the aquifer to the extent practicable.
- Restore LADWP's capability to operate its existing well fields in each OU consistent with its historical and planned use in a flexible manner.

The primary contaminants known to be present in the SFB are VOCs such as Trichloroethylene (TCE), Tetrachloroethylene (PCE), and 1-4 Dioxane. Additional contaminants include 1, 1-DCE, Perchlorate salts, Hexavalent chromium, and Carbon tetrachloride.<sup>614</sup> Water treatment facilities operated by the LA DWP are listed in Table 5.20-6.

<sup>611</sup> MWD. 2023, April 24. Joseph Jensen Treatment Plant. <https://www.mwdh2o.com/your-water/water-quality-and-treatment/>.

<sup>612</sup> MWD. 2023, April 24. Service Area Map. <https://www.mwdoc.com/wp-content/uploads/2017/06/MET-Agency-Map.pdf>.

<sup>613</sup> MWD. 2023, April 24. <https://www.mwdh2o.com/>.

<sup>614</sup> LARWQB Groundwater Workshop, October 11, 2018. [https://www.waterboards.ca.gov/rwqcb4/water\\_issues/programs/remediation/DocAndInfo/workshop/7LADWP.pdf](https://www.waterboards.ca.gov/rwqcb4/water_issues/programs/remediation/DocAndInfo/workshop/7LADWP.pdf).

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**Table 5.20-6 Water Treatment Facilities, Los Angeles Department of Water and Power**

Facility	Contaminants Treated	Technology	Capacity
<b>San Fernando Valley Groundwater Basin</b>			
Tujunga Wellfield Joint Project (Online winter 2023)	VOCs, 1-4 dioxane, TCE, PCE	Liquid-phase granular activated carbon	55,385 AFY*
North Hollywood Central Treatment Facility (Online winter 2023)	VOCs, 1-4 dioxane	Advanced Oxidation Process (AOP) with UV/H <sub>2</sub> O <sub>2</sub>	27,656 AFY *
North Hollywood West Wellhead Treatment Facility	VOCs, 1-4 dioxane	AOP with UV/H <sub>2</sub> O <sub>2</sub>	21,000 AFY *
Pollock Wells Treatment Plant	VOCs (TCE, PCE)	Four liquid-phase granular activated carbon units	Total design flow of 6.7 cubic feet per second (cfs) **
<b>Sylmar Groundwater Basin</b>			
Mission Wells Improvement Project	Trichloroethylene (a VOC)	Not available	3,405 afy

Source:\* LADWP.com, San Fernando Groundwater Basin Remediation Program Overview for Southern California Water Dialogue, February 23, 2023.

\*\* LADWP UWMP 2020.

### 5.20.1.4 WASTEWATER SERVICES

#### 5.20.1.4.1 Wastewater Collection

Sewer service providers by jurisdiction are listed in Table 5.20-7.

**Table 5.20-7 Sewer Service Providers**

Regions	City and Community	Sewer
Portions of North, West, East, and South	City of Los Angeles <sup>615</sup>	City of Los Angeles Bureau of Sanitation
North	San Fernando <sup>616</sup>	City of San Fernando Sewer Maintenance Division
West	West Hollywood <sup>617</sup>	City of West Hollywood Engineering Division
	Unincorporated Los Angeles County: Marina Del Rey <sup>618</sup>	Marina Del Rey Sewer Maintenance District
East	Bell <sup>619</sup>	City of Bell Engineering Division
	Cudahy <sup>620</sup>	Cudahy Public Works Department
	Huntington Park <sup>621</sup>	Water and Sewer Division
	South Gate <sup>622</sup>	City of South Gate Water Division

<sup>615</sup> City of Los Angeles Bureau of Sanitation (LABOS). 2023, April 24. [https://www.lacitysan.org/san/faces/home?\\_afrctrl-state=r1mn43wsk\\_166&\\_afrcLoop=727035552764137#](https://www.lacitysan.org/san/faces/home?_afrctrl-state=r1mn43wsk_166&_afrcLoop=727035552764137#).

<sup>616</sup> City of San Fernando. 2023, April 24. Public Works: Sewer Maintenance. <https://ci.san-fernando.ca.us/public-works/#water-sewer>.

<sup>617</sup> City of West Hollywood. 2023, April 24. Sewers. <https://www.weho.org/city-government/city-departments/public-works/engineering/sewers>.

<sup>618</sup> Los Angeles County Department of Public Works. 2014, February 4. <https://pw.lacounty.gov/smd/smd/>.

<sup>619</sup> City of Bell. 2023, April 24. Utility Providers. <http://www.cityofbell.org/?navid=113>.

<sup>620</sup> City of Cudahy. 2023, April 24. Water and Sewer. <https://www.cityofcudahy.com/187/Maintenance-Division>.

<sup>621</sup> City of Huntington Park. 2023, April 24. Water & Sewer Division. <https://www.hpcg.gov/76/Water-Sewer-Division>.

<sup>622</sup> City of South Gate. 2023, February 4. Water/Sewer Service. <https://www.cityofsouthgate.org/Government/Departments/Administrative-Services/Utilities-Water>.

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Regions	City and Community	Sewer
	Unincorporated Los Angeles County: East Los Angeles	Los Angeles County Consolidated Sewer Maintenance District
South	Carson <sup>623</sup>	Los Angeles County Consolidated Sewer Maintenance District
	Gardena <sup>624</sup>	City of Gardena Sanitation Services Division
	Lomita	Los Angeles County Consolidated Sewer Maintenance District
	Unincorporated Los Angeles County communities of: <sup>625</sup> - Florence-Graham - West Carson - West Rancho Dominguez - Willowbrook	Los Angeles County Consolidated Sewer Maintenance District

## 5.20.1.4.2 Wastewater Treatment

## 5.20.1.4.2.1 Wastewater Treatment Process

Sanitary wastewater is treated in the following three phases:

- **Primary Treatment:** removal of solids using settling tanks;
- **Secondary Treatment:** reduction of organic matter using bacteria and oxygen; followed by further removal of solids; and
- **Tertiary Treatment:** filtration of wastewater to remove any solids remaining after the first two phases of treatment.

Most wastewater that undergoes tertiary treatment is disinfected after tertiary treatment. Disinfection methods include chlorine bleach and ultraviolet light. Tertiary-treated wastewater is often reused (i.e. recycled) for landscape and agricultural irrigation, groundwater recharge, and industrial uses.

## 5.20.1.4.2.2 City of Los Angeles

The City of Los Angeles Bureau of Sanitation provides wastewater treatment to the City. The Bureau of Sanitation operates four wastewater treatment plants:

- Hyperion Treatment Plant in the City of El Segundo provides primary and secondary treatment; capacity 450 million gallons per day (mgd); and peak wet weather flows of 800 mgd.<sup>626</sup>

<sup>623</sup> City of Carson. 2023, April 24. <https://ci.carson.ca.us/publicworks/PW.aspx>.

<sup>624</sup> City of Gardena. 2023, April 24. Sanitation – <https://cityofgardena.org/public-works/.html>.

<sup>625</sup> Los Angeles County Department of Public Works. 2023, April 24. Sewer Maintenance. <https://pw.lacounty.gov/smd/smd/>.

<sup>626</sup> Los Angeles Bureau of Sanitation (LABOS). 2023, April 24. Hyperion Treatment Plant: About our plant. [https://www.lacitysan.org/san/faces/wcnav\\_externalId/s-lsh-wwd-cw-p-hwrp-tp?\\_adf.ctrl-state=jcsles5en\\_5&\\_afriLoop=553294515324626#!](https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=jcsles5en_5&_afriLoop=553294515324626#!).

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- Donald Tillman Water Reclamation Plant in the Community of Van Nuys (City of Los Angeles) in the San Fernando Valley provides primary, secondary, and tertiary treatment; capacity 80 mgd; average daily flows 67 mgd.<sup>627, 628</sup>
- Los Angeles-Glendale Water Reclamation Plant in the Community of Atwater Village (City of Los Angeles) in the San Fernando Valley provides primary, secondary, and tertiary treatment; capacity 20 mgd; average daily flows 20 mgd.<sup>629</sup>
- Terminal Island Water Reclamation Plant on Terminal Island in Los Angeles Harbor in the City of Los Angeles provides primary, secondary, and tertiary treatment; capacity 30 mgd; average daily flows 17.5 mgd.<sup>630</sup>

### 5.20.1.4.2.3 Sanitation Districts of Los Angeles County

Most of the District outside of the City of Los Angeles is in the service area of the LACSD. Parts of the District are in the service area of the Joint Water Pollution Control Plant in the City of Carson. This facility provides primary and secondary treatment with capacity of 400 mgd and average daily flows of 260 mgd.<sup>631</sup>

### 5.20.1.5 STORM DRAINAGE SYSTEMS

The Los Angeles County storm drain system consists of channels, drains, debris basins, and catch basins owned and maintained by the LACFCD, the City of Los Angeles, and U.S. Army Corps of Engineers (Corps).<sup>632</sup>

#### 5.20.1.5.1 Flood Control Facilities

Major regional flood control facilities in the District and upstream near the District are discussed below.

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<sup>627</sup> LABOS. 2023, April 24. Donald C. Tillman Water Reclamation Plant: About our plant. [https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-dctwrp?\\_adf.ctrl-state=jcsles5en\\_5&\\_afLoop=553371741479404#!](https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-dctwrp?_adf.ctrl-state=jcsles5en_5&_afLoop=553371741479404#!).

<sup>628</sup> LABOS. 2023, April 24. About Wastewater: Facts and Figures. [https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-dctwrp?\\_afLoop=727447126513388&\\_afWindowMode=0&\\_afWindowId=null&\\_adf.ctrl-state=r1mn43wsk\\_1078#!%40%40%3F\\_afWindowId%3Dnull%26\\_afLoop%3D727447126513388%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3Dr1mn43wsk\\_1082](https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-dctwrp?_afLoop=727447126513388&_afWindowMode=0&_afWindowId=null&_adf.ctrl-state=r1mn43wsk_1078#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D727447126513388%26_afWindowMode%3D0%26_adf.ctrl-state%3Dr1mn43wsk_1082).

<sup>629</sup> LABOS. 2023, April 24. Los Angeles-Glendale Water Reclamation Plant: About our plant. [https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-lagwrp?\\_afLoop=727624376810072&\\_afWindowMode=0&\\_afWindowId=db4a8ddh1&\\_adf.ctrl-state=r1mn43wsk\\_1232#!%40%40%3F\\_afWindowId%3Ddb4a8ddh1%26\\_afLoop%3D727624376810072%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3Dr1mn43wsk\\_1236](https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-lagwrp?_afLoop=727624376810072&_afWindowMode=0&_afWindowId=db4a8ddh1&_adf.ctrl-state=r1mn43wsk_1232#!%40%40%3F_afWindowId%3Ddb4a8ddh1%26_afLoop%3D727624376810072%26_afWindowMode%3D0%26_adf.ctrl-state%3Dr1mn43wsk_1236).

<sup>630</sup> LABOS. 2023, April 24. Terminal Island Water Reclamation Plant: About our plant. [https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-tiwrp?\\_adf.ctrl-state=jcsles5en\\_1378&\\_afLoop=55384360533922#!](https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-tiwrp?_adf.ctrl-state=jcsles5en_1378&_afLoop=55384360533922#!).

<sup>631</sup> Los Angeles County Sanitation Districts. 2023, May 1. Joint Water Pollution Control Plant (JWPCP). <https://www.lacsd.org/services/wastewater-sewage/facilities/joint-water-pollution-control-plant/wastewater-treatment-process-at-jwpcp>.

<sup>632</sup> Los Angeles County Department of Public Works (LADPW). 2023, April 24. LACFCD. <https://pw.lacounty.gov/LACFCD/web/>.

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### 5.20.1.5.1.1 North and West Regions: Los Angeles River Watershed

The primary drainage channel is the Los Angeles River. Major tributaries of the Los Angeles River include Tujunga Wash, Pacoima Wash, Bull Creek, Aliso Canyon Wash, Browns Canyon Wash, Bell Creek, and Arroyo Calabasas. Major flood control dams and basins include Sepulveda Dam on the Los Angeles River, Hansen Dam on Tujunga Wash, and Pacoima Dam on Pacoima Wash.

### 5.20.1.5.1.2 East Region: Los Angeles River Watershed.

The major tributary of the Los Angeles River in this area is the Arroyo Seco. The major flood control dam upstream from this area is Devil's Gate Dam and Reservoir in the City of Pasadena.

### 5.20.1.5.1.3 West Region: Santa Monica Bay Watershed

The primary drainage channel in the west Los Angeles Basin within the Santa Monica Bay Watershed is Ballona Creek.

### 5.20.1.5.1.4 South Region: Los Angeles River Watershed and Dominguez Watershed

5.20.1.5.1.5 Los Angeles River Watershed - The Los Angeles River and the Rio Hondo are the primary drainage channels in this area. Major flood control dams and basins include Whittier Narrows Dam on the Rio Hondo and San Gabriel River.<sup>633</sup> Dominguez Watershed - The Dominguez Channel is the major drainage channel in this area.

## 5.20.1.6 SOLID WASTE

### 5.20.1.6.1 Solid Waste Collection

Agencies and companies collecting solid waste in the District are listed by jurisdiction below in Table 5.20-8.

**Table 5.20-8 Solid Waste Collection by Jurisdiction**

Region	City	Solid Waste Collector(s)
Portions of North, West, East, and South	Los Angeles <sup>634</sup>	City of Los Angeles Bureau of Sanitation
North	San Fernando <sup>635</sup>	Republic Services
West	West Hollywood <sup>636</sup>	Athens Services
	Unincorporated Los Angeles County: Marina Del Rey	City of Los Angeles Bureau of Sanitation
East	Unincorporated Los Angeles County: East Los Angeles	Republic Services

<sup>633</sup> The Rio Hondo is tributary to the Los Angeles River and connects the San Gabriel River at Santa Fe Dam in the San Gabriel Valley to the Los Angeles River in the City of South Gate.

<sup>634</sup> City of Los Angeles Bureau of Sanitation (BOS). 2023, April 24. [lacitysan.org](http://lacitysan.org).

<sup>635</sup> City of San Fernando. 2023, April 24. <https://ci.san-fernando.ca.us/trash-information/>.

<sup>636</sup> City of West Hollywood. 2023, April 24. Trash and Recycling: <https://www.weho.org/city-government/city-departments/public-works/environmental-services/trash-and-recycling>.

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Region	City	Solid Waste Collector(s)
	Bell <sup>637</sup>	Consolidated Disposal Service
	Cudahy <sup>638</sup>	Consolidated Disposal Service, Republic Services
	Huntington Park <sup>639</sup>	Valley Vista Services
	Maywood <sup>640</sup>	Republic Services
	South Gate <sup>641</sup>	Universal Waste Service.
South	Carson <sup>642</sup>	Waste Resources
	Gardena <sup>643</sup>	Waste Resources
	Lomita <sup>644</sup>	Athens Services
	Unincorporated Los Angeles County communities of: <sup>645</sup> - Florence-Graham - West Carson - West Rancho Dominguez - Willowbrook - West Athens - Westmont	GDD Services.

### 5.20.1.6.2 Solid Waste Disposal

#### 5.20.1.6.2.1 Landfills

##### 5.20.1.6.2.1.1 City of Los Angeles

The City of Los Angeles is one of 18 member cities of the Los Angeles Regional Agency (LARA), a joint powers authority promoting recycling and solid waste diversion. The majority of solid waste landfilled from LARA member cities is disposed of in the eight landfills listed in Table 5.20-9.

<sup>637</sup> City of Bell. 2023, April 24. Residential Trash and Recycling. <http://www.cityofbell.org/?navid=74>.

<sup>638</sup> City of Cudahy. 2023, April 24. Solid Waste and Recycling. <https://www.cityofcudahy.com/213/Solid-Waste-Recyclingdefault.asp>.

<sup>639</sup> City of Huntington Park. 2023, April 24. Trash Collection. <http://hpcg.gov/145/Residential-Trash-Recycling-Collection>.

<sup>640</sup> City of Maywood. 2023, April 24. Solid Waste & Recycling. [https://www.cityofmaywood.com/215/Solid-Waste-Recycling/index.php?option=com\\_content&view=article&id=61&Itemid=89](https://www.cityofmaywood.com/215/Solid-Waste-Recycling/index.php?option=com_content&view=article&id=61&Itemid=89).

<sup>641</sup> City of South Gate. 2023, April 24. Refuse & Recycling Services. <https://www.cityofsouthgate.org/Government/Departments/Public-Works/Maintenance-Services/Trash-Pickup-Illegal-Dumping>.

<sup>642</sup> City of Carson. 2023, April 24. Solid Waste. <https://ci.carson.ca.us/publicworks/solidwaste.aspx>.

<sup>643</sup> City of Gardena. 2023, April 24. Residential Trash Collection. <https://cityofgardena.org/recycling-and-trash/>.

<sup>644</sup> City of Lomita. 2023, April 24. Services. <https://lomitacity.com/recycling-waste-collection/>.

<sup>645</sup> Los Angeles County Public Works Solid Waste Information System. 2023 May 10. <https://pw.lacounty.gov/epd/swims/Residents/GDDs.aspx>.



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**Table 5.20-9. Landfills Used by Los Angeles Regional Authority**

Landfill and Location	Current Remaining Capacity, Cubic Yards	Estimated Close Date	Maximum Daily Load (tons)
Antelope Valley Public Landfill <sup>646</sup> City of Palmdale	17,911,225	2044	5,548
Calabasas Sanitary Landfill <sup>647</sup> Community of Agoura, unincorporated Los Angeles County	14,500,000	2029	3,500
Chiquita Canyon Sanitary Landfill <sup>648</sup> Community of Castaic, unincorporated Los Angeles County	60,408,000	2047	12,000
El Sobrante Landfill <sup>649</sup> City of Corona, Riverside County	143,977,170	2051	16,054
Lancaster Landfill and Recycling Center <sup>650</sup> , City of Lancaster	14,514,648	2044	5,100
Olinda Alpha Sanitary Landfill <sup>651</sup>	17,500,000	2036	8,000
Simi Valley Landfill & Recycling Center <sup>652</sup> City of Simi Valley, Ventura County	82,954,873	2063	64,750
Sunshine Canyon City/County Landfill <sup>653</sup> Community of Sylmar, City of Los Angeles	77,900,000	2037	64,750

Each of the eight landfills is open six days per week, Monday through Saturday, except for certain holidays.

Sources: CalRecycle. 2023, April 24. Jurisdiction Disposal by Facility. <https://www2.calrecycle.ca.gov/SolidWaste/Site/Search>.

**5.20.1.6.2.1.2 Other Jurisdictions**

Most of the District outside of the City of Los Angeles is in the service area of the Los Angeles County Sanitation Districts. LACSD landfills, material recovery facilities, transfer stations, and refuse to energy facilities serving the District include: Calabasas Sanitary Landfill, Puente Hills Materials Recovery Facility, Downey Area Recycling and Transfer Facility, South Gate Transfer Station, Southeast Resource Recovery Facility, and Commerce Refuse-to-Energy Facility.<sup>654</sup> The Calabasas Sanitary Landfill is described above in Table 5.20-9.

<sup>646</sup> CalRecycle. 2023 April 24. <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3458?siteID=1364>.

<sup>647</sup> CalRecycle. 2023, April 24. Calabasas Sanitary Landfill (19-AA-0056). <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3579?siteID=1041>.

<sup>648</sup> CalRecycle. 2023, April 24. Chiquita Canyon Sanitary Landfill (19-AA-0052). <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3574?siteID=1037>.

<sup>649</sup> CalRecycle. 2023, April 24. El Sobrante Landfill (33-AA-0217). <http://www.calrecycle.ca.gov/SWFacilities/Directory/33-AA-0217/Detail/>.

<sup>650</sup> CalRecycle. 2023, April 24. Lancaster Landfill and Recycling Center (19-AA-0050). <http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-0050/Detail/>.

<sup>651</sup> CalRecycle. 2023, April 24. Olinda Alpha Sanitary Landfill (30-AB-0035). <http://www.calrecycle.ca.gov/SWFacilities/Directory/30-AB-0035/Detail/>.

<sup>652</sup> CalRecycle. 2023, April 24. Simi Valley Landfill & Recycling Center (56-AA-0007). <http://www.calrecycle.ca.gov/SWFacilities/Directory/56-AA-0007/Detail/>.

<sup>653</sup> CalRecycle. 2023, April 24. Sunshine Canyon City/County Landfill (19-AA-2000). <https://www2.calrecycle.ca.gov/SolidWaste/Site/Details/4702>.

<sup>654</sup> LACSD operates a second landfill, the Scholl Canyon Landfill in the City of Glendale. However, that landfill is limited by Glendale City Ordinance to accepting waste from certain parts of the San Gabriel and San Fernando Valleys and does not serve the District. Los

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Maximum daily capacities of LACSD material recovery facilities, transfer stations, and refuse to energy facilities serving the District are, in tons per day:

- Materials Recovery Facilities and Transfer Stations
  - Puente Hills Materials Recovery Facility, City of Industry: 4,400<sup>655</sup>
  - South Gate Transfer Station, City of South Gate: 2,200<sup>656</sup>
  - American Waste Transfer Station, Gardena: 2,225<sup>657</sup> Refuse to Energy Facilities
  - Southeast Resource Recovery Facility, City of Long Beach: 2,240<sup>658</sup>

### 5.20.1.6.3 Solid Waste Diversion

Fifty-seven solid waste diversion programs are provided within the 18-member jurisdictions of the LARA, including composting, material recovery facilities, household hazardous waste collection, public education, recycling, source reduction,<sup>659</sup> special waste materials (such as tires and concrete/asphalt/rubble), and waste-to-energy programs.<sup>660</sup>

### 5.20.1.7 ELECTRICITY

The LADWP provides electricity to the City of Los Angeles. Southern California Edison provides electricity to nearly all of the balance of the District. The City of Vernon Light and Power Department provides electricity to the City of Vernon.

#### 5.20.1.7.1 City of Los Angeles

LADWP's net maximum generating plant capacity is 7,197 megawatts. LADWP supplied about 26 million megawatt-hours of electricity during fiscal year 2017.<sup>661</sup> LADWP's sources of electricity generation during 2019 were: 33% coal, 21% natural gas, 36% renewables (including 40% solar, 34% wind, 11% small hydro, 13% geothermal, and 0.7% biowaste. In 2018, renewable generation accounted for 36% of retail sales (California

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Angeles County Sanitation District (LACSD). 2014, February 5. Scholl Canyon Landfill. <https://www.lacsd.org/services/solid-waste/facilities/scholl-canyon-landfill>.

<sup>655</sup> CalRecycle. 2014, February 5. Puente Hills Materials Recovery Facility (19-AA-1043). <http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-1043/Detail/>.

<sup>656</sup> CalRecycle. 2014, February 5. South Gate Transfer Station (19-AA-0005). <https://www.lacsd.org/services/solid-waste/facilities/puente-hills-materials-recovery-facility-mrf>.

<sup>657</sup> <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3520?siteID=991>.

<sup>658</sup> CalRecycle. 2023, April 24. Southeast Resource Recovery Facility <https://www.lacsd.org/services/solid-waste/facilities/southeast-resource-recovery-facility-serrf>.

<sup>659</sup> <https://www.sce.com/sites/default/files/custom-files/Web%20files/2021%20Power%20Content%20Label.pdf>.

<sup>660</sup> CalRecycle. 2023, April 24. <http://www.calrecycle.ca.gov/LGCentral/reports/diversionprogram/JurisdictionDiversionPrograms.aspx?JurisdictionID=621&Year=2012>.

<sup>661</sup> LADWP. 2023, May 8. Facts & Figures. [https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?\\_afL.oop=323811493202942](https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_afL.oop=323811493202942).

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Energy Commission Staff Report, Review of LADWP 2017 Power Integrated Resource Plan, September 2019).<sup>662</sup>

### 5.20.1.7.2 Southern California Edison

Total electricity demands in SCE's service area are forecast to increase from 110,053 GWh per year in 2023 to 128,776 GWh in 2035; one GWh is equivalent to one million kilowatt-hours.<sup>663</sup> SCE's sources of electricity generation in 2021 were 33.6% renewable, including 4.8% geothermal and 11.4% wind; 37.9% natural gas; 3% coal; 9.3% nuclear; 9.2% large hydroelectric; and 6.8% unspecified.<sup>664</sup>

### 5.20.1.8 NATURAL GAS

The Southern California Gas Company (SCGC) provides natural gas to nearly the entire District. The Vernon Light and Power Department provides natural gas to the City of Vernon. Total natural gas supplies available to SCGC are forecast to range between 2,415 million cubic feet per day (MMcf/day) in 2023 to 2,251 MMcf/day in 2026.<sup>665</sup>

## 5.20.2 Thresholds of Significance

According to CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project:

- USS-1 Would exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.
- USS-2 Would require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.
- USS-3 Would require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- USS-4 Would not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

<sup>662</sup> LADWP. 2021. Power Content Label. [https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-powercontentlabel?adf.ctrl-state=q4accti9m\\_4&afL.oop=323909368047003](https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-powercontentlabel?adf.ctrl-state=q4accti9m_4&afL.oop=323909368047003).

<sup>663</sup> CEC. California Energy Demand Forecast 2021-2035. <https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2021-integrated-energy-policy-report/2021-1>.

<sup>664</sup> (SCE. 2021. Power Content Label. <https://www.sce.com/sites/default/files/custom-files/Web%20files/2021%20Power%20Content%20Label.pdf>.

<sup>665</sup> California Gas and Electric Utilities (CGEU). 2022 California Gas Report, Executive Summary, Table 4. [https://www.socalgas.com/sites/default/files/Joint\\_Utility\\_Biennial\\_Comprehensive\\_California\\_Gas\\_Report\\_2022.pdf](https://www.socalgas.com/sites/default/files/Joint_Utility_Biennial_Comprehensive_California_Gas_Report_2022.pdf).

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USS-5 Would result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

USS-6 Would 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.

USS-7 Would not comply with federal, state, and local statutes and regulations related to solid waste.

### 5.20.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.20-1: The SUP would not exceed wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board. [Thresholds USS-1]**

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#### 5.20.3.1.1 All SUP Projects

All wastewater that would be generated by improvements developed by SUP projects could be treated at wastewater treatment plants of the City of Los Angeles and the Sanitation Districts of Los Angeles County. The SUP would not develop land uses requiring wastewater treatment requirements separate from municipal wastewater treatment. Such requirements are issued for some types of land uses including some industrial uses and large agricultural operations.

Compliance with requirements for discharges to municipal stormwater systems are addressed in Section 5.9, *Hydrology and Water Quality*.

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**Impact 5.20-2: The SUP would not require relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. [Threshold USS-2, USS-5]**

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#### 5.20.3.1.2 WATER TREATMENT FACILITIES

##### 5.20.3.1.3 New Construction on New Property or Existing Campus

These projects could expand the total student capacity of the District. However, the SUP would not increase District enrollment. The SUP would accommodate forecast increases in enrollment due to projected increasing numbers of school-aged children as well as higher graduation rates. (Forecast trends in District enrollment are discussed in Chapter 4, *Project Description*.) The SUP therefore would not expand total water consumption within the District and would not require construction of new or expanded water treatment facilities. Additionally, over the next 10 years student enrollment is projected to decline by 18%. Impacts would be less than significant.

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### **5.20.3.1.4 Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation**

These projects would not expand capacity and would not expand District enrollment. Thus, these types of projects would not require construction of new or expanded water treatment facilities. No impact would occur.

### **5.20.3.1.5 WASTEWATER TREATMENT FACILITIES**

#### **5.20.3.1.6 New Construction on New Property or Existing Campus**

These types of projects could expand the total student capacity of the District. However, the SUP would not increase District enrollment, which is projected to decrease 18% in the next 10 years. The SUP would therefore not expand total water consumption within the District and would not require construction of new or expanded wastewater treatment facilities. Impacts would be less than significant.

### **5.20.3.1.7 Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation**

These projects would not expand capacity or District enrollment. Thus, these types of projects would not require construction of new or expanded wastewater treatment facilities, and no impact would occur.

### **5.20.3.1.8 ELECTRIC POWER AND NATURAL GAS**

#### **5.20.3.1.9 New Construction on New Property or Existing Campus**

These types of projects could expand the total student capacity of the District. However, the SUP would not increase District enrollment, which is projected to decrease 18% in the next 10 years. The SUP would therefore not expand total electric power or natural gas consumption within the District and would not require construction of new or expanded electric power or natural gas generation facilities. Impacts would be less than significant.

### **5.20.3.1.10 Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation**

These projects would not expand capacity or District enrollment. Thus, these types of projects would not require construction of new or expanded electric power or natural gas generation facilities, and no impact would occur.

### **5.20.3.1.11 TELECOMMUNICATIONS FACILITIES**

#### **5.20.3.1.12 New Construction on New Property or Existing Campus**

These types of projects could expand the total student capacity of the District. However, the SUP would not increase District enrollment, which is projected to decrease 18% in the next 10 years. The SUP would therefore not expand total telecommunications usage within the District and would not require construction of new or expanded telecommunications facilities. Impacts would be less than significant.

## 5. Environmental Analysis

### 5.20.3.1.13 Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

These projects would not expand capacity or District enrollment. Thus, these types of projects would not require construction of new or expanded telecommunications facilities, and no impact would occur.

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**Impact 5.20-3: The SUP would not cause significant environmental effects from the construction of new or expanded stormwater drainage facilities. [Thresholds USS-3]**

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### 5.20.3.1.14 New Construction on New Property or Existing Campus

All new construction projects would be on or next to existing campuses. The vast majority of District schools are in built-out urban neighborhoods where much of the land surface is already impervious. Site-specific project design would include provisions to control surface runoff, and the requirements of applicable NPDES permits and Standard Urban Stormwater Mitigation Plans would be included. For example, the LAUSD requires the collection of stormwater runoff, compliance with any applicable NPDES stormwater permit, restricting sediment flows into storm drainage systems, and compliance with the District's Stormwater Technical Manual. Compliance with applicable laws, regulations, and standard LAUSD Standard Conditions and practices during project siting, construction and operation would ensure that impacts associated with runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, are less than significant.

### 5.20.3.1.15 Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation

The SUP would include stormwater BMPs that would be adequately designed to accommodate site runoff so that it would not adversely impact downstream storm drain facilities or provide substantial additional sources of polluted runoff. In addition, California Government Code Section 53097 requires school districts to comply with city and county ordinances regulating drainage improvements and requiring review and approval of grading plans as they relate to design and construction of on-site improvements that affect drainage. LAUSD would comply with Section 53097 in implementing the SUP. This compliance would ensure that school projects would not have a significant adverse effect on the local drainage system. The implementation of a project's proposed engineered drainage improvements would ensure that impacts to existing or planned drainage would be less than significant.

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**Impact 5.20-4: SUP-related projects would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. [Thresholds USS-4]**

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### 5.20.3.1.16 New Construction on New Property or Existing Campus

These types of projects could expand the total student capacity of the District. However, the SUP would not increase District enrollment. It would accommodate forecast increases in enrollment. The SUP would therefore not expand total water consumption within the District. Impacts would be less than significant.

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### 5.20.3.1.17 Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

Modernization, repair, upgrade, and renovation projects would not expand capacity or District enrollment. Thus, these types of projects would not require new or expanded water supplies, and no impact would occur.

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**Impact 5.20-5: Landfill facilities would be able to accommodate SUP-related solid waste and the District would comply with related solid waste regulations. [Thresholds USS-6 and USS-7]**

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### 5.20.3.1.18 SOLID WASTE DISPOSAL CAPACITY

#### 5.20.3.1.19 New Construction on New Property or Existing Campus

These types of projects could expand the total student capacity of the District. However, the SUP would not increase District enrollment. In fact, the 10-year forecast projects an 18% decrease in student enrollment. The SUP would not expand total solid waste generation within the District and would not require construction of new or expanded solid waste disposal or recycling facilities. Impacts would be less than significant.

### 5.20.3.1.20 Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

Modernization, repair, upgrade, and renovation projects would not expand capacity or District enrollment. Thus, these types of projects would not expand solid waste generation from District facilities, and no impact would occur.

### 5.20.3.1.21 SOLID WASTE REGULATORY COMPLIANCE

#### 5.20.3.1.22 All SUP Projects

All projects implemented by the SUP would comply with the recycling requirement in AB 341. All SUP-related projects involving construction and/or demolition would comply with the C&D waste recycling/reuse requirement in California Green Building Standards Code Section 5.408, and LAUSD School Design Guide & Specification 01340, Construction & Demolition Waste Management, that 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. Impacts would be less than significant.

## 5.20.4 Applicable Regulations and Standard Conditions

### 5.20.4.1.1 Water

- California Water Code Sections 10608 et seq.: The Water Conservation Act of 2009
- Governor's Statewide Mandatory Water Reductions Executive Order. April 1, 2015, readopted in December, 2022
- LAUSD SC-USS-2

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- LAUSD SC-GHG-1 through SC-GHG-4

### 5.20.4.1.2 Wastewater

- United States Code, Title 33, Sections 1251 et seq.: Clean Water Act.

### 5.20.4.1.3 Solid Waste

- Public Resources Code 40050 et seq.: Integrated Solid Waste Management Act of 1989
- Assembly Bill 341 (Chapter 476, Statutes of 2011)
- 2013 California Green Building Standards Code, Section 5.408
  - LAUSD SC-USS-1 and SC-USS-3

### 5.20.4.1.4 Electricity and Natural Gas

- California Green Building Standards Code (CALGreen), California Code of Regulations, Title 24, Part 11
- LAUSD SC-USS-1 through SC-USS-4
  - LAUSD SC-GHG-5

## 5.20.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standard Conditions listed above, the following impacts would be less than significant: 5.20-1, 5.20-2, 5.20-3, 5.20-4, and 5.20-5.

## 5.20.6 Mitigation Measures

No mitigation measures are required.

## 5.20.7 Level of Significance After Mitigation

Impacts would be less than significant.



## 5. Environmental Analysis

### 5.21 WILDFIRE

This section of the Supplemental Program EIR evaluates the potential for implementation of the SUP Update and Measure RR Implementation Plan to create a significant impact related to Wildfires in the District. This section discusses regulatory framework (plans and policies from several jurisdictional agencies and LAUSD Standard Conditions), along with the existing wildfire hazard throughout the SUP area including two types of potential risks associated with site-specific new school construction and upgrade projects: 1) risks that construction of new school facilities could pose to onsite workers and the surrounding community, and 2) risks to students, faculty, and other LAUSD staff from on- and offsite wildfire hazards.

#### TERMINOLOGY

Wildland fires affect grass, forest, and brushlands, as well as any structures located within them. Where there is human access to wildland areas, the risk of fire increases due to a greater chance for human carelessness and historical fire management practices. Generally, there are four major factors that sustain wildfires and allow for predictions of a given area's potential to burn. These factors include fuel, topography, weather, and human actions.

**Climate Change.** Climate Change is driving increases in dry, drought conditions, which among other things contribute to an increase in dead vegetation and tree mortality increasing the potential for wildfires.

**Fuel.** Fuel is the material that feeds a fire and is a key factor in wildfire behavior. Fuel is generally classified by type and by volume. Fuel sources are diverse and include everything from dead tree leaves, twigs, and branches to dead standing trees, live trees, brush, and cured grasses. Also, to be considered as a fuel source are manmade structures, such as homes and other associated combustibles. The type of prevalent fuel directly influences the behavior of wildfire. Fuel is the only factor that is under human control. The 2018-2022 Los Angeles County Strategic Fire Plan describes the fuels in the County. There are a wide range of fuels and vegetation types in the District. Of these different vegetation types, coastal sage scrub, chaparral, and grasslands reach some degree of flammability during the dry summer months and, under certain conditions, during the winter months. For example, as chaparral gets older, twigs and branches within the plants die and are held in place. A stand of brush 10- to 20-years of age usually has enough dead material to produce rates of spread about the same as in grass fires when the fuels have dried out. In severe drought years, additional plant material may die, contributing to the fuel load. There will normally be enough dead fuel accumulated in 20- to 30-year old brush to give rates of spread about twice as fast as in a grass fire. Under moderate weather conditions that produce a spread rate of one-half foot per second in grass, a 20- to 30-year old stand of chaparral may have a rate of fire spread of about one foot per second. Fire spread in old brush (40 years or older) has been measured at eight times as fast as in grass, about four feet per second. Under extreme weather conditions, the fastest fire spread in grass is 12 feet per second or about eight miles per hour. <sup>666</sup>

**Human Actions.** Most wildfires are ignited by human action, the result of direct acts of arson, carelessness, or accidents. Many fires originate in populated areas along roads and around homes and are often the result of

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<sup>666</sup> U.S. Fire Administration Federal Emergency Management Agency. <https://www.usfa.fema.gov/stories/wildland-urban-interface/>. Accessed May 8, 2023.

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arson or careless acts such as the disposal of cigarettes, use of equipment, or debris burning. Recreation areas that are located in high fire hazard areas also result in increased human activity that can elevate the potential for wildfires to occur.

**Hazardous materials.** Generally refers to hazardous substances that exhibit corrosive, poisonous, flammable, and/or reactive properties and have the potential to harm human health and/or the environment. Hazardous materials are used in products (e.g., household cleaners, industrial solvents, paint, pesticides) and in the manufacturing of products (e.g., electronics, newspapers, plastic products). Hazardous materials can include petroleum, natural gas, synthetic gas, acutely toxic chemicals, and other toxic chemicals that are used in agriculture, commercial, and industrial uses; businesses; hospitals; and households. Accidental releases of hazardous materials have a variety of causes, including wildfire, highway incidents, warehouse fires, train derailments, shipping accidents, and industrial incidents.

**Pollutant.** The term pollutant is defined very broadly by NPDES regulations and litigation and includes any type of industrial, municipal, and agricultural waste discharged into water. Pollutant sources are generally categorized as either point sources or nonpoint sources under NPDES regulations. Pollutants can enter waters of the United States from a variety of pathways, including agricultural, domestic, and industrial sources. Typical point source discharges include discharges from publicly owned treatment works, discharges from industrial facilities, and discharges associated with urban runoff. The majority of agricultural facilities are defined as nonpoint sources and are exempt from NPDES regulation. Direct sources discharge wastewater directly into the receiving water body, whereas indirect sources discharge wastewater to a publicly owned treatment work, which in turn discharges into the receiving water body.

**School Site.** The SUP is not anticipated to include the acquisition of new sites for the construction of “stand alone” schools. However, some projects developed under the SUP may incorporate the acquisition of property, thus expanding an existing campus. For this section, the term “school site” relates to the latter rather than the former definition.

**Topography.** An area’s terrain and land slopes affect its susceptibility to wildfire spread. Both fire intensity and rate of spread increase as slope increases due to the tendency of heat from a fire to rise via convection. The arrangement of vegetation throughout a hillside can also contribute to increased fire activity on slopes. The Fire Plan noted that terrain within the District’s territory can be classified in broad terms as being 75% alluvial plain and 25% rugged canyons and hills. Elevations range from 5,074 feet at Sister Elsie Peak in the San Gabriel Mountains to nearly mean sea level in the southwestern part of the District. The canyons and hills of the area are at higher risk to wildfire. The 2012 District LHMP noted that rough topography greatly limits road construction, road standards, and accessibility by ground equipment. Steep topography also channels airflow, creating extremely erratic winds on lee slopes and in canyons. Water supply for fire protection to structures at higher elevations is frequently dependent on pumping units. The source of power for such units is usually from overhead distribution lines, which are subject to destruction by wildland fires.

**Weather.** Weather components such as temperature, relative humidity, wind, and lightning also affect the potential for wildfire. High temperatures and low relative humidity dry out fuels that feed wildfires, creating a situation where fuel will ignite more readily and burn more intensely. Thus, during periods of drought, the

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threat of wildfire increases. Wind is the most treacherous weather factor. The greater a wind, the faster a fire will spread and the more intense it will be. In addition to wind speed, wind shifts can occur suddenly due to temperature changes or the interaction of wind with topographical features such as slopes or steep hillsides. Lightning also ignites wildfires, often in difficult to reach terrain for firefighters. The 2017 Los Angeles County Strategic Fire Plan noted that during the autumn and winter months, high-pressure weather systems will originate over the Great Basin and upper Mojave Deserts, which heats up the air. These systems often produce strong offshore winds, known as the Santa Ana winds by the National Weather Service and is described as having strong down slope winds blowing through the mountain passes of Southern California. The relative humidity of the air is further decreased as it travels from the high desert to the coast. These hot dry winds blow through the valley and canyons pre-heating and dropping the fuel moisture and relative humidities in all areas of Los Angeles County, including the District Planning Area. This can cause a high frequency of wildland fires where the temperatures are high, while fuel moistures are extremely low, and winds are blowing at 30-70 miles per hour.

**Wildland Urban Interface (WUI).** The WUI is an area where human development meets or intermingles with undeveloped wildland and vegetative fuels that are both fire-dependent and fire-prone. The wildland urban interface is a general term that applies to development adjacent to landscapes that support wildland fire. The WUI defines the community development into the foothills and mountainous areas of California. The WUI describes those communities that are mixed in with grass, brush and timbered covered lands (wildland). These are areas where wildland fire once burned only vegetation but now burns homes as well. There are two types of WUI environments. The first is the true urban interface where development abruptly meets wildland. The second WUI environment is referred to as the wildland urban intermix. Wildland urban intermix communities are rural, low density communities where homes are intermixed in wildland areas. Wildland urban intermix communities are difficult to defend because they are sprawling communities over a large geographical area with wild fuels throughout. This profile makes access, structure protection, and fire control difficult as fire can freely run through the community.<sup>667</sup>

### 5.10.2 Environmental Setting

California is recognized as one of the most fire-prone and consequently fire-adapted landscapes in the world. The combination of complex terrain, Mediterranean climate, and productive natural plant communities, along with ample natural and aboriginal ignition sources, has created conditions for extensive wildfires. Wildland fire is an ongoing concern for the District Planning Area. Generally, the fire season extends from early spring through late fall of each year during the hotter, dryer months. However, in recent years, wildfire season is more of a year-round event. Fire conditions arise from a combination of high temperatures, low moisture content in the air and fuel, an accumulation of vegetation, and high winds. Economic losses could also result. Smoke and air pollution from wildfires can be a severe health hazard to students and faculty. In addition, catastrophic wildfire can create favorable conditions for other hazards such as flooding; landslides, mud and debris flows; and erosion during the rainy season.

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<sup>667</sup> U.S. Fire Administration Federal Emergency Management Agency. <https://www.usfa.fema.gov/stories/wildland-urban-interface/>. Accessed May 8, 2023.

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Wildfires are often caused by humans, either intentionally or accidentally. There is no way to predict when one might break out. Since fireworks often cause brush fires, extra diligence is warranted around Independence Day, when the use of fireworks is highest. Dry seasons and droughts are factors that greatly increase fire likelihood. Dry lightning may increase the likelihood of wildfires. Adverse weather can be predicted, therefore additional monitoring should be made, during weather events that may include lightning. Reliable National Weather Service lightning warnings are available on average 24 to 48 hours prior to a significant electrical storm. Although physical damages and casualties arising from wildland-urban interface fires may be severe, significant economic impacts may occur from the loss of District buildings and infrastructure. In some cases, the economic impact of this loss of services may be comparable to the economic impact of physical damages or, in some cases, even greater.

WUI fires are often the most damaging. WUI fires occur where the natural and urban development intersect. Even relatively small acreage fires may result in disastrous damages. WUI fires occur where the natural forested landscape and urban-built environment meet. The damages are primarily reported as damage to infrastructure, built environment, loss of socio-economic values and injuries to people. The pattern of increased damages is directly related to increased urban spread into historical forested areas that have wildfire as part of the natural ecosystem.<sup>668</sup> Many WUI fire areas have long histories of wildland fires that previously only burned vegetation. However, WUI fires can occur where there is a distinct boundary between the built and natural areas or where development or infrastructure has encroached or is intermixed in the natural area. WUI fires may include fires that occur in remote areas with critical infrastructure easements, including electrical transmission towers, railroads, water reservoirs, communications relay sites or other infrastructure assets. Human expansion into wildland areas has made it much more difficult to protect life and property during a wildland fire.

### Fire Protection and Emergency Services

Emergency response plans include elements to maintain continuity of government, emergency functions of governmental agencies, mobilization and application of resources, mutual aid, and public information. Emergency response plans are maintained at the federal, state, and local level for all types of disasters, including human-made and natural. It is the responsibility of government to undertake an ongoing comprehensive approach to emergency management in order to avoid or minimize the effects of hazardous events, such as wildfires. Local governments have the primary responsibility for preparedness and response activities.

The Los Angeles County OEM maintains the Los Angeles County Operational Area Emergency Response Plan and the County of Los Angeles All-Hazard Mitigation Plan. OEM leads and coordinates disaster plans and disaster preparedness exercises for all cities and 288 special districts in Los Angeles County.

The LACoFD is one of six contract counties that have executed a contract with the State of California to provide wildland fire protection on State Responsibility Areas. The Department has the responsibility as a contract County to implement the State Strategic Fire Plan and functionally operates as a unit of CAL FIRE and is responsible for Strategic Fire Plan activities in the County, discussed further in Regulatory Setting, under 2021 LACoFD Strategic Plan.

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<sup>668</sup> U.S. Fire Administration FEMA. <https://www.usfa.fema.gov/stories/wildland-urban-interface/>. Accessed June 9, 2023.

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The LACoFD serves 59 cities and the unincorporated areas of Los Angeles County. The LACoFD provides safety, fire and emergency medical services to the 4.1 million residents in the County, across 2,311 square miles.<sup>669</sup> The LACoFD is comprised of 177 fire stations, 288 engine companies, 112 paramedic units, 61 engines, 33 truck companies, 22 battalions and 10 helicopters. Specialized resources include four hazardous materials squads, six swift water rescue units, two urban search and rescue squads, and two fire boats. According to the LACoFD statistical summary, as of 2020, there were a total of 4,775 personnel employed across all divisions. The LACoFD service area is divided into three regions, North, Central and East. Within these regions there are 9 divisions and 22 battalions.

In addition to fire protection and management, the LACoFD also provides hazardous materials mitigation, search and rescue and emergency medical services. These services are provided through the following divisions: Fire Prevention, Health and Hazardous Materials, Forestry, Lifeguard and Air and Wildland Divisions.<sup>670</sup>

The LACoFD created a response time standard to ensure that adequate fire protection is available in each district. The following response times are outlined in the Los Angeles County General Plan EIR:

- **Urban Areas:** 5 minutes or less
- **Suburban Areas:** 8 minutes or less
- **Rural Areas:** 12 minutes or less

### 5.21.2 REGULATORY FRAMEWORK

National, state, regional, and local laws, regulations, plans, and guidelines are summarized in this section. The following regulatory framework discussion does not include all plans and policies that relate to wildfires in the District. Many site-specific projects have not been identified, and there may be local jurisdictional plans and policies that are applicable depending on the project site. Specific requirements of these laws, regulations, plans, and guidelines may be dated when a proposed site-specific school project is evaluated. Therefore, this section provides a general discussion of the most important plans and policies that apply to SUP-related projects. These regulatory programs are designed to reduce the danger that wildfires may pose to people and businesses as a result of emergencies and disasters. Although some of these may not directly apply to the SUP or site-specific projects implemented under the SUP, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD Standard Conditions are also listed.

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<sup>669</sup> LACoFD. 2020b. Health Hazardous Materials Division. 2020 Cal Fire Hazard Severity Zones. <https://gis.data.ca.gov/datasets/31219c833cb54598ba83d09fa0adb346>. Accessed April 2023.

<sup>670</sup> LACoFD. 2021. Los Angeles County Fire Department: Annual Report. Updated August 2021. [https://fire.lacounty.gov/wp-content/uploads/2022/08/LACoFD-2020-Annual-Report\\_Final\\_081722.pdf](https://fire.lacounty.gov/wp-content/uploads/2022/08/LACoFD-2020-Annual-Report_Final_081722.pdf). Accessed April 20, 2023.

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### 5.21.2.1 FEDERAL LAWS, REGULATIONS, AND POLICIES

#### *National Fire Protection Association*

The National Fire Protection Association (NFPA) is a non-profit organization with a mission to eliminate death, economic loss, and property damage from fire, electrical and associated hazards. The NFPA design, building and installation criteria includes 300 codes and standards which enact to minimize the risk of fire incidents.

NFPA 1710, Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, establishes a recommended response time for dispatched incidents. NFPA recommends that fire departments respond to emergency calls within 6 minutes of receiving the call, 90% of the time.

### 5.21.2.2 STATE LAWS, REGULATIONS, AND POLICIES

#### *California Health and Safety Code (Section 13000 et seq.)*

Section 13000 et seq. of the California Health and Safety Code outlines state fire regulations such as building standards, fire notification systems, fire protection devices (extinguishers and smoke alarms), high-rise building standards, and childcare facilities standards. All state-occupied buildings, state owned buildings and state institutions must comply with these regulations and building standards. The State Fire Marshall is responsible for enforcing the regulations and standards outlined in Section 13000 et seq. of the California Health and Safety Code.

#### *California State Responsibility Area Fire Safe Regulations (Title 14 Natural Resources, Department of Forestry and Fire Protection)*

Title 14, also known as the State Responsibility Area Fire Safe Regulations, was amended by the California Board of Forestry and Fire Protection in 2020. Title 14 establishes minimum wildfire protection to support building and development in State Responsibility Areas. These measures require sufficient emergency access, sufficient and accessible water supply for containing fires, clear building signage and numbering, and vegetation modification to reduce fire risk.

#### *2022 California Fire Code*

The California Fire Code is contained within Title 24, Chapter 9 of the California Code of Regulations. Based on the International Fire Code, the California Fire Code is created by the California Buildings Standards Commission and regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. Similar to the International Fire Code, the California Fire Code (CFC), and the CBC use a hazards classification system to determine the appropriate measures to incorporate to protect life and property. Section 1206 of the California Fire Code outlines provisions for applicable stationary and mobile energy storage systems, including threshold quantities. The California Public Resources Code includes fire safety provisions applicable to either mountainous, forest, brush, and/or grass covered lands deemed necessary by the director or agency with

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primary responsibility for fire protection in the area.<sup>671</sup> During the fire hazard season, these regulations restrict the use of equipment that may produce a spark, flame, or fire; require the use of spark arrestors on equipment that has an internal combustion engine; specify requirements for the safe use of gasoline-powered tools in fire hazard areas; and specify fire suppression equipment that must be provided on-site for various types of work in fire-prone areas. Additional codes provided in Public Resources Code Sections 4294–4296 require that any person who owns, controls, operates, or maintains any electrical transmission or distribution line upon any mountainous land, or in forest-covered land, brush-covered land, or grass-covered land shall, during such times and in such areas as are determined to be necessary by the director or the agency which has primary responsibility for the fire protection of such areas, and maintain a firebreak clearing around and adjacent to any pole, tower, and conductors that carry electric current as specified in Public Resources Code Sections 4292 and 4293. The state's Fire Prevention Standards for Electric Utilities (14 CCR Sections 1250–1258) provide specific exemptions from electric pole and tower firebreak and electric conductor clearance standards and specifies when and where standards apply.

Requirements in the CFC are for building and equipment design, such as fire-rated construction, alarm systems, sprinkler systems, and means of egress; requirements for specific land uses, including airports, dry cleaners, gas stations, and automotive service businesses; hazardous materials; fire flow requirements; and fire hydrant spacing. The CFC is updated on a three-year cycle with the current 2022 CFC was updated in January 2023.

### *California Code of Regulations, Title 24, Part 2*

Current law states that every local agency enforcing building regulations, such as cities and counties, must adopt the provisions of the CBC within 180 days of its publication date, which is established by the California Building Standards Commission. The most recent building standard adopted by the legislature and used throughout the state is the 2013 version of the CBC, often with local, more restrictive amendments that are based on local geographic, topographic, or climatic conditions. The CBC includes requirements for fire and smoke protection features, fire protection systems, and means of egress.<sup>672</sup>

Requirements for structures in Fire Hazard Severity Zones are in Chapter 7A of the California Building Code, “Materials and Construction Methods for Exterior Wildfire Exposure,” and Chapter 49 of the California Fire Code, “Requirements for Wildland-Urban Interface Fire Areas.” Requirements in these two chapters cover roofing; attic ventilation; exterior walls; exterior windows and glazing; exterior doors; decking; protection of underfloor, appendages, and floor projections; and ancillary structures.<sup>673</sup>

### *CA Govt Code § 51182 (2017)*

(a) A person who owns, leases, controls, operates, or maintains an occupied dwelling or occupied structure in, upon, or adjoining a mountainous area, forest-covered land, brush-covered land, grass-covered land, or land

<sup>671</sup> <https://law.justia.com/codes/california/2021/code-prc/division-4/part-2/chapter-3/section-4291/>. Accessed June 9, 2023

<sup>672</sup> <https://www.dgs.ca.gov/BSC/Codes>. Accessed June 9, 2023.

<sup>673</sup> <https://up.codes/viewer/california/ca-fire-code-2022/chapter/49/requirements-for-wildland-urban-interface-fire-areas#49>. Accessed June 9, 2023

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that is covered with flammable material, which area or land is within a very high fire hazard severity zone designated by the local agency pursuant to Section 51179, shall at all times do all of the following:

(1) Maintain defensible space of 100 feet from each side and from the front and rear of the structure, but not beyond the property line except as provided in paragraph (2). The amount of fuel modification necessary shall take into account the flammability of the structure as affected by building material, building standards, location, and type of vegetation. Fuels shall be maintained in a condition so that a wildfire burning under average weather conditions would be unlikely to ignite the structure. This paragraph does not apply to single specimens of trees or other vegetation that are well-pruned and maintained so as to effectively manage fuels and not form a means of rapidly transmitting fire from other nearby vegetation to a structure or from a structure to other nearby vegetation. The intensity of fuels management may vary within the 100-foot perimeter of the structure, the most intense being within the first 30 feet around the structure. Consistent with fuels management objectives, steps should be taken to minimize erosion.

(2) A greater distance than that required under paragraph (1) may be required by state law, local ordinance, rule, or regulation. Clearance beyond the property line may only be required if the state law, local ordinance, rule, or regulation includes findings that the clearing is necessary to significantly reduce the risk of transmission of flame or heat sufficient to ignite the structure, and there is no other feasible mitigation measure possible to reduce the risk of ignition or spread of wildfire to the structure. Clearance on adjacent property shall only be conducted following written consent by the adjacent landowner.

(3) An insurance company that insures an occupied dwelling or occupied structure may require a greater distance than that required under paragraph (1) if a fire expert, designated by the fire chief or fire official from the authority having jurisdiction, provides findings that the clearing is necessary to significantly reduce the risk of transmission of flame or heat sufficient to ignite the structure, and there is no other feasible mitigation measure possible to reduce the risk of ignition or spread of wildfire to the structure. The greater distance may not be beyond the property line unless allowed by state law, local ordinance, rule, or regulation.

(4) Remove that portion of a tree that extends within 10 feet of the outlet of a chimney or stovepipe.

(5) Maintain a tree, shrub, or other plant adjacent to or overhanging a building free of dead or dying wood.

(6) Maintain the roof of a structure free of leaves, needles, or other vegetative materials.

(7) Prior to constructing a new dwelling or structure that will be occupied or rebuilding an occupied dwelling or occupied structure damaged by a fire in that zone, the construction or rebuilding of which requires a building permit, the owner shall obtain a certification from the local building official that the dwelling or structure, as proposed to be built, complies with all applicable state and local building standards, including those described in subdivision (b) of Section 51189, and shall provide a copy of the certification, upon request, to the insurer providing course of construction insurance coverage for the building or structure. Upon completion of the construction or rebuilding, the owner shall obtain from the local building official, a copy of the final inspection report that demonstrates that the dwelling or structure was constructed in compliance with all applicable state and local building standards, including those described in subdivision (b) of Section 51189, and shall provide a copy of the report, upon request, to the property insurance carrier that insures the dwelling or structure.



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(b) A person is not required under this section to manage fuels on land if that person does not have the legal right to manage fuels, nor is a person required to enter upon or to alter property that is owned by any other person without the consent of the owner of the property.

(c) The Department of Forestry and Fire Protection shall develop, periodically update, and post on its Internet Web site a guidance document on fuels management pursuant to this chapter. Guidance shall include, but not be limited to, regionally appropriate vegetation management suggestions that preserve and restore native species, minimize erosion, minimize water consumption, and permit trees near homes for shade, aesthetics, and habitat; and suggestions to minimize or eliminate the risk of flammability of nonvegetative sources of combustion such as woodpiles, propane tanks, decks, and outdoor lawn furniture.

### 5.21.2.3 REGIONAL LAWS, REGULATIONS, AND POLICIES

There are no regional laws, regulations, and/or policies that are specifically applicable to wildfire. See below for a discussion of the local laws, regulations, and policies.

#### Los Angeles County Fire Department (LACoFD) Forestry Fuel Modification

The LACoFD Fuel Modification Unit is responsible for the approval of a landscape plan for structures located in the Fire Hazard Severity Zones. The process of approval consists of reviewing aspects such as structure location and type of construction, topography, slope, amount and arrangement of vegetation and overall site settings. Our objective through this approval plan process is to create defensible space necessary for effective fire protection of homes in the Fire Hazard Severity Zones. Fuel modification plans for projects located within the Coastal Zone require a Coastal Development Permit.

### 5.21.2.4 LOCAL LAWS, REGULATIONS, AND POLICIES

#### *Los Angeles County General Plan*

The following goals and policies from the Safety Element of the General Plan are relevant to Wildfire:

***Goal S 4: An effective regulatory system that prevents or minimizes personal injury, loss of life, and property damage due to fire hazards.***

**Policy S 4.4:** Reduce the risk of wildland fire hazards through meeting minimum State and local regulations for fire-resistant building materials, vegetation management, fuel modification, and other fire hazard reduction programs.

**Policy S 4.8:** Support the retrofitting of existing structures in FHSZs to meet current safety regulations, such as the building and fire code, to help reduce the risk of structural and human loss due to wildfire.

**Policy S 4.12:** Support efforts to incorporate systematic fire protection improvements for open space, including facilitation of safe fire suppression tactics, standards for adequate access for firefighting, fire mitigation planning with landowners and other stakeholders, and water sources for fire suppression.

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**Policy S 4.15:** Encourage rebuilds and additions to comply with fire mitigation guidelines.

***Goal S 7: Effective County emergency response management capabilities.***

**Policy S 7.1:** Ensure that residents are protected from the public health consequences of natural or man-made disasters through increased readiness and response capabilities, risk communication, and the dissemination of public information.

**Policy S 7.2:** Support County emergency providers in reaching their response time goals.

**Policy S 7.3:** Coordinate with other County and public agencies, such as transportation agencies, and health care providers on emergency planning and response activities, and evacuation planning.

**Policy S 7.4:** Encourage the improvement of hazard prediction and early warning capabilities.

**Policy S 7.5:** Ensure that there are adequate resources, such as sheriff and fire services, for emergency response.

**Policy S 7.6:** Ensure that essential public facilities are maintained during natural disasters, such as flooding, wildfires, extreme temperature and precipitation events, drought, and power outages.

### ***Los Angeles County Code Regulations***

- Title 20, Utilities, Section 20.16.060. Fire flow and fire hydrant requirements, including in Very High Fire Hazard Severity Zones.
- Title 21, Subdivisions, Chapter 21.24, Part 1 Streets and access routes requirements, including fire apparatus access, and public evacuation.
- Title 21, Subdivisions, Section 21.24.220 Fire-protection access easements.
- Title 26, Building, Chapter 7A Materials and Construction Methods for Exterior Wildfire Exposure.
- Title 30, Residential, Section R337 Materials and Construction Methods for Exterior Wildfire Exposure.
- Title 32, Fire, Section 325 Clearance of brush and vegetative growth.
- Title 32, Fire, Section 503 Specifications for fire access roads in developed areas, including dimensions and markings.
- Title 32, Fire, Section 4907.1 Defensible space around structures in State Responsibility Areas, per Title 14, Section 1270 of the California Code of Regulations.
- Title 32, Fire, Sections 4908, 1117.2.1 Fuel modification.
- Title 32, Fire, Appendix B and Appendix C Fire flow requirements and fire hydrant locations.

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### *Los Angeles County Operational Area Emergency Response Plan*

Adopted in 2012, the Los Angeles County Operational Area Emergency Response Plan identifies how the emergency response plan aligns with other local, state, and federal authorities. It also identifies various emergency management phases, incident management systems, and includes operational priorities.

### *2021 LACoFD Strategic Plan*

As noted above, LACoFD has the responsibility as a CAL FIRE county contract to implement the State Strategic Fire Plan and functionally operates as a unit of CAL FIRE and is responsible for Strategic Fire Plan activities in the county. The 2021 LACoFD Strategic Plan includes three goals: emergency operations, public service, and organizational effectiveness. The 2021 LACoFD Strategic Plan includes goals related to analyzing the threat of wildfire to communities in the WUI, fuel reduction projects, developing battalion specific asset maps, strategies, and tactics, and identifying fire prevention strategies that are consistent with the County's land use planning strategies. LACoFD also support local Fire Safe Councils and work with communities to develop Community Wildfire Protection Plans.<sup>674</sup>

### *Los Angeles County: 2045 Climate Action Plan: Strategy 9: Conserve and Connect Wildlands and Working Lands*

Forests, chaparral shrublands, and wetlands serve as carbon sinks that can sequester carbon dioxide resulting from human activity. When these natural and working lands are converted to residential and other urbanized uses, that stored carbon dioxide is released into the atmosphere. Conserving and restoring these lands keeps carbon in the ground and provides a multitude of benefits, from maintaining biodiversity in the SEAs to preserving the character of the County's rural areas.<sup>675</sup>

**Measure A1: Conserve Forests, Woodlands, Shrublands, Grasslands, Desert, and other Carbon-Sequestering Wildlands and Working Lands.** The performance objectives of Measure A1 are to: (1) reduce the average annual amount of natural land converted for urbanized uses 25% by 2030 (53 hectares conserved annually), 50% by 2035 (106 hectares conserved annually), and 75% by 2045 (159 hectares conserved annually); (2) conserve and restore 2,000 acres of natural forest lands by 2030, 4,000 acres by 2035, and 6,000 acres by 2045; and (3) manage 10,000 acres of wildland for wildfire risk reduction and carbon stock savings by 2030, 20,000 acres by 2035, and 50,000 acres by 2045.

### 5.21.2.5 EMERGENCY RESPONSE PLANS

#### **City of Los Angeles**

The City of Los Angeles Emergency Management Department (EMD) is responsible for the coordination of Los Angeles' emergency planning, training, response, and recovery efforts in the midst of major disasters such as fires, floods, earthquakes, acts of terrorism, and major events in the city that require involvement by multiple

<sup>674</sup> Los Angeles County Fire Department 2021. Department Overview Booklet 2017-2021. [https://fire.lacounty.gov/wp-content/uploads/2021/09/Department-Overview-Booklet\\_single-pages\\_9.09.21-A.pdf](https://fire.lacounty.gov/wp-content/uploads/2021/09/Department-Overview-Booklet_single-pages_9.09.21-A.pdf). Accessed April 20, 2023.

<sup>675</sup> <https://planning.lacounty.gov/long-range-planning/climate-action-plan/documents/>.

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city departments. EMD maintains the city's emergency operations master plan and local hazard mitigation plan. EMD also operates the city's emergency operations center.

### Los Angeles County

All cities within the District are member jurisdictions of the Los Angeles County Operational Area. The Los Angeles County OEM maintains the Los Angeles County Operational Area Emergency Response Plan and the County of Los Angeles All-Hazard Mitigation Plan. OEM leads and coordinates disaster plans and disaster preparedness exercises for all cities and 288 special districts in the County, including the LAUSD.<sup>676</sup>

### LAUSD Emergency Operations Plan

OEHS manages four District EOCs; responds to District emergency response situations (e.g., hazardous materials, fires, chemical spills, sewer overflows, vandalism); provides emergency response training; coordinates the District emergency response equipment inventory; responds to catastrophic emergencies; liaises with local, state, and federal emergency management agencies; communicates with District executive management during large-scale emergencies; and conducts post-event analyses of District response activities. OEHS staff work with School Operations and School Police to ensure that required District emergency response/management processes are in place and functional. Day-to-day emergency preparedness and response planning and coordination are overseen by LAUSD's Office of Emergency Services.

The LAUSD has developed a district-wide Emergency Operations Plan that addresses the District's responsibilities in emergencies associated with natural disaster, human-caused emergencies, and technological incidents.<sup>677</sup> The EOP provides a framework for coordination of responses and recovery efforts within the District in coordination with local, state, and federal agencies. It also establishes an emergency organization to direct and control operations at all sites during a period of emergency by assigning responsibilities to specific personnel. The EOP meets the requirements of Los Angeles County's policies on emergency response and planning and the Standardized Emergency Management System (SEMS) operations area response.

District schools are required to comply with California Education Code Sections 32281-32289 associated with the preparation of SSPs to address violence prevention, student wellness, emergency preparedness, traffic safety, and crisis intervention.<sup>678</sup> The District has developed an SSP model plan and guidelines to assist individual schools in the development of their individual SSPs.<sup>679</sup> The purpose of the model plan is to standardize SSPs throughout the District and minimize the time required for annual updates. The District also developed an emergency response protocol for use in the event of an emergency on a District site during renovation or modification work performed by a contractor. The protocol is a supplement to the contractor's

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<sup>676</sup> County of Los Angeles. Los Angeles County Operational Area Emergency Response Plan. <https://ceo.lacounty.gov/emergency-management/>. Accessed April 20, 2023.

<sup>677</sup> LAUSD Emergency Operations Plan 2022. <https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/318/EOP%20LAUSD%202022%20FINAL%206.7.22.pdf>. Accessed April 21, 2023.

<sup>678</sup> CDE. 2023. Comprehensive School Safety Plans. <https://www.cde.ca.gov/ls/ss/vp/cssp.asp>. Accessed April 21, 2023.

<sup>679</sup> LAUSD OEHS Integrated Safe School Plans Update for 2022-2023. <https://achieve.lausd.net/issp>. Accessed April 21, 2023.

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emergency response plan. Finally, safety procedures are in place for specific school activities and conditions, such as school laboratories<sup>680</sup> and methane safety.

### 5.21.3 LAUSD Standard Conditions of Approval

- Numerous LAUSD Standard Conditions are listed and referenced throughout this chapter of the Subsequent Program EIR. Those of particular importance or relevance are itemized below.  
SC-WF-1: Reduction of Wildfire Hazards: Projects located within a Fire Hazard Severity Zone shall comply with local brush clearance requirements. Specific brush clearance activities include, but are not limited to, the following:
  - Maintain Defensible Space. Maintain around and adjacent to any building or structure defensible space by removing and clearing away, for a distance of not less than 100 feet on each side thereof or to the property line, whichever is nearer, all flammable vegetation or other combustible growth. This does not apply to ornamental shrubbery or similar plants that are used as groundcover that do not readily support ignition of fire, and if they do not form a means of rapidly transmitting fire from the growth to any building or structure. A greater distance may be required by state law, local ordinance, rule, or regulation.
  - Remove that portion of any tree that extends within 10 feet of the outlet of any chimney or stovepipe. Trees shall be permitted within the defensible space provided that the horizontal distance between the crowns of adjacent trees is not less than 10 feet. Tree crowns extending to within 10 feet of any structure shall be pruned to maintain a minimum horizontal clearance of 10 feet. Tree crowns within the defensible space shall be pruned to remove limbs located less than 6 feet above the ground surface.
  - Deadwood and litter shall be regularly removed from trees. Maintain any tree adjacent to or overhanging any building free of dead or dying wood.
  - Maintain the roof of any structure free of leaves, needles, or other dead vegetative growth.
  - Provide and maintain at all times a screen over the outlet of every chimney or stovepipe that is attached to any fireplace, stove, or other device that burns any solid or liquid fuel. The screen shall be constructed of nonflammable material with openings of not more than 1/2 inch in size.<sup>681</sup>
- SC-WF-2 Preparation of Fuel Modification Plan for Projects in Fire Hazard Severity Zones. Fuel modification plans shall be prepared for development projects within areas designated as a Fire Hazard Severity Zone within the State Responsibility Areas or Very High Fire Hazard Severity Zone within the Local Responsibility Areas, as described in Title 32, Fire Code. The fuel modification plans are subject to approval by the local authority having jurisdiction and to identify specific zones within a property that are required to fuel modification. A fuel modification zone is an area of land where combustible native or

<sup>680</sup> LAUSD OEHS School Laboratory Chemical Hygiene & Safety Plan. <https://achieve.lausd.net/Page/2797>. Accessed April 21, 2023.

<sup>681</sup> California Government Code 51182.

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ornamental vegetation has been modified and/or partially or totally replaced with drought-tolerant, low-fuel-volume plants.<sup>682</sup>

- SC-PS-1: Prior to new construction or changes in campus traffic circulation. If necessary, LAUSD shall:
  - 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.

This table lists the public service related standard conditions that will be included as part of each SUP-related project, as appropriate.

**Table 5.21-1**

Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
SC-WF-1	Wildland Fires	Location within FHSZ	Prior to construction, maintenance	<p>Reduction of Wildfire Hazards: Projects located within a Fire Hazard Severity Zone shall comply with local brush clearance requirements. Specific brush clearance activities include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>• Maintain Defensible Space. Maintain around and adjacent to any building or structure defensible space by removing and clearing away, for a distance of not less than 100 feet on each side thereof or to the property line, whichever is nearer, all flammable vegetation or other combustible growth. This does not apply to ornamental shrubbery or similar plants that are used as groundcover that do not readily support ignition of fire, and if they do not form a means of rapidly transmitting fire from the growth to any building or structure. A greater distance may be required by state law, local ordinance, rule, or regulation.</li> <li>• Remove that portion of any tree that extends within 10 feet of the outlet of any chimney or stovepipe. Trees shall be permitted within the defensible space provided that the horizontal distance between the crowns of adjacent trees is not less than 10 feet. Tree crowns extending to within 10 feet of any structure shall be pruned to maintain a minimum horizontal clearance of 10</li> </ul>

<sup>682</sup> Los Angeles County General Plan Safety Element. [https://planning.lacounty.gov/wp-content/uploads/2022/11/12.1\\_gp\\_final-general-plan-ch12\\_updated\\_2022.pdf](https://planning.lacounty.gov/wp-content/uploads/2022/11/12.1_gp_final-general-plan-ch12_updated_2022.pdf). Accessed May 2023.

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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
				<p>feet. Tree crowns within the defensible space shall be pruned to remove limbs located less than 6 feet above the ground surface.</p> <ul style="list-style-type: none"> <li>• Deadwood and litter shall be regularly removed from trees. Maintain any tree adjacent to or overhanging any building free of dead or dying wood.</li> <li>• Maintain the roof of any structure free of leaves, needles, or other dead vegetative growth.</li> <li>• Provide and maintain at all times a screen over the outlet of every chimney or stovepipe that is attached to any fireplace, stove, or other device that burns any solid or liquid fuel. The screen shall be constructed of nonflammable material with openings of not more than ½ inch in size.</li> </ul>
SC-WF-2	Wildland Fires	Location within FHSZ	Prior to construction, maintenance	Preparation of Fuel Modification Plan for Projects in Fire Hazard Severity Zones. Fuel modification plans shall be prepared for development projects within areas designated as a Fire Hazard Severity Zone within the State Responsibility Areas or Very High Fire Hazard Severity Zone within the Local Responsibility Areas, as described in Title 32, Fire Code. The fuel modification plans are subject to approval by the local authority having jurisdiction and identify specific zones within a property that require fuel modification. A fuel modification zone is an area of land where combustible native or ornamental vegetation has been modified and/or partially or totally replaced with drought-tolerant, low-fuel-volume plants.
SC-PS-1	Emergency Protection Services	New building, new school, change in campus traffic circulation	Prior to construction (Pre-Construction)	LAUSD shall: 1) have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval; and 2) provide a full site plan for the local review, including all buildings, both existing and proposed, fences, drive gates, retaining walls, and other construction affecting emergency vehicle access, with unobstructed fire lanes for access indicated.
SC-PS-2	Emergency Preparedness & Response	Practice on a standard schedule during school operation & during emergencies or disaster situations	During school operation	<p>LAUSD shall implement emergency preparedness and response procedures in all schools as required in LAUSD References, Bulletins, Safety Notes, and Emergency Preparedness Plans.</p> <ul style="list-style-type: none"> <li>• REF-5803.2 - Emergency Drills and Procedures, August 26, 2013.</li> <li>• SAF: 30 - Emergency Response Protocol for LASUD Existing Facilities, March 2, 2007.</li> <li>• Emergency Operations Plan, updated April 2010.</li> <li>• BUL-6084.0 - Use of School Facilities in an Emergency or Disaster Situation, June 11, 2013.</li> <li>• REF-5511.2 - Safe School Plans Update for 2013-2014, August 15, 2013.</li> </ul>

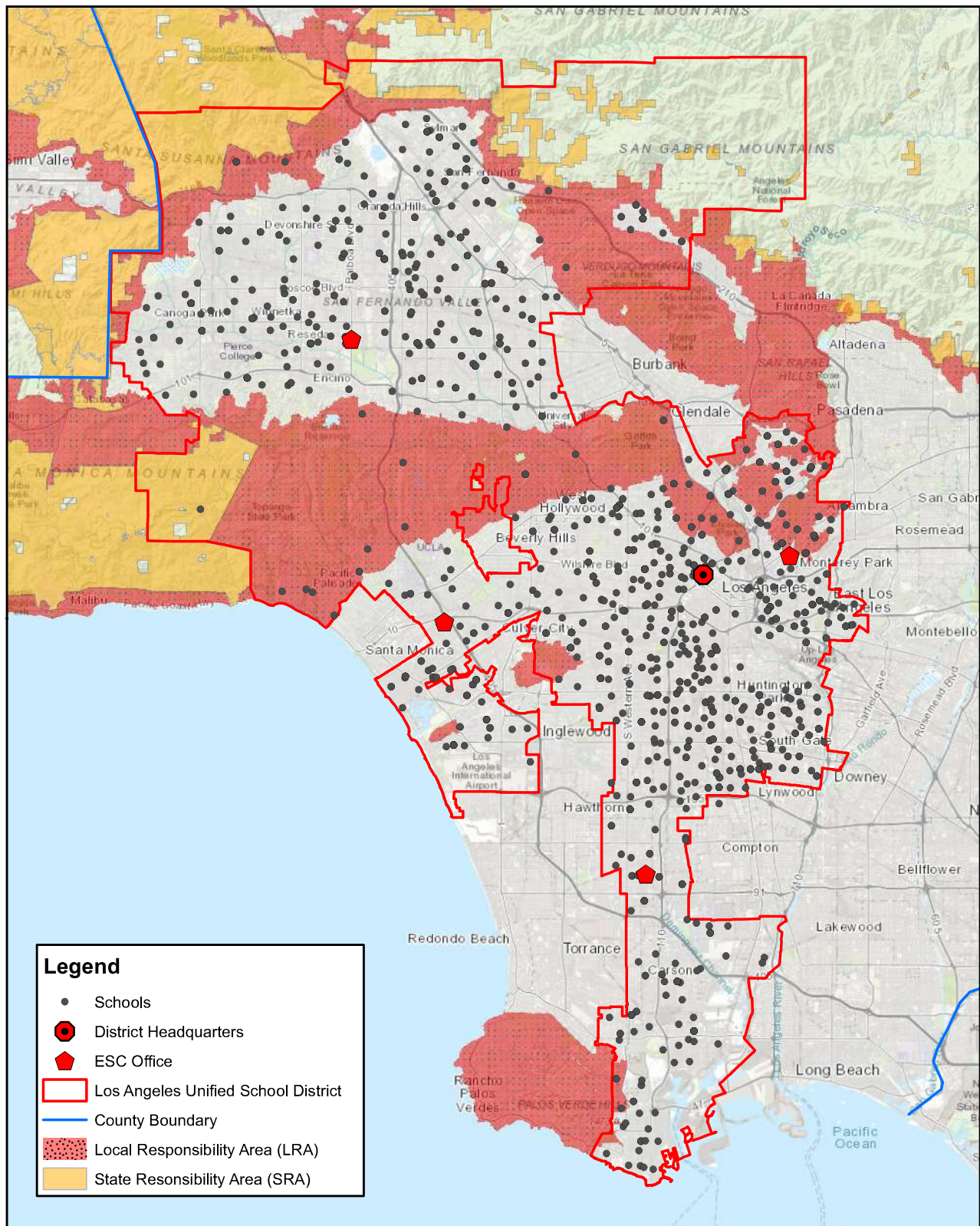
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Reference #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions
				<ul style="list-style-type: none"> <li>• BUL-5433.1 - District Emergency Response and Preparedness, March 8, 2013.</li> <li>• REF-5451.1 - School Site Emergency/Disaster Supplies, April 12, 2013.</li> <li>• REF-5451.2 - School Site Emergency/Disaster Supplies, August 15, 2016.</li> <li>• REF 5741.0 - Emergency Response – Communications and Response Actions, April 23, 2012.</li> <li>• Other LAUSD Emergency Preparedness Plans (as amended):</li> <li>• Earthquakes</li> <li>• Bio-Terrorism</li> <li>• Heavy Rain and Flooding</li> <li>• Disturbances/ Demonstrations</li> <li>• School Safety</li> <li>• West Nile Virus Precautions</li> <li>• Procedures for Reentry and Cleanup of Fire-Damaged Building</li> <li>• Disposal Procedures for Hazardous Waste and Universal Waste</li> </ul>



## 5. Environmental Analysis

Figure 5.21-1 Fire Hazard Severity Zones



Source: California Department of Forestry and Fire Protection - Fire and Resource Assessment Program (FRAP); 2018

0 3 6 Miles



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### 5.21.4 Existing Environmental Conditions

Risk and vulnerability to the LAUSD Planning Area from wildfire is of significant concern, with some areas of the District being at greater risk than others as shown on Figure 5.21-1. Potential losses from wildfire include human life for District staff and students; District facilities and other improvements; natural and cultural resources; and quality and quantity of water supplies. High fuel loads in some areas of the District, along with geographical and topographical features, create the potential for both natural and human-caused fires that can result in loss of life and property. These factors, combined with natural weather conditions common to the area, including periods of drought, high temperatures, low relative humidity, and periodic winds, can result in frequent and possibly catastrophic fires. Generally, fire season occurs from May to October. However, in recent years, wildfire season is more of a year-round event. The dry vegetation, high heat, and sometimes windy weather, combined with continued growth in the WUI areas, results in an increase in the number of ignitions. Any fire, once ignited, has the potential to quickly become a large, out-of-control fire.

In Los Angeles County, past wildfires have caused major damages to the County. The County has suffered loss of lives, loss of structures, loss of tax revenue, recreation and tourism, and high costs to battle fires. Wildfire smoke and air quality issues have also affected the District, resulting in school closures. Impacts associated with the loss of transportation and utility services may include traffic delays/detours from road and bridge closures and loss of electric power, potable water, and wastewater services. This could cause closing of school facilities and difficulties for staff and students to be transported to and from schools. Fires can also cause major damage to power plants and power lines needed to distribute electricity to operate facilities.

#### 5.21.4.1 Fire Hazard Severity Areas

Fire Hazard Severity Areas in Los Angeles County are designated by the California Department of Forestry and Fire Prevention and in incorporated cities by the Los Angeles County Fire Department. Fire hazard severity zone levels range from moderate to very high. Fire hazard severity zones are designated in three types of areas based on what level of government is financially responsible for preventing and suppressing wildfires:

- **Federal Responsibility Areas:** The federal government is financially responsible for wildfire suppression. Within the District, the Angeles National Forest and federal land in the Santa Monica Mountains National Recreation Area are federal responsibility areas.
- **State Responsibility Areas:** The state is financially responsible for wildfire suppression. Within the District, state responsibility areas are in outlying areas such as the Santa Susana Mountains, foothills of the San Gabriel Mountains, and parts of the Santa Monica Mountains.
- **Local Responsibility Areas:** Cities or Los Angeles County are financially responsible for wildfire suppression. Local responsibility areas in the District are along foothills of the Santa Susana and San Gabriel Mountains, and in the Verdugo Mountains, Santa Monica Mountains, Hollywood Hills, San Rafael Hills, Puente Hills, and in other hills in the central Los Angeles area (see Figure 5.21-1, *Fire Hazard Severity Zones*).

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As part of the Fire and Resource Assessment Program (FRAP), CAL FIRE was mandated to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. These zones, referred to as FHSZs, then define the application of various mitigation strategies to reduce risk associated with wildland fires.

In 2022, CAL FIRE updated its FHSZ maps for the State of California to provide updated map zones, based on new data, science, and technology that will create more accurate zone designations such that mitigation strategies are implemented in areas where hazards warrant these investments. The zones provide specific designation for application of defensible space and building standards consistent with known mechanisms of fire risk to people, property, and natural resources. The program is still ongoing with fire hazard severity zone maps being updated based on designated responsibility areas: Federal Responsibility Area (FRA), State Responsibility Area (SRA), and Local Responsibility Area (LRA).

LAUSD schools within the Fire Hazard Severity Zones are shown in Figure 5.21-1. One school, Topanga Elementary, is within the SRA, while 45 other schools are within the LRA Table 5.21-2 lists the schools that are in FHSZs.

**Table 5.21-2**

School in FHSZs	Fire Responsibility
Topanga El	SRA
Franklin El	LRA
Glen Alta El	LRA
Arroyo Seco Museum Science Magnet	LRA
Huntington Dr El	LRA
Roscomare El	LRA
San Pascual El	LRA
Solano El	LRA
Valley View El	LRA
Crestwood St El	LRA
Delevan Drive El	LRA
El Sereno El	LRA
Elysian Heights El	LRA
Farmdale El	LRA
Wilson Sh	LRA
Mayberry El	LRA
Porter Ranch Community School	LRA
Aldama El	LRA
Micheltorena El	LRA
Lincoln Sh	LRA
Marshall Sh	LRA
Zoo Magnet	LRA

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School in FHSZs	Fire Responsibility
Palisades Charter Hs	LRA
Eagle Rock Sh	LRA
Community Magnet	LRA
Canyon El	LRA
Carpenter El	LRA
Castlebay Ln El	LRA
Wonderland El	LRA
Ivanhoe El	LRA
Kenter Canyon El	LRA
Lanai El	LRA
Revere Ms	LRA
Dodson Ms	LRA
El Sereno Ms	LRA
Vinedale El	LRA
Marquez El	LRA
Mt Washington El	LRA
Pacific Palisades El	LRA
Clifford El	LRA
Annandale El	LRA
Brainard El	LRA
Bushnell Way El	LRA
Allesandro El	LRA
Latona El	LRA

Fire protection agencies in the District are listed in Table 5.15-1.

**Table 5.15-1 Fire Protection by Jurisdiction**

LAUSD Regions	Jurisdictions	Fire Departments
Portions of North, West, East, and South	City of Los Angeles	Los Angeles Fire Department
North	City of San Fernando	Los Angeles Fire Department
West	City of Gardena	Los Angeles County Fire Department
	City of West Hollywood	
	City of Hawthorne	
	City of Inglewood	
	Unincorporated Los Angeles County: Marina Del Rey	
East	City of Santa Monica	Santa Monica Fire Department
	City of Beverly Hills	Beverly Hills Fire Department
	City of El Segundo	El Segundo Fire Department
	City of Bell City of Bell Gardens	Los Angeles County Fire Department

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LAUSD Regions	Jurisdictions	Fire Departments
	City of Commerce City of Cudahy City of Huntington Park City of Lynwood City of Maywood City of South Gate Unincorporated Los Angeles County: East Los Angeles	
	City of Downey	Downey Fire Department
	City of Monterey Park	Monterey Park Fire Department
	City of Montebello	Montebello Fire Department
	City of Vernon	Vernon Fire Department
South	Unincorporated Los Angeles County communities of: - Willowbrook - Florence-Graham - West Carson - West Rancho Dominguez	Los Angeles County Fire Department
	City of Long Beach	Long Beach Fire Department
	City of Rancho Palos Verdes	
	City of Torrance	Torrance Fire Department

Sources:

LACoFD. Fire Station Locator. <http://lafd.org/fire-stations/station-results>.

SMFD. <http://santamonicafire.org/>.

BHFD. <http://www.beverlyhills.org/citygovernment/departments/firedepartment/>.

El Segundo Fire Department. <http://www.elsegundo.org/depts/fire/>.

Monterey Park Fire Department. <http://www.ci.monterey-park.ca.us/>.

Montebello Fire Department. <http://www.cityofmontebello.com/depts/fire/>.

Downey Fire Department. <https://www.downeyca.org/our-city/departments/emergency-preparedness>.

Vernon Fire Department. <https://www.vernon.ca/homes-building/fire-safety>.

Long Beach Fire Department. <http://www.longbeach.gov/fire/>.

Torrance Fire Department. <https://www.torranceca.gov/our-city/fire>.

### 5.21.5 Thresholds of Significance

According to CEQA Guidelines (14 CCR Sections 15000–15387, Appendix G) and CEQA Statute (PRC Section 21151.8), if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, a project would normally have a significant effect on the environment if it would:

#### 5.21.5.1 CEQA GUIDELINES THRESHOLDS

- WF-1 Substantially impair an adopted emergency response plan or emergency evacuation plan.
- WF-2 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.
- WF-3 Require the installation or maintenance 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.

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WF-4 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.

### 5.21.6 Environmental Impacts

Many site-specific school upgrade projects have not been scoped at this time, and an evaluation of site-specific wildfire risk is not feasible. Each future school project would require a site-specific analysis considering wildfire risks during CEQA review. Moreover, because the SUP will be implemented over the course of several years, a detailed description of site-specific risks could become obsolete over time as response resources are added and removed.

The LAUSD Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects will be applied on a project specific level to ensure consideration of wildfire risks during design and development.

The applicable thresholds are identified in brackets after the impact statement.

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**IMPACT 5.21-1: SUP-related projects would not substantially impair an adopted emergency response plan or emergency evacuation plan. [Threshold WF-1]**

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#### New Construction on New Properties

The Project consists of the SUP Update and Measure RR Implementation Plan for which no new construction is proposed as part of implementing the plan. The SUP is not anticipated to include the acquisition of new sites for the construction of “stand alone” schools. However, some projects developed under the SUP may incorporate the acquisition of property, thus expanding an existing campus. The enrollment in LAUSD schools is not likely to increase in the foreseeable future (see Section 5.15 *Population and Housing*), and projects will focus on modernizing and upgrading existing facilities. The SUP Update and Measure RR Implementation Plan outline no potential projects that would affect emergency response plans or emergency evacuation plans in the LAUSD service area. Instead, the types of projects that would be carried out under the SUP would be developed in full compliance and under jurisdictions with existing emergency response and evacuation plans and established firefighting infrastructure.

The majority of school sites are located along commercial corridors, and are within the LACoFD service area, and LRA, as illustrated in Figure 5.21-1. Projects would concentrate any potential development efforts in urban and suburban areas, at or near existing school sites serving urban and suburban communities. However, some schools are located in WUI zones, including two outdoor education centers run by LAUSD at Clear Creek and Canyon Creek outdoor education centers. As shown in Figure 5.21-1, 45 school sites are within the FHSZs. These sites are at higher risk of wildfire. However, as described in Section 5.2 Agriculture and Forestry, there are no forest lands on LAUSD campus sites. Standard conditions SC-WF-1 and SC-WF-2, would reduce wildfire risk and ensure that SUP related projects do not impair response or evacuation in the area.

LAUSD schools serve the urban and suburban communities of which they are a part, and enrollment is expected to decline based on demographic trends. Any new construction would most likely occur on school



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sites to modernize or upgrade the systems that are in place. The District is also required to make sure all designs conform to the methods of the current School Design Guide and to ensure compatibility with local plans, policies and regulations related to wildfire risk. Any potential new construction is not likely to increase wildfire risks through the increased intensity of use or infrastructure since enrollment is not expected to increase. Additionally, any potential new construction would incorporate SC-PS-1 to have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval; and 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.

Impacts to emergency response or evacuation plans would remain less than significant.

### **New Construction and Modernization on Existing Campus**

As depicted in Figure 5.21-1, Fire Hazard Severity Zones, some school site areas are located in FHSZs. The schools within the FHSZs are listed in Table 5.21-2. In addition to the sites shown on Figure 5-21-1, LAUSD operates Clear Creek and Canyon Creek Outdoor Education Centers, located in northern Los Angeles County. These sites, located in WUI areas, are more vulnerable to wildland fires and would follow SC-WF-1 and SC-WF-2 to reduce wildland fire risk and modify onsite fuel sources according to best practices for wildfire risk avoidance.

Any potential new construction and modernizations of existing campuses associated with implementation of the Project would be required to coordinate among various County departments, to ensure adequate emergency response. As explained in Regulatory Setting, OEM is responsible for organizing and directing the preparedness efforts of the emergency management organization of the County. The OEM is the day-to-day Los Angeles County Operational Area coordinator. The emergency response plan for the LAUSD service area is the Operational Area Emergency Response Plan, which is prepared by OEM. The Operational Area Emergency Response Plan strengthens short- and long-term emergency response and recovery capability and identifies emergency procedures and emergency management routes in the County.<sup>683</sup>

Any future development would be required to comply with applicable federal, state, and local regulations related to emergency response and wildland fires. Required compliance with these regulations would ensure impacts related to emergency response and wildfire would be less than significant. In addition to aspects of the existing regulatory framework that would lessen potential impacts of the Project on emergency response, a number of goals and policies in the County's General Plan, listed in Regulatory Setting (specifically Goal S 4 and Policies S 4.1, S 4.2, S 4.3, S 4.4, S 4.5 and S 4.6), would also serve to minimize potential impacts to emergency response.

### **Operational and Other Campus Changes**

Approval of the Project itself, would not change any emergency response regulations and would not provide any goals, policies, or programs that would significantly impact emergency response and/or evacuation. With

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<sup>683</sup> Office of Emergency Management Emergency Response. <https://ceo.lacounty.gov/emergency-management/>. Accessed April 19, 2023.



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incorporation of 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.

No impacts from operational or other campus changes that would impair an adopted emergency response plan or emergency evacuation plan would occur.

### All SUP Projects

The existing regulatory setting, the goals and policies contained in the General Plan, and general urban location of the areas where Project related changes or development are likely to occur, would ensure that potential impacts to emergency response associated with implementation of the Project would be less than significant. Furthermore, incorporation of SCs SC-WF-1, SC-WF-2, SC-PS-1 and SC-PS-2 would ensure that adequate procedures and interagency coordination are in place to avoid increase risks or impairment of emergency response or evacuation plans.

Therefore, impacts to an adopted emergency response plan or emergency evacuation plan would be less than significant. No mitigation is required.

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**IMPACT 5.21-2: SUP-related projects would not 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 wildfire. [Threshold WF-2]**

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### New Construction on New Properties

The majority of school sites are located along commercial corridors, and are covered in the LACoFD service area, and Local Responsibility Area, as shown in Figure 5.21-1. As shown, the Project would concentrate any potential development efforts in urban and suburban areas, at or near existing school sites serving urban and suburban communities. However, as shown in Figure 5.21-1, 45 school sites are within the FHSZs. Schools most at risk are in the WUI zones. Additionally, the two outdoor education centers, Clear Creek and Canyon Creek outdoor education centers, are in areas of higher wildfire risk, and within FHSZs. The schools within FHSZs are clustered near the foothills of the San Gabriel Mountains, the Santa Susanna Mountains and the Santa Monica Mountains, or WUI zones within or abutting the Angeles National Forest. Topanga Elementary School is located between Topanga State Park and the Santa Mountains National Recreation Area and is the only school within a SRA. The Woolsey Fire of 2018 burned across the Santa Monica Mountains just to the west, and the Old Topanga fire of 1993 burned through the hills to the east of Topanga Elementary School. Other schools within or near FHSZs to the north near the Santa Susanna mountains have seen fires as recent as the 2019 Saddle Ridge fire and 2008 Sayre, and 2008 Sesnon fires. Schools to the east, near the San Gabriel Mountains, are also at higher risks. In 2017, the Creek fire burned through the San Gabriel Mountains. Griffith Park suffered a wildfire in 2007. However, as described in Section 5.2 Agriculture and Forestry, there are no forest lands on LAUSD campus sites or adjacent.

Schools are subject to LAUSD School Design Guidelines and Design Standards. Topanga Elementary School and other school sites in hilly areas with more vegetation and WUI areas, or areas that have high fuel loads, would need to assess wildfire risk on a site-specific basis. Although wildfire risk in the area is higher than other

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areas of the District, risk would be minimized to the extent feasible for the area. Any new construction would occur on school sites that would be under an existing fire service plan and would be in conformance with relevant laws, regulations, policies and SCs that reduce fire risk. Each new construction project would need to be evaluated on site-specific basis to evaluate the potential wildfire risks associated with that site, including the potential to expose occupants to pollutant concentrations as a result of wildfire. Any potential new construction would incorporate SC-PS-1 to have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval; and 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.

Impacts to emergency response or evacuation plans would remain less than significant.

### **New Construction and Modernization on Existing Campus**

As depicted in Figure 5.21-1, Fire Hazard Severity Zones, some school site areas are located in FHSZs. The schools within the FHSZs are listed in Table 5.21-2. In addition to the sites shown on Figure 5-21-1, LAUSD operates Clear Creek and Canyon Creek Outdoor Education Centers, located in northern Los Angeles County. These sites, located in WUI areas, are more vulnerable to wildland fires.

New construction would be completed to modernize or upgrade the systems that are in place. Any potential new construction or modernization efforts associated with implementation of the Project would be required to coordinate among various County departments, to ensure adequate emergency response. As explained in Regulatory Setting, OEM is responsible for organizing and directing the preparedness efforts of the emergency management organization of the County. The OEM is the day-to-day Los Angeles County Operational Area coordinator. The emergency response plan for the LAUSD service area is the Operational Area Emergency Response Plan, which is prepared by OEM. The Operational Area Emergency Response Plan strengthens short- and long-term emergency response and recovery capability and identifies emergency procedures and emergency management routes in the County.<sup>684</sup>

Any future development would be required to comply with applicable federal, state, and local regulations related to emergency response and wildland fires. Required compliance with these regulations would ensure impacts related to emergency response and wildfire would be less than significant. In addition to aspects of the existing regulatory framework that would lessen potential impacts of the Project on emergency response, a number of goals and policies in the County's General Plan, listed in Regulatory Setting (specifically Goal S 4 and Policies S 4.1, S 4.2, S 4.3, S 4.4, S 4.5 and S 4.6), would also serve to minimize potential impacts to emergency response.

### **Operational and Other Campus Changes**

Approval of the Project itself, would not exacerbate wildfire risks and would not provide any goals, policies, or programs that would significantly impact risks associated with wildfire. With incorporation of SC-PS-2,

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<sup>684</sup> Office of Emergency Management Emergency Response. <https://ceo.lacounty.gov/emergency-management/>. Accessed April 19, 2023.

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LAUSD shall implement emergency preparedness and response procedures in all schools as required in LAUSD References, Bulletins, Safety Notes, and Emergency Preparedness Plans.

No impacts that would increase risks associated with wildfire would occur.

### All SUP Projects

The existing regulatory setting, the goals and policies contained in the General Plan, and general urban location of the areas where Project related changes or development are likely to occur, would ensure that potential impacts to emergency response associated with implementation of the Project would be less than significant. Furthermore, incorporation of SC-WF-1 and SC-WF-2, SC-PS-1 and SC-PS-2 would ensure SUP related projects would not, 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 wildfire.

Therefore, impacts to wildfire risks would be less than significant. No mitigation is required.

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**IMPACT 5.21-3: SUP-related projects would not require the installation or maintenance 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. [Threshold WF-3]**

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### New Construction on New Properties

The SUP is not anticipated to include the acquisition of new sites for the construction of “stand alone” schools. However, some projects developed under the SUP may incorporate the acquisition of property, thus expanding an existing campus. Potential wildfire risks due to the installation and maintenance of infrastructure associated with potential future projects under the SUP Update would need to be evaluated on site specific basis. However, any potential new construction would incorporate SC-PS-1 to have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall’s final approval; and 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. Furthermore, any new construction would likely be carried out on existing school property, or as an expansion, and would be accounted for in local service plans and serviced by existing infrastructure.

Any potential new construction is not likely to increase wildfire risks through the increased intensity of use or infrastructure in the communities that they serve. Potential projects under the SUP would be located within existing schools or adjacent, embedded within the community, and connected to existing infrastructure and covered under local laws, regulations, policies and plans that account for the public school use at current enrollment levels.

With incorporation of SC-PS-1, impacts that exacerbate wildfire risks due to installation or maintenance of infrastructure would remain less than significant.

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### New Construction and Modernization on Existing Campus

The most likely forms of development outlined in the SUP Update include modernization or new construction on existing campuses. As shown in Figure 5.21-1, Fire Hazard Severity Zones, some school site areas of the LAUSD are located in FHSZs. The schools within the FHSZs are listed in Table 5.21-2. Any potential new construction associated with implementation of the Project would be required to coordinate among various County departments, to ensure adequate emergency response. As explained in Regulatory Setting, OEM is responsible for organizing and directing the preparedness efforts of the emergency management organization of the County. The OEM is the day-to-day Los Angeles County Operational Area coordinator. The emergency response plan for the LAUSD service area is the Operational Area Emergency Response Plan, which is prepared by OEM. The Operational Area Emergency Response Plan strengthens short- and long-term emergency response and recovery capability and identifies emergency procedures and emergency management routes in the County.<sup>685</sup>

Any future development would be required to comply with applicable federal, state, and local regulations related to emergency response and wildland fires. Required compliance with these regulations would ensure impacts related to the exacerbation of wildfire risks would be less than significant. Potential new construction would not require the installation or maintenance 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.

### Operational and Other Campus Changes

Approval of the Project itself, would not require any installation or maintenance of infrastructure and would not exacerbate wildfire risks. With incorporation of 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.

Any impacts that would require the installation or maintenance of associated that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment would remain less than significant.

### All SUP Projects

The existing regulatory setting, the goals and policies contained in the General Plan, and general urban location of the areas where Project related changes or development are likely to occur, would ensure that potential impacts to emergency response associated with implementation of the Project would be less than significant. Furthermore, incorporation of SC-WF-1 and SC-WF-2, SC-PS-1 and SC-PS-2 would ensure that any impacts that would require the installation or maintenance of associated that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment would remain less than significant.

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<sup>685</sup> Office of Emergency Management Emergency Response. <https://ceo.lacounty.gov/emergency-management/>. Accessed April 19, 2023.

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**IMPACT 5.21-4: SUP-related projects would not 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. [Threshold WF-4]**

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### New Construction on New Properties

Any new construction would take place on school sites and involve school related structures. Any potential new construction is not likely to include features that expose people to significant downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. However, each new construction project would need to be evaluated on site-specific basis to evaluate the potential risks associated with that site.

Any potential new construction would incorporate SC-PS-1 to have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval; and 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.

Impacts that would expose people or structures to significant risks, including downslope or downstream flooding or landslides, because of runoff, post-fire slope instability, or drainage changes would remain less than significant.

### New Construction and Modernization on Existing Campus

As shown in Figure 5.21-1, Fire Hazard Severity Zones, some school site areas of the LAUSD are located in FHSZs. The schools within the FHSZs are listed in Table 5.21-2. Some of the schools most vulnerable to wildfires exist in the foothills of the Santa Monica Mountains, and Santa Susanna Mountains, areas that have experienced wildfires in recent history. While existing schools may be embedded in communities that experience higher levels of wildfire risk, they would not inherently expose people or structures to increased risks above other everyday activities within these communities near FHSZs. Each potential project would ensure this through the application of SC-PS-1 which ensures fire authority's oversight.

New construction would be completed to modernize or upgrade the systems that are in place. Any potential new construction or modernization efforts would be required to coordinate among various County and local departments, to ensure adequate emergency response. As explained in Regulatory Setting, OEM is responsible for organizing and directing the preparedness efforts of the emergency management organization of the County. The OEM is the day-to-day Los Angeles County Operational Area coordinator. The emergency response plan for the LAUSD service area is the Operational Area Emergency Response Plan, which is prepared by OEM. The Operational Area Emergency Response Plan strengthens short- and long-term emergency response and recovery capability and identifies emergency procedures and emergency management routes in the County.<sup>686</sup> LAUSD Office of Environmental Health and Safety is responsible for coordinating hazard mitigation and safety with OEM LA County.

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<sup>686</sup> Office of Emergency Management Emergency Response. <https://ceo.lacounty.gov/emergency-management/>. Accessed April 19, 2023.

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### Operational and Other Campus Changes

Approval of the Project itself, would not exacerbate wildfire risks and would not provide any goals, policies, or programs that would significantly impact risks associated with wildfire. With incorporation of 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.

No impacts that would 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 would occur.

### All SUP Projects

The existing regulatory setting, the goals and policies contained in the General Plan, and general urban location of the areas where Project related changes or development are likely to occur, would ensure that potential impacts to emergency response associated with implementation of the Project would be less than significant. Furthermore, incorporation of SC-WF-1 and SC-WF-2, SC-PS-1 and SC-PS-2 would ensure that SUP related projects would not 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.

Any future development would be required to comply with applicable federal, state, and local regulations related to emergency response and wildland fires. Required compliance with these regulations would ensure impacts related to emergency response and wildfire would be less than significant. In addition to aspects of the existing regulatory framework that would lessen potential impacts of the Project on emergency response, a number of goals and policies in the County's General Plan, listed in Regulatory Setting (specifically Goal S 4 and Policies S 4.1, S 4.2, S 4.3, S 4.4, S 4.5 and S 4.6), would also serve to minimize potential impacts that could 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.

Therefore, impacts that would expose people or structures to significant risks, including downslope or downstream flooding or landslides, because of runoff, post-fire slope instability, or drainage changes, would remain less than significant. No mitigation is required.

### 5.21.7 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standard Conditions listed above, the following impacts would be less than significant: Impacts 5.21-1, 5.21-2, 5.21-3, 5.21-4.

### 5.21.8 Mitigation Measures

No mitigation measures are required.

### 5.21.9 Level of Significance After Mitigation

Impacts would be less than significant.

## 6. Significant Unavoidable Adverse Impacts

# 6. Significant Unavoidable Adverse Impacts

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Chapter 1, *Executive Summary*, Table 1-1, summarizes the impacts and levels of significance. Even with federal, state, and local regulatory compliance, implementation of LAUSD Standard Conditions of Approval, and consideration of possible feasible mitigation measures (none were identified), the following impacts may not be feasibly mitigated to a level of insignificance; therefore, they are considered Significant Unavoidable Adverse Impacts.

## 6.1 AIR QUALITY

**Impact 5.3-2: Regional Construction Emissions.** Construction activities may generate short-term emissions that exceed the South Coast Air Quality Management District's regional significance thresholds and cumulatively contribute to the South Coast Air Basin nonattainment designations.

Compliance with SCAQMD regulations and LAUSD Standard Conditions would reduce criteria air pollutant emissions from construction-related activities. However, short-term emissions generated from future individual projects could still exceed the SCAQMD regional significance threshold criteria.

No additional measures have been identified that would further reduce criteria air pollutant emissions beyond the LAUSD Standard Conditions that are already incorporated into the SUP, and no feasible measures would guarantee a less than significant impact for all SUP-related projects. Therefore, Impact 5.3-2 is considered potentially significant and unavoidable.

**Impact 5.3-4: Local Construction Emissions.** Site-specific projects may generate short-term emissions that exceed SCAQMD's localized significance thresholds and expose sensitive receptors to substantial pollutant concentrations.

Compliance with SCAQMD regulations and LAUSD Standard Conditions would reduce criteria air pollutant emissions from construction-related activities. However, short-term onsite emissions generated from future individual projects could still exceed the SCAQMD localized significance threshold criteria, even after this reduction. No additional measures have been identified that would further reduce localized short-term construction emissions beyond the LAUSD Standard Conditions that are already incorporated into the SUP, and no feasible measures would guarantee a less than significant impact for all SUP-related projects. Therefore, Impact 5.3-4 is considered potentially significant and unavoidable.

## 6.2 CULTURAL RESOURCES

**Impact 5.5-1: Historical Resources.** SUP-related project implementation may substantially degrade the significance of historical resources.

## 6. Significant Unavoidable Adverse Impacts

Each project that may impact a historic resource will include implementation of SC-CUL-1 through SC-CUL-11 to reduce impacts from relocation, conversion, rehabilitation, alteration, damage, or demolition of a historic resource. LAUSD Standard Conditions would reduce historic resource impacts to the extent feasible; however, no mechanism for the full mitigation has been established. Even with the LAUSD Standard Conditions, impacts associated with the demolition or damage to a historic resource may be significant. Therefore, Impact 5.5 1 is considered potentially significant and unavoidable.

### 6.3 NOISE

**Impact 5.13-1: Local Noise Ordinance.** SUP implementation may result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance.

Projects that place stadiums or other outdoor activity areas near sensitive noise receptors may exceed local ambient noise limits. Implementation of LAUSD SC-N-3 would include measures such as buffer zones, sound barriers such as masonry walls, building orientation improvements between playgrounds and adjacent residential uses, or other special design features to reduce noise levels at nearby noise-sensitive land uses to no more than 3 dBA CNEL. However, there is no guarantee that these measures would reduce noise to less than significant levels, and no additional measures are available to reduce impacts. Therefore, Impact 5.13-1 is considered potentially significant and unavoidable.

**Impact 5.13-2: Construction Vibration.** SUP-related project construction activities may result in generation of excessive groundborne vibration.

Demolition and construction for activities within 25 feet of a historic building or where pile driving activities are within 150 feet of a structure and may cause vibration annoyance and/or architectural damage. For these types of projects, a detailed vibration assessment would be provided by an acoustical engineer to analyze potential vibration impacts to nearby structures and to determine feasible alternatives to eliminate potential risk of annoyance and architectural damage. Implementation of LAUSD SC-N-4, SC-N-5, SC-N-6, and SC-N-7 would reduce construction-related vibration impacts, but for some projects, these LAUSD Standard Conditions may not be enough to avoid the impact. No additional measures are available to reduce impacts. Therefore, Impact 5.13-2 is considered potentially significant and unavoidable.

### 6.4 TRANSPORTATION AND TRAFFIC

**Impact 5.17-2: Traffic.** SUP-related project trip generation may result in designated road and/or highways exceeding county congestion management agency standards.

VTM impacts may occur for some large-scale projects, such as major administrative centers or athletic facilities, associated with the SUP. Implementation of mitigation measures would further evaluate the significance of potential VMT impacts and, if necessary, identify TDM measures to reduce VMT impacts. Possible TDM measures could include priced workplace parking, transit subsidies, voluntary travel behavior change programs, commute trip reduction programs, shared mobility programs, and improved bicycle/pedestrian infrastructure. Most SUP projects are expected to have a less than significant VMT impact; however, it may be infeasible to implement TDM measures that would fully mitigate VMT impacts for large-scale projects that are expected to attract people from a broader area. Therefore, Impact 5.17-2 would remain significant and unavoidable.



## 7. Alternatives to the SUP

# 7. Alternatives to the SUP

## 7.1 INTRODUCTION

### 7.1.1 Purpose and Scope

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives.”<sup>687</sup> This chapter identifies potential alternatives to the proposed project and evaluates them, as required by CEQA.

Key provisions of the CEQA Guidelines on alternatives are summarized below to explain the foundation and legal requirements for the alternatives analysis in the EIR.<sup>688</sup>

- “The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.”<sup>689</sup>
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact.”<sup>690</sup>
- “The no project analysis shall discuss the existing conditions at the time the Notice of Preparation (NOP) is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.”<sup>691</sup>
- “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.”<sup>692</sup>
- “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or

<sup>687</sup> CEQA Guidelines Section 15126.6

<sup>688</sup> CEQA Guidelines Sections 15126.6(a) through (f)

<sup>689</sup> CEQA Guidelines Section 15126.6(b)

<sup>690</sup> CEQA Guidelines Section 15126.6(e)(1)

<sup>691</sup> CEQA Guidelines Section 15126.6(e)(2)

<sup>692</sup> CEQA Guidelines Section 15126.6(f)

## 7. Alternatives to the SUP

regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).”<sup>693</sup>

- “For alternative locations, “only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.”<sup>694</sup>
- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.”<sup>695</sup>

For each development alternative, this analysis:

- Describes the alternative.
- Analyzes the impact of the alternative compared to the proposed project.
- Identifies the impacts of the project that would be avoided or lessened by the alternative.
- Assesses whether the alternative would meet most of the basic project objectives.
- Evaluates the comparative merits of the alternative and the project.

Per the CEQA Guidelines Section 15126.6(d), additional significant effects of the alternatives are discussed in less detail than the significant effects of the project as proposed.

### 7.1.2 Typical SUP Project Categories

The environmental analysis in this document is based on the following typical SUP project categories.

- Type 1. New Construction on New Property (adjacent to existing campus).
- Type 2. New Construction on Existing Campus.
- Type 3. Modernization, Repair, Replacement, Upgrade, Remodel, and Renovation.
- Type 4. Operational and Other Campus Changes.

### 7.1.3 Project Objectives

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

- Repair aging schools and improve student safety.
- Upgrade schools to modern technology and educational needs.

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<sup>693</sup> CEQA Guidelines Section 15126.6(f)(1)

<sup>694</sup> CEQA Guidelines Section 15126.6(f)(2)(A)

<sup>695</sup> CEQA Guidelines Section 15126.6(f)(3)

## 7. Alternatives to the SUP

- Create capacity to attract, retain, and graduate more students through a comprehensive portfolio of small, high quality pre-K through adult schools.
- Promote healthier environment through green technology.

### 7.2 POTENTIALLY SIGNIFICANT IMPACTS OF THE SUP

A primary consideration in defining SUP alternatives is their potential to reduce or eliminate significant impacts and to meet most of the objectives. The impact analysis in Chapter 5 of this EIR concludes that the following impacts would be potentially significant and unavoidable even after federal, state, and local regulatory compliance, implementation of LAUSD Standard Conditions of Approval, and consideration of possible feasible mitigation measures (none were identified).

#### 7.2.1 Air Quality

**Impact 5.3-2: Local Construction Emissions.** Construction activities could generate short-term emissions in exceedance of SCAQMD'S regional construction significance threshold criteria and cumulatively contribute to the nonattainment designations of the SoCAB. Compliance with SCAQMD regulations and LAUSD Standard Conditions would reduce criteria air pollutant emissions from construction-related activities. However, short-term emissions generated from future individual projects could still exceed the SCAQMD regional significance threshold criteria. Therefore, Impact 5.3-2 is considered potentially significant and unavoidable.

**Impact 5.3-4: Local Construction Emissions.** Construction activities could generate short-term emissions in exceedance of SCAQMD'S localized significance threshold criteria and expose sensitive receptors to substantial pollutant concentrations. Site-specific projects may generate short-term emissions that exceed South Coast Air Quality Management District's localized significance thresholds and expose sensitive receptors to substantial pollutant concentrations.

#### 7.2.2 Cultural Resources

**Impact 5.5-1: Historical Resources.** SUP-related project implementation may substantially degrade the significance of historical resources. Each project that may impact an historic resource will include implementation of SC-CUL-1 through SC-CUL 11 to reduce impacts from relocation, conversion, rehabilitation, alteration, damage, or demolition of an historical resource. LAUSD Standard Conditions would reduce historic resource impacts to the extent feasible; however, no mechanism for the full mitigation has been established. Therefore, even with the federal, state regulatory compliance, and implementation of LAUSD Standard Conditions, impacts associated with the demolition or damage to a historic resource would remain significant and unavoidable.

#### 7.2.3 Noise

**Impact 5.13-1: Local Noise Ordinance.** SUP implementation may result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance.

## 7. Alternatives to the SUP

Implementation of LAUSD SC-N-3 would include measures such as buffer zones, sound barriers such as masonry walls, or building orientation improvements between playgrounds and adjacent residential uses, or other special design features to reduce noise levels at nearby noise-sensitive land uses to no more than 3 dBA CNEL. However, there is no guarantee that these measures would reduce noise to less than significant levels. Therefore, Impact 5.132-1 is considered potentially significant and unavoidable.

**Impact 5.13-2: Construction Vibration.** SUP-related project construction activities may result in generation of excessive groundborne vibration. Demolition and construction for activities within 25 feet of a historic building or where pile driving activities are within 150 feet of a structure may cause vibration annoyance and/or architectural damage. For these types of projects, a detailed vibration assessment would be provided by an acoustical engineer to analyze potential vibration impacts to nearby structures and to determine feasible alternatives to eliminate potential risk of annoyance and architectural damage. Implementation of LAUSD SC-N-4, SC-N-5, SC-N-6, and SC-N-7 would reduce construction-related vibration impacts, but for some projects, these LAUSD Standard Conditions may not be enough to avoid the impact. No additional measures are available to reduce impacts. Therefore, Impact 5.13-2 is considered potentially significant and unavoidable.

### 7.2.4 Transportation and Traffic

**Impact 5.18-2: Traffic.** Prior to project approval of large-scale new construction (10,000 square feet or more) on new property or existing campus, LAUSD shall prepare a VMT assessment that documents the project trip generation, whether the project is expected to serve the immediate community or a broader area, and the expected net effect on VMT for the region. If necessary, the VMT assessment shall identify TDM measures to reduce VMT impacts. VMT impacts may occur for some large-scale projects, such as major administrative centers or athletic facilities, associated with the SUP. Implementation of mitigation measures would further evaluate the significance of potential VMT impacts and, if necessary, identify TDM measures to reduce VMT impacts. Possible TDM measures could include priced workplace parking, transit subsidies, voluntary travel behavior change programs, commute trip reduction programs, shared mobility programs, and improved bicycle/pedestrian infrastructure. Most SUP projects are expected to have a less than significant VMT impact; however, it may be infeasible to implement TDM measures that would fully mitigate VMT impacts for large-scale projects that are expected to attract people from a broader area. Therefore, Impact 5.17 2 would remain significant and unavoidable.

## 7.3 ALTERNATIVES CONSIDERED AND REJECTED DURING THE PLANNING PROCESS

The following is a discussion of the land use alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in this Subsequent Program EIR (SPEIR).

### 7.3.1 Alternative Development Areas

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially

## 7. Alternatives to the SUP

lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.<sup>696</sup> The project is the SUP for the entire LAUSD. The project is intended to provide improvements, repairs, and maintenance to existing LAUSD schools and future school expansions and to benefit current and future students in the District. Therefore, the SUP could not be implemented outside of the District's boundaries, and no alternative development area can feasibly be considered.

### 7.4 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Based on the criteria listed above, the following two options were determined to represent a reasonable range of alternatives, have the potential to feasibly attain most of the basic SUP objectives, and may substantially lessen the four potentially significant effects of the SUP.

- No Project Alternative
- Reduced SUP Alternative

An EIR must identify an “environmentally superior” alternative, and where that is the No Project Alternative, the EIR must identify another alternative as environmentally superior. Each alternative's environmental impacts are compared to the proposed SUP and determined to be environmentally superior, neutral, or inferior.

Because of the type of program-level alternatives identified for the SUP (both would significantly reduce all impacts), the following environmental topics found to be less than significant for the proposed SUP would be less than significant for each of the alternatives:

- Aesthetics
- Agriculture and Forestry Resources
- Biological Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Pedestrian Safety

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<sup>696</sup> CEQA Guidelines Section 15126(5)(B)(1).

## 7. Alternatives to the SUP

- Population and Housing
- Public Services
- Recreation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

Only those impacts found significant (air quality, cultural resources, noise, and traffic) are used in this alternatives analysis, and only those found significant and unavoidable are used to make the final determination for the superior alternative (for this project same as significant impacts). Section 7.7 identifies the Environmentally Superior Alternative.

### 7.4.1 No Project Alternative

The No Project Alternative would only involve projects that were approved under the 2015 Program EIR or for maintenance and critical repairs required for health and safety, including repair and maintenance of construction, protection, and occupancy features necessary to minimize danger to life and maintain full compliance with current codes and regulations.

This alternative would not involve property acquisition or construction or installation of any buildings. Existing buildings and school campuses would continue to deteriorate (most noticeably cosmetically, as nonessential maintenance and repairs are deferred). The No Project Alternative would include, but not be limited to, the following types of minor essential projects:

- HVAC repairs needed to maintain classroom temperatures conducive to learning.
- Repair of broken, unsafe walkways and driveways.
- Seismic retrofits.
- Maintenance of fire alarm and fire suppression systems.
- Replacement of poor lighting.
- Repairs to security systems and emergency communications systems.
- Abatement of asbestos and lead-based paint.
- Replacement of lead pipes.
- Improvements for ADA compliance: ramps, rails, etc.
- Replacement fencing.
- Essential replacement of building systems such as flooring, windows, and roofing.

## 7. Alternatives to the SUP

- Essential repair of modular units or portable classrooms.
- Relocation of portables on campus to avoid a safety hazard.

### **Air Quality**

This alternative would not involve construction projects that would generate significant air emissions. Most minor projects would not involve heavy construction equipment. The total number of projects that the District would undertake would be significantly reduced in this alternative compared to the proposed SUP. Overall, total emissions would be substantially reduced by this alternative, and would remain less than significant. This alternative would be superior to the SUP.

### **Cultural Resources**

This alternative would not involve demolition or substantial alterations to existing historic buildings except for critical repairs needed for health and safety. However, because these buildings are already some of the oldest in the District, they would deteriorate and may lose some essential defining features. These features could be repaired later when a safety issue arises. Because physical damage and demolition cause the greatest impacts to historic districts and buildings, under this alternative, impacts to historical resources would be greatly reduced. This alternative would not involve grading or excavation for construction projects and would not involve construction on new properties; therefore, any surrounding historic buildings would not be affected. Impacts to Cultural Resources would remain less than significant. This alternative would be superior to the SUP.

### **Noise**

Under the No Project Alternative, the types of projects that would be completed would not involve large construction equipment that would generate significant noise. Standards established in the local general plan or noise ordinance would not be exceeded. Additionally, without the construction equipment, projects would not generate significant excessive groundborne vibration or significantly increase ambient noise levels. Impacts to Noise would remain less than significant, and this alternative would be superior to the SUP.

### **Transportation and Traffic**

This alternative would not construct new classrooms, stadiums, or community use buildings, and would not install field lights. Any project that increases trip generation at an existing school would not be included in this alternative. Therefore, the potential to impact levels of service on the existing area roadway system would not occur and would remain less than significant. This alternative would be superior to the SUP.

### **Conclusion**

Overall, this alternative would reduce environmental impacts in comparison to the proposed project and would reduce impacts associated with Air Quality, Cultural Resources, Noise, and Transportation and Traffic to less than significant. However, the No Project alternative would not meet most of the objectives of the SUP.

- Repair aging schools and improve student safety. This alternative would improve safety but only where there was a critical need for repairs.

## 7. Alternatives to the SUP

- Upgrade schools to modern technology and educational needs. This alternative would not meet this objective because modern technology is not critical to health and safety.
- Create capacity to attract, retain and graduate more students through a comprehensive portfolio of small, high quality pre-K through adult schools. This alternative would not meet this objective because new seats would not be constructed.
- Promote healthier environment through green technology. This alternative would not meet this objective because, although desired, green technology is not critical to health and safety.

### 7.4.2 Reduced SUP Alternative

This alternative would not include installation of more than nine modular or portable classroom buildings, acquisition of any property, or the construction of any permanent buildings. All projects under this alternative would qualify for one or more of the CEQA statutory or categorical exemptions, as listed in Chapter 4, *Project Description*.

- Installation of modular units, portable classrooms, or bungalows resulting in a net increase student capacity *less than 25%* or 10 classrooms, whichever is greater.
- Sustainability energy conservation installations, such as new photovoltaic panels on rooftops and parking-lot shade structures or small wind arrays.
- Essential and cosmetic replacement of building systems such as flooring, windows, and roofing.
- New or replacement furniture or other interior equipment.
- Replace existing diesel buses with higher efficiency buses.
- Sustainability energy conservation changes, such as replacement, upgrade, or retrofit of inefficient lighting, electrical transformers, or building insulation, and installation of irrigation smart controllers.
- Essential and cosmetic upgrades of modular units or portable classrooms, relocation of portables on campus.
- Exterior cosmetic improvements such as Facelift Program, painting, site cleanup.
- Essential and nonessential interior remodeling and renovations; painting; installation, repair, and upgrades to fire/life-safety/security/emergency systems; ADA; plumbing, lighting, electrical, HVAC, and computer systems; low-flow restroom fixtures; and food service equipment.
- Change in student capacity (student classroom loading but not an increase in school seating).
- Closure of existing school or transfer of students to another school (as long as the increase at the new school does not generate a significant environmental impact).



## 7. Alternatives to the SUP

### **Air Quality**

To qualify for a CEQA exemption, this alternative would not involve construction projects that would generate significant air emissions. These projects would not involve more than two or three pieces of heavy construction equipment. The total number of projects that the District would undertake would be significantly reduced in this alternative. Overall, total emissions would be substantially reduced by this alternative. This alternative would be superior to the SUP.

### **Cultural Resources**

This alternative would not involve demolition of existing historic buildings. Repairs and improvements would occur but could not involve permanent damage to historic features (in-kind replacement would be permitted). Because physical damage and demolition is the greatest impact to historic districts and buildings, impacts to historical resources would be greatly reduced under this alternative, and would remain less than significant. This alternative would not involve grading or excavation for construction projects and would not involve construction on new properties; therefore, any surrounding historic buildings would not be affected. This alternative would be superior to the SUP.

### **Noise**

Under the Reduced SUP Alternative, the types of projects that would be completed would not involve large construction equipment operating adjacent to older, fragile buildings or to noise- and vibration-sensitive land uses. Standards established in the local general plan or noise ordinance would not be exceeded. Projects would involve fewer pieces of construction equipment and would not exceed local noise ordinances; therefore, impacts would be less than significant. This alternative would be superior to the SUP.

### **Transportation and Traffic**

This alternative would not construct stadiums or community use buildings and would not install field lights. Any project that significantly increases trip generation at an existing school would not be included in this alternative. Therefore, there would be no potential to impact levels of service on the existing area roadway system. This alternative would be superior to the SUP.

### **Conclusion**

Overall, the Reduced SUP alternative would reduce environmental impacts in comparison to the proposed project. This alternative would not meet some of the objectives of the SUP.

- Repair aging schools and improve student safety. This alternative would meet this objective.
- Upgrade schools to modern technology and educational needs. This alternative is anticipated to meet this objective, but it will depend on the scope of the upgrade.
- Create capacity to attract, retain and graduate more students through a comprehensive portfolio of small, high quality pre-K through adult schools. This alternative would partially meet this objective because of the limit on the number of seats that could be provided at each school to qualify for the CEQA exemption.

## 7. Alternatives to the SUP

- Promote healthier environment through green technology. This alternative is anticipated to meet this objective, but it will depend on the scope of the upgrade.

### 7.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the “environmentally superior alternative” and, in cases where the “No Project” Alternative is environmentally superior to the proposed project, the environmentally superior development alternative must be identified. The Reduced SUP Alternative has been identified as “environmentally superior” to the proposed project. This alternative would reduce impacts associated with the SUP by limiting the scope and type of projects that would be undertaken.

## 8. Significant Irreversible Changes

# 8. Significant Irreversible Changes

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Section 15126.2(c) of the CEQA Guidelines requires that an EIR describe any significant irreversible environmental changes that would be caused by implementation of the SUP. Specifically, the CEQA Guidelines state:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highways improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

- In the case of the LAUSD SUP, its implementation would involve a land use, development, and implementation framework to support the next phase of the District's bond program to build, modernize, and repair school facilities to improve student health, safety, and educational quality. The following significant irreversible changes may occur. Future SUP-related projects would involve construction activities that entail the commitment of nonrenewable and/or slowly renewable energy resources, including gasoline, diesel fuel, electricity; human resources; and natural resources such as lumber and other forest products, sand and gravel, asphalt, steel, copper, lead, other metals, and water. The commitment of resources required for the construction would limit the availability of such resources for future generations or for other uses.
- Operation of the SUP-related projects would require the use of natural gas and electricity, petroleum-based fuels, fossil fuels, and water. The commitment of resources required for the operation would limit the availability of such resources for future generations or for other uses during the life of each project.
- An increased commitment of social services (e.g., police and fire protection) would be long-term obligations.
- SUP implementation may involve a long-term irreversible commitment of vacant parcels of land, and/or redevelopment of existing developed land next to existing District schools.

## 8. Significant Irreversible Changes

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## 9. Growth-Inducing Impacts

# 9. Growth-Inducing Impacts

Pursuant to Sections 15126(d) and 15126.2(d) of the CEQA Guidelines, this section is provided to examine ways in which the SUP could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Also required is an assessment of other projects that would foster other activities which could affect the environment, individually or cumulatively. To address this issue, potential growth-inducing effects will be examined through analysis of the following questions:

- Would the SUP remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?
- Would the SUP result in the need to expand one or more public services to maintain desired levels of service?
- Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
- Would approval of the SUP involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

Please note that growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment. This issue is presented to provide additional information on ways in which this project could contribute to significant changes in the environment, beyond the direct consequences of school facility construction, operation, modernization, repair, replacement, upgrade, remodel, renovation and installation examined in the preceding sections of this EIR.

**Would the SUP remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?**

SUP implementation would not extend major infrastructure to places currently unserved by such facilities. The vast majority of existing District schools are in built-out urban and suburban neighborhoods served by infrastructure such as water and sewer mains and electricity and natural gas services. The SUP does not propose development of new schools on new sites; thus, the SUP would not place new schools on land not currently served by such infrastructure.

**Would the SUP result in the need to expand one or more public services to maintain desired levels of service?**

New construction projects could expand the total student capacity of individual schools by constructing new classrooms or installation of portables; however, total District enrollment is forecast to decrease. Over the next 10 years, student enrollment is anticipated to decrease by approximately 18%. Therefore, no expansion of any

## 9. Growth-Inducing Impacts

public services would be required to maintain desired levels of service and SUP implementation would not have a growth-inducing impact.

### **Would the SUP encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?**

Construction would generate short-term employment; operation of such projects could expand total employment by LAUSD and by charter school operators. The unemployment rate in Los Angeles County in August 2021 was 9.7%<sup>697</sup>, and the corresponding estimated rate in the City of Los Angeles was 9.0%<sup>698</sup>. Therefore, it is expected that construction employment and most operational employment would be absorbed from the regional labor force and would not attract new workers into the region.

### **Would approval of the SUP involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?**

SUP approval would not set a precedent that could encourage and facilitate other activities that could significantly affect the environment. School modernization, refurbishment, and expansion projects and programs are common statewide and nationwide. Several ongoing District programs for upgrade, modernization, and replacement of existing facilities are described in Chapter 4, *Project Description*, of this EIR.

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<sup>697</sup> SCAG Regional Briefing Book, December 2021. [https://scag.ca.gov/sites/main/files/file-attachments/regional-briefing-book-2021\\_final.pdf](https://scag.ca.gov/sites/main/files/file-attachments/regional-briefing-book-2021_final.pdf). Accessed May 24, 2023.

<sup>698</sup> Los Angeles, Ca Unemployment Rate, Y Charts.com. [https://ycharts.com/indicators/los\\_angeles\\_ca\\_unemployment\\_rate](https://ycharts.com/indicators/los_angeles_ca_unemployment_rate). Accessed May 24, 2023.

## 10. Draft EIR Comments and Responses

# 10. Draft EIR Comments and Responses

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This section discusses the legal requirements for comments and responses and provides all written comments on the Draft EIR and the District's responses to each comment.

## 10.1 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204 (a) outlines parameters for submitting comments, and reminds persons and public agencies that the focus of review and comment of Draft EIRs should be

...on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. ...CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

CEQA Guidelines Section 15204 (c) further advises, "Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence." Section 15204 (d) also states, "Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility." Section 15204 (e) states, "This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section."

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies will be forwarded to those agencies at least 10 days prior to certifying the environmental impact report. The responses will be forwarded with copies of this Final EIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on Draft EIRs.

## 10.2 COMMENTS AND RESPONSES

Section 15088 of the CEQA Guidelines requires the Lead Agency (District) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the Draft EIR and prepare written responses.

## 10. Draft EIR Comments and Responses

This section provides all written comments on the Draft EIR and the District's responses to each comment. Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the Draft EIR are excerpted in this document, the sections are shown indented.

Revisions to the Draft EIR are based on (1) additional or revised information required to respond to a specific comment; (2) applicable updated information that was not available at the time of Draft EIR publication; and/or (3) typographical errors and clarifications. The provision of these changes does not alter any impact significance or conclusions as identified in the Draft EIR. Changes made to the Draft PEIR are identified in this Final EIR as ~~strikeout~~ to indicate deletions and in underlined for additions.

The following is a list of agencies that submitted comments on the Draft EIR during the extended public review period (July 5, 2023 to August 19, 2023). No comments were submitted by residents, organizations, or other interested parties.

Number Reference	Commenting Person/Agency	Date of Comment	Page No.



## 10. Draft EIR Comments and Responses

LETTER A1 –

## 10. Draft EIR Comments and Responses

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## 10. Draft EIR Comments and Responses

### **A1. Response**

A1-1 Response:

## 10. Draft EIR Comments and Responses

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## 10. Draft EIR Comments and Responses

LETTER A2 –

## 10. Draft EIR Comments and Responses

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## 10. Draft EIR Comments and Responses

### A2. Response

A2-1 Response:

A2-2 Response:

## 10. Draft EIR Comments and Responses

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## 10. Draft EIR Comments and Responses

LETTER A3–

## 10. Draft EIR Comments and Responses

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## 10. Draft EIR Comments and Responses

### A3. Response

A3-1 Response:

A3-2 Response:

## 10. Draft EIR Comments and Responses

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## 10. Draft EIR Comments and Responses

LETTER A4 –

## 10. Draft EIR Comments and Responses

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## 10. Draft EIR Comments and Responses

### A4. Response

A4-1 Response:

A4-2 [Response:](#)

LETTER A5 –

## 10. Draft EIR Comments and Responses

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## 10. Draft EIR Comments and Responses

### A5. Response

A5-1      [Response:](#)

## 10. Draft EIR Comments and Responses

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## 10. Draft EIR Comments and Responses

LETTER A6 –

## 10. Draft EIR Comments and Responses

### **A6. Response**

A6-1 Response.

A6-2 Response:

A6-3

## 11. Persons Preparing EIR

# 11. Persons Preparing EIR

---

### **Lead Agency: Los Angeles Unified School District**

**Christy Wong**

CEQA Project Manager - Contract Professional  
Office of Environmental Health & Safety

**Edward Paek**

CEQA Senior Project Manager - Contract Professional  
Office of Environmental Health & Safety

**Gwenn Godek**

CEQA Advisor - Contract Professional  
Office of Environmental Health & Safety

### **CEQA Consultant: Tetra Tech**

**Randy Westhaus, P.E.**

Director, California Schools Program

**Paula Fell, AICP, LEED AP**

Senior Associate/Project Manager

**Seth Hopkins, M.A.**

Senior Environmental Planner

**Jim Steele, P.G., C.E.G., C.Hg**

Senior Geologist, Hydro Geologist

**Michelle Bates**

Principal Biologist

**Amy Noddings, M.E.S.M.**

Senior Biologist

**Tim Tringali, QSD/P**

Senior Scientist

**Anne Simpson, QSD/P, QISP**

Project Scientist

## 11. Persons Preparing EIR

**Dave Romero, QSP**

Project Scientist

**Victor Velazquez**

Senior Environmental Engineer

**Kevin Fowler, INCE**

Senior Acoustical Engineer

**Chris Hulik, INCE**

Acoustical Engineer

**J.J. Madden, GISP**

GIS Manager

**Julia Mates**

Architectural Historian

**Jennifer Farrell, M.A.**

Cultural Resources Specialist

**Sub-consultant: Transportation Engineering**

**Giancarlo Ganddini, P.E., PTP**

Transportation Engineer

## Appendix A. CEQA Notices

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## A-1 Notice of Preparation

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JAN 03 2023

**Los Angeles Unified School District****Office of Environmental Health and Safety****LOS ANGELES, COUNTY CLERK**

**ALBERTO M. CARVALHO**  
*Superintendent of Schools*

**CARLOS A. TORRES**  
*Director, Environmental Health and Safety*

**JENNIFER FLORES**  
*Deputy Director, Environmental Health and Safety*

## **NOTICE OF PREPARATION OF A DRAFT SUBSEQUENT PROGRAM ENVIRONMENTAL IMPACT REPORT**

**TO:** Agencies, Organizations, Property Owners, and Interested Parties

**SUBJECT:** Notice of Preparation of a Draft Subsequent Program Environmental Impact Report

NOTICE IS HEREBY GIVEN that the Los Angeles Unified School District (District or LA Unified), as lead agency for the project, will prepare a Draft Subsequent Program Environmental Impact Report (PEIR) for the District-Wide Redevelopment Program pursuant to the California Environmental Quality Act (CEQA) [California Public Resources Code (PRC), Division 13, Section 21000 et seq. (CEQA Statute) and the California Code of Regulations (CCR), Title 14, Division 6, Chapter 3, Section 15000 et seq. (CEQA Guidelines)]. The District needs to know the views of agencies, organizations, and interested parties as to the scope and content of the Draft Subsequent PEIR.

In compliance with CEQA Guidelines Section 15060(d) and 15082, the District will not be preparing an initial study and will begin to work directly on the Draft Subsequent PEIR.

**PROJECT TITLE:** District-Wide Redevelopment Program

**PROJECT LOCATION:** The proposed redevelopment program encompasses schools within the entire LA Unified, which is the largest (in terms of number of students) public school system in California and the second largest public school district in the United States. The District covers a 710 square mile area. This includes most of the County of Los Angeles, along with all or portions of 31 cities and unincorporated areas of Los Angeles County.

**PROJECT DESCRIPTION:** In 2020, voters in Los Angeles County passed Measure RR as a funding mechanism to help address the significant and unfunded needs of Los Angeles public school facilities. Measure RR is aimed at continuing the funding for improvement of facilities and technology, upgrade of existing facilities, as well as increased safety measures. Measure RR proceeds may also be used when necessary to complete projects initiated with funds from Measure K, R, Y, and/or Q as long as the project appears on the Measure RR Bond Project List, as authorized by voters.

The District's bond program has been operating under the framework of the School Upgrade Program (SUP) since January 2014, when the program's focus shifted from constructing new facilities to address decades of overcrowding, to addressing aging existing school facilities. Projects developed under the SUP framework are upgrading, modernizing, and replacing aging and deteriorating school facilities, updating technology, and addressing facilities inequities.

Projects designed to achieve the objectives of Measure RR will be incorporated into the SUP based on a prioritization methodology adopted through the solicitation of input from Community of Schools Administrators and Regional District leadership to help inform priorities, scoping and project development.

Under Measure RR and in association with other, ongoing LA Unified Facilities programs, the District is proposing to upgrade, modernize, and replace aging and deteriorating District school facilities; update technology; and address District school facilities inequities in order to provide students with physically and environmentally safe, secure, and updated school facilities that support 21st century learning at hundreds of neighborhood schools District-wide. Not

every project will be undertaken at every campus, and some campuses may not undergo any of the repairs, upgrades, or modernization. Each category of project will be carried out at schools found to have the greatest need, as determined by the Strategic Execution Plan adopted by the LAUSD Board of Education. The program may include, but is not limited to, the following types of campus-specific projects:

- Major modernizations, upgrades, and reconfigurations to school campuses;
- Critical replacements and upgrades of school building/site systems and components;
- Upgrade and equip schools with 21st Century technologies, and upgrade technology infrastructure, information systems, hardware and software;
- School upgrades and reconfigurations to support wellness, health, athletics, learning, and efficiency;
- Specialized facilities upgrades such as Early Childhood Education Centers, Adult and Career Education facilities, and school cafeterias;
- Transition Plan implementation; and
- Districtwide Charter School facilities upgrades and expansions.

**POTENTIAL ENVIRONMENTAL EFFECTS:** In accordance with Section 15082 of the State CEQA Guidelines, the District has prepared this Notice of Preparation to provide Responsible Agencies and other interested parties with information describing the proposal and its potential environmental effects. Environmental factors that will be analyzed in the Draft Subsequent PEIR are:

- |                               |                                      |                                   |
|-------------------------------|--------------------------------------|-----------------------------------|
| • Aesthetics                  | • Agriculture and Forestry Resources | • Air Quality                     |
| • Biological Resources        | • Cultural Resources                 | • Energy                          |
| • Geology and Soils           | • Greenhouse Gas Emissions           | • Hazards and Hazardous Materials |
| • Hydrology and Water Quality | • Land Use and Planning              | • Mineral Resources               |
| • Noise                       | • Pedestrian Safety                  | • Population and Housing          |
| • Public Services             | • Recreation                         | • Transportation and Traffic      |
| • Tribal Cultural Resources   | • Utilities and Service Systems      | • Wildfire                        |

**PUBLIC REVIEW PERIOD:** Pursuant to California Code of Regulations, Title 14, Section 15082(b), the District is soliciting comments regarding the environmental impacts of the proposed project. The District will accept written comments between **January 3, 2023 and February 2, 2023**.

**PUBLIC COMMENTS:** Please indicate a contact person for your agency or organization and send your comments to:

Los Angeles Unified School District  
Office of Environmental Health and Safety  
333 South Beaudry Avenue, 21<sup>st</sup> Floor,  
Los Angeles, CA 90017,  
Attention: Christy Wong

Comments can also be sent by e-mail to [cp-christy.wong@lausd.net](mailto:cp-christy.wong@lausd.net). Please include "District-Wide Redevelopment Program" in the subject line.

**LAUSD BOARD HEARING:** Additional information concerning the proposed Project will be posted on the District's OEHS website: <http://achieve.lausd.net/ceqa>.

## A-2 Notice of Preparation Comment Letters

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**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7- OFFICE OF REGIONAL PLANNING  
100 S. MAIN STREET, SUITE 100  
LOS ANGELES, CA 90012  
PHONE (213) 897-0067  
FAX (213) 897-1337  
TTY 711  
www.dot.ca.gov



*Making Conservation  
a California Way of Life.*

January 25, 2023

Christy Wong, CEQA Project Manager  
Los Angeles Unified School District  
333 South Beaudry Avenue  
Los Angeles, California 90017

RE: District-Wide Redevelopment Program –  
Notice of Preparation (NOP)  
SCH# 2023010013  
GTS# 07-LA-2023-04144  
Vic. LA Multiple

Dear Christy Wong,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Los Angeles Unified School District (District or LA Unified) is proposing to upgrade and modernize District school facilities in accordance with Measure RR, which seeks to address the significant and unfunded needs of Los Angeles public school facilities. The following updates and related policy changes are included as part of the proposed project and dependent on priority, as determined by the Strategic Execution Plan adopted by the LAUSD Board of Education.

- Major modernizations, upgrades, and reconfigurations to school campuses.
- Critical replacements and upgrades of school building/site systems and components.
- School upgrades and reconfigurations to support wellness, health, athletics, learning, and efficiency.
- Specialized facilities upgrades such as Early Childhood Education Centers, Adult and Career Education facilities, and school cafeterias.
- Transition Plan implementation.
- Districtwide Charter School facilities upgrades and expansions.

After reviewing the NOP, Caltrans has the following comments:

The Lead Agency is encouraged to integrate transportation in a way that reduces VMT and Greenhouse Gas (GHG) emissions by facilitating the provision of more transit-oriented and pedestrian-friendly projects to achieve a high level of non-motorized travel near schools. Caltrans recommends the following to more effectively approach developing physically and environmentally safe commutes to District facilities.

1. Reducing the amount of car parking supplied acts against enabling driving over other methods of transit. Research indicates that removing car parking is a proven method of reducing trip demand, improving housing affordability, and encouraging active modes of transportation. If surface parking must be built, it is recommended that it does not face the street directly. With

active frontage against the sidewalk and parking shifted to the rear or interior of the site, a streetscape that encourages recreational walking and transit can be produced.

2. Improve connections from schools to existing active transportation and transit infrastructure. This can be done with robust signage near school crosswalks, safety improvements, and human scale amenities. Examples of effective physical design include the construction of physically separated facilities such as Class IV bike lanes, wide sidewalks, pedestrian refuge islands, and reductions in crossing distances through roadway narrowing.

3. Implement Transportation Demand Management (TDM) strategies to reduce school traffic congestion at peak periods as alternatives to requiring car drop-off and pick-up. Infrastructure like frequent stops for school shuttles, skateboard and scooter storage, bicycle parking, and sufficient pedestrian level lighting should be included to encourage these uses. To support a community's ability to choose public transit and active modes of transportation, the plan should consider accessibility options for all impacted by vehicular traffic caused during school hours.

Caltrans looks forward to reviewing the forthcoming Draft Program Environmental Impact Report (PEIR) to confirm that the Project will contribute towards widespread transit-centered street design in California schools.

If you have any questions, please contact project coordinator Anthony Higgins, at [anthony.higgins@dot.ca.gov](mailto:anthony.higgins@dot.ca.gov) and refer to GTS# 07-LA-2023-04144.

Sincerely,



MIYA EDMONSON  
LDR Branch Chief

cc: State Clearinghouse



State of California – Natural Resources Agency  
 DEPARTMENT OF FISH AND WILDLIFE  
 South Coast Region  
 3883 Ruffin Road  
 San Diego, CA 92123  
 (858) 467-4201  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

GAVIN NEWSOM, Governor  
 CHARLTON H. BONHAM, Director



Via Electronic Mail Only

January 30, 2023

Christy Wong  
 Los Angeles Unified School District  
 333 South Beaudry Ave  
 Los Angeles, CA 90017  
[cp-christy.wong@lausd.net](mailto:cp-christy.wong@lausd.net)

**Subject: Notice of Preparation of a Draft Environmental Impact Report for the District-Wide Redevelopment Program, SCH #2023010013, Los Angeles Unified School District, Los Angeles County**

Dear Ms. Wong:

The California Department of Fish and Wildlife (CDFW) has reviewed a Notice of Preparation (NOP) of the Draft Subsequent Program Environmental Impact Report (PEIR) from the Los Angeles Unified School District (LAUSD) for the District-Wide Redevelopment Program (Project). CDFW appreciates the opportunity to provide comments regarding aspects of the Project that could affect fish and wildlife resources and be subject to CDFW's regulatory authority under the Fish and Game Code.

### **CDFW's Role**

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, § 1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

*Conserving California's Wildlife Since 1870*

Christy Wong  
 Los Angeles Unified School District  
 January 30, 2023  
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## Project Description and Summary

**Objective:** The LAUSD is proposing to upgrade, modernize, and replace aging and deteriorating LAUSD school facilities; update technology; and address LAUSD school facilities inequities. Not every project will be undertaken at every campus, and some campuses may not undergo any of the repairs, upgrades, or modernization. Each category of project will be carried out at schools found to have the greatest need, as determined by the Strategic Execution Plan adopted by the LAUSD Board of Education. The program may include, but is not limited to, the following types of campus-specific projects:

- Major modernizations, upgrades, and reconfigurations to school campuses;
- Critical replacements and upgrades of school building/site systems and components;
- Upgrade and equip schools with 21st Century technologies, and upgrade technology infrastructure, information systems, hardware and software;
- School upgrades and reconfigurations to support wellness, health, athletics, learning, and efficiency;
- Specialized facilities upgrades such as Early Childhood Education Centers, Adult and Career Education facilities, and school cafeterias;
- Transition Plan implementation; and
- Districtwide Charter School facilities upgrades and expansions.

**Location:** The LAUSD area covers 710 square miles of Los Angeles County and includes the City of Los Angeles as well as all or parts of 25 smaller municipalities and several unincorporated sections of Los Angeles County. The cities included are Bell, Bell Gardens, Beverly Hills, Calabasas, Carson, Commerce, Cudahy, Culver City, Downey, El Segundo, Gardena, Hawthorne, Huntington Park, Inglewood, Lomita, Long Beach, Los Angeles, Lynwood, Maywood, Montebello, Monterey Park, Rancho Palos Verdes, Rolling Hills Estates, San Fernando, Santa Clarita, Santa Monica, South Gate, Torrance, Vernon, and West Hollywood.

## Comments and Recommendations

CDFW offers the comments and recommendations below to assist the LAUSD in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. The PEIR should provide adequate and complete disclosure of the Project's potential impacts on biological resources [Pub. Resources Code, § 21061; CEQA Guidelines, §§ 15003(i), 15151]. CDFW looks forward to commenting on the PEIR when it is available.

## Specific Comments

- 1) Stream Delineation and Impact Assessment. The LAUSD contains watercourses and wetland features including, but not limited to, the Los Angeles River and Compton Creek (USFWS 2021).
  - a) Analysis and Disclosure. In preparation of the Project's PEIR, CDFW recommends the PEIR include a stream delineation and evaluation of impacts on any river, stream, or

Christy Wong  
 Los Angeles Unified School District  
 January 30, 2023  
 Page 3 of 12

lake<sup>1</sup>. The delineation should be conducted pursuant to the United States Fish and Wildlife Service (USFWS) wetland definition adopted by CDFW<sup>2</sup> (Cowardin et al. 1979). The PEIR should discuss the Project's potential impact on streams including impacts on associated natural communities. Impacts may include channelizing or diverting streams, impairing a watercourse, and removing or degrading vegetation through habitat modification (e.g., loss of water source, encroachment, and edge effects leading to introduction of non-native plants). Impacts may occur during Project-facilitated repairs, upgrades, or modernizations. The PEIR should include a map of where Project-facilitated development could occur overlaid on streams.

- b) Mitigation. If the Project would impact streams, CDFW recommends the PEIR include measures that require future projects facilitated by the Project to mitigate for impacts on streams and associated natural communities. Mitigation may include avoiding impacts by establishing effective unobstructed vegetated buffers and setbacks adjoining streams and associated natural communities. If LAUSD proposes buffers and setbacks as mitigation for all subsequent individual projects, the PEIR should include justification for the effectiveness of chosen buffer and setback distances to avoid impacts on the stream and associated natural communities. If avoidance is not feasible, LAUSD should require individual projects to provide compensatory mitigation for impacts on streams and associated plant communities such that there is no net loss of biological resources. LAUSD should provide higher mitigation for impacts on sensitive natural communities (see General Comment #3a) and presence of rare, sensitive, or special status flora and fauna.
- c) Fish and Game Code section 1602. CDFW exercises its regulatory authority as provided by Fish and Game Code section 1600 et seq. to conserve fish and wildlife resources, which includes rivers, streams, or lakes and associated natural communities. As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream, or use material from a streambed. For any such activities, the project applicant (or "entity") must notify CDFW<sup>3</sup>. Accordingly, if the Project would impact streams, the PEIR should include a measure that requires future projects facilitated by the Program to notify CDFW pursuant to Fish and Game Code section 1602 prior to starting activities that may impact streams. Please visit CDFW's [Lake and Streambed Alteration Program](#) webpage for more information (CDFW 2023a).

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<sup>1</sup> "Any river, stream, or lake" includes those that are dry for periods of time (ephemeral/episodic) as well as those that flow year-round (perennial). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a water body.

<sup>2</sup> Be advised that some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers' Section 404 permit and Regional Water Quality Control Board Section 401 Certification.

<sup>3</sup> CDFW's issuance of a Lake and Streambed Alteration (LSA) Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the environmental document of the local jurisdiction (lead agency) for the project. To minimize additional requirements by CDFW pursuant to section 1600 et seq. and/or under CEQA, the environmental document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.



Christy Wong  
 Los Angeles Unified School District  
 January 30, 2023  
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- 2) Nesting Birds. The LAUSD contains open space, ornamental trees, and many buildings. Trees within open spaces and urbanized landscape as well as many types of buildings could support nesting birds. In the greater Los Angeles, urban forests and street trees, both native and some non-native species, provide habitat for a high diversity of birds (Wood and Esaian 2020). Some species of raptors have adapted to and exploited urban areas for breeding and nesting (Cooper et al. 2020). For example, raptors (Accipitridae, Falconidae) such as red-tailed hawks (*Buteo jamaicensis*) and Cooper's hawks (*Accipiter cooperii*) can nest successfully in urban sites. Red-tailed hawks commonly nest in ornamental vegetation such as eucalyptus (Cooper et al. 2020).
  - a) Protection Status. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). It is unlawful to take, possess, or needlessly destroy the nest or eggs of any raptor.
  - b) Analysis and Disclosure. The PEIR should discuss the Project's potential impact on nesting birds and raptors. A discussion of potential impacts should include impacts that may occur during implementation of future projects facilitated by the Project resulting in ground-disturbing activities and vegetation removal.
  - c) Avoidance. CDFW recommends the PEIR include measures that require future projects facilitated by the Project to fully avoid impacts on nesting birds and raptors. To the extent feasible, no construction, ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating), and vegetation removal should occur during the avian breeding season which generally runs from February 15 through September 15 (as early as January 1 for some raptors) to avoid take of birds, raptors, or their eggs.
  - d) Minimizing Potential Impacts. If impacts on nesting birds and raptors cannot be avoided, CDFW recommends the PEIR include measures that require future projects facilitated by the Project to minimize impacts on nesting birds and raptors. Prior to starting ground-disturbing activities and vegetation removal, a qualified biologist should conduct nesting bird and raptor surveys to identify nests. The qualified biologist should establish no-disturbance buffers to minimize impacts on those nests. CDFW recommends a minimum 300-foot no-disturbance buffer around active bird nests. For raptors, the no-disturbance buffer should be expanded to 500 feet and 0.5 mile for special status species, if feasible. Personnel working on a project, including all contractors working on site, should be instructed on the presence of nesting birds, area sensitivity, and adherence to no-disturbance buffers. Reductions in the buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors determined by a qualified biologist.
- 3) Bats. Numerous bat species are known to roost in trees and structures throughout Los Angeles County (Miner and Stokes 2005). Bats and roosts could be impacted by removal of trees, vegetation, and/or structures supporting roosting bats. This could result in injury and/or mortality of bats, as well as loss of roosting habitat. Bats and roosts could also be impacted by increased noise, human activity, dust, and ground vibrations.

Christy Wong  
 Los Angeles Unified School District  
 January 30, 2023  
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- a) Protection Status. Bats are considered non-game mammals and are afforded protection by State law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs., § 251.1). In addition, some bats are considered a California Species of Special Concern (SSC). CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC which can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Take of SSC could require a mandatory finding of significance (CEQA Guidelines, § 15065).
- b) Analysis and Disclosure. The PEIR should discuss the Project's potential impact on bats and habitat supporting roosting bats. A discussion of potential impacts should include impacts that may occur during implementation of future projects facilitated by the Project resulting in ground-disturbing activities and vegetation removal.
- c) Avoidance and Minimization. If the Project would impact bats, CDFW recommends the PEIR include measures that require future projects facilitated by the Project to avoid and minimize impacts on bats, roosts, and maternity roosts. Individual projects should be required to retain a qualified bat specialist identify potential daytime, nighttime, wintering, and hibernation roost sites and conduct bat surveys within these areas (plus a 100-foot buffer as access allows) to identify roosting bats and any maternity roosts. CDFW recommends using acoustic recognition technology to maximize detection of bats. The PEIR should include mitigation measures in accordance with [California Bat Mitigation Measures](#) (Johnston et al. 2004) that would be implemented at a project-level.

## General Comments

- 1) Disclosure. The PEIR should provide an adequate, complete, and detailed disclosure about the effect which the proposed Project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, § 15151). Adequate disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as to assess the significance of the specific impact relative to plant and wildlife species impacted (e.g., current range, distribution, population trends, and connectivity).
- 2) Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in a project through the use of feasible alternatives or mitigation measures [CEQA Guidelines, §§ 15002(a)(3), 15021]. Pursuant to CEQA Guidelines section 15126.4, an environmental document "shall describe feasible measures which could mitigate for impacts below a significant level under CEQA."
  - a) Level of Detail. Mitigation measures must be feasible, effective, implemented, and fully enforceable/imposed by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, § 15126.4). A public agency "shall provide the measures that are fully enforceable through permit conditions, agreements, or other measures" (Pub. Resources Code, § 21081.6). CDFW recommends LAUSD provide mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (Pub. Resources Code, § 21081.6;

Christy Wong  
Los Angeles Unified School District  
January 30, 2023  
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CEQA Guidelines, § 15097).

- b) Disclosure of Impacts. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the proposed Project, the PEIR should include a discussion of the effects of proposed mitigation measures [CEQA Guidelines, § 15126.4(a)(1)]. In that regard, the PEIR should provide an adequate, complete, and detailed disclosure about the Project's proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.
- 3) Biological Baseline Assessment. An adequate biological resources assessment should provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project area and where the Project may result in ground disturbance. The assessment and analysis should place emphasis on identifying endangered, threatened, rare, and sensitive species; regionally and locally unique species; and sensitive habitats. An impact analysis will aid in determining the Project's potential direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW also considers impacts to SSC a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. The PEIR should include the following information:
- a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. The PEIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities. CDFW considers Sensitive Natural Communities as threatened habitats having both regional and local significance. Natural communities, alliances, and associations with a State-wide rarity ranking of S1, S2, and S3 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting the [Vegetation Classification and Mapping Program - Natural Communities](#) webpage (CDFW 2023b);
  - b) A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#) (CDFW 2018). Botanical field surveys should be comprehensive over the entire Project area, including areas that could be directly or indirectly impacted by the Project. Adjoining properties should also be surveyed where direct or indirect Project effects could occur, such as those from fuel modification, herbicide application, invasive species, and altered hydrology;
  - c) Floristic alliance- and/or association-based mapping and vegetation impact assessments conducted in the Project area and within adjacent areas. The [Manual of California Vegetation](#), second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2009). This assessment should include adjoining habitat areas that could be directly or indirectly impacted by the Project;
  - d) A complete and recent assessment of the biological resources associated with each habitat type in the Project area and within adjacent areas. CDFW's [California Natural Diversity Database](#) in Sacramento should be contacted to obtain current information on

Christy Wong  
 Los Angeles Unified School District  
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any previously reported sensitive species and habitat (CDFW 2023c). An assessment should include a minimum nine-quadrangle search of the CNDDDB to determine a list of species potentially present in the Project area. A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review [CEQA Guidelines, § 15003(i)];

- e) A complete, recent, assessment of endangered, rare, or threatened species and other sensitive species within the Project area and adjacent areas, including SSC and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of the Project area should also be addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See CDFW's [Survey and Monitoring Protocols and Guidelines](#) for established survey protocol for select species (CDFW 2023d). Acceptable species-specific survey procedures may be developed in consultation with CDFW and U.S. Fish and Wildlife Service; and,
  - f) A recent wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period and assessments for rare plants may be considered valid for a period of up to three years. Some projects may warrant periodic updated surveys for certain sensitive taxa, particularly if build out and project implementation could occur over a protracted time frame or in phases.
- 4) CESA. Appropriate take authorization from CDFW under CESA may include an Incidental Take Permit (ITP) or a Consistency Determination in certain circumstances, among other options [Fish & Game Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to the project and mitigation measures may be required to obtain an ITP. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP for the Project unless the Project's CEQA document addresses all the Project's impact on CESA endangered, threatened, and/or candidate species. The Project's CEQA document should also specify a mitigation monitoring and reporting program that will meet the requirements of an ITP. It is important that the take proposed to be authorized by CDFW's ITP be described in detail in the Project's CEQA document. Also, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for an ITP. However, it is worth noting that mitigation for the Project's impact on a CESA endangered, threatened, and/or candidate species proposed in the Project's CEQA document may not necessarily satisfy mitigation required to obtain an ITP.
- 5) Biological Direct, Indirect, and Cumulative Impacts. The PEIR should provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources with specific measures to offset such impacts. The PEIR should address the following:

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Los Angeles Unified School District  
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- a) A discussion regarding Project-related indirect impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan (Fish & G. Code, § 2800 et. seq.)]. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in areas adjacent to the Project, should be fully analyzed and discussed in the PEIR;
  - b) A discussion of both the short-term and long-term effects of the Project on species population distribution and concentration, as well as alterations of the ecosystem supporting those species impacted [CEQA Guidelines, § 15126.2(a)];
  - c) A discussion of potential adverse impacts from lighting, noise, temporary and permanent human activity, and exotic species, and identification of any mitigation measures;
  - d) A discussion of post-Project fate of drainage patterns, surface flows, and soil erosion and/or sedimentation in streams and water bodies. The discussion should also address the potential water extraction activities and the potential resulting impacts on habitat and natural communities supported by the groundwater. Measures to mitigate such impacts should be included;
  - e) An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the PEIR; and,
  - f) A cumulative effects analysis as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant and wildlife species, habitat, and natural communities. If LAUSD determines that the Project would not have a cumulative impact, the PEIR should indicate why the cumulative impact is not significant. LAUSD's determination should be supported by facts and analyses [CEQA Guidelines, § 15130(a)(2)].
- 6) Project Description and Alternatives. To enable adequate review and comment on the proposed Project from the standpoint of the protection of fish, wildlife, and plants, CDFW recommends the following information be included in the PEIR:
- a) A complete discussion of the purpose and need for, and description of the proposed Project;
  - b) Pursuant to CEQA Guidelines section 15126.6(a), an environmental document "shall describe a reasonable range of potentially feasible alternatives to the Project, or to the location of the Project, which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project." CEQA Guidelines section 15126.6(f)(2) states if the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion; and

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 Los Angeles Unified School District  
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- c) A range of feasible alternatives to the Project location to avoid or otherwise minimize direct and indirect impacts on sensitive biological resources and wildlife movement areas. CDFW recommends LAUSD select Project designs and alternatives that would avoid or otherwise minimize direct and indirect impacts on biological resources. CDFW also recommends LAUSD consider establishing appropriate setbacks from sensitive and special status biological resources. Setbacks should not be impacted by ground disturbance, fuel modification, or hydrological changes from any future Project-related construction, activities, maintenance, and development. As a general rule, CDFW recommends reducing or clustering a development footprint to retain unobstructed spaces for vegetation and wildlife and provide connections for wildlife between properties and minimize obstacles to open space.

Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6). The PEIR “shall” include sufficient information about each alternative to allow meaningful evaluation, public participation, analysis, and comparison with the proposed Project (CEQA Guidelines, § 15126.6).

- d) Where the Project may impact aquatic and riparian resources, CDFW recommends LAUSD select Project designs and alternatives that would fully avoid impacts to such resources. CDFW also recommends an alternative that would not impede, alter, or otherwise modify existing surface flow, watercourse and meander, and water-dependent ecosystems and natural communities. Project designs should consider elevated crossings to avoid channelizing or narrowing of watercourses. Any modifications to a river, creek, or stream may cause or magnify upstream bank erosion, channel incision, and drop in water level and cause the watercourse to alter its course of flow.
- 7) Data. CEQA requires that information developed in environmental impact reports be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species and sensitive natural communities detected by completing and submitting [CNDDB Field Survey Forms](#) (CDFW 2023e). To submit additional information on sensitive natural communities, the [Combined Rapid Assessment and Releve Form](#) should be completed and submitted to CDFW’s Vegetation Classification and Mapping Program (CDFW 2023f). LAUSD should ensure data collected for the preparation of the PEIR be properly submitted and with all applicable data fields filled out.
- 8) Use of Native Plants and Trees. CDFW supports the use of native plants for any project proposing revegetation and landscaping. CDFW strongly recommends avoiding non-native, invasive plants for landscaping and restoration, particularly any species listed as ‘Moderate’ or ‘High’ by the [California Invasive Plant Council](#) (Cal-IPC 2022). CDFW supports the use of native species found in naturally occurring plant communities within or adjacent to the Project area. In addition, CDFW supports planting species of trees, such as oaks (*Quercus* genus), and understory vegetation (e.g., ground cover, subshrubs, and shrubs) in order to create habitat and provide a food source for birds. CDFW recommends retaining any standing, dead, or dying tree (snags) where possible because snags provide perching and nesting habitat for birds and raptors. Finally, CDFW supports planting species of vegetation with high insect and pollinator value.



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- 9) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of removing plants and wildlife from one location and permanently moving it to a new location. CDFW generally does not support the use of translocation or transplantation as the primary mitigation strategy for unavoidable impacts to endangered, rare, or threatened plants and animals. Studies have shown that these efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving plants and animals and their habitats.
- 10) Compensatory Mitigation. The PEIR should include compensatory mitigation measures for the Project's significant direct and indirect impacts to sensitive and special status plants, animals, and habitats. Mitigation measures should emphasize avoidance and minimization of Project-related impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore inadequate to mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement and financial assurance and dedicated to a qualified entity for long-term management and monitoring. Under Government Code, section 65967, the Lead Agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.
- 11) Long-term Management of Mitigation Lands. For proposed preservation and/or restoration, the PEIR should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset Project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of mitigation lands.
- 12) Wetland Resources. CDFW, as described in Fish and Game Code section 703(a), is guided by the Fish and Game Commission's (Commission) policies. The [Wetlands Resources](#) policy the Commission "...seek[s] to provide for the protection, preservation, restoration, enhancement and expansion of wetland habitat in California" (CFGC 2020). Further, it is the policy of the Fish and Game Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion that would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be 'no net loss' of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values."
  - a) The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization

Christy Wong  
Los Angeles Unified School District  
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measures have been exhausted, a project should include mitigation measures to assure a "no net loss" of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions benefiting local and transient wildlife populations. CDFW recommends mitigation measures to compensate for unavoidable impacts be included in the PEIR and these measures should compensate for the loss of function and value.

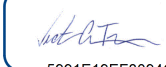
- b) The Fish and Game Commission's Water policy guides CDFW on the quantity and quality of the waters of this State that should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this State; prevent the degradation thereof caused by pollution and contamination; and, endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible (Fish & G. Code, § 5650).

## Conclusion

We appreciate the opportunity to comment on the NOP for the District-wide Redevelopment Program to assist the Los Angeles Unified School District in preparing the Project's environmental document and identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Felicia Silva, Environmental Scientist, at [Felicia.Silva@wildlife.ca.gov](mailto:Felicia.Silva@wildlife.ca.gov) or (562) 292-8105.

Sincerely,

DocuSigned by:



5991E19EF8094C3...

Victoria Tang signing for

Erinn Wilson-Olgin  
Environmental Program Manager I  
South Coast Region

ec: CDFW

Erinn Wilson-Olgin, Seal Beach – [Erinn.Wilson-Olgin@wildlife.ca.gov](mailto:Erinn.Wilson-Olgin@wildlife.ca.gov)  
Victoria Tang, Seal Beach – [Victoria.Tang@wildlife.ca.gov](mailto:Victoria.Tang@wildlife.ca.gov)  
Ruby Kwan-Davis, Seal Beach – [Ruby.Kwan-Davis@wildlife.ca.gov](mailto:Ruby.Kwan-Davis@wildlife.ca.gov)  
Felicia Silva, Seal Beach – [Felicia.Silva@wildlife.ca.gov](mailto:Felicia.Silva@wildlife.ca.gov)  
Julisa Portugal, Seal Beach – [Julisa.Portugal@wildlife.ca.gov](mailto:Julisa.Portugal@wildlife.ca.gov)  
Cindy Hailey, San Diego – [Cindy.Hailey@wildlife.ca.gov](mailto:Cindy.Hailey@wildlife.ca.gov)  
CEQA Program Coordinator, Sacramento – [CEQACommentLetters@wildlife.ca.gov](mailto:CEQACommentLetters@wildlife.ca.gov)



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OPR

State Clearinghouse, Sacramento – [State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

## References:

- [CDFWa] California Department of Fish and Wildlife. 2023. Lake and Streambed Alteration Program. Available from: <https://wildlife.ca.gov/Conservation/LSA>.
- [CDFWb] California Department of Fish and Wildlife. 2023. Natural Communities. Available from: <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities>.
- [CDFWc] California Department of Fish and Wildlife. 2022. California Natural Diversity Database. Available from: <https://wildlife.ca.gov/Data/CNDDDB/Maps-and-Data#43018408-cnddb-in-bios>
- [CDFWd] California Department of Fish and Wildlife. 2023. Survey and Monitoring Protocols and Guidelines. Available from: <https://wildlife.ca.gov/conservation/survey-protocols>
- [CDFWe] California Department of Fish and Wildlife. 2023. Submitting Data to the CNDDDB. Available from: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>
- [CDFWf] California Department of Fish and Wildlife. 2023. Natural Communities — Submitting Information. Available from: <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>
- [CDFW] California Department of Fish and Wildlife. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Available from: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959>
- [Cal-IPC] California Invasive Plant Council. 2022. The Cal-IPC Inventory. Available from: <https://www.cal-ipc.org/plants/inventory/>
- [CFGc] California Fish and Game Commission. 2020. Policies. Retention of Wetland Acreage and Habitat Values. Accessed: <https://fgc.ca.gov/About/Policies/Miscellaneous>.
- Cooper D.S., Yeh, P.J., and D.T. Blumstein. 2020. Tolerance and avoidance of urban cover in a southern California suburban raptor community over five decades. Urban Ecosystems. doi.org/10.1007/s11252-020-01035-w
- Cowardin, L.M., V. Carter, F.C. Golet, and E.T. LaRoe. 1979. Classification of wetlands and deepwater habitats of the United States. U.S. Fish and Wildlife Service. FWS/OBS-79/31. Washington, DC.
- Johnston, D., Tatarian, G., & Pierson, E. 2004. California Bat Mitigation Techniques, Solutions, and Effectiveness. Available from: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=10334>
- Miner, K.L. and D.C. Stokes. 2005. Bats in the South Coast Ecoregion: Status, Conservation Issues, and Research Needs. USDA Forest Service Gen. Tech. Rep. PSW-GTR-195.
- Sawyer, J. O., Keeler-Wolf, T., and Evens J.M. 2009. A Manual of California Vegetation, 2nd ed. ISBN 978-0-943460-49-9.
- [USFWS] United States Fish and Wildlife Service. 2021. Wetlands Mapper. [Accessed 24 January 2023]. Accessed at: <https://www.fws.gov/wetlands/data/mapper.html>.
- Wood, E.M. and S. Esaian. 2020. The importance of street trees to urban avifauna. Ecological Applications 30(7): e02149.

## Wong, Christy

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**From:** Juan Arauz <jarauz@cityofcudahyca.gov>  
**Sent:** Tuesday, January 31, 2023 6:37 PM  
**To:** Wong, Christy  
**Cc:** Alfonso Noyola; Aaron Hernandez-Torres  
**Subject:** District-Wide Redevelopment Program

You don't often get email from jarauz@cityofcudahyca.gov. [Learn why this is important](#)

### CAUTION: EXTERNAL EMAIL

Hi Christy,

The City of Cudahy has received LAUSD's NOP of a PEIR for the district-wide redevelopment of school campuses. Per the NOP, the project aims to *1) increase safety measures and 2) address facility inequities in order to provide students with physical and environmentally safe, secure, and updated school facilities.*

The City of Cudahy requests the following be evaluated and implemented upon the preparing of the PEIR:

- 1) Schools within our city limits have inadequate and unsafe vehicle drop-off and pick-up zones, and queueing capacity. For example, schools within our city limits do not provide onsite pick-up/drop-off areas, and therefore parents are forced to unsafely and illegally park their vehicles on city streets and public right-of-ways and have their children traverse through unprotected crossing (street) areas. Schools should support their drop-off and pick-up completely onsite through adequate internal vehicle circulation and queueing. The PEIR should analyze how this can be accomplished.
- 2) Please add Alfonso Noyola, Aaron Hernandez, and myself as interested parties and include us in all public correspondences and updates on this project.

Thank you,



**Juan Arauz, AICP**  
Community Development Director  
City of Cudahy  
5220 Santa Ana Street  
Cudahy, California 90201  
Tel: 323.773.5143  
[www.cityofcudahy.com](http://www.cityofcudahy.com)



## Community Development Department

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Christy Wong  
Los Angeles Unified School District  
Office of Environmental Health and Safety  
333 South Beaudry Avenue, 21<sup>st</sup> Floor  
Los Angeles, CA 90017

02/02/2023

RE: District-Wide Redevelopment Program

Dear Ms. Wong,

Thank you for allowing the City of Huntington Park the opportunity to review and comment on the Draft Subsequent Program Environmental Impact Report for the LAUSD District Wide Redevelopment Program. After reviewing the documents available online, we are writing in concern of the proposed expansion of Districtwide Charter Schools.

The City of Huntington Park currently has 32 schools located within just three-square miles. Presently there are 11 LAUSD Charter Schools within the City of Huntington Park. These Charter Schools include but are not limited to 4 KIPP locations and 4 Aspire locations. The proposed upgrades and expansions to LAUSD Charter Schools will result in increased traffic to and from the site, increased noise concerns and additional need for public services. As a result of the State ADU law off-street and on-street parking has been severely impacted throughout the City. It should be noted that several existing LAUSD charter schools within the City of Huntington Park do not have the proper infrastructure in place for drop off and pick up zones. This has resulted in increased congestion and vehicles double parking on City streets.

Sincerely,

A handwritten signature in dark ink, appearing to read "S. Forster", is written over a faint, larger signature that looks like "AF".

Steve Forster, Community Development Director



523 West Sixth Street, Suite 826  
Los Angeles, CA 90014

213 623 2489 OFFICE  
213 623 3909 FAX  
[laconservancy.org](http://laconservancy.org)

February 2, 2023

Submitted Electronically

Christy Wong  
Los Angeles Unified School District  
Office of Environmental Health and Safety  
333 South Beaudry Avenue, 21<sup>st</sup> Floor  
Los Angeles, CA 90017  
Email: [cp-christy.wong@lausd.net](mailto:cp-christy.wong@lausd.net)

**RE: Notice of Preparation (NOP) of a Draft Subsequent Program Environmental Impact Report (PEIR) for the District-Wide Redevelopment Program**

Dear Christy Wong:

On behalf of the Los Angeles Conservancy, I am writing to comment on the Notice of Preparation (NOP) of a Draft Subsequent Program Environmental Impact Report (PEIR) for the District-Wide Redevelopment Program. The proposed redevelopment program encompasses schools within the entire LA Unified School District (LAUSD). In 2020, Los Angeles County passed Measure RR to help address the significant and unfunded needs of LAUSD facilities.

At the time of its release, the NOP does not include an Initial Study (IS) per CEQA Guidelines Section 15060(d) and 15082, which allows the lead agency to skip further initial review and begin work directly on the PEIR. Without an IS, the Conservancy offers the following comments and recommendations.

**I. Preservation planning for historically significant LAUSD campuses should be included within the redevelopment program.**

There are many historically significant schools within LAUSD. In 2014, Sapphos Environmental, Inc. completed a district-wide historic resources survey and historic context statement. Through their



research, Sapphos identified a period of significance of 1870-1969. The context statement reveals four distinct periods listed below.

- 1) Founding Years, 1870s through 1909;
- 2) Progressive Education Movement: Standardization and Expansion, 1910 to 1933;
- 3) Era of Reform: Great Depression, Earthquake, and Early Experiments in the Modern Functionalist School Plant, 1933-1944; and
- 4) Educating the Baby Boom: Post War Expansion and the Modern, Functionalist School Plant, 1945 to 1969

Within these distinct periods, Sapphos developed a number of themes that range from architectural styles to properties significant for their connection to the Civil Rights Movement.

Prior to the Sapphos context/survey, LAUSD in conjunction with the Getty Conservation Institute (GCI) launched the district's first comprehensive Historic Resources Survey from 2001-2004. This survey resulted in findings of federal and/or state eligibility for 123 schools and focused primarily on pre-World War II era resources. At the time of Sapphos' survey, approximately 175 additional campuses passed the 45-year mark. Sapphos evaluated approximately 125 additional campuses constructed between 1945-1955. A significant number of these campuses were found eligible for listing at the national and/or state levels. Additionally, LAUSD owns a number of designated properties including Hollywood and University High Schools among others.

The Conservancy has long advocated for historic resources under the purview of LAUSD. We have been involved with comprehensive modernization (Comp Mod) projects at Jefferson, Lincoln, and Roosevelt High Schools to name a few. We believe it is important to preserve Los Angeles's historically significant campuses for future generations of students to connect with and learn from.

The LAUSD has already set up measures and protocols to ensure historic school facilities are properly considered, and sets an example for its students of responsible historic and cultural stewardship. Will the process established through the "Comp Mod" program follow in this case and the Measure RR funding? As LAUSD has demonstrated before, the district's goal to provide a safe and healthy environment that promotes learning is not mutually exclusive to preservation. The Conservancy strongly believes that these two concepts can successfully work in tandem to inspire future generations.

Recommendation: Embed historic preservation language and policy within the redevelopment plan to ensure future comp mod and development projects impacting historic resources are compliant with the *Secretary of the Interior's Standards for the*





Treatment of historic Properties. Additionally, previously identified historic resources should be clearly identified in the redevelopment program.

## **II. The redevelopment program should include an expanded historic resources survey to include additional properties that fall outside the 1870-1969 period of significance**

The Conservancy encourages LAUSD to conduct an additional survey for properties that fall outside the 1870-1969 period of significance. When completed in 2014, the 1969 cutoff date accounted for properties up to 45 years old. Today, nearly ten years later, additional properties have reached the threshold of 45 years used during the previous survey. As time passes, a campus's architecture or past events may elevate its significance.

Recommendation: Update and expand the existing historic resources survey to include properties outside the previous period of significance to accommodate properties reaching the 45-year threshold used in 2014.

## **III. The Los Angeles Conservancy requests a meeting with the project team**

The Los Angeles Conservancy welcomes the opportunity to meet with the project team to discuss the project further. As stated above, we have long advocated for historic schools. The Conservancy values their presence as cultural resources for future Angelinos to connect with and learn from. It is not our intention to freeze these campuses in the past; rather we look for win-win outcomes that allow for modernization while honoring their significant pasts.

In Summary, the Conservancy recommends the following be included in the District-Wide Redevelopment Program.

- Embed historic preservation language and policy within the redevelopment plan to ensure future comp mod and development projects impacting historic resources are compliant with the *Secretary of the Interior's Standards for the Treatment of historic Properties*. Additionally, previously identified historic resources should be clearly identified in the redevelopment program.
- Update and expand the existing historic resources survey to include properties outside the previous period of significance to accommodate properties reaching the 45-year threshold used in 2014.



As stated above, the Conservancy welcomes the opportunity to meet with the project team to discuss the impacts of cultural resources and find win-win outcomes.

**About the Los Angeles Conservancy:**

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Please do not hesitate to contact me at (213) 430-4203 or [afine@laconservancy.org](mailto:afine@laconservancy.org) should you have any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "Adrian Scott Fine". The script is fluid and cursive, with the first name "Adrian" being the most prominent.

Adrian Scott Fine  
Senior Director of Advocacy





## NATIVE AMERICAN HERITAGE COMMISSION

January 5, 2023

Christy Wong  
 Los Angeles Unified School District  
 333 South Beaudry Avenue, 21<sup>st</sup> Floor  
 Los Angeles, CA 90017

**Re: 2023010013, District-Wide Redevelopment Project, Los Angeles County**

Dear Ms. Wong:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

AB 52



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- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- Avoidance and preservation of the resources in place, including, but not limited to:
    - Planning and construction to avoid the resources and protect the cultural and natural context.
    - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - Protecting the cultural character and integrity of the resource.
    - Protecting the traditional use of the resource.
    - Protecting the confidentiality of the resource.
  - Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)



3. Contact the NAHC for:
- a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
- a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:  
[Andrew.Green@nahc.ca.gov](mailto:Andrew.Green@nahc.ca.gov).

Sincerely,



Andrew Green  
Cultural Resources Analyst

cc: State Clearinghouse

## A-3 Notice of Availability of Draft EIR

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# NOTICE OF AVAILABILITY

## DRAFT SUBSEQUENT PROGRAM ENVIRONMENTAL IMPACT REPORT

**TO:** Agencies, Organizations and Interested Parties

**PROJECT TITLE:** School Upgrade Program (SUP)

**SUBJECT:** Notice of Availability of a Draft Subsequent Program Environmental Impact Report

**Notice is hereby given** that the Los Angeles Unified School District (LAUSD or District), as Lead Agency for the School Upgrade Program, has prepared a Draft Subsequent Program Environmental Impact Report (Draft SPEIR) pursuant to the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC], Division 13, Section 21000 et seq. [CEQA Statute] and the California Code of Regulations [CCR], Title 14, Division 6, Chapter 3, Section 15000 et seq. [CEQA Guidelines]). The purpose of this notice is to solicit comments regarding the content of the Draft SPEIR.

### PROJECT LOCATION:

The proposed upgrade program encompasses schools within the District, which is the largest (in terms of number of students) public school system in California and the second largest public school district in the United States. LAUSD covers an area totaling 710 square miles which includes most of the city of Los Angeles, along with all or portions of 25 cities and unincorporated areas of Los Angeles County

### PROJECT DESCRIPTION:

In 2020, voters in Los Angeles County passed Measure RR as a funding mechanism to help address the significant and unfunded needs of Los Angeles public school facilities. Measure RR is aimed at continuing the funding for improvement of facilities and technology, upgrade of existing facilities, as well as increased safety measures. Measure RR proceeds may also be used when necessary to complete projects initiated with funds from Measure K, R, Y, and/or Q as long as the project appears on the Measure RR Bond Project List, as authorized by voters.

The District's bond program has been operating under the framework of the School Upgrade Program (SUP) since January 2014, when the program's focus shifted from constructing new facilities to address decades of overcrowding, to addressing aging existing school facilities. Projects developed under the SUP framework are upgrading, modernizing, and replacing aging and deteriorating school facilities, updating technology, and addressing facilities inequities.

Projects designed to achieve the objectives of Measure RR will be incorporated into the SUP based on a prioritization methodology adopted through the solicitation of input from stakeholders to help inform priorities, scoping and project development.

Under Measure RR and in association with other, ongoing LA Unified Facilities programs, the District is proposing to upgrade, modernize, and replace aging and deteriorating District school facilities; update technology; and address District school facilities inequities in order to provide students with physically and environmentally safe, secure, and updated school facilities that support 21st century learning at hundreds of neighborhood schools District-wide. Not every project will be undertaken at every campus, and some campuses may not undergo any of the repairs, upgrades, or modernization. Each category of project will be carried out at schools found to have the greatest need, as determined by the Strategic Execution Plan adopted by the LAUSD Board of Education. The program may include, but is not limited to, the following types of campus-specific projects:

- Major modernizations, upgrades, and reconfigurations to school campuses;
- Critical replacements and upgrades of school building/site systems and components;
- Upgrade and equip schools with 21st Century technologies, and upgrade technology infrastructure, information systems, hardware and software;
- School upgrades and reconfigurations to support wellness, health, athletics, learning, and efficiency;
- Specialized facilities upgrades such as Early Childhood Education Centers, Adult and Career Education facilities, and school cafeterias;
- Transition Plan implementation; and
- Districtwide Charter School facilities upgrades and expansions.

### POTENTIAL ENVIRONMENTAL EFFECTS:

In accordance with Section 15082 of the State CEQA Guidelines, the District has prepared this Notice of Availability to provide Responsible Agencies and other interested parties with information describing the proposed Project and its potential environmental effects. Environmental factors that will be analyzed in the Draft Subsequent PEIR are:

Aesthetics	Greenhouse Gas Emissions	Population and Housing
Agriculture and Forestry Resources	Hazards and Hazardous Materials	Public Services
Air Quality	Hydrology and Water Quality	Recreation
Biological Resources	Land Use and Planning	Transportation and Traffic
Cultural Resources	Mineral Resources	Tribal Cultural Resources
Energy	Noise	Utilities and Service Systems
Geology and Soils	Pedestrian Safety	Wildfire

### SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS:

Specific Environmental Factors associated with the Project involve potentially unavoidable significant adverse impacts, including: Air Quality, Cultural Resources, Noise, and Transportation and Traffic.



## NOTICE OF AVAILABILITY DRAFT SUBSEQUENT PROGRAM ENVIRONMENTAL IMPACT REPORT

**PUBLIC REVIEW PERIOD AND DOCUMENT AVAILABILITY:** The Draft SPEIR will be available for review during the 45-day public review period from **July 5, 2023, to August 19, 2023**. A copy of the Draft SPEIR is available for review at:

- LAUSD, Office of Environmental Health and Safety, 333 South Beaudry Avenue 21st Floor, Los Angeles, CA 90017. Please call (213) 241-3199 for appointment.

The Draft SPEIR and additional information concerning the proposed Program is also available electronically on the LAUSD Office of Environmental Health and Safety Website: <https://achieve.lausd.net/ceqa>.

**PUBLIC COMMENTS:** Please indicate a contact person and send your comments to:

Los Angeles Unified School District  
Office of Environmental Health and Safety  
333 South Beaudry Avenue, 21<sup>st</sup> Floor,  
Los Angeles, CA 90017  
Attention: Christy Wong

Comments can also be sent by e-mail to [ceqa-comments@lausd.net](mailto:ceqa-comments@lausd.net). Please include "School Upgrade Program" in the subject line.

**LAUSD BOARD HEARING:** The LAUSD Board of Education will consider certification of this CEQA document during a regularly scheduled meeting. Check the LAUSD website periodically for the meeting date, time and location at: <https://achieve.lausd.net/boe>.



## AVISO DE DISPONIBILIDAD PROYECTO DE INFORME DE IMPACTO AMBIENTAL DEL PROGRAMA SUBSIGUIENTE

**PARA:** Agencias, organizaciones y partes interesadas

**TÍTULO DEL PROYECTO:** Programa de mejora de escuelas (SUP)

**ASUNTO:** Aviso de disponibilidad de un borrador de informe de impacto ambiental del programa subsiguiente

**Por la presente se notifica** que el Distrito Escolar Unificado de Los Ángeles (LAUSD o Distrito), como organismo o agencia principal del Programa de Mejora de Escuelas, ha preparado un Borrador del Informe de Impacto Ambiental del Programa Subsiguiente (Borrador SPEIR) de conformidad con la Ley de Calidad Ambiental de California (CEQA) (Código de Recursos Públicos de California [PRC], División 13, Sección 21000 y siguientes [Estatuto CEQA]) y el Código de Reglamentos de California [CCR], Título 14, División 6, Capítulo 3, Sección 15000 y siguientes [Estatuto CEQA], [Estatuto CEQA] y el Código de Regulaciones de California [CCR], Título 14, División 6, Capítulo 3, Sección 15000 y siguientes [Directrices de CEQA]. El propósito de este aviso es solicitar comentarios sobre el contenido del Borrador del SPEIR.

### UBICACIÓN DEL PROYECTO:

El programa de mejora propuesto abarca las escuelas del distrito, que es el sistema escolar público más grande (en número de alumnos) de California y el segundo distrito escolar público más grande de Estados Unidos. El LAUSD cubre un área total de 710 millas cuadradas que incluye la mayor parte de la ciudad de Los Ángeles, junto con la totalidad o partes de 25 ciudades y áreas no incorporadas del condado de Los Ángeles.

### DESCRIPCIÓN DEL PROYECTO:

En el año 2020, los votantes del condado de Los Ángeles aprobaron la Medida RR como mecanismo de financiamiento para ayudar a hacer frente a las importantes necesidades sin financiamiento de las instalaciones de las escuelas públicas de Los Ángeles. La Medida RR tiene por objeto seguir financiando la mejora de las instalaciones y la tecnología, la modernización de las instalaciones existentes, así como el aumento de las medidas de seguridad. Los ingresos de la Medida RR también pueden utilizarse cuando sea necesario para completar proyectos iniciados con fondos de las Medidas K, R, Y y/o Q, siempre que el proyecto figure en la Lista de Proyectos de Bonos de la Medida RR, tal y como autorizaron los votantes.

El programa de bonos del Distrito ha estado operando bajo el marco del Programa de Mejora de Escuelas (SUP) desde enero de 2014, cuando el enfoque del programa pasó de la construcción de nuevas instalaciones para hacer frente a décadas de hacinamiento, a abordar el envejecimiento de las instalaciones escolares existentes. Los proyectos desarrollados en el marco del SUP mejoran, modernizan y sustituyen las instalaciones escolares antiguas y deterioradas, actualizan la tecnología y abordan las desigualdades en las instalaciones.

Los proyectos diseñados para alcanzar los objetivos de la Medida RR se incorporarán al SUP basándose en una metodología de prioridades adoptada a través de la solicitud de aportaciones de las partes interesadas para ayudar a informar sobre las prioridades, el alcance y el desarrollo de los proyectos.

Bajo la Medida RR y en asociación con otros programas en curso de Instalaciones del Distrito Unificado de Los Ángeles, el Distrito está proponiendo mejorar, modernizar y reemplazar las instalaciones escolares del Distrito que estén antiguas y deterioradas; actualizar la tecnología; y abordar las desigualdades de las instalaciones escolares del Distrito con el fin de proporcionar a los estudiantes instalaciones escolares física y ambientalmente seguras, protegidas y actualizadas que apoyen el aprendizaje del siglo XXI en cientos de escuelas vecinales en todo el Distrito. No todos los proyectos se llevarán a cabo en todos los planteles, y es posible que en algunos de ellos no se realice ninguna de las reparaciones, mejoras o modernizaciones. Cada categoría de proyecto se llevará a cabo en las escuelas que se consideren más necesitadas, según determine el Plan de Ejecución Estratégica adoptado por el Consejo de Educación del LAUSD. El programa puede incluir, entre otros, los siguientes tipos de proyectos específicos del plantel escolar:

- Modernizaciones, mejoras y reconfiguraciones importantes de los planteles escolares;
- Sustituciones y mejoras esenciales de los sistemas y componentes de los edificios y de los sitios escolares;
- Modernizar y equipar las escuelas con las tecnologías del siglo XXI y mejorar la infraestructura tecnológica, los sistemas de información, el hardware y el software;
- Mejoras y reconfiguraciones escolares para apoyar el bienestar, la salud, el atletismo, el aprendizaje y la eficiencia;
- Mejoras de instalaciones especializadas como centros de educación infantil, instalaciones de educación profesional y de adultos y comedores escolares;
- Aplicación del Plan de Transición; y
- Mejoras y expansiones de las instalaciones de las escuelas semiautónomas en todo el distrito.

### EFFECTOS AMBIENTALES POTENCIALES:

De acuerdo con la Sección 15082 de las Directrices de CEQA del Estado, el Distrito ha preparado este Aviso de Disponibilidad para proporcionar a las Agencias Responsables y a otras partes interesadas información que describa el Proyecto propuesto y sus posibles efectos ambientales. Los factores ambientales que se analizarán en el Borrador del PEIR subsiguiente son:

Estética	Emisiones de gases de efecto invernadero	Población y vivienda
Agricultura y recursos forestales	Riesgos y materiales peligrosos	Servicios públicos
Calidad del aire	Hidrología y calidad del agua	Recreación
Recursos biológicos	Usos y planificación de los terrenos	Transporte y tráfico
Recursos culturales	Recursos minerales	Recursos culturales tribales
Enfermedad	Ruido	Sistemas de utilidades/servicios



## AVISO DE DISPONIBILIDAD PROYECTO DE INFORME DE IMPACTO AMBIENTAL DEL PROGRAMA SUBSIGUIENTE

Geología y suelos

Seguridad de los peatones

Incendio forestal

### IMPACTOS ADVERSOS NO EVALUABLES SIGNIFICATIVOS:

Los Factores Ambientales Específicos asociados con el Proyecto implican impactos adversos significativos potencialmente inevitables, incluyendo: Calidad del aire, recursos culturales, ruido y transporte y tráfico.

**PERÍODO DE REVISIÓN PÚBLICA Y DISPONIBILIDAD DE DOCUMENTOS:** El Borrador del SPEIR estará disponible para su revisión durante el periodo de revisión pública de 45 días entre el **5 de julio de 2023 y el 19 de agosto de 2023**. Una copia del Borrador del SPEIR está disponible para su revisión en:

- LAUSD, Oficina de Salud y Seguridad Ambiental, 333 South Beaudry Avenue 21st Floor, Los Ángeles, CA 90017. Llame al (213) 241-3199 si desea programar una cita.

El Borrador del SPEIR y la información adicional relativa al Programa propuesto también están disponibles en formato electrónico en el sitio web de la Oficina de Salud y Seguridad Ambiental del LAUSD: <https://achieve.lausd.net/ceqa>.

**COMENTARIOS PÚBLICOS:** Por favor, indique una persona de contacto y envíe sus comentarios a

Los Angeles Unified School District  
Oficina de Salud y Seguridad Ambiental  
333 South Beaudry Avenue, 21<sup>st</sup> Floor,  
Los Ángeles, CA 90017  
Atención: Christy Wong

También puede enviar sus comentarios por correo electrónico a [ceqa-comments@lausd.net](mailto:ceqa-comments@lausd.net). Por favor, incluya "Programa de mejora escolar" en el asunto.

**AUDIENCIA DEL CONSEJO DEL LAUSD:** El Consejo de Educación del LAUSD considerará la certificación de este documento de CEQA durante una reunión programada regularmente. Visite el sitio web de LAUSD periódicamente para conocer la fecha, hora y lugar de la reunión en: <https://achieve.lausd.net/boe>.

## Appendix B. Cultural Resource

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## B-1 Historic Resource Context Statement 2014

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# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**Prepared by**

Sapphos Environmental, Inc.

for the

Los Angeles Unified School District  
Office of Environmental Health and Safety

**June 2014**

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## DRAFT HISTORIC RESOURCES SURVEY REPORT

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# LOS ANGELES UNIFIED SCHOOL DISTRICT

## DRAFT HISTORIC RESOURCES SURVEY REPORT

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# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



Figures 1 and 2. San Fernando Valley postwar schools: at left, Grover Cleveland Senior High School (1959), Charles Matcham & Stewart Granger and Associates, Reseda-West Van Nuys; at right, Chatsworth Senior High School (1963), Wilson & Associates, Chatsworth. Source: Sapphos Environmental, Inc., 2013.

### EXECUTIVE SUMMARY

This report presents the results of a historic resources survey conducted for the Los Angeles Unified School District (LAUSD) by Sapphos Environmental, Inc. between October 2013 and February 2014. Debi Howell-Ardila, senior architectural historian, served as project manager, survey team lead, and principal author of the LAUSD Historic Resources Survey Report. Marilyn Novell, historic resources coordinator, contributed to fieldwork, research, data management, and documenting survey results on Department of Parks and Recreation forms. Carole Zellie, historic resources manager, provided oversight and input. All staff meet and/or exceed the Secretary of the Interior's Professional Qualifications Standards for architectural history. Gwenn Godek of the LAUSD Office of Environmental Health and Safety served as project administrator and manager.

This survey represents a first step in a district-wide historic resources survey of as-yet unevaluated LAUSD campuses and properties. The information compiled in this report, including the *LAUSD Historic Context Statement, 1870 to 1969*, is intended to provide the district with a basis for proactively identifying, documenting, and maintaining its historically significant school buildings and campuses in advance of district-wide redevelopment efforts.

Included in this survey were a total of 55 LAUSD campuses, which span the extent of the district (Figure 3, *Los Angeles Unified School District boundary*). At the time of the survey, all campuses were 45 years of age or older, with dates of construction ranging from the late 1940s through early 1970s; a majority had not been previously surveyed or evaluated. The survey sample included elementary, middle, and senior high schools, as well as several specialty facilities or campuses.

Of the 55 campuses surveyed, 14 campuses appear to be eligible for the National Register of Historic Places (NRHP) and/or the California Register of Historical Resources (CRHR). Eligible campuses are described in detail in Section 4, Survey Results, and documented on Department of Parks and Recreation (DPR) Primary and Building, Structure, and Object forms, which are included in Appendix A.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



Figure 3. Los Angeles Unified School District boundary. Source: Sapphos Environmental, Inc., 2014.



Figures 4 and 5. Leapwood Avenue Elementary School (1962), Carson. Source: Sapphos Environmental, Inc., 2014.

### I. INTRODUCTION

With nearly 800 campuses and a geographic span of over 700 square miles, LAUSD is the second largest public school system in the United States. The district includes all of incorporated Los Angeles, as well as unincorporated areas throughout Los Angeles County. LAUSD's northern portion spans the San Fernando Valley, including Granada Hills, Chatsworth, Reseda, Woodland Hills, Van Nuys, Sylmar, San Fernando, Pacoima, and Sunland. Along the west, LAUSD includes western Los Angeles, Pacific Palisades, Venice, and Westchester. Along the east, LAUSD borders Glendale, Monterey Park, Montebello, Commerce, Downey, and Long Beach. Within LAUSD, extending south from Los Angeles, are the communities of Vernon, Huntington Park, Maywood, Bell, South Gate, Gardena, and Carson. LAUSD's southernmost portion includes San Pedro, Lomita, and Rancho Palos Verdes.

Since its founding in 1872, LAUSD has commissioned, designed, and acquired a remarkable collection of buildings, campuses, and facilities. These properties reflect more than a century of social, architectural, and technological advances, as well as ongoing educational and curricular reform. Extant properties range from a wood-framed schoolhouse of the late nineteenth century to superblock campuses displaying Mid-Century Modern architectural styles.

In the early 2000s, in conjunction with the Getty Conservation Institute, LAUSD launched the district's first comprehensive Historic Resources Survey. This work resulted in findings of federal and/or state eligibility for 123 schools (local eligibility criteria were not included in these surveys; public schools are statutorily exempt in the California State Government Code from local landmark designation).<sup>1</sup> With a project scope focused primarily on the pre-World War II era, however, many postwar campuses were either not surveyed or not subject to context-driven evaluations. Since the 2001–2004 surveys, approximately 175 additional campuses have passed the 45-year mark, signaling the need for future evaluation. Another approximately 125 campuses constructed between 1945 and 1955 have been evaluated only at the reconnaissance level, and only from the public right-of-way.<sup>2</sup>

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### **Project Description and Purpose**

In advance of campus-wide redevelopment, LAUSD contracted with Sapphos Environmental, Inc. to provide historic resource consulting services to inform master planning efforts and environmental review pursuant to the California Environmental Quality Act (CEQA). The scope of work is three-fold:

1. Preparation of a comprehensive LAUSD Historic Context Statement;
2. Historic resource surveys of 55 campuses; and
3. Updating the LAUSD Historic Resources Inventory database.

The 55 campuses surveyed included school plants that have not yet been subject to historic resource evaluations due to age (i.e., schools built primarily between 1955 and 1969) and schools that were previously identified as warranting re-evaluation once they reached 45 years of age. These included: (1) 10 high schools; (2) 22 schools identified in the 2002 “Phase 2” Getty survey as warranting re-evaluation; and (3) 23 elementary and junior high schools.

### ***Historic Resources and CEQA***

In addition to helping inform master planning efforts for LAUSD, this Historic Resources Survey and report are designed to facilitate compliance with CEQA, which requires lead agencies to consider the potential effects of proposed projects on historic resources as defined by CEQA. CEQA identifies a historic resource as a property that is listed in—or is eligible for listing in—the NRHP, CRHR, or local registers. NRHP-listed properties are automatically included in the CRHR. The criteria for both are similar and described below, with the NRHP letter (A, B, C, and D) followed by the corresponding CRHR number (1, 2, 3, and 4). In keeping with the 2001–2004 LAUSD Historic Resources Surveys, local criteria were not included.<sup>3</sup>

Resources that may be eligible for listing include buildings, sites, structures, objects, and historic districts. To qualify as a historic resource under CEQA, a resource must be significant at the local, state, or national level under one or more of the following criteria:

- A/1: For an association with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States (NRHP Criterion A; CRHR Criterion 1);
- B/2: For an association with the lives of persons important to local, California, or national history (NRHP Criterion B; CRHR Criterion 2);
- C/3: As an embodiment of the distinctive characteristics of a type, period, region, or method of construction, representative of the work of a master or high artistic values (NRHP Criterion C; CRHR Criterion 3); or



D/4: Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation (NRHP Criterion D; CRHR Criterion 4).

There is no specific age threshold for CRHR eligibility; rather, the regulations specify that enough time must have passed for a property to be evaluated within its historic context.

Resources eligible for listing in the CRHR must retain enough of their historic character or appearance to be recognizable as historic resources and to convey the reasons for their significance. It is possible that resources that may not retain sufficient integrity for listing in the NRHP may still be eligible for the CRHR. The evaluation of integrity is based on how a property's physical features and attributes tell the story of its historic significance. The NRHP has defined the following seven aspects of historic integrity: Location, Design, Setting, Materials, Workmanship, Feeling, and Association.<sup>4</sup>

### ***Previous Historic Resources Surveys and Studies***

The consultants reviewed past LAUSD property surveys, including the following three historic resource surveys, as well as one in-progress project:

(1) **Historic resource surveys following the 1994 Northridge Earthquake**

Conducted for the Federal Emergency Management Agency (FEMA) and carried out in support of compliance under Section 106 of the National Historic Preservation Act, these surveys identified approximately 39 out of 71 campuses surveyed as historic (i.e., eligible for listing in the NRHP or for designation under a local ordinance);

(2) **"Phase 1" Getty survey**

This 2001–2002 historic resource survey was funded through a Planning Grant from Preserve LA, a program of the J. Paul Getty Trust. The survey included approximately 190 campuses, with results incorporating and expanding on the 1994 FEMA survey; a database of 410 schools aged 45 years or older was prepared as part of the project;

(3) **"Phase 2" Getty survey**

This 2002–2004 expansion of Phase 1 considered approximately 220 campuses;

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT

### (4) **SurveyLA**

A multi-year, citywide historic resource survey, partially funded by the J. Paul Getty Trust and covering all of Los Angeles; led by the City of Los Angeles Office of Historic Resources, the project is in its final phase as of spring 2014. Numerous LAUSD properties appear to be eligible for federal, state, or local listing and are therefore presumed historic resources for the purposes of CEQA. Final results from SurveyLA will be incorporated into the California State Historic Resources Inventory.

Included in the compiled LAUSD Historic Resources Inventory prepared for this report are eligibility findings from the 2001–2004 Phase 1 and Phase 2 Getty surveys (i.e., all campuses found eligible for either the NRHP and/or the CRHR). Eligibility findings for LAUSD schools made through SurveyLA, which is in progress as of June 2014, are available through the City of Los Angeles Office of Historic Resources.<sup>5</sup>

### II. SURVEY METHODS AND PROCEDURES

The survey process used by Sapphos Environmental, Inc. staff was based on recognized professional standards, including those recommended by the National Park Service and the California Office of Historic Preservation guided by California Historic Resources Status Codes. Proceeding in stages, the survey method was as follows:

1. Pre-field research on each campus;
2. Fieldwork, including on-campus site inspections;
3. Compilation of results, with data entered into a property list including Assessor's Parcel Number; address; principal dates of construction; architect, designer, and/or contractor, if known; and past and present evaluation results;
4. Analysis, with compiled data and results of site inspections studied and compared with applicable criteria as well as the findings of the LAUSD Historic Context Statement;
5. Evaluation/Designation, wherein each campus was found either eligible or not eligible and assigned a California Historic Resources Status Code indicating evaluation findings.

Before beginning survey work, Sapphos Environmental, Inc. completed a comprehensive Historic Context Statement to guide evaluations. The complete LAUSD Historic Context Statement is included in this report as Appendix B. Framed in accordance with the NRHP Multiple Property Documentation (MPD) approach, the LAUSD Historic Context Statement identifies themes of significance, property types, eligibility standards, and integrity thresholds for LAUSD school properties from the late nineteenth century through 1969. By using the MPD approach, properties sharing a given theme of significance are assessed consistently, in comparison with resources that share similar physical characteristics and historical associations. In this way, the Historic Context Statement was designed to provide a consistent framework for evaluations both for the current scope of work and future LAUSD historic resource surveys.

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## HISTORIC RESOURCES SURVEY REPORT



Figure 6. Susan Miller Dorsey High School, Gogerty and Noerenberg, Los Angeles (1937). Source: LAUSD.

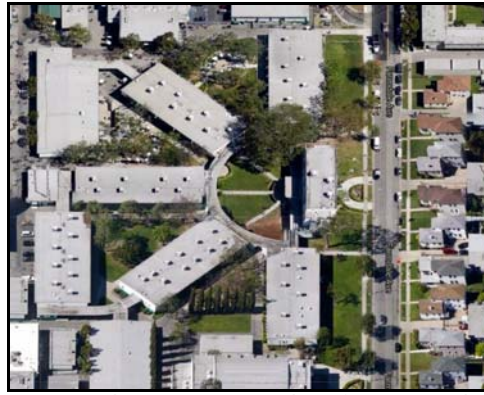


Figure 7. The inventive site plan of Dorsey High School. Source: Google Maps, 2013.

Survey results were incorporated into the LAUSD Historic Resource Inventory database; the inventory compiles 2013/2014 survey results with eligibility findings from the 2001–2004 Phase 1 and Phase 2 Getty surveys. The LAUSD Historic Resources Inventory prepared for this report is ArcGIS-compatible and designed for future use as an ArcGIS layer.

Campus-specific research incorporated a wide variety of sources, online databases and archives, as well as available print sources. Sapphos Environmental, Inc. staff investigated the origins and history of each school. This included research on architects, designers, or contractors involved in the school's design and construction; significant teachers, students, administrators, or other individuals who might have had an association with the school over time; and how the school reflected or fit within patterns of development, such as suburbanization, or significant events.

Staff members also reviewed and compiled data collected as part of LAUSD's Pre-Planning Surveys; relevant information was obtained from the Pre-Planning Surveys for all 55 campuses, including dates of construction, site maps, and plans.<sup>6</sup>

For site inspections, survey teams documented the principal buildings, structures, general character-defining features, and alterations. DPR Primary and Building, Structure, and Object forms were prepared for all campuses appearing to have either individual buildings or districts eligible for federal or state landmark designation. For potential historic districts, the identification of contributors and non-contributors was outside the scope of the current project, but is a suggested next step, as projects are proposed for school campuses including buildings, structures, related features, or historic districts appearing eligible for federal or state landmark designation and therefore qualifying as historic resources under CEQA.

### Definitions of California Historic Resources Status Codes

The following are the California Historic Resources Status Codes assigned in the course of this survey and incorporated into the Historic Resources Inventory; codes also include eligibility findings from the 2001–2004 Phase 1 and Phase 2 Getty surveys:

- 1S/1D: Properties listed in the NRHP or CRHR either as individual resources (1S) or contributors to historic districts (1D).
- 2S/2D: Officially determined eligible for NRHP (and therefore also for the CRHR) as a single property or as a district contributor. As official evaluations, these codes were not modified during either the Phase 1 or Phase 2 studies.
- 3S: Appears individually eligible for the NRHP as a result of survey evaluation. These properties should also be understood as eligible for the CRHR.
- 3D: Appears eligible as a historic district for the NRHP as a result of survey evaluation. These properties should also be understood as eligible for the CRHR.
- 3CS: Appears individually eligible for the CRHR as a result of a survey evaluation.
- 3CD: Appears eligible for the CRHR as a potential historic district as a result of survey evaluation.
- 6Y: Officially determined ineligible for the NRHP.
- 6Z: Does not appear eligible for the NRHP or the CRHR, in the opinion of the surveyor.

Given that all codes from 1 to 5 denote properties eligible for either federal, state, or local listing, all codes from 1 to 5 correspond to properties considered to be historic resources for the purposes of CEQA.



Figure 8. Children at Vernon Avenue Junior High School, Los Angeles, circa 1925. Source: LAPL Photo Collection.

### III. SUMMARY OF THE LAUSD HISTORIC CONTEXT STATEMENT

The complete *Los Angeles Unified School District Historic Context Statement, 1870 to 1969*, follows this report as Appendix B. Prepared in accordance with the National Register Multiple Property Documentation approach, the study provided the survey team with a consistent, context-driven framework for evaluations of LAUSD campuses and buildings.<sup>7</sup>

To summarize, research conducted for the *Los Angeles Unified School District Historic Context* revealed four distinct periods and corresponding themes of significance:

- (1) Founding Years, 1870s through 1909;
- (2) Progressive Education Movement: Standardization and Expansion, 1910 to 1933;
- (3) Era of Reform: Great Depression, Earthquake, and Early Experiments in the Modern, Functionalist School Plant, 1933 to 1944; and
- (4) Educating the Baby Boom: Postwar Expansion and the Modern, Functionalist School Plant, 1945 to 1969.

Themes of significance associated with each era were developed, along with eligibility standards, character-defining features, and integrity thresholds. Additional sections describe the typical architectural styles of LAUSD schools, along with character-defining features for each, as well as a list of some of the leading architects and designers participating in the design of extant LAUSD schools and campuses. Given this survey's focus on unevaluated properties, constructed between the late 1940s and 1969, evaluations primarily drew upon the final era, from 1945 to 1969. The following section presents the applicable themes of significance, architectural style descriptions, and architects/designers corresponding to the era of 1945 to 1969.



Figure 9. Baldwin Hills Elementary School, Robert Alexander, architect, Los Angeles (1949–1951).  
Source: Getty Research Institute, Shulman Archives.



Figure 10. Early finger-plan school, Baldwin Hills Elementary School. Source: Google Maps, 2013.

**CONTEXT: PUBLIC AND PRIVATE INSTITUTIONAL DEVELOPMENT | EDUCATION**  
**THEME: LAUSD | EDUCATING THE BABY BOOM: THE POSTWAR MODERN FUNCTIONALIST SCHOOL PLANT, 1945–1969**

By the 1950s, many of the design ideas considered experimental in the 1930s had matured and become the national standard for schools. Stylistically, schools might include some historicist detailing reflecting popular styles (such as Colonial Revival). However, overall, a unified campus design, building types and plans that accommodated a high degree of indoor-outdoor integration, ample outdoor spaces, and sheltered corridors marked the typology as the mature version of the functionalist school plant. The priority remained the creation of a domestic scale for schools. Campuses displayed a one-story massing for elementary schools, and up to two stories for middle and high schools. Site plans, which often featured a decentralized, pavilion-like layout, lacked the formality and monumentality that characterized earlier eras of school design.

School types expressive of these ideals include the finger-plan (1940s through 1950s) and cluster-plan (1950s), and variations on their basic themes. Combinations of these basic forms, which flexed according to available lot size and school enrollment, are also evident.

For LAUSD, the postwar years brought another round of reform as well as unprecedented expansion. Given the postwar classroom shortage, many campuses were constructed quickly, from standardized plans used district-wide, in designs that convey some of these ideas. The most intact and well-designed campuses among these, though, uniquely represent this era of reform and the midcentury modern school.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT

Property Type:	Institutional/Educational
Property Subtypes:	Elementary Schools, Junior High Schools, and High Schools
Period of Significance:	1945 to 1969
Area of Significance:	Education
Geographic Location:	Citywide; with concentrations in the San Fernando Valley and West Los Angeles
Area of Significance:	A/1

### Eligibility Standards

- Clearly embodies the characteristics of a postwar modern functionalist school campus
- Displays a unified, functional site design, with buildings extending across the site and oriented in relation to outdoor spaces (courtyards, patios, outdoor play areas)
- One-story massing for elementary schools; up to two-stories for junior/high schools
- Classrooms, in detailing and plans, clearly express their function, with axial, finger-like wings, plentiful fenestration, and connections to the outdoors
- Retains most of the associative and character-defining features from the period of significance

### Character-Defining Features | Buildings/Structures

- Building plans and site design clearly express their function; classroom wings often exhibit one-story “finger-like” wings, arranged on an axis
- Easily identifiable indoor-outdoor spaces, connections to classrooms through the incorporation of patios, courtyards, and outdoor canopied corridors
- One-story massing, particularly for elementary schools; up to two to three stories for junior and high schools
- Building types and plans expressive of postwar ideals in school design; these can include (1) finger-plan schools (usually in 1940s through 1950s); (2) cluster-plan schools (beginning in 1950s); and (3) variations and combinations of these typologies clearly expressive of the ideals for informality, indoor-outdoor connections, and zoned planning for the site
- Varying elevations might display differentiated window sizes and configurations, in order to tailor interior light to sun patterns and create cross-lit classrooms

### Character-Defining Features | Campus/District

- Unified campus design includes most or all of the following attributes: lack of formality and monumentality; low massing (usually one story for classrooms and up to two stories for auditoriums/multipurpose rooms); strong geometric ordering of buildings and outdoor spaces; decentralized, pavilion-like layout; rational, function-



driven site design; buildings extend across the site; buildings are oriented to outdoor spaces (courtyards, patios, outdoor areas), purposeful indoor-outdoor integration

- Automobile traffic/drop-off areas separated from campus; linked to interior via extended canopied corridors
- Buildings often turn inward, toward green spaces, courtyards, and lawns
- Outdoor corridors, sheltered beneath simple canopies, forming links between the buildings of the campus
- Classrooms often consist of a series of axial, modular units
- An informal, domestic scale for the buildings and campus might be especially evident in elementary schools
- Swaths of patios, terraces, and plantings adjacent to and alternating with buildings
- Generous expanses of windows, including steel- and wood-framed multi-light windows, in awning and hopper casements, clerestories, and fixed panes
- Flat roof or broken-plane roof often used for lighting and acoustical issues
- Modular design, with a rhythmic, asymmetrical but balanced composition
- Usually displays a modern design idiom, usually either regional modernist (with use of native materials such as stone, brick, and wood siding and/or framing), International Style modernist, or, by the early 1960s, Late Modern (more expressive and sculptural)
- Some examples might include some degree of historicist detailing or styles popular in the postwar period (such as American Colonial Revival); these are less common than modernist examples
- May have been designed by a prominent architect of the period
- Often associated with post–World War II suburbanization and growth near major employment centers beyond the city periphery (such as the San Fernando Valley and southwest Los Angeles)
- Often built in residential neighborhoods on large expanses of land, with large areas devoted to landscape design and playing fields (in particular for high school campuses)

### **Integrity Considerations**

- Retains most of the essential physical features from the period of significance
- School expansion and new construction over the years, in particular in the postwar period, might have resulted in the addition of in-fill buildings and structures in areas that were originally designed open spaces. Such new additions should not interfere with or serve as a visual impairment to the designed connections between buildings, in particular classroom wings, and adjacent outdoor patios and spaces.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT

- Many postwar schools were designed to be easily expandable as enrollment increased; the original site design and building types and plans should be readily discernible. If additional wings were added or the campus extended, the additions should be compatible with and visually subordinate to the original.
- Some materials may have been removed or altered
- Modern lighting and fencing of site acceptable
- Should retain integrity of Setting, Materials, Design, Workmanship, Feeling, and Association from its period of significance
- Addition of portable or permanent buildings after the period of significance acceptable as long as original campus design is intact

**Comments:** This theme would most often apply to a campus evaluated as a historic district. Individual buildings and/or campuses exhibiting distinctive design features might also qualify under Criteria C/3, as the embodiment of the distinctive characteristics of a type/period or method of construction, as an example of the work of a master architect, or for high artistic values.



Figure 11. The “East LA Blow Out,” Lincoln High School, 16 September 1968. Students protested for “better schools for Mexican Americans. Sal Castro was a teacher there and spearheaded the movement.” Source: LAPL, Herald-Examiner Collection, 00041327.

**CONTEXT: PUBLIC AND PRIVATE INSTITUTIONAL DEVELOPMENT | EDUCATION**

**THEME: LAUSD AND THE CIVIL RIGHTS MOVEMENT, 1954–1980**

This theme of significance begins with the filing of the landmark U.S. Supreme Court case *Brown v. The Board of Education Topeka, Kansas*. Although *Brown v. Board of Education* addressed state laws that did not exist in California—namely, laws allowing for racially segregated public schools—this case and the Civil Rights Movement helped generate and focus attention on related issues in Los Angeles. Issues touched on racial division and cultural identity, equal access, and how to create more balance and diversity in public schools. Signaling the end of this period of significance is the U.S. Supreme Court decision effectively ending mandatory school busing as a solution to racial imbalance in California’s public schools. Although this issue continued to form part of the social context for LAUSD, this period captures an era of intense debate and activism on the part of community members, parents, politicians and jurists, as well as teachers and administrators.

A school eligible under this theme might be the site of significant integration initiatives, challenges, or community activities related to the Civil Rights Movement and school integration. This might include initiatives for equal access to schools and/or to employment opportunities in LAUSD schools.

In addition, a school might qualify under this theme for a long-term association with a figure who was significant in the Civil Rights Movement and school integration.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT

Property Type: Institutional/Educational  
Property Subtypes: Elementary Schools, Junior High Schools, and High Schools  
Period of Significance: 1954 to 1980  
Area of Significance: Education/Ethnic Heritage  
Geographic Location: Citywide  
Area of Significance: A/1 and/or B/2

### Eligibility Standards

- Was constructed during the theme of significance
- Was the site of significant integration initiatives, challenges, or activities related to the Civil Rights Movement and school integration
- Directly reflects the movement for equal access to schools, through integration activities, events, or protests, and/or equal access to employment opportunities in LAUSD schools
- Has a well-established, long-term association with a figure who was significant in the Civil Rights Movement and school integration (eligibility under B/2)

### Character-Defining Features

- Retains most of the associative and character-defining features from the period of significance

### Integrity Considerations

- Retains integrity of Location, Design, Setting, Feeling, Association
- Some materials may have been removed or altered
- If there are multiple buildings on campus constructed during the period of significance, these should be evaluated as a potential historic district



Figures 12 and 13. At left, Fernangeles Elementary School (1954), Sun Valley. At right, Parmelee Avenue Elementary School (1962), southeastern Los Angeles. Source: Sapphos Environmental, Inc., 2014.

### ARCHITECTURAL STYLES

#### MID-CENTURY MODERNISM / REGIONAL MODERNISM (POST-1945)

Mid-Century Modernism, or Regional Modernism, represents a middle ground between the formal, machine-age aesthetic of the International Style and a regional idiom reflecting local precedent and identity. In the postwar period through the 1960s, as practiced in Southern California, Mid-Century Modernism took its cues from the region's first-generation modernist architects such as Richard Neutra, Rudolph Schindler, Gregory Ain, Frank Lloyd Wright, and Harwell Hamilton Harris. In the postwar period, second-generation practitioners such as Raphael Soriano, Whitney Smith, and A. Quincy Jones, among many others, established Los Angeles as a center for innovative architectural design and culture.

Mid-Century Modernism is characterized by an honest expression of structure and function, with little applied ornament. Aesthetic effect is achieved through an asymmetrical but balanced, rhythmic design composition, often expressed in modular post-and-beam construction. Whether wood or steel, post-and-beam construction allowed for open floor plans, ease of expansion, and generous expanses of glazing to heighten indoor-outdoor integration. Infill panels of wood or glass are common, with glazing often extending to the gable. Buildings are generally one to two-stories, with an emphasis on simple, geometric forms. Capped with low-pitched gabled or flat roofs, a Mid-Century Modern building often displays wide eaves and cantilevered canopies, supported on spider-leg or post supports. Sheathing materials vary, with wood, stucco, brick and stone, or steel-framing and glass. Windows are generally flush-mounted, with metal frames.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



Figures 14 and 15. Grover Cleveland High School, Administration Building (left) and typical classroom wing (right), Matcham & Granger and Associates (1959), Reseda. Source: Sapphos Environmental, Inc., 2013.

This style was seen in postwar institutional and commercial buildings, as well as residences, from 1945 until circa 1975.

### Typical Character-Defining Features

- Horizontal design composition and massing; generally one to two stories; simple, geometric volumes; flat or shed roof, often with wide, cantilevered overhangs
- Exterior materials include stucco, brick, or concrete; modular design and planning
- Simply treated, natural materials and excellent craftsmanship
- Direct expression of structural systems, often in wood or steel post-and-beam
- Lack of historicizing ornament
- Generous expanses of fenestration, including bands of grouped multi-light windows
- Extensive use of sheltered exterior corridors, with flat or slightly sloped roofs supported by posts, piers, or pipe columns

### ***Mid-Century Modernism | Expressionistic/Organic Subtype***

- A more dynamic Mid-Century Modernism: combines sculptural forms with basic geometric volumes; curved, sweeping wall surfaces; dynamic, expressionistic roof forms, including butterfly, folded plate or barrel vault roof forms

### ARCHITECTS AND BUILDERS OF LAUSD PROPERTIES

Since the early years of LAUSD, the school buildings and campuses of LAUSD have been designed by some of the region's most prominent master architects as well as the district's own architectural department. The following architects and firms were responsible for numerous designs of extant buildings throughout the district, since the early twentieth century:

- Thornton Abell
- Ain, Johnson & Day (Gregory Ain, Joseph Johnson, and Alfred Day)
- Robert Evans Alexander
- Allison & Allison (David Clark Allison and James Edward Allison)
- John C. Austin
- Austin and Ashley (John C. Austin and Frederic Ashley)
- Austin, Field & Fry (John C. Austin, Robert Field, Jr., Charles Eugene Fry)
- Edwin Bergstrom
- Daniel, Mann, Johnson & Mendenhall, DMJM (Phillip Daniel, Arthur Mann, Kenneth Johnson, Irvan Mendenhall)
- Stiles O. Clements
- Roland Coate
- Edelman and Zimmerman
- Sidney Eisenshtat
- Henry L. Gogerty
- Heitschmidt & Thompson (Earl Heitschmidt and Whiting Thompson)
- Frank Hudson
- Hudson & Munsell
- Stewart S. Granger
- Myron Hunt
- Hunt & Chambers
- Hunt & Burns
- Gordon B. Kaufmann
- George Lindsey
- Marsh, Smith, & Powell (Norman Marsh, David Smith, and Herbert James Powell)
- A. C. Martin
- Matcham & Granger (Charles O. Matcham Sr. and Stewart S. Granger)
- Alfred S. Nibecker
- Richard Neutra
- C.E. Noerenberg and Johnson
- Parkinson and Parkinson
- Charles Plummer
- Alfred Rosenheim
- Sumner Spaulding
- Spaulding & Rex (Sumner Spaulding and John Rex)
- William Stockwell
- Whiting Thompson
- Walker and Eisen
- Adrian Wilson & Associates

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT

### IV. SURVEY RESULTS

As a result of the LAUSD Historic Resources Survey, 2013/2014, the following 14 of 55 LAUSD campuses were found to include properties that appear eligible for either the NRHP and/or the CRHR. These campuses therefore include one or more buildings, structures, and/or related features that are presumed historic resources for purposes of CEQA:

1. 156th Street Elementary School	Eligible for CRHR (3CD)
2. Castle Heights Elementary School	Eligible for CRHR (3CD)
3. Chatsworth Senior High School	Eligible for NRHP (3D)
4. Cleveland Senior High School	Eligible for NRHP (3D)
5. Colfax Avenue Elementary School	Eligible for CRHR (3CD)
6. Dodson Middle School	Eligible for CRHR (3CD)
7. Fernangeles Elementary School	Eligible for CRHR (3CD)
8. Leapwood Avenue Elementary School	Eligible for NRHP (3D)
9. Narbonne Senior High School	Eligible for CRHR (3CD)
10. Pacoima Middle School	Eligible for CRHR (3CD)
11. Palisades Senior High School	Eligible for NRHP (3D)
12. Parmelee Avenue Elementary School	Eligible for CRHR (3CD)
13. Topanga Charter Elementary School	Eligible for NRHP (3D)
14. Webster Middle School	Eligible for CRHR (3CD)

Properties found eligible for the National Register under Criteria A/1, as representing the ideals and design principals of LAUSD from the era, were highly exceptional examples of the school type, though minor alterations might have been noted. Properties found eligible for the California Register only under the same criteria were generally outstanding examples of the applicable school type but exhibited a higher number of alterations.

The following sections present: (1) an overall district map, as well as detailed area maps, showing survey results, and (2) a pictorial overview of all eligible and non-eligible campuses, including school name, address, dates of construction, architect/designer (if known), and evaluation findings. Section 5 provides a tabulated version of the updated LAUSD Historic Resources Inventory.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT

### Mapped Results: District Overview and Area Maps

Below is a composite map of the study area showing all LAUSD campuses, with eligibility indicated for campuses evaluated in the Historic Resources Survey, 2013/2014. The subsequent pages present enlarged versions of each subdivision of the composite map.

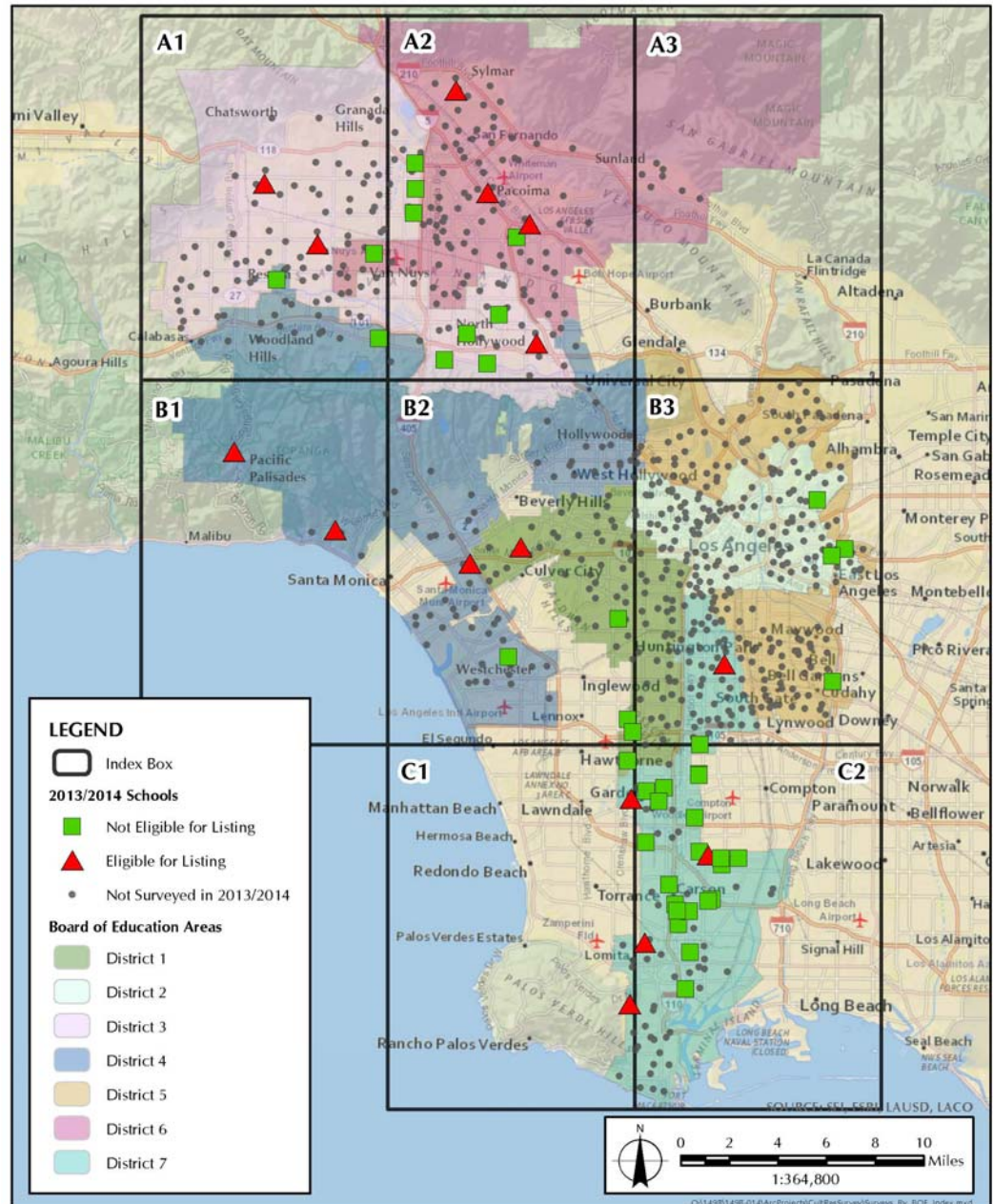


Figure 16a. District overview: Results of Los Angeles Unified School District Historic Resources Survey, 2013/2014. Source: Sapphos Environmental, Inc., 2014.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT

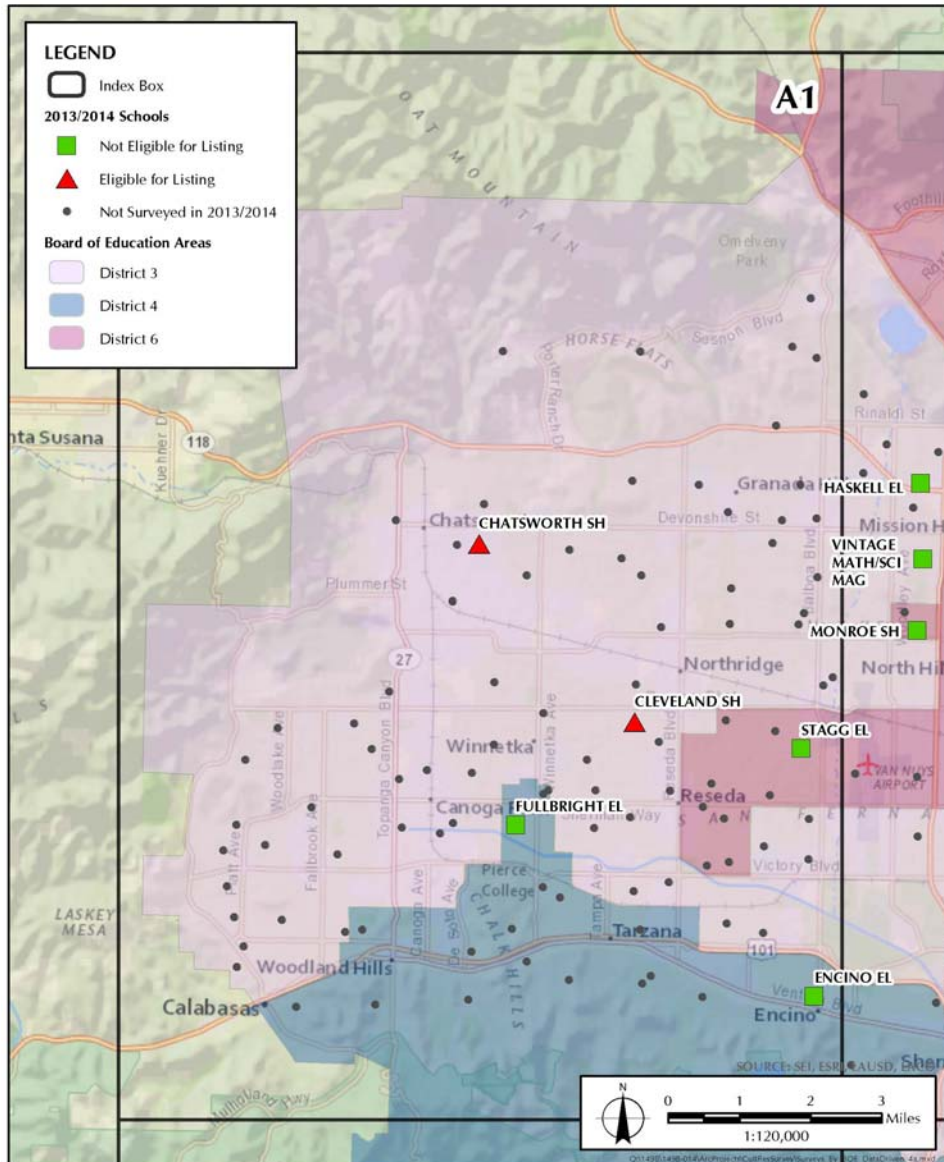
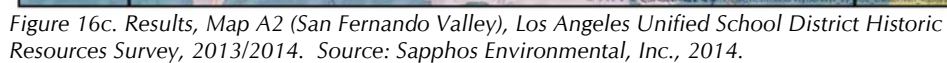


Figure 16b. Results, Map A1 (San Fernando Valley), Los Angeles Unified School District Historic Resources Survey, 2013/2014. Source: Sapphos Environmental, Inc., 2014.

## HISTORIC RESOURCES SURVEY REPORT





## HISTORIC RESOURCES SURVEY REPORT

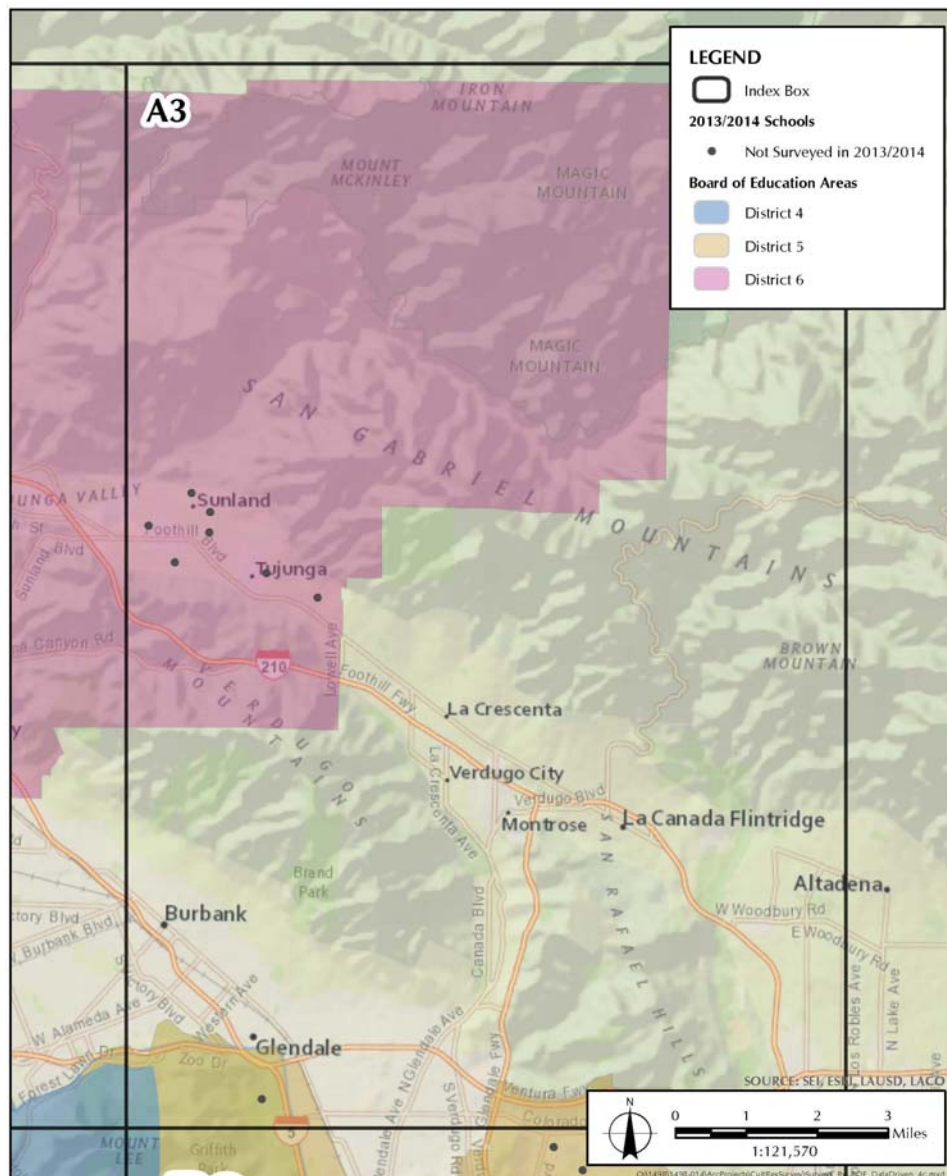


Figure 16d. Results, Map A3 (San Fernando Valley), Los Angeles Unified School District Historic Resources Survey, 2013/2014. Source: Sapphos Environmental, Inc., 2014.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT

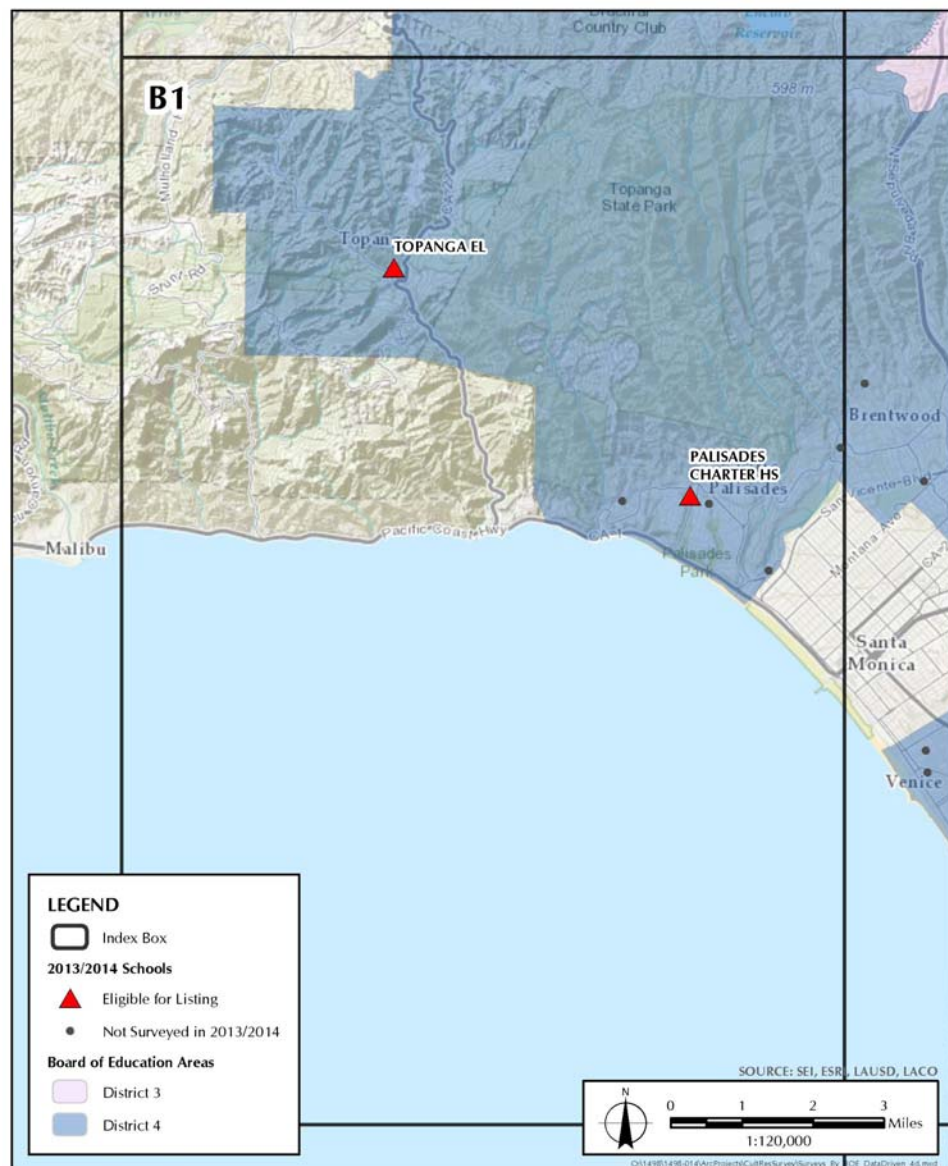


Figure 16e. Results, Map B1 (Topanga, Pacific Palisades), Los Angeles Unified School District Historic Resources Survey, 2013/2014. Source: Sapphos Environmental, Inc., 2014.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT

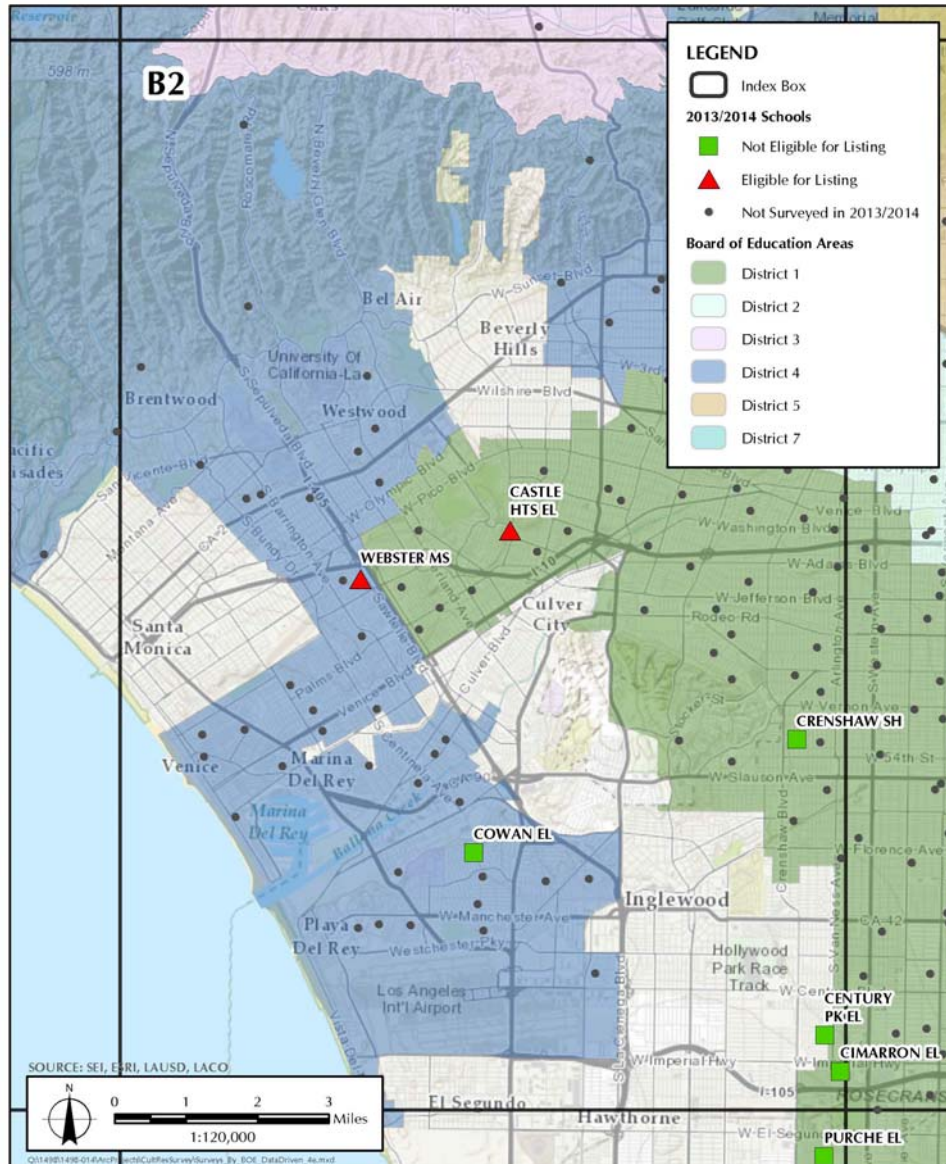


Figure 16f. Results, Map B2 (West Los Angeles), Los Angeles Unified School District Historic Resources Survey, 2013/2014. Source: Sapphos Environmental, Inc., 2014.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT

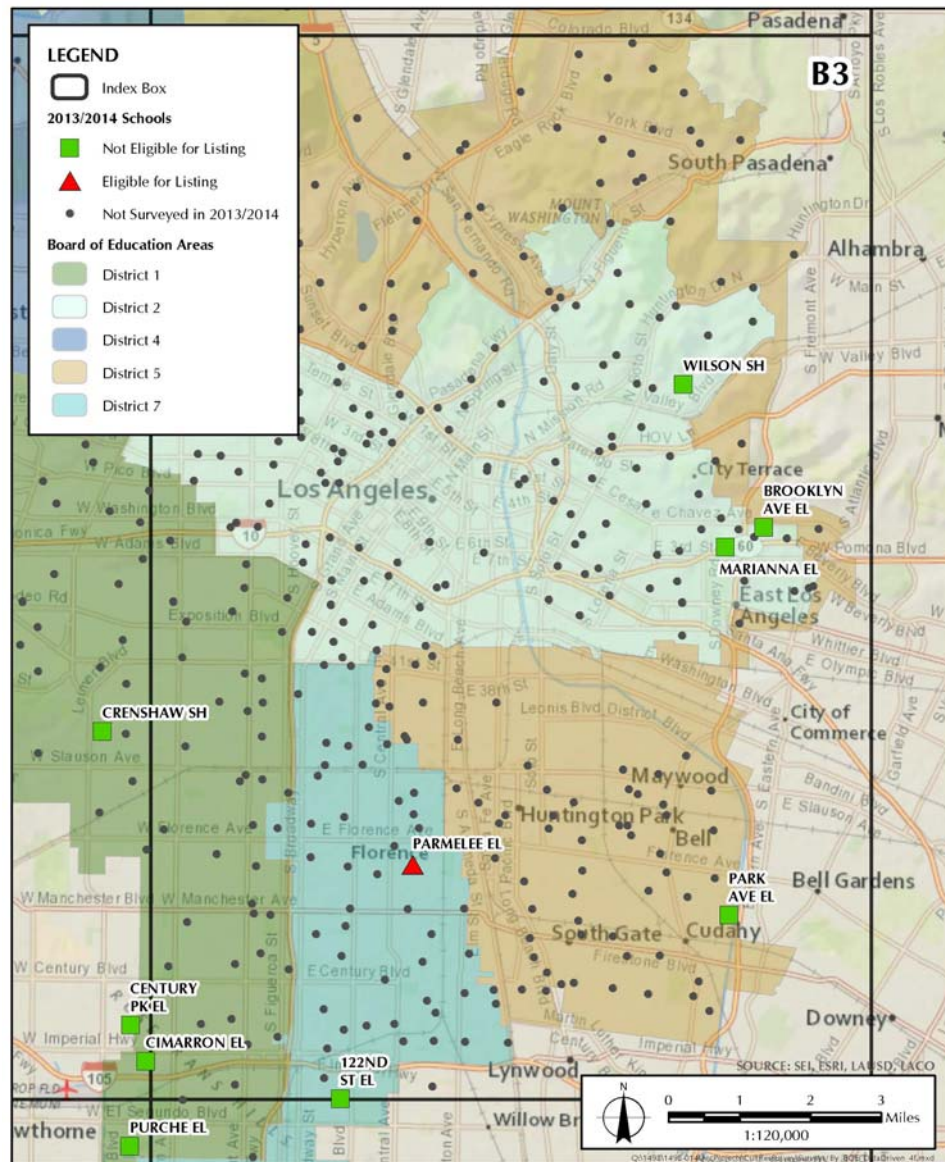


Figure 16g. Results, Map B3 (Central Los Angeles), Los Angeles Unified School District Historic Resources Survey, 2013/2014. Source: Sapphos Environmental, Inc., 2014.

# HISTORIC RESOURCES SURVEY REPORT

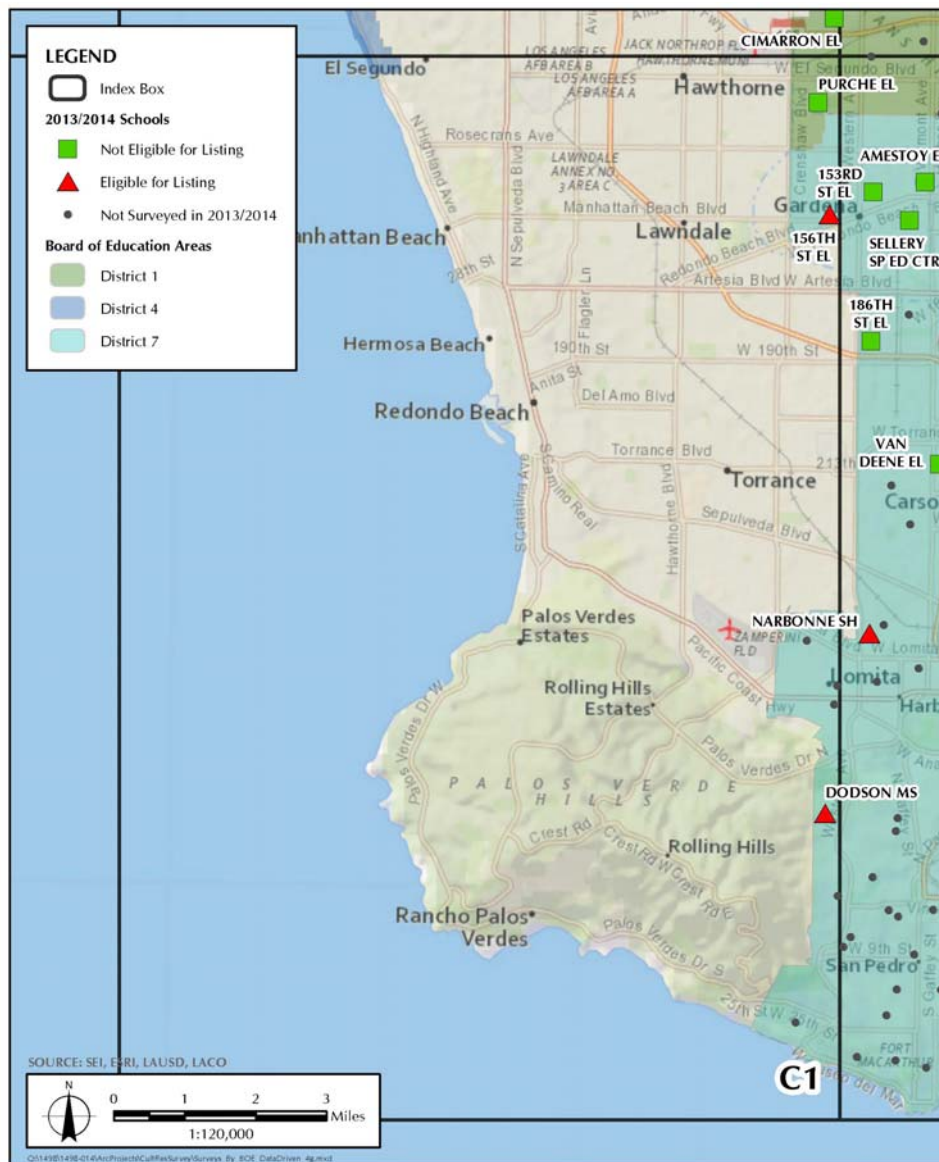


Figure 16h. Results, Map C1 (Palos Verdes, San Pedro), Los Angeles Unified School District Historic Resources Survey, 2013/2014. Source: Sapphos Environmental, Inc., 2014.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT

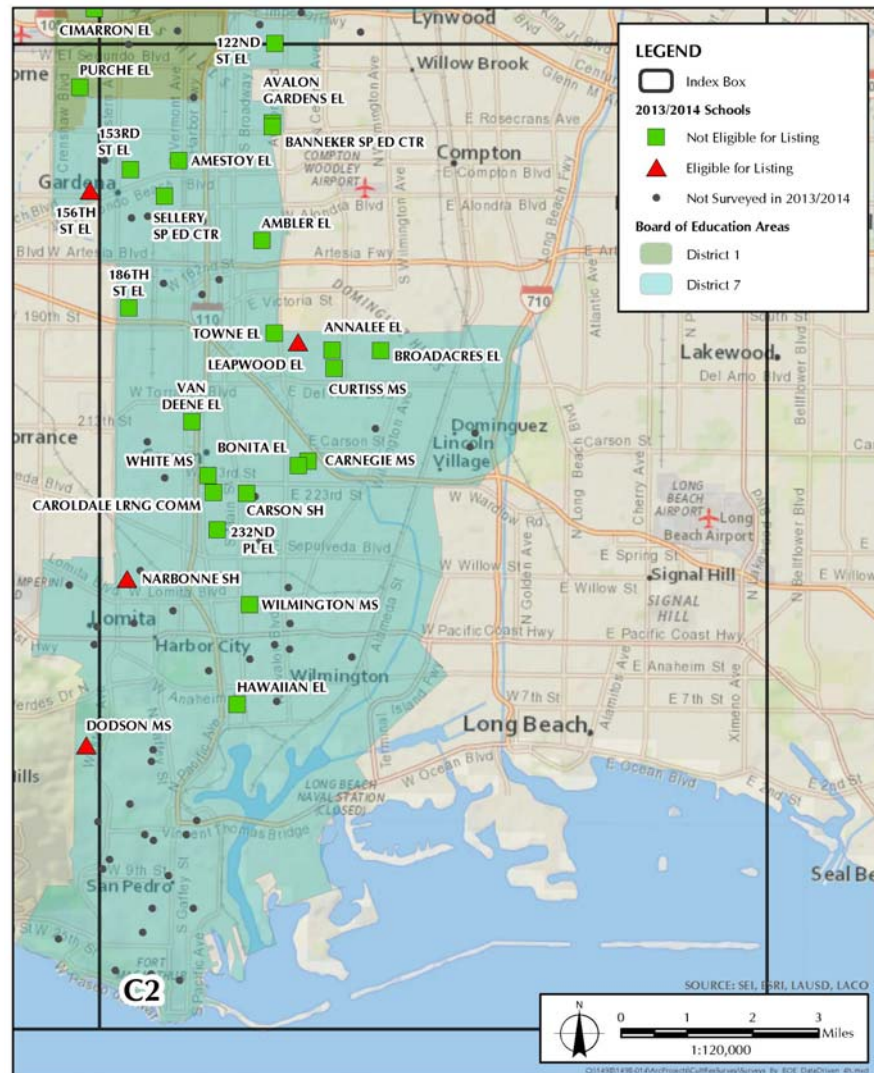


Figure 16i. Results, Map C2 (San Pedro, Carson, South Los Angeles), Los Angeles Unified School District Historic Resources Survey, 2013/2014. Source: Sapphos Environmental, Inc., 2014.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT

### ELIGIBLE CAMPUSES: OVERVIEW



**School Name:** 156th Street Elementary School  
**Address:** 2100 West 156th Street, Gardena  
**Date(s) of Construction:** 1953  
**Architect/Designer:** Unknown  
**Eligibility Criteria:** CRHR 1  
**CHR Status Code:** 3CD

**Notes:** Campus core appears eligible as a historic district under CRHR Criterion 1, in the context of institutional architecture/educational facilities in Los Angeles. Excellent and intact example of the standardized finger-plan school used throughout LAUSD in the postwar period. Exemplifies LAUSD design principles of the era. CRHR eligible only (due to alterations).



**School Name:** Castle Heights Elementary School  
**Address:** 9755 Cattaraugus Avenue, Los Angeles  
**Date(s) of Construction:** 1951  
**Architect/Designer:** Unknown  
**Eligibility Criteria:** CRHR 1  
**CHR Status Code:** 3CD

**Notes:** Campus core appears eligible as a historic district under CRHR Criterion 1, in the context of institutional architecture/educational facilities in Los Angeles. Castle Heights Elementary School is an excellent example of a postwar indoor-outdoor LAUSD campus. Exemplifies LAUSD design principles of the postwar era.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** Chatsworth Senior High School  
**Address:** 10027 Lurline Avenue, Chatsworth  
**Date(s) of Construction:** 1963  
**Architect/Designer:** Unknown  
**Eligibility Criteria:** NRHP 1, 3; CRHR A, C  
**CHR Status Code:** 3D

**Notes:** The campus core appears eligible as a historic district under Criteria A/1, in the context of institutional architecture/educational facilities in Los Angeles. Excellent, intact example of postwar LAUSD school; exemplifies LAUSD design ideals and principles of the era. Also eligible as a historic district under Criteria C/3, as an excellent example of Mid-Century Modern design applied to institutional architecture. Some alterations, but intact and exceptional example that is eligible for the NRHP and CRHR.



**School Name:** Cleveland Senior High School  
**Address:** 8140 Vanalden Avenue, Reseda  
**Date(s) of Construction:** 1959–1960  
**Architect/Designer:** Matcham and Granger & Associates  
**Eligibility Criteria:** NRHP 1, 3; CRHR, A, C  
**CHR Status Code:** 3D

**Notes:** The campus core appears eligible as a historic district under the NRHP and CRHR Criteria A/1, in the context of institutional architecture/educational facilities in Los Angeles. As an intact, indoor-outdoor finger- and cluster-plan school, Cleveland Senior High School exemplifies LAUSD design ideals and principles of the era. Also eligible as a historic district under Criteria 3, as an excellent example of Mid-Century Modern style applied to institutional architecture. Some alterations, but intact and exceptional example that is eligible for the NRHP and CRHR.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** Colfax Avenue Elementary School  
**Address:** 11724 Addison St., North Hollywood  
**Date(s) of Construction:** 1950–1955  
**Architect/Designer:** Unknown  
**Eligibility Criteria:** CRHR 1  
**CHR Status Code:** 3CD

**Notes:** Appears eligible as a historic district under CRHR Criterion 1, in the context of institutional architecture/educational facilities in Los Angeles. Colfax Avenue Elementary School is an excellent, intact example of an indoor-outdoor, postwar finger-plan school. Exemplifies LAUSD design ideals and principles of the era. Some replaced/filled-in windows and non-original hardscaping; CRHR eligible as historic district.



**School Name:** Dodson Middle School  
**Address:** 28014 South Montereina Drive,  
Rancho Palos Verdes  
**Date(s) of Construction:** 1960  
**Architect/Designer:** Unknown  
**Eligibility Criteria:** CRHR 1  
**CHR Status Code:** 3CD

**Notes:** Campus core appears eligible as a historic district under CRHR Criterion 1, in the context of institutional architecture/educational facilities in Los Angeles. Excellent and intact example of an indoor-outdoor, postwar finger-plan school. Exemplifies LAUSD design principles of the era. CRHR eligible only (due to alterations).

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** Fernangeles Elementary School  
**Address:** 12001 Art Street, Sun Valley  
**Date(s) of Construction:** 1954  
**Architect/Designer:** Unknown  
**Eligibility Criteria:** CRHR 1  
**CHR Status Code:** 3CD

**Notes:** Campus core appears eligible as a historic district under CRHR Criterion 1, in the context of institutional architecture/educational facilities in Los Angeles. Administration building and assembly room form a distinctive entrance to the school and architectural anchor for adjacent neighborhood. From the interior, these buildings frame a courtyard and outdoor dining area. Site design includes expansive central lawn with mature (original) trees. Due to alterations, CRHR eligible only.



**School Name:** Leapwood Avenue Elementary School  
**Address:** 19302 Leapwood Avenue, Carson  
**Date(s) of Construction:** 1962  
**Architect/Designer:** Unknown  
**Eligibility Criteria:** NRHP A; CRHR 1  
**CHR Status Code:** 3D

**Notes:** Campus core appears eligible as a historic district under CRHR Criterion 1, in the context of institutional architecture/educational facilities in Los Angeles. Outstanding example of a one- and two-story school with a finger- and cluster-plan campus design.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** Narbonne Senior High School  
**Address:** 24300 South Western Avenue, Harbor City  
**Date(s) of Construction:** 1955–1960  
**Architect/Designer:** Daniel, Mann, Johnson & Mendenhall  
**Eligibility Criteria:** CRHR 1  
**CHR Status Code:** 3CD

**Notes:** Campus core appears eligible as a historic district under CRHR Criterion 1, in the context of institutional architecture/educational facilities in Los Angeles. Excellent, innovative example of postwar LAUSD school; exemplifies LAUSD design ideals and principles of the era. Some replaced / filled-in windows and non-original seismic supports. CRHR eligible only (due to alterations).



**School Name:** Pacoima II Middle School  
**Address:** 9919; 9921 Laurel Canyon Boulevard, Pacoima  
**Date(s) of Construction:** 1953 - 1957  
**Architect/Designer:** Unknown  
**Eligibility Criteria:** CRHR 1  
**CHR Status Code:** 3CD

**Notes:** Campus core appears eligible as a historic district under CRHR Criterion 1, in the context of institutional architecture/educational facilities in Los Angeles. Excellent, intact example of postwar LAUSD school; exemplifies LAUSD design ideals and principles of the era. A number of alterations, including many filled-in / covered over clerestory windows, which has compromised the integrity of some classroom wings. CRHR eligible only (due to alterations). Site of a 1957 mid-air collision of two aircrafts.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** Palisades Senior High School  
**Address:** 15777 Bowdoin Street, Pacific Palisades  
**Date(s) of Construction:** 1961  
**Architect/Designer:** Adrian Wilson and Associates  
**Eligibility Criteria:** NRHP 1, 3; CRHR, A, C  
**CHR Status Code:** 3D

**Notes:** Campus core appears eligible as a historic district under Criteria A/1, in the context of institutional architecture/educational facilities in Los Angeles. Excellent, intact example of postwar LAUSD school; exemplifies LAUSD design ideals and principles of the era. Also eligible as a historic district under Criteria C/3, as an excellent example of Mid-Century Modern design (expressionist subtype) applied to institutional architecture in Los Angeles. Few visible alterations; eligible for NRHP and CRHR as historic district.



**School Name:** Parmelee Avenue Elementary School  
**Address:** 1338 E. 76th Place, Los Angeles  
**Date(s) of Construction:** 1962, 1964, 1965  
**Architect/Designer:** Unknown  
**Eligibility Criteria:** CRHR 1  
**CHR Status Code:** 3CD

**Notes:** Campus core appears eligible as a historic district under CRHR Criterion 1, in the context of institutional architecture/educational facilities in Los Angeles. Outstanding example of a one- and two-story school with a cluster-plan campus design and ample indoor-outdoor integration. CRHR eligible only (due to alterations).



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** Topanga Elementary School  
**Address:** 22075 Topanga School Road, Topanga  
**Date(s) of Construction:** 1953, 1955  
**Architect/Designer:** Unknown  
**Eligibility Criteria:** NRHP 1, 3; CRHR, A, C  
**CHR Status Code:** 3D

**Notes:** Campus core appears eligible as a historic district under Criteria A/1, in the context of institutional architecture/educational facilities in Los Angeles. Excellent, intact example of postwar LAUSD school; exemplifies LAUSD design ideals and principles of the era. Also eligible as a historic district under Criteria C/3 as an excellent example of the Mid-Century Modern style applied to institutional architecture.



**School Name:** Webster Middle School  
**Address:** 11330 Graham Place, Los Angeles  
**Date(s) of Construction:** 1954–1958  
**Architect/Designer:** Building Dept., Los Angeles Board of Education  
**Eligibility Criteria:** CRHR 1  
**CHR Status Code:** 3CD

**Notes:** Campus core appears eligible as a historic district under CRHR Criterion 1, in the context of institutional architecture/educational facilities in Los Angeles. Outstanding example of a postwar, indoor-outdoor school employing an innovative site plan. CRHR eligible only (due to alterations).



### INELIGIBLE CAMPUSES: OVERVIEW



**School Name:** 122nd Street Elementary School

**Address:** 405 East 122nd Street, Los Angeles

**Date(s) of Construction:** 1963

**Architect/Designer:** Unknown

**Notes:** Not eligible. In terms of the context of institutional architecture/educational facilities in Los Angeles, this campus is a typical but not outstanding example of a postwar LAUSD campus. Additionally, under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criterion 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.



**School Name:** 153rd Street Elementary School

**Address:** 1605 W 153rd Street, Gardena

**Date(s) of Construction:** 1957–1958

**Architect/Designer:** Ain, Johnson & Day

**Notes:** Not eligible. This campus has many of the character-defining features of a postwar finger-plan school but not all the eligibility standards required under Criteria A/1 as an exemplification of LAUSD design ideals for postwar schools. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, this campus was designed by master architects Ain, Johnson & Day; however, the school plan and design overall do not stand out as an outstanding exemplar of the firm's work.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** 186th Street Elementary School

**Address:** 1581 West 186th Street, Gardena

**Date(s) of Construction:** 1955–1962

**Architect/Designer:** John Kewell & Associates

**Notes:** Not eligible. Not typical of LAUSD design principles of the era; site design does not exhibit an exceptionally unified plan. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect. Displays some characteristics of Mid-Century Modern design, but the design does not rise to the level required for eligibility for either the NRHP or CRHR.



**School Name:** 232nd Place Elementary School

**Address:** 23240 Archibald Avenue, Carson

**Date(s) of Construction:** 1957–1968

**Architect/Designer:** A. Quincy Jones and Frederick E. Emmons & Associates; landscape architect Curtis Dixon Anderson

**Notes:** Not eligible. Campus and its classroom wings and buildings represent typical but not outstanding examples of a postwar finger-plan school. Lack of indoor-outdoor integration in campus plan; arcades are replaced with tunnel-like corridors. Represents the work of master architects A. Quincy Jones and Frederick E. Emmons & Associates, but is not an exceptional example of their many buildings throughout Southern California. The campus is not eligible under other applicable criteria.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** Ambler Avenue Elementary School

**Address:** 319 East Sherman Drive, Carson

**Date(s) of Construction:** 1966

**Architect/Designer:** Unknown

**Notes:** Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, the school does not qualify as an outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.



**School Name:** Amestoy Elementary School

**Address:** 1048 West 149th Street, Gardena

**Date(s) of Construction:** 1949–1957

**Architect/Designer:** Unknown

**Notes:** Not eligible. Not typical of LAUSD design principles of the era; site design does not exhibit an exceptionally unified plan. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** Annalee Avenue Elementary School  
**Address:** 19410 South Annalee Avenue, Los Angeles  
**Date(s) of Construction:** 1966–1967  
**Architect/Designer:** Unknown

**Notes:** Not eligible. The school campus and buildings represent a typical but not exemplary embodiment of LAUSD design principles of the era. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.



**School Name:** Avalon Gardens Elementary School  
**Address:** 13940 South San Pedro Street, Los Angeles  
**Date(s) of Construction:** 1948–1955  
**Architect/Designer:** Unknown

**Notes:** Not eligible. This campus has many of the character-defining features of a postwar finger-plan school, but the range of construction dates, from 1948 to 1955, produced a campus plan that is not sufficiently unified to qualify under Criteria A/1 as an exemplification of LAUSD design ideals for postwar schools (under the context of institutional architecture/educational facilities in Los Angeles). In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** Banneker Special Education Center

**Address:** 14024 South San Pedro Street, Los Angeles

**Date(s) of Construction:** 1972–1978

**Architect/Designer:** Unknown

**Notes:** Not eligible. In terms of the context of institutional architecture/educational facilities in Los Angeles, the campus is not representative of LAUSD design principles of the era. Additionally, under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.



**School Name:** Bonita Street Elementary School

**Address:** 21929 Bonita Street, Carson

**Date(s) of Construction:** 1958

**Architect/Designer:** Unknown

**Notes:** Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** Broadacres Elementary School  
**Address:** 19424 South Broadacres Avenue, Carson  
**Date(s) of Construction:** 1967  
**Architect/Designer:** Unknown

**Notes:** Not eligible. In terms of the context of institutional architecture/educational facilities, the campus does not represent an outstanding example of LAUSD design principles of the era. Additionally, under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.



**School Name:** Brooklyn Avenue Elementary School  
**Address:** 4620 Cesar Chavez Avenue, Los Angeles  
**Date(s) of Construction:** 1960–1975  
**Architect/Designer:** Unknown

**Notes:** Not eligible. In terms of the context of institutional architecture/educational facilities in Los Angeles, the campus is not representative of LAUSD design principles of the era. Additionally, under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** Carnegie Middle School

**Address:** 21820 Bonita Street, Carson

**Date(s) of Construction:** 1965

**Architect/Designer:** Unknown

**Notes:** Not eligible. The campus overall is not typical of LAUSD design principles of the era. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.



**School Name:** Caroldale Learning Community

**Address:** 22424 Caroldale Avenue, Carson

**Date(s) of Construction:** 1960–1969

**Architect/Designer:** Unknown

**Notes:** Not eligible. The campus overall is not typical of LAUSD design principles of the era. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** Carson Senior High School

**Address:** 22328 South Main Street, Carson

**Date(s) of Construction:** 1962–1969

**Architect/Designer:** Austin, Field, and Fry

**Notes:** Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.



**School Name:** Century Park Elementary School

**Address:** 10935 South Spinning Avenue, Inglewood

**Date(s) of Construction:** 1948–1959

**Architect/Designer:** Unknown

**Notes:** Not eligible. Not typical of LAUSD design principles of the era; all of the original classrooms in addition to the auditorium are located in a single building; classrooms on double-loaded interior corridor. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** Chandler Elementary School

**Address:** 14030 Weddington Street, Van Nuys

**Date(s) of Construction:** 1949–1956

**Architect/Designer:** Unknown

**Notes:** Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.



**School Name:** Cimarron Elementary School

**Address:** 11559 Cimarron Avenue, Los Angeles

**Date(s) of Construction:** 1953–1957

**Architect/Designer:** Unknown

**Notes:** Not eligible. The school campus and buildings represent a typical but not exemplary embodiment of LAUSD design principles of the era. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** Cowan Avenue Elementary School

**Address:** 7615 Cowan Avenue, Los Angeles

**Date(s) of Construction:** 1953–1958

**Architect/Designer:** Unknown

**Notes:** Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.



**School Name:** Crenshaw Senior High School

**Address:** 5010 11th Avenue, Los Angeles

**Date(s) of Construction:** 1968

**Architect/Designer:** Unknown

**Notes:** Not eligible. Not typical of LAUSD design principles of the era. In terms of eligibility under Criteria A/1, research showed that construction of Crenshaw High School reflected post-Watts Riots investment in South Los Angeles schools. Research conducted within the parameters of the current scope, however, did not identify a broader, contextual pattern to justify eligibility under Criteria A/1 on this basis. In addition, research did not show that this campus was the site of a significant event. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** Curtiss Middle School

**Address:** 1254 East Helmick Street, Carson, Los Angeles

**Date(s) of Construction:** 1969

**Architect/Designer:** Unknown

**Notes:** Not eligible. The school campus and buildings represent a typical but not exemplary embodiment of LAUSD design principles of the era. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or work of a master architect.



**School Name:** Dixie Canyon Avenue Elementary School

**Address:** 4220 Dixie Canyon Avenue, Sherman Oaks

**Date(s) of Construction:** 1949–1961

**Architect/Designer:** Unknown

**Notes:** Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** Encino Elementary School

**Address:** 16941 Addison Street, Encino, Los Angeles

**Date(s) of Construction:** 1949–1961

**Architect/Designer:** Unknown

**Notes:** Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.



**School Name:** Francis Polytechnic Senior High School

**Address:** 12431 Roscoe Boulevard, Sun Valley

**Date(s) of Construction:** 1957

**Architect/Designer:** Austin, Field, and Fry

**Notes:** Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** Fullbright Avenue Elementary School

**Address:** 6940 Fullbright Avenue, Canoga Park

**Date(s) of Construction:** 1954

**Architect/Designer:** Unknown

**Notes:** Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.



**School Name:** Grant Senior High School

**Address:** 13000 Oxnard Street, Valley Glen

**Date(s) of Construction:** 1958–1964

**Architect/Designer:** J. E. Stanton and William F. Stockwell

**Notes:** Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design. Designed by prominent architectural firm, Stanton & Stockwell (J.E. Stanton & William F. Stockwell), but the school is not the most representative or intact example of the firm's work.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** Haskell Avenue Elementary School  
**Address:** 15850 Tulsa Street, Granada Hills  
**Date(s) of Construction:** 1953–1965  
**Architect/Designer:** Unknown

**Notes:** Not eligible. In terms of the context of institutional architecture/educational facilities in Los Angeles, this campus exhibits most of the character-defining features of the indoor-outdoor, finger-plan school constructed throughout LAUSD in the postwar period. However, due to alterations (primarily in-filled windows, altered window and door openings), the campus does not retain sufficient integrity to convey its period of significance.



**School Name:** Hawaiian Avenue Elementary School  
**Address:** 540 Hawaiian Avenue, Wilmington  
**Date(s) of Construction:** 1948–1966  
**Architect/Designer:** Unknown

**Notes:** Not eligible. The campus overall is not typical of LAUSD design principles of the era. The 1948 Administration Building is noteworthy, but due to alterations (replaced windows), it does not retain integrity. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation.

In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** Marianna Elementary School

**Address:** 4215 East Gleason Street, Los Angeles

**Date(s) of Construction:** 1958–1964

**Architect/Designer:** Unknown

**Notes:** Not eligible. In terms of the context of institutional architecture/educational facilities in Los Angeles, this campus is a typical but not outstanding example of a postwar LAUSD campus. Additionally, under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.



**School Name:** Monroe Senior High School

**Address:** 9229 North Haskell Avenue, North Hills

**Date(s) of Construction:** 1957

**Architect/Designer:** Heitschmidt and Thompson

**Notes:** Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** Park Avenue Elementary School

**Address:** 8020 Park Avenue, Cudahy

**Date(s) of Construction:** 1968

**Architect/Designer:** Unknown

**Notes:** Not eligible. In terms of the context of institutional architecture/educational facilities in Los Angeles, the campus is a common but not outstanding example of LAUSD design principles of the era. Additionally, under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.



**School Name:** Purche Elementary School

**Address:** 13210 Purche Avenue, Gardena

**Date(s) of Construction:** 1957

**Architect/Designer:** Unknown

**Notes:** Not eligible. The school campus and buildings represent a typical but not exemplary embodiment of LAUSD design principles of the era. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** Sellery Special Education Center

**Address:** 15804 South Budlong Avenue, Gardena

**Date(s) of Construction:** 1961–1963

**Architect/Designer:** Unknown

**Notes:** This school was custom-built to serve a special needs population of children with severe handicaps. As such, the plan and building types vary from typical LAUSD plan typologies. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect. The school displays many character-defining features of the Mid-Century Modern architectural style. However, the school is not an outstanding or distinctive example of the Mid-Century Modern architectural style and does not qualify under Criteria C/3.



**School Name:** Sherman Oaks Elementary School

**Address:** 14755 Greenleaf Street, Sherman Oaks

**Date(s) of Construction:** 1948–1976

**Architect/Designer:** Unknown

**Notes:** Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** Stagg Street Elementary School  
**Address:** 7839 Amestoy Avenue, Van Nuys  
**Date(s) of Construction:** 1954–1958  
**Architect/Designer:** Unknown

**Notes:** Not eligible. In terms of the context of institutional architecture/educational facilities in Los Angeles, this campus exhibits most of the character-defining features of the indoor-outdoor, finger-plan school constructed throughout LAUSD in the postwar period. However, due to alterations (primarily in-filled windows, altered window and door openings), the campus does not retain sufficient integrity to convey its period of significance.



**School Name:** Towne Avenue Elementary School  
**Address:** 18924 Towne Avenue, Carson  
**Date(s) of Construction:** 1958  
**Architect/Designer:** Unknown

**Notes:** Not eligible. In terms of the context of institutional architecture/educational facilities in Los Angeles, this campus is a typical but not outstanding example of a postwar LAUSD campus. Additionally, under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** Van Deene Elementary School  
**Address:** 826 West Javelin Street, Torrance  
**Date(s) of Construction:** 1960–1965  
**Architect/Designer:** Unknown

**Notes:** Not eligible; very typical but not outstanding example of LAUSD design ideals of the era. Appears to be drawn from one of the standardized plans for schools during this period. Not the site of significant event or representative of a significant pattern of development. Not an outstanding example of architectural design or the work of a master architect.



**School Name:** Vintage Street Elementary School  
(Vintage Street Fundamental Magnet School)  
**Address:** 15848 Stare Street, North Hills  
**Date(s) of Construction:** 1953  
**Architect/Designer:** Unknown

**Notes:** Not eligible. In terms of the context of institutional architecture/educational facilities in Los Angeles, this campus exhibits most of the character-defining features of the indoor-outdoor, finger-plan school constructed throughout LAUSD in the postwar period. However, due to alterations (primarily in-filled windows, altered window and door openings, and changes to the design configuration of the entrance and auditorium), the campus does not retain sufficient integrity to convey its period of significance.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** White Middle School  
**Address:** 22102 South Figueroa Street, Carson  
**Date(s) of Construction:** 1956  
**Architect/Designer:** Unknown

**Notes:** Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.



**School Name:** Wilmington II Middle School  
**Address:** 1700 Gulf Avenue, Wilmington  
**Date(s) of Construction:** 1951–1962  
**Architect/Designer:** Unknown

**Notes:** Not eligible. The campus overall is not typical of LAUSD design principles of the era. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT



**School Name:** Wilson Senior High School

**Address:** 4500 Multnomah Street, Los Angeles

**Date(s) of Construction:** 1970

**Architect/Designer:** Unknown

**Notes:** Not eligible. The campus overall is not typical of LAUSD design principles of the era. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC RESOURCES SURVEY REPORT

### **V. UPDATED LAUSD HISTORIC RESOURCES INVENTORY**

This section presents a tabulated version of the updated LAUSD Historic Resources Inventory. The inventory compiles results from the LAUSD Historic Resources Survey, 2013/2014, with eligibility findings from the 2001–2004 Phase 1 and Phase 2 Getty Historic Resources Surveys. The compiled results are presented in an Excel spreadsheet format and an Access Database format compatible with ArcGIS.

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TABLE V-1  
UPDATED LAUSD HISTORIC RESOURCES INVENTORY WITH COMPILED RESULTS FROM THE LAUSD HISTORIC RESOURCES SURVEY, 2013/2014, AND  
THE GETTY HISTORIC RESOURCES SURVEYS, 2001/2004

Assessor Parcel Number	LAUSD Campus #	Campus Name	School Type	Street #	Street Direction	Street Name	Street Type	City	ZIP	Principal Construction Dates: Start Date	Principal Construction Dates: End Date	Year Opened	Former Names & Dates	CR Status (2001- 2004 Getty Surveys)	Evaluation Results / Notes	Found Eligible in 2013 / 2014 Survey?	CHR Status Code
4063-012-900	13673	156th Street Elementary School	ES	2100	W	156th	St	Gardena	90249	1953		1953		6Z/7N	Campus core appears eligible as a historic district under California Register Criterion 1, in the context of institutional architecture/educational facilities in Los Angeles. Excellent and intact example of the standardized indoor-outdoor, postwar finger-plan school used throughout LAUSD in the postwar period. Exemplifies LAUSD design principles of the era. California Register eligible only (due to alterations).	Yes	3CD
4308-019-900	13680	Castle Heights Elementary School	ES	9755		Cattaraugus	Ave	Los Angeles	90034	1951	1961	1951		6Z/7N	Campus core appears eligible as a historic district under California Register Criterion 1, in the context of institutional architecture/educational facilities in Los Angeles. Castle Heights Elementary School is an excellent example of a postwar, indoor-outdoor LAUSD campus. Exemplifies LAUSD design principles of the postwar era.	Yes	3CD
2355-013-900	13681	Colfax Avenue Elementary School	ES	11724		Addison	St	North Hollywood	91607	1950	1955	1951		6Z/7N	Campus core appears eligible as a historic district under California Register Criterion 1, in the context of institutional architecture/educational facilities in Los Angeles. Colfax Avenue Elementary School is an excellent, intact example of an indoor-outdoor, postwar finger-plan school. Exemplifies LAUSD design ideals and principles of the era. Some replaced/filled-in windows and non-original hardscaping; CRHR eligible as historic district.	Yes	3CD
2631-019-904	13594	Fernangeles Elementary School	ES	12001		Art	St	Sun Valley	91352	1948	1954	1946		6Z/7N	Campus core appears eligible as a historic district under California Register Criterion 1, in the context of institutional architecture/educational facilities in Los Angeles. Administration building and assembly room form a distinctive, 1950s-flavored entrance to the school and anchor for the residential community around it. From the interior, these two buildings frame a courtyard and outdoor dining area. Site design features buildings and facilities oriented around an expansive lawn with mature (original) trees. Due to alterations on many of the classrooms, however, including clerestories that have been covered and sheathed in stucco, contributing buildings appear eligible for the California Register only.	Yes	3CD
2505-025-900	13707	Olive Vista Middle School	MS	14600		Tyler	St	Sylmar	91342	1958	1968	1958		6Z/7N	Campus core appears eligible as a historic district under Criteria C/3, as an excellent example of Mid-Century Modern design applied to institutional architecture. The elements of the campus that are considered contributors are the complex of buildings and structures at the entrance of the campus on Tyler Street, consisting of the Administration Building, the Library, the Health and Counseling Building, and the entrance portal that unifies the northwest side of the campus and forms a distinctive 1950s Mid-Century Modern entrance. Because the other structures on	Yes	3CD



TABLE V-1  
UPDATED LAUSD HISTORIC RESOURCES INVENTORY WITH COMPILED RESULTS FROM THE LAUSD HISTORIC RESOURCES SURVEY, 2013/2014, AND  
THE GETTY HISTORIC RESOURCES SURVEYS, 2001/2004

Assessor Parcel Number	LAUSD Campus #	Campus Name	School Type	Street #	Street Direction	Street Name	Street Type	City	ZIP	Principal Construction Dates: Start Date	Principal Construction Dates: End Date	Year Opened	Former Names & Dates	CR Status (2001- 2004 Getty Surveys)	Evaluation Results / Notes	Found Eligible in 2013 / 2014 Survey?	CHR Status Code
															campus and the site plan are not outstanding examples of LAUSD design principles or architecture, California Register eligible only.		
2622-001-900	13750	Pacoima II Middle School	MS	9919; 9921		Laurel Canyon	Blvd	Pacoima	91331	1953	1957	1954	Pacoima Junior High School	6Z/7N	Campus core appears eligible as a historic district under California Register Criterion 1, in the context of institutional architecture/educational facilities in Los Angeles. Excellent, intact example of postwar LAUSD school; exemplifies LAUSD design ideals and principles of the era. A number of alterations, including many filled-in/stucco'd over clerestories, may compromise the integrity of some classroom wings. California Register eligible only (due to alterations).Site of infamous 1957 mid-air collision of two aircraft.	Yes	3CD
4258-016-900	13741	Webster, Daniel Middle School	MS	11330		Graham	Pl	Los Angeles	90064	1954	1958	1954	Richland JHS 1954	6Z/7N	Campus core appears eligible as a historic district under California Register Criterion 1, in the context of institutional architecture/educational facilities in Los Angeles. Excellent example of postwar LAUSD middle school campus; exemplifies LAUSD design ideals and principles of the era. Inventive site plan, with classroom wings radiating outward from a central circular core, and extensive network of arcades creates classroom spaces well integrated with designed outdoor spaces throughout the campus. Some alterations (to Auditorium and to some classroom wings, mostly consisting of in-filled windows). Eligible for CRHR as a district.	Yes	3CD
7552-017-900	13846	Dodson Middle School (Rudecinda Sepulveda Dodson Middle School)	MS	28014	S	Montereina	Dr	Rancho Palos Verdes	90275	1960		1960		N/A	Campus core appears eligible as a historic district under California Register Criterion 1, in the context of institutional architecture/educational facilities in Los Angeles. Excellent and intact example of an indoor-outdoor, postwar finger-plan school. Exemplifies LAUSD design principles of the era. California Register eligible only (due to alterations).	Yes	3CD
7439-015-900	13407	Narbonne Senior High School	SH	24300	S	Western	Ave	Harbor City	90710	1956		1938		N/A	Campus core appears eligible as a historic district under California Register Criterion 1, in the context of institutional architecture/educational facilities in Los Angeles. Excellent, intact example of postwar LAUSD school; exemplifies LAUSD design ideals and principles of the era. Highly inventive site plan, in the form of a spiral, allows for maximum indoor-outdoor integrated classrooms on compact, urban site. Some replaced/filled-in windows and seismic supports visible on building exteriors. California Register eligible only (due to alterations).	Yes	3CD

TABLE V-1  
UPDATED LAUSD HISTORIC RESOURCES INVENTORY WITH COMPILED RESULTS FROM THE LAUSD HISTORIC RESOURCES SURVEY, 2013/2014, AND  
THE GETTY HISTORIC RESOURCES SURVEYS, 2001/2004

Assessor Parcel Number	LAUSD Campus #	Campus Name	School Type	Street #	Street Direction	Street Name	Street Type	City	ZIP	Principal Construction Dates: Start Date	Principal Construction Dates: End Date	Year Opened	Former Names & Dates	CR Status (2001- 2004 Getty Surveys)	Evaluation Results / Notes	Found Eligible in 2013 / 2014 Survey?	CHR Status Code
6024-022-900	13815	Parmelee Elementary School	ES	1338	E	76th	Pl	Los Angeles	90001	1962	1965	1962		N/A	Campus core appears eligible as a historic district under California Register Criterion 1, in the context of institutional architecture/educational facilities in Los Angeles. Outstanding example of a one- and two-story school with a cluster-plan campus design and ample indoor-outdoor integration. California Register eligible only (due to alterations).	Yes	3CD
2741-002-900	13870	Chatsworth Senior High School	SH	10027		Lurline	Ave	Chatsworth	91311	1963		1963		N/A	Campus core appears eligible as a historic district under Criteria A/1, in the context of institutional architecture/educational facilities in Los Angeles. Excellent, intact example of postwar LAUSD school; exemplifies LAUSD design ideals and principles of the era. Inventive site plan, with classrooms radiating outward from a central landscaped quad. Also eligible as a historic district under Criteria C/3, as an excellent example of Mid-Century Modern design applied to institutional architecture. Some alterations, but intact and exceptional example that is eligible for both National Register and California Register.	Yes	3D
2104-004-905	13753	Cleveland, Grover Senior High School	SH	8140		Vanalden	Ave	Reseda	91335	1959	1960	1950		N/A	Campus core appears eligible as a historic district under National Register and California Register Criteria A/1, in the context of institutional architecture/educational facilities in Los Angeles. As an intact, indoor-outdoor finger-plan school, Cleveland Senior High School exemplifies LAUSD design ideals and principles of the era. Also eligible as a historic district under Criteria A/3, as an excellent example of Mid-Century Modern style applied to institutional architecture. Some replaced/filled-in windows and non-original hardscaping.	Yes	3D
7321-018-900	13817	Leapwood Elementary School	ES	19302		Leapwood	Ave	Carson	90746	1962		1963		N/A	Campus core appears eligible as a historic district under National Register and California Register Criteria A/1, in the context of institutional architecture/educational facilities in Los Angeles. Outstanding example of a one- and two-story school with a cluster-plan campus design and ample indoor-outdoor integration. Few visible alterations.	Yes	3D
4413-021-905	13742	Palisades Charter Senior High School	SH	15777		Bowdoin	St	Pacific Palisades	90272	1961		1958		N/A	Campus core appears eligible as a historic district under Criteria A/1, in the context of institutional architecture/educational facilities in Los Angeles. Excellent, intact example of postwar LAUSD school; exemplifies LAUSD design ideals and principles of the era. Also eligible as a historic district under Criteria C/3, as an excellent example of Mid-Century Modern design (expressionist subtype) applied to institutional architecture in Los Angeles. Few visible alterations; eligible for National Register and California Register as historic district.	Yes	3D
4445-	13816	Topanga Charter	ES	22075		Topanga	Rd	Topanga	90290	1953	1955	1940		N/A	Campus core appears eligible as a historic district	Yes	3D

TABLE V-1  
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THE GETTY HISTORIC RESOURCES SURVEYS, 2001/2004

Assessor Parcel Number	LAUSD Campus #	Campus Name	School Type	Street #	Street Direction	Street Name	Street Type	City	ZIP	Principal Construction Dates: Start Date	Principal Construction Dates: End Date	Year Opened	Former Names & Dates	CR Status (2001- 2004 Getty Surveys)	Evaluation Results / Notes	Found Eligible in 2013 / 2014 Survey?	CHR Status Code
005-902		Elementary School				School									under Criteria A/1, in the context of institutional architecture/educational facilities in Los Angeles. Excellent, intact example of postwar LAUSD school; exemplifies LAUSD design ideals and principles of the era. Also eligible as a historic district under Criteria C/3 as an excellent example of the Mid-Century Modern style applied to institutional architecture.		
6103-017-900	13812	153rd Street Elementary School	ES	1605	W	153rd	St	Gardena	90247	1957	1958	1956		6Z/7N	Not eligible. This campus has many of the character-defining features of a postwar finger-plan school but not all the eligibility standards required under Criteria A/1 as an exemplification of LAUSD design ideals for postwar schools. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, this campus was designed by master architects Ain, Johnson & Day; however, the school plan and design overall do not stand out as an outstanding exemplar of the firm's work.	No	6Z
6108-003-900	13303	186th Street Elementary School	ES	1581	W	186th	St	Gardena	90248	1955	1962	1907	McKinley Home 1907; 182nd St 1924; 184th St 1925	6Z/7N	Not eligible. Not typical of LAUSD design principles of the era; site design does not exhibit an exceptionally unified plan. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect. Displays some characteristics of Mid-Century Modern design, but the design does not rise to the level required for eligibility for either the National Register or California Register.	No	6Z
6114-030-902	13426	Amestoy Elementary School	ES	1048	W	149th	St	Gardena	90247	1949	1957	1915	Amestoy Avenue 1915	6Z/7N	Not eligible. Not typical of LAUSD design principles of the era; site design does not exhibit an exceptionally unified plan. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural	No	6Z

TABLE V-1  
UPDATED LAUSD HISTORIC RESOURCES INVENTORY WITH COMPILED RESULTS FROM THE LAUSD HISTORIC RESOURCES SURVEY, 2013/2014, AND  
THE GETTY HISTORIC RESOURCES SURVEYS, 2001/2004

Assessor Parcel Number	LAUSD Campus #	Campus Name	School Type	Street #	Street Direction	Street Name	Street Type	City	ZIP	Principal Construction Dates: Start Date	Principal Construction Dates: End Date	Year Opened	Former Names & Dates	CR Status (2001- 2004 Getty Surveys)	Evaluation Results / Notes	Found Eligible in 2013 / 2014 Survey?	CHR Status Code
															design or the work of a master architect.		
6131-013-900	13618	Avalon Gardens Elementary School	ES	13940	S	San Pedro	St	Los Angeles	90061	1948	1955	1952		6Z/7N	Not eligible. This campus has many of the character-defining features of a postwar finger-plan school, but the range of construction dates, from 1948 to 1955, produced a campus plan that is not sufficiently unified to qualify under Criteria A/1 as an exemplification of LAUSD design ideals for postwar schools (under the context of institutional architecture/educational facilities in Los Angeles). In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z
4029-021-900	13675	Century Park Elementary School	ES	10935	S	Spinning	Ave	Inglewood	90303	1948	1959	1947		6Z/7N	Not eligible. Not typical of LAUSD design principles of the era; all of the original classrooms in addition to the auditorium are located in a single building; classrooms on double-loaded interior corridor. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z
2247-020-900	13619	Chandler Elementary School	ES	14030		Weddington	St	Van Nuys	91401	1949	1956	1949		6Z/7N	Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z

TABLE V-1  
UPDATED LAUSD HISTORIC RESOURCES INVENTORY WITH COMPILED RESULTS FROM THE LAUSD HISTORIC RESOURCES SURVEY, 2013/2014, AND  
THE GETTY HISTORIC RESOURCES SURVEYS, 2001/2004

Assessor Parcel Number	LAUSD Campus #	Campus Name	School Type	Street #	Street Direction	Street Name	Street Type	City	ZIP	Principal Construction Dates: Start Date	Principal Construction Dates: End Date	Year Opened	Former Names & Dates	CR Status (2001- 2004 Getty Surveys)	Evaluation Results / Notes	Found Eligible in 2013 / 2014 Survey?	CHR Status Code
4110-016-900	13622	Cowan Avenue Elementary School	ES	7615		Cowan	Ave	Los Angeles	90045	1953	1958	1949		6Z/7N	Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z
2360-011-900	13677	Dixie Canyon Avenue	ES	4220		Dixie Canyon	Ave	Sherman Oaks	91423	1949	1961	1947		6Z/7N	Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z
2258-016-902	13500	Encino Elementary School	ES	16941		Addison	St	Encino	91316	1947	1961	1923		6Z/7N	Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z

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Assessor Parcel Number	LAUSD Campus #	Campus Name	School Type	Street #	Street Direction	Street Name	Street Type	City	ZIP	Principal Construction Dates: Start Date	Principal Construction Dates: End Date	Year Opened	Former Names & Dates	CR Status (2001- 2004 Getty Surveys)	Evaluation Results / Notes	Found Eligible in 2013 / 2014 Survey?	CHR Status Code
2136-009-900	13661	Fullbright Avenue Elementary School	ES	6940		Fullbright	Ave	Canoga Park	91306	1954	1954	1955		6Z/7N	Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z
2667-020-900	13736	Haskell Avenue Elementary School	ES	15850		Tulsa	St	Granada Hills	91344	1953	1965	1956	Haskell Avenue 1956	6Z/7N	Not eligible. In terms of the context of institutional architecture/educational facilities in Los Angeles, this campus exhibits most of the character-defining features of the indoor-outdoor, finger-plan school constructed throughout LAUSD in the postwar period. However, due to alterations (primarily in-filled windows, altered window and door openings), the campus does not retain sufficient integrity to convey its period of significance.	No	6Z
7417-012-900	13648	Hawaiian Avenue Elementary School	ES	540		Hawaiian	Ave	Wilmington	90744	1948	1966	1942	Hawaiian Avenue School	6Z/7N	Not eligible. The campus overall is not typical of LAUSD design principles of the era. The 1948 Administration Building is noteworthy but, due to alterations (replaced windows), it does not retain integrity. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z
2276-012-902	13517	Sherman Oaks Elementary School	ES	14755		Greenleaf	St	Sherman Oaks	91403	1948	1976	1924	Cahuenga Park 1924; Dickens Street 1929	6Z/7N	Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state,	No	6Z

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															or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.		
2204-014-900	13722	Stagg Street Elementary School	ES	7839		Amestoy	Ave	Van Nuys	91406	1954	1958	1953		6Z/7N	Not eligible. In terms of the context of institutional architecture/educational facilities in Los Angeles, this campus exhibits most of the character-defining features of the indoor-outdoor, finger-plan school constructed throughout LAUSD in the postwar period. However, due to alterations (primarily in-filled windows, altered window and door openings), the campus does not retain sufficient integrity to convey its period of significance.	No	6Z
2669-015-900	13694	Vintage Street Elementary School (Vintage Street Fundamental Magnet School)	ES	15848		Stare	St	North Hills	91343	1953	1955	1955	Vintage Street 1955	6Z/7N	Not eligible. In terms of the context of institutional architecture/educational facilities in Los Angeles, this campus exhibits most of the character-defining features of the indoor-outdoor, finger-plan school constructed throughout LAUSD in the postwar period. However, due to alterations (primarily in-filled windows, altered window and door openings, and changes to the design configuration of the entrance and Auditorium), the campus does not retain sufficient integrity to convey its period of significance.	No	6Z
7414-008-900	13538	Wilmington II Middle School	MS	1700		Gulf	Ave	Wilmington	90744	1951	1962	1949		6Z/7N	Not eligible. The campus overall is not typical of LAUSD design principles of the era. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z
6086-021-906	13868	122nd Street Elementary School	ES	405	E	122nd	St	Los Angeles	90061	1963	1963	1963		N/A	Not eligible. In terms of the context of institutional architecture/educational facilities in Los Angeles, this campus is a typical but not outstanding example of a postwar LAUSD campus. Additionally, under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z

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7363-020-900	13709	232nd Place Elementary School	ES	23240		Archibald	Ave	Carson	90745	1957	1968	1953		N/A	Not eligible. Campus and its classroom wings and buildings represent typical but not outstanding examples of a postwar finger-plan school. Lack of indoor-outdoor integration in campus plan; arcades are replaced with tunnel-like corridors. Represents the work of master architects A. Quincy Jones and Frederick E. Emmons & Associates but is not an exceptional example of their many buildings throughout Southern California. The campus is not eligible under other applicable criteria.	No	6Z
6126-012-900	13833	Ambler Avenue Elementary School	ES	319	E	Sherman	Dr	Carson	90746	1966		1966		N/A	Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, the school does not qualify as an outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z
7322-005-900	13760	Annalee Avenue Elementary School	ES	19410	S	Annalee	Ave	Los Angeles	90746	1966	1967	1965		N/A	Not eligible. The school campus and buildings represent a typical but not exemplary embodiment of LAUSD design principles of the era. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding/distinctive example of architectural design or the work of a master architect.	No	6Z
6131-013-900		Banneker Special Education Center		14024	S	San Pedro	St	Los Angeles	90061	1972	1978	1968	Alternate/former name Benjamin Banneker School	N/A	Not eligible. In terms of the context of institutional architecture/educational facilities in Los Angeles, the campus is not representative of LAUSD design principles of the era. Additionally, under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z



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7332-003-900	13796	Bonita Street Elementary School	ES	21929		Bonita	St	Carson	90745	1958	1958	1958		N/A	Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z
7320-013-900	13837	Broadacres Elementary School	ES	19424	S	Broadacres	Ave	Carson	90746	1967	1967	1967		N/A	Not eligible. In terms of the context of institutional architecture/educational facilities, the campus does not represent an outstanding example of LAUSD design principles of the era. Additionally, under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z
5235-021-906	13471	Brooklyn Avenue Elementary School	ES	4620		Cesar Chavez	Ave	Los Angeles	90022	1960	1975	1922		N/A	Not eligible. In terms of the context of institutional architecture/educational facilities in Los Angeles, the campus is not representative of LAUSD design principles of the era. Additionally, under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z
7332-004-901	13761	Carnegie Middle School	MS	21820		Bonita	St	Carson	90745	1965		1965		N/A	Not eligible. The campus overall is not typical of LAUSD design principles of the era. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In	No	6Z

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Assessor Parcel Number	LAUSD Campus #	Campus Name	School Type	Street #	Street Direction	Street Name	Street Type	City	ZIP	Principal Construction Dates: Start Date	Principal Construction Dates: End Date	Year Opened	Former Names & Dates	CR Status (2001- 2004 Getty Surveys)	Evaluation Results / Notes	Found Eligible in 2013 / 2014 Survey?	CHR Status Code
															terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.		
7341-024-900	13843	Caroldale Learning Community	ES	22424		Caroldale	Ave	Carson	90745	1960	1969	1960		N/A	Not eligible. The campus overall is not typical of LAUSD design principles of the era. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z
7333-001-900	13869	Carson Senior High School	SH	22328	S	Main	St	Carson	90745	1962	1969	1962		N/A	Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z
4057-005-900	13660	Cimarron Elementary School	ES	11559		Cimarron	Ave	Los Angeles	90044	1953	1957	1955		N/A	Not eligible. The school campus and buildings represent a typical but not exemplary embodiment of LAUSD design principles of the era. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z
5014-001-922	13766	Crenshaw	SH	5010		11TH	Ave	Los Angeles	90043	1968	1968	1968		N/A	Not eligible. Not typical of LAUSD design principles of the era. In terms of eligibility under Criteria A/1, research showed that construction of Crenshaw High School reflected post-Watts Riots investment in South Los Angeles schools. Given project limitations and	No	6Z

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															scope, however, research did not identify a broader, contextual pattern to justify eligibility under Criteria A/1. In addition, research did not show that this campus was the site of a significant event. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.		
7380-004-900	13775	Curtiss Middle School	MS	1254	E	Helmick	St	Carson	90746	1969	1969	1969		N/A	Not eligible. The school campus and buildings represent a typical but not exemplary embodiment of LAUSD design principles of the era. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z
2634-019-900	13734	Francis, John H., Polytechnic Senior High School	SH	12431		Roscoe	Blvd	Sun Valley	91352	1957	1957	1957	Los Angeles Commercial High School, 1900; Los Angeles Polytechnic High, 1905-1953 (LAT, Oct 14, 1956)	N/A	Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z
2341-024-900	13674	Grant, Ulysses S. Senior High School	SH	13000		Oxnard	St	Valley Glen	91401	1958	1964	1958		N/A	Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated	No	6Z

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															with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design. Designed by prominent architectural firm, Stanton & Stockwell (J.E. Stanton & William F. Stockwell), but the school is not the most representative or intact example.		
5234-008-900	13479	Marianna Elementary School	ES	4215	E	Gleason	St	Los Angeles	90063	1958	1964	1924		N/A	Not eligible. In terms of the context of institutional architecture/educational facilities in Los Angeles, this campus is a typical but not outstanding example of a postwar LAUSD campus. Additionally, under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z
2671-013-900	13704	Monroe, James Senior High School	SH	9229	N	Haskell	Ave	North Hills	91343	1957	1957	1958		N/A	Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z
6224-001-900	13861	Park Avenue Elementary School	ES	8020		Park	Ave	Cudahy	90210	1968	1968	1968		N/A	Not eligible. In terms of the context of institutional architecture/educational facilities in Los Angeles, the campus is a common but not outstanding example of LAUSD design principles of the era. Additionally, under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding/distinctive example of architectural design or the work of a master architect.	No	6Z

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4060-018-900	13655	Purche Elementary School	ES	13210		Purche	Ave	Gardena	90249	1957	1957	1957		N/A	Not eligible. The school campus and buildings represent a typical but not exemplary embodiment of LAUSD design principles of the era. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z
6113-004-902	13855	Sellery Special Education Center	ES	15804	S	Budlong	Ave	Gardena	90247	1961	1963	1961	C. Morley Sellery Elementary School	N/A	This school was custom-built to serve a special needs population of children with severe handicaps. As such, the plan and building types vary from typical LAUSD plan typologies. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect. The school displays many character-defining features of the Mid-Century Modern architectural style. However, the school is not a distinctive example of the Mid-Century Modern architectural style and does not qualify under Criteria C/3.	No	6Z
7341-002-902	13708	Stephen M. White Middle School	MS	22102	S	Figueroa	St	Carson	90745	1956	1956	1956		N/A	Not eligible. Campus plan and buildings have many of the typical character-defining features of postwar LAUSD schools. However, taken as a whole, the campus is a common but not outstanding exemplification of postwar LAUSD design ideas. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z

TABLE V-1  
UPDATED LAUSD HISTORIC RESOURCES INVENTORY WITH COMPILED RESULTS FROM THE LAUSD HISTORIC RESOURCES SURVEY, 2013/2014, AND  
THE GETTY HISTORIC RESOURCES SURVEYS, 2001/2004

Assessor Parcel Number	LAUSD Campus #	Campus Name	School Type	Street #	Street Direction	Street Name	Street Type	City	ZIP	Principal Construction Dates: Start Date	Principal Construction Dates: End Date	Year Opened	Former Names & Dates	CR Status (2001- 2004 Getty Surveys)	Evaluation Results / Notes	Found Eligible in 2013 / 2014 Survey?	CHR Status Code
7338-021-901	13755	Towne Avenue Elementary School	ES	18924		Towne	Ave	Carson	90746	1958	1958	1953		N/A	Not eligible. In terms of the context of institutional architecture/educational facilities in Los Angeles, this campus is a typical but not outstanding example of a postwar LAUSD campus. Additionally, under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z
7345-006-900	13788	Van Deene Elementary School	ES	826	W	Javelin	St	Torrance	90502	1960	1965	1960		N/A	Not eligible; very typical but not outstanding example of LAUSD design ideals of the era. Appears to be drawn from one of the standardized plans for schools during this period. Not the site of significant event or representative of a significant pattern of development. Not an outstanding example of architectural design or the work of a master architect.	No	6Z
5215-040-901	13778	Wilson, Woodrow Senior High School	SH	4500		Multnomah	St	Los Angeles	90032	1970	1970	1969		N/A	Not eligible. The campus overall is not typical of LAUSD design principles of the era. In terms of eligibility under Criteria A/1, research did not show that this campus was the site of a significant event or representative of a significant pattern of development. In terms of eligibility under Criteria B/2, research did not show that the campus was associated with a person of significance in the community, state, or nation. In terms of eligibility under Criteria 3, the campus and its buildings are not an outstanding or distinctive example of architectural design or the work of a master architect.	No	6Z
	13429	Cienega	ES	2611	S	Orange	Dr	Los Angeles	90016	1924-1969		1917	Sprague School 1917	2			
	13427	Angeles Mesa	ES	2611	W	52nd	St	Los Angeles	90043	1917-1968		1917		2S	Annexed from Hyde Park School District 1917; HUD DOE 1989 Crit AC		
	13350	Buchanan Street	ES	5024		Buchanan	St	Los Angeles	90042	1937-1996		1913	Illinois Avenue 1913	2S1	Ross Montgomery		
	13326	002nd Street	ES	1942	E	2nd	St	Los Angeles	90033	1923	1969	1895		2S2			
		017th Street	ES	644	W	17th	St	Los Angeles	90015	1926		1881	Georgia Street 1881; Montgomery Street 1885	2S2	Closed 1939; now Admin Ofc-SH Div		
	13335	024th Street	ES	2055	W	24th	St	Los Angeles	90018	1926-1971		1904		2S2	per GAP listing; not on OHP data base		
		Arlington Heights	ES	1717		Seventh	Ave	Los Angeles	90019	1937-1968		1910	Arlington Hts 1910; Seventh Avenue 1914	2S2	District; GAP db: at Mt. Vernon JHS		
	13458	Bandini Street	ES	425	N	Bandini	St	San Pedro	90731	1923-1977		1923		2S2	looked altered		

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	13373	Belvedere I	ES	3724	E	1st	St	Los Angeles	90063	1922-1962		1912		2S2			
	13416	Canoga Park I	ES	7438		Topanga Canyon	Blvd	Canoga Park	91303	1935-1969		1915	Owensmouth School 1915	2S2	Annexed from San Fernando 1915		
		Eshelman Avenue	ES	25902		Eshelman	Ave	Lomita	90717	1925-1969				2S2			
		Garvanza	ES	317	N	Avenue 62		Los Angeles	90042	1922-1966		1899	Garvanza 1899; Eagle Rock Ave 1903; 62nd Ave 1908	2S2			
		Gompers, Samuel Intermediate	MS	234	E	112th	St	Los Angeles	90061	1937-1962		1937	Gompers, Samuel 1937	2S2			
		Grant II	ES	1530	N	Wilton	Pl	Los Angeles	90028	1922-1990		1910		2S2			
		Gulf Avenue	ES	828	W	L	St	Wilmington	90744	1926-1969		1923		2S2			
		Hamilton, Alexander	SH	2955	S	Robertson	Blvd	Los Angeles	90034	1931-1974		1931		2S2			
		Hancock Park	ES	408	S	Fairfax	Ave	Los Angeles	90036	1937-1958		1937		2S2			
		Hollenbeck	MS	2510	E	6th	St	Los Angeles	90023	1923-1976		1914	Boyle Hts Inter. #1 1914	2S2			
		LA CES/Pasteur, Louis	Mag	5931	W	18th	St	Los Angeles	90035	1937-1961		1937		2S2	Closed 1987		
		Le Conte, Joseph	MS	1316	N	Bronson	Ave	Los Angeles	90028	1922-1977		1922	Le Conte Junior 1922	2S2			
		Lincoln, Abraham II	SH	3501	N	Broadway		Los Angeles	90031	1937-1980		1878	var.ES1878;Av e21Inter1911; LincolnHigh1 918	2S2			
		Los Feliz	ES	1740	N	New Hampshire	Ave	Los Angeles	90027	1937		1910		2S2			
		Manual Arts	SH	4131	S	Vermont	Ave	Los Angeles	90037	1935-1989		1910		2S2	Donald Parkinson		
		Marshall, John	SH	3939		Tracy	St	Los Angeles	90027	1931-1992		1931		2S2			
		Miramonte	ES	1400	E	68th	St	Los Angeles	90001	1936-1969		1912		2S2	Annexed 1912		
		Morningside	ES	576	N	Maclay	Ave	San Fernando	91340	1915-1995		1915		2S2	Annexed from Morningside School District 1915		
		North Hollywood III	SH	5231		Colfax	Ave	North Hollywood	91601	1926-		1927	Lankershim HS 1927	2S2			
		Reseda I	ES	7265		Amigo	Ave	Reseda	91335	1936-1955		1916	Marian Avenue 1916	2S2	Annexed from San Fernando 1915		
		Ritter	ES	11108		Watts	Ave	Los Angeles	90059	1932-1968		1928		2S2	Annexed from Palomar District 1927		
		San Fernando II	MS	130	N	Brand	Blvd	San Fernando	91340	1916-1975		1915	San Fernando HS 1915	2S2	Annexed from San Fernando 1915		
		San Pedro I	SH	1001	W	15th	St	San Pedro	90731	1936-1971		1909		2S2	Annexed 1900; sold in late 1930s; new site built late 1930s		
		San Pedro II	AS	950	W	Santa Cruz	St	San Pedro	90731	1926				2S2			
		Santa Monica Boulevard	ES	1022	N	Van Ness	Ave	Los Angeles	90038	1937-1993		1910	Santa Monica Avenue 1910	2S2	Annexed 1910		
		Soto Street	ES	1020	S	Soto	St	Los Angeles	90023	1937		1914	?	2S2			
		South Gate I	MS	4100		Firestone	Blvd	South Gate	90280	1941-1966		1941		2S2			

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Assessor Parcel Number	LAUSD Campus #	Campus Name	School Type	Street #	Street Direction	Street Name	Street Type	City	ZIP	Principal Construction Dates: Start Date	Principal Construction Dates: End Date	Year Opened	Former Names & Dates	CR Status (2001- 2004 Getty Surveys)	Evaluation Results / Notes	Found Eligible in 2013 / 2014 Survey?	CHR Status Code
		University II	SH	11800		Texas	Ave	Los Angeles	90025	1924-1978		1922	Sawtelle 1922; Harding, Warren G. 1925	2S2			
		Van Ness	ES	501	N	Van Ness	Ave	Los Angeles	90004	1923		1916		2S2			
		Vine Street	ES	955	N	Vine	St	Los Angeles	90038	1922-1995		1909	Colgrove School 1909	2S2	Annexed 1909		
	13265	010th Street	ES	1000		Grattan	St	Los Angeles	90015	1922-1983		1888		3CS			
	13348	049th Street	ES	750	E	49th	St	Los Angeles	90011	1923-1969		1913		3CS			
	13366	Adams, John	MS	151	W	30th	St	Los Angeles	90007	1927-1964		1911	30th St Intermediate 1911	3CS			
	13608	Apperson Street	ES	10233		Woodward	Ave	Sunland	91040	1949-1957		1949		3CS			
	13488	Bell	SH	4328		Bell	Ave	Bell	90201	1925-1989		1926		3CS			
	13533	Broadway	ES	1015		Lincoln	Blvd	Venice	90291	1936-1963		1926	Abraham Lincoln 1926	3CS	Annexed from Venice 1926		
	13558	Bryson Avenue	ES	4470		Missouri	Ave	South Gate	90280	1925-1977		1931		3CS	McNerney annexed 1931		
	13415	Canoga Park II	SH	6850		Topanga Canyon	Blvd	Canoga Park	91303	1930-1977		1915	Owensmouth HS 1915	3CS	Aud.only; annexed from San Fernando 1915		
	13435	Carson Street	ES	161	E	Carson	St	Carson	90745	1927-1966		1921	Boulevard Acres 1920	3CS			
		Eagle Rock I	ES	2057		Fair Park	Ave	Los Angeles	90041	1917-1919		1923		3CS	Annexed 1923		
		Euclid Avenue	ES	806		Euclid	Ave	Los Angeles	90023	1923-1970		1907		3CS			
		Fairfax	SH	7850		Melrose	Ave	Los Angeles	90046	1942-1968		1924		3CS	Parkinson & Parkinson		
		Fries Avenue	ES	1301		Fries	Ave	Wilmington	90744	1924-1977		1923		3CS			
		Graham	ES	8407	S	Fir	Ave	Los Angeles	90001	1925-1975		1924		3CS			
		Hobart Boulevard	ES	980	S	Hobart	Blvd	Los Angeles	90006	1937-1968		1906		3CS			
		Humphreys Avenue	ES	500	S	Humphreys	Ave	Los Angeles	90022	1923-1969		1922		3CS			
		Jordan, David Starr	SH	2265	E	103rd	St	Los Angeles	90002	1927-1970		1925		3CS	Annexed 1925		
		Kester Avenue	ES	5353		Kester	Ave	Van Nuys	91411	1951-1957		1951		3CS	Richard Neutra		
		King Jr., Martin Luther	ES	3989	S	Hobart	Blvd	Los Angeles	90062	1936-1972		1914	Santa Barbara Ave 1914; Santa Barbara 1968	3CS			
		Lankershim I	ES	5250		Bakman	Ave	North Hollywood	91601	1912-1982		1910		3CS	Annexed 1910		
		Leland Street	ES	2120		Leland	St	San Pedro	90731	1924-1977		1922		3CS			
		Lokrantz, Sven Special Ed Ctr	SS	19451		Wyandotte	St	Reseda	91335	1960-1975		1961		3CS	Sidney Eisenstadt		
		Lomita Fundamental Magnet	ES	2211	W	247th	St	Lomita	90717	1937-1968		1909	Lomita 1909	3CS			



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Assessor Parcel Number	LAUSD Campus #	Campus Name	School Type	Street #	Street Direction	Street Name	Street Type	City	ZIP	Principal Construction Dates: Start Date	Principal Construction Dates: End Date	Year Opened	Former Names & Dates	CR Status (2001- 2004 Getty Surveys)	Evaluation Results / Notes	Found Eligible in 2013 / 2014 Survey?	CHR Status Code
		Mann, Horace	MS	7001	S	St. Andrews	Pl	Los Angeles	90047	1926-1977		1926	Mann JHS 1926	3CS	A. M. Edelman & A. C. Zimmerman		
		Mar Vista	ES	3330		Granville	Ave	Los Angeles	90066	1949-1957		1947		3CS			
		Muir, John	MS	5929	S	Vermont	Ave	Los Angeles	90044	1922-1971		1922		3CS	John C. Austin		
		Nightingale, Florence	MS	3311	N	Figueroa	St	Los Angeles	90065	1937-1969		1937		3CS			
		Norwood Street	ES	2020		Oak	St	Los Angeles	90007	1939-1969		1895		3CS			
		Pacoima I	ES	11016		Norris	Ave	Pacoima	91331	1916-1969		1915		3CS	Paul V. Tuttle & A. W. Angel; annexed from San Fernando 1915		
		Palms II	MS	10860		Woodbine	St	Los Angeles	90034	1949-1960		1949		3CS			
		Perez, Alfonso B. Special Education Center	SS	4540		Michigan	Ave	Los Angeles	90022	1926-1981		1926	BelvedereGar dens1926;Eug eneSt1926;Mc DonnellAve19 59	3CS			
		Point Fermin	ES	3333		Kerckhoff	Ave	San Pedro	90731	1921-1925		1912		3CS	Hunt & Burns		
		Salvin, Sophia T. Special Education Center	SS	1925		Budlong	Ave	Los Angeles	90007	1937-1974		1896	see previous entry	3CS			
		San Gabriel Avenue	ES	8628		San Gabriel	Ave	South Gate	90280	1924-1937		1932		3CS	Annexed from Huntington Park 1932		
		San Pedro Street	ES	1635	S	San Pedro	St	Los Angeles	90015	1927-1997		1866		3CS			
		Solano Avenue	ES	615		Solano	Ave	Los Angeles	90012	1924		1904		3CS			
		South Park	ES	8510		Towne	Ave	Los Angeles	90003	1936-1966		1907	South Park Avenue 1907	3CS	Walker & Eisen		
		State Street	ES	3211		Santa Ana	St	South Gate	90280	1924-1937		1932		3CS	Annexed from Huntington park 1932		
		State Street Children's Center	CC	3210		Broadway		Huntington Park	90255	1931		1943		3CS			
		Sterry, Nora Children's Center	CC	1747		Sawtelle	Blvd	Los Angeles	90025	1914			Flower Guild	3CS			
		Sun Valley	MS	7330		Bakman	Ave	Sun Valley	91352	1944-1954		1950		3CS			
		Utah Street	ES	255	N	Clarence	St	Los Angeles	90033	1937-1970		1904		3CS			
		Van Nuys II	MS	5435		Vesper	Ave	Van Nuys	91411	1948-1958		1948		3CS			
		Vernon City	ES	2360	E	Vernon	Ave	Los Angeles	90058	1929-1942		1928		3CS	Annexed from Vernon City District 1928		
		Victoria Avenue	ES	3320		Missouri	Ave	South Gate	90280	1929-1976		1925	Home Gardens 1925	3CS	Annexed from Watts 1925		
		Warner Avenue	ES	615		Holmby	Ave	Los Angeles	90024	1949-1977		1927		3CS			
		West Vernon Avenue	ES	4312	S	Grand	Ave	Los Angeles	90037	1937-1976		1905		3CS			
		Wilton Place	ES	745	S	Wilton	Pl	Los Angeles	90005	1922-1996		1905		3CS			
		Yorkdale	ES	5687		Meridian	St	Los Angeles	90042	1923-1966		1912		3CS	Annexed from Annandale School District 1911		
	13307	052nd Street II	ES	816	W	51st	St	Los Angeles	90037	1922-1969		1908		3S			
	13339	066th Street	ES	6600	S	San Pedro	St	Los Angeles	90003	1927-1965		1909		3S	Fitzhugh & Teal/Gene Verge		
	13672	109th Street	ES	10915		McKinley	Ave	Los Angeles	90059	1940-1976		1926		3S	Survey evaluation		
	13401	Aldama	ES	632	N	Avenue 50		Los Angeles	90042	1923-1927		1924	Aldama Street 1924	3S	Charles F. Plummer		

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	13402	Alta Loma	ES	1745		Vineyard	Ave	Los Angeles	90019	1935-1972		1915	Sprague Avenue 1915	3S	Charles M. Hutchinson		
	13595	Baldwin Hills	ES	5421		Rodeo	Rd	Los Angeles	90016	1949-1973		1943		3S	Robert Alexander (aka University ES?)		
	13340	Barton Hill	ES	423	N	Pacific	Ave	San Pedro	90731	1923-1965		1909		3S			
	13274	Berendo	MS	1157	S	Berendo	St	Los Angeles	90006	1937-1992		1896	Pico Hgts1896;Ber endoSt1903;B erendoInterme d1911	3S			
	13448	Burroughs, John	MS	600	S	McCadden	Pl	Los Angeles	90005	1923-1978		1922		3S			
	13453	Corona Avenue	ES	3825		Bell	Ave	Bell	90201	1935-1968		1926		3S	Richard Neutra; annexed from Bell 1926		
	13510	Dorris Place	ES	2225		Dorris	Pl	Los Angeles	90031	1928-1970		1925		3S			
		Dorsey, Susan Miller	SH	3537		Farmdale	Ave	Los Angeles	90016	1937-1961		1937		3S	Gogerty & Noerenberg		
		El Sereno II	MS	2839	N	Eastern	Ave	Los Angeles	90032	1937-1968		1937	Farmdale1915 ;ElSerenoArea HS1936;Wdr wWilsonHS19 37	3S			
		Emerson, Ralph Waldo	MS	1650		Selby	Ave	Los Angeles	90024	1937-1957		1935		3S	Richard Neutra		
		Fremont, John C.	SH	7676	S	San Pedro	St	Los Angeles	90003	1924-1976		1924		3S	Edwin Bergstrom; auditorium only		
		Glassell Park	ES	2211	W	Avenue 30		Los Angeles	90065	1924-1952		1912	Washington Park 1912	3S			
		Hamasaki, Morris K. School	ES	4865	E	First	St	Los Angeles	90022	1927-1962		1926	Riggin Avenue 1926; Riggin 1968	3S			
		Hollywood	SH	1521	N	Highland	Ave	Los Angeles	90028	1910-1977		1910		3S			
		Huntington Park	SH	6020		Miles	Ave	Huntington Park	90255	1923-1991		1909		3S	Annexed 1932		
		Irving, Washington	MS	3010		Estarra	Ave	Los Angeles	90065	1937-1990		1937		3S			
		Jefferson, Thomas	SH	1319	E	41st	St	Los Angeles	90011	1936-1970		1917	Jefferson High 1917	3S	Stiles O. Clements		
		Old Canyon School	N/A	421		Entrada	Dr	Santa Monica	90402	1894				3S			
		Old Farmdale School	N/A	2839	N	Eastern	Ave	Los Angeles	90032	1894				3S	Bradbeer & Ferris		
		Old Vernon Avenue School	N/A	450	N	Grand	Ave	Los Angeles	90012	1876				3S	1884 per Building Directory; restored 1976		
		Pacific Palisades	ES	800		Via de la Paz		Pacific Palisades	90272	1931-1960		1922	Palisades School 1922	3S			
		Reed, Walter	MS	4525		Irvine	Ave	North Hollywood	91602	1939-1958		1939	N.Hollywood JHS 1939	3S			
		Rowan Avenue	ES	600	S	Rowan	Ave	Los Angeles	90023	1916-1963		1912	Belvedere #2	3S	Annexed 1912		
		South Gate II	SH	3351		Firestone	Blvd	South Gate	90280	1930-1988		1932		3S	George M. Lindsey & Erwood P. Elden		
		Van Nuys III	SH	6535		Cedros	Ave	Van Nuys	91411	1933-1976		1915		3S	Annexed from San Fernando 1915		
		Venice	SH	13000		Venice	Blvd	Los Angeles	90066	1935-1969		1925		3S	Annexed 1925		

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		Verdugo Hills	SH	10625		Plainview	Ave	Tujunga	91042	1937-1970		1936	Calvin Coolidge High 1936	3S			
		Virgil II	MS	152	N	Vermont	Ave	Los Angeles	90004	1924-1978		1912	Virgil Ave Inter 1912; Virgil School 1914	3S	1924 CR South by Hunt & Burns		
		Virginia Road	ES	2925		Virginia	Rd	Los Angeles	90016	1924-1977		1924		3S			
		Wright, Orville	MS	6550	W	80th	St	Los Angeles	90045	1948-1951		1956		3S			

### VI. CONCLUSION | RECOMMENDATIONS

The LAUSD Historic Resources Survey, 2013/2014, recommended a total of 14 of 55 campuses as eligible for either the NRHP and/or CRHR. Consequently, these campuses include buildings, structures, and features that are presumed historic resources under CEQA. The survey pool included a variety of LAUSD property types, including elementary, middle, and senior high schools, as well as special education centers. This variety was also reflected in the selection of campuses that appear to be eligible.

The following recommendations may further and expand the survey results in this report:

#### 1. **Update and expand the *LAUSD Historic Resources Survey***

LAUSD should update its comprehensive Historic Resources Survey in order to consider all as-yet unevaluated LAUSD assets. The survey could be initially broadened to include all post-1945 school buildings and campuses that have not yet been subject to context-driven evaluation. According to the *Los Angeles Unified School District History of Schools, 1855 to 1972*, there are roughly 175 campuses constructed between 1955 and 1969, as well as approximately 125 campuses constructed between 1945 and 1954.<sup>8</sup>

The current survey examined 55 campuses, with approximately 245 remaining unevaluated.

A comprehensive survey update would provide a cost-effective method for guiding district-wide redevelopment plans and CEQA compliance. It would also assist LAUSD in continuing stewardship of its many historically significant school buildings and campuses.

#### 2. **Intensive-Level, District Recordation for Eligible Campuses**

Proposed modernization or redevelopment projects may include the LAUSD campuses found eligible as historic districts in this survey or included in the LAUSD Historic Resources Inventory database. It is recommended that, prior to or concurrent with project planning, LAUSD commission an intensive-level survey by a qualified architectural historian to document all eligible and non-eligible buildings and structures (contributors and non-contributors) to the historic district. The qualified architectural historian should ideally meet and exceed the Secretary of the Interior's Professional Qualifications Standards for Architectural History and possess a minimum of 5 years of full-time experience conducting historic resource evaluations. It is further recommended that contributors and non-contributors be documented in ArcGIS maps for ease of use by LAUSD Facilities Services Division staff.

**3. Expand the *LAUSD Historic Context Statement* and *Historic Resources Survey* to include the period to 1980**

Pursuant to Measure Q, district-wide modernization and redevelopment will unfold gradually, over many years. Broadening the LAUSD Historic Context Statement and survey to consider all schools constructed in the past 35 years (rather than 45 years) would allow the district to take proactive steps to identify historically significant campuses (and therefore historic resources under CEQA) prior to redevelopment planning and work. This would also bring the LAUSD comprehensive Historic Resources Survey up to date with the City of Los Angeles Office of Historic Resources citywide survey, SurveyLA.

**4. Conduct archival research to expand property eligibility under additional criteria**

In the current scope, campus-specific work included research on events, patterns of development, and significant people associated with the schools included in the accompanying survey. However, scope limitations precluded extensive research on LAUSD's history that might result in eligibility under Criteria A/1 (such as LAUSD and the Civil Rights Movement) and Criteria B/2 (for an association with significant figures in the history of public schools in Los Angeles). These and other areas should receive further study. (The context of the Civil Rights Movement and Los Angeles schools was addressed, however, in the NRHP MPD form for African-Americans in Los Angeles.<sup>9)</sup>)

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## DRAFT HISTORIC RESOURCES SURVEY REPORT

### VII. SELECTED BIBLIOGRAPHY

- Bhatia, Pavan, "Modern Concept for Los Angeles Public Schools," Doctoral Dissertation (Cambridge, MA: Harvard University Graduate School of Design, Advanced Management Development Program in Real Estate, July 2009).
- Blumenson, John J.-G., *Identifying American Architecture* (New York: W.W. Norton & Company, 1977).
- California Office of Historic Preservation, *California Register and National Register: A Comparison (for Purposes of Determining Eligibility for the California Register)*, Technical Assistance Series No. 6. (Sacramento, CA, 14 March 2006).
- California Office of Historic Preservation, *Instructions for Recording Historical Resources* (Sacramento, CA, March 1995).
- Donovan, John J., *School Architecture: Principles and Practices* (New York: The MacMillan Company, 1921).
- Eales, John R., "A Brief, General History of the Los Angeles City School System," Doctoral Dissertation (Los Angeles: University of California, June 1956).
- Gebhard, David, and Robert Winter, *A Guide to Architecture in Los Angeles and Southern California* (Santa Barbara, CA: Peregrine Smith, Inc., 1977).
- Harris, Cyril M., *American Architecture: An Illustrated Encyclopedia* (New York: W.W. Norton & Company, 1998).
- Heumann & Associates and Anne Doehne, Science Applications International Corporation, March 2002, "Historic Schools of the Los Angeles Unified School District," a presentation prepared for LAUSD Facilities Services Division (March 2002).
- Hille, R. Thomas, *Modern Schools: A Century of Design for Education* (Hoboken, NJ: John Wiley & Sons, 2011), 13.
- Lee, Antoinette, and Linda F. McClelland, U.S. Department of the Interior, National Park Service, *National Register Bulletin No. 16B, How to Complete the National Register Multiple Property Documentation Form* (1999).
- McAlester, Virginia, and Lee McAlester, *A Field Guide to American House* (New York: Alfred A. Knopf, 2004).
- Mock, Elizabeth, *Built in USA, 1932 – 1944: A Survey of Contemporary American Architecture*, The Museum of Modern Art (New York: Simon & Shuster, 1944).

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## DRAFT HISTORIC RESOURCES SURVEY REPORT

Ogata, Amy F., "Building for Learning in Postwar American Elementary Schools," *Journal of the Society of Architectural Historians* 67, no. 4 (December 2008): 562–91.

Science Applications International Corporation, *Historic Context Statement: Los Angeles Unified School District*, prepared for Los Angeles Unified School District (Pasadena, CA: March 2002).

U.S. Department of the Interior, National Park Service, "How to Apply the National Register Criteria for Evaluation," National Register Bulletin No. 15 (Washington, DC, 2002).

U.S. Department of the Interior, National Park Service, "How to Complete the National Register Form," National Register Bulletin No. 16A (Washington, DC, 1997).

U.S. Department of the Interior, National Park Service, "How to Complete the National Register Multiple Property Documentation Form," National Register Bulletin No. 16B (Washington, DC, 1999).

Whiffen, Marcus, *American Architecture since 1780: A Guide to the Styles* (Cambridge, MA: MIT Press, 1981).

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## DRAFT HISTORIC RESOURCES SURVEY REPORT

### ENDNOTES

- 1 California State Government Code, Section 53094 permits 'the governing board of a school district, by vote of two-thirds of its members . . . [to] render a city or county zoning ordinance inapplicable to a proposed use of property by such school district . . . ' The legislative history of section 53094 indicates that 'the Legislature deliberately accorded different treatment to school districts than to other local agencies because it was well aware that school construction was subject to almost complete control by the state. . . . The Legislature accordingly provided in section 53094 that school districts, as opposed to other local agencies, should retain the right to exempt themselves from local zoning ordinances.'" (*Santa Clara, supra*, 22 Cal.App.3d at p. 158 fn. 3.) Court of Appeal, State of California, Second Appellate District, Division 7, Los Angeles Unified School District, Petitioner and Appellant, versus City of Maywood, et al., Respondents and Defendants. Nos. B238629, B238630, Los Angeles Superior Court. Filed 13 February 2013.
- 2 These figures are drawn from: Los Angeles Unified School District, Educational Housing Branch, School Planning Division, Los Angeles Unified School District History of Schools, 1855 to 1972, January 1973.
- 3 As noted above, under the provisions of California State Government Code Section 53094, California school districts, including LAUSD, are generally exempt from local zoning ordinance provisions, including for landmark designation. See endnote 1 for further detail.
- 4 U.S. Department of the Interior, National Park Service, National Register Bulletin 15, How to Apply the National Register Criteria for Evaluation (Washington, DC: 1990, revised 1997).
- 5 See <http://www.preservation.lacity.org/survey> for survey results.
- 6 See the Website of the Los Angeles Unified School District for Pre-Planning Surveys. Search engine for Pre-Planning Survey available at: <http://mo.laschools.org/planlausd/content>. Accessed 14 March 2014.
- 7 Lee, Antoinette, and Linda F. McClelland, U.S. Department of the Interior, National Park Service, "How to Complete the National Register Multiple Property Documentation Form," *National Register Bulletin* No. 16B (1999).
- 8 These figures are drawn from: Los Angeles Unified School District, Educational Housing Branch, School Planning Division, Los Angeles Unified School District History of Schools, 1855 to 1972, January 1973.
- 9 Grimes, Teresa, 31 December 2008, National Register of Historic Places, "Historic Resources Associated with African Americans in Los Angeles, Los Angeles County, California" (Washington, DC: US Department of the Interior, National Park Service).



***APPENDIX A  
DEPARTMENT OF PARKS AND RECREATION FORMS,  
ELIGIBLE CAMPUSES***

---

PRIMARY RECORD

Primary # \_\_\_\_\_

HRI # \_\_\_\_\_

Trinomial \_\_\_\_\_

NRHP Status Code 3CD

Other Listings \_\_\_\_\_

Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 6 Resource name(s) or number (assigned by recorder) 156th Street Elementary School

P1. Other Identifier:

\*P2. Location: ☐ Not for Publication ☒ Unrestricted

\*a. County Los Angeles County

\*b. USGS 7.5' Quad Inglewood, CA

Date 1981

T 3S R 14W; SW ¼ of SE ¼ of Sec 23; S.B.B.M.

c. Address 2100 West 156th Street

City Gardena

Zip 90249

e. Other Locational Data: APN: # 4063-012-900

\*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries.)

Located in a residential neighborhood in the city of Gardena, the 156th Street Elementary School occupies a 4.9-acre site bounded by West 156th Street to the north, an alleyway to the south, an LAUSD facility to the east, and Van Ness Avenue to the west. Built in 1953 in a standardized school plan, the campus consists of a series of stucco-clad, one-story rectilinear buildings, with a central courtyard. The campus layout is characterized by finger-like classroom wings, arranged in a grid. Linking the classroom wings of the campus is a network of sheltered corridors, capped with flat roofs, with wood planks and cross beams and simple pipe supports. Campus buildings and structures display a similar massing, detailing, and Mid-Century Modern-influenced architectural style. (See Continuation Sheet)

\*P3b. Resource Attributes: (list attributes and codes) HP15. Educational Building.

\*P4. Resources Present: ☐ Building ☐ Structure ☐ Object ☐ Site ☒ District ☐ Element of District ☐ Other

P5a. Photo



P5b. Description of Photo (view, date, accession #) Classroom building, northwest elevation  
15 January 2014

\*P6. Date Constructed/Age and Sources: ☒ Historic ☐ Prehistoric  
☐ Both

1953 (Los Angeles Unified School District)

\*P7. Owner and Address:  
Los Angeles Unified School District

\*P8. Recorded by:  
Debi Howell-Ardila and Marilyn Novell  
Sapphos Environmental, Inc.  
430 North Halstead Street  
Pasadena, CA 91107

\*P9. Date Recorded:  
10 March 2014

\*P10. Survey Type:  
Intensive

\*P11. Report Citation: (Cite survey report and other sources, or enter "none")

Sapphos Environmental, Inc. March 2014. *Los Angeles Unified School District Historic Context Statement, 1870 to 1969*. Pasadena, CA.

Sapphos Environmental, Inc. June 2014. *Los Angeles Unified School District Historic Resources Survey Report*. Pasadena, CA.

\*Attachments: ☐ None ☐ Location Map ☐ Sketch Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record  
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record  
☐ Artifact Record ☐ Photograph Record ☐ Other (list)

## BUILDING, STRUCTURE, AND OBJECT RECORD

\*NHRP Status Code 3CD

Page 2 of 6

\*Resource Name or #: 156th Street Elementary School

B1. Historic Name: 156th Street Elementary School

B2. Common Name: Same

B3. Original Use: Institutional (Educational Facility)

B4. Present Use: Institutional (Educational Facility)

\*B5. **Architectural Style:** Mid-Century Modern–influenced

\*B6. **Construction History:** (Construction date, alterations, and date of alterations):

According to records on file with the Los Angeles Unified School District, the campus core was constructed in 1953. A \$338,990 contract was awarded for the construction of a semi-permanent frame and stucco building to accommodate 520 students at the school, with the Hudson Construction Company serving as contractor ("Contract for Gardena School Let" 1953). All of the campus's permanent buildings, structures, and facilities date from 1953. The grounds also contain four portable/temporary buildings dating from 1997 located south of the campus core.

A number of alterations and repairs have taken place over the years, including seismic and systems upgrades, the removal of windows to accommodate the installation of air-conditioning units, the retrofitting of electrical systems, the removal and replacement of gutters and downspouts (*LAUSD Pre-Planning Survey, 156th Street Elementary School*, provides a list of repairs and improvements performed since the late 1990s). Alterations to the original buildings on campus include the replacement of some original windows and hardscaping.

\*B7. **Moved?** ☒ No ☐ Yes ☐ Unknown **Date:** \_\_\_\_\_ **Original Location:** \_\_\_\_\_

\*B8. **Related Features:** Landscaping/mature trees

B9a. Architect: Unknown

b. **Builder:** Hudson Construction Company

\*B10. **Significance:** **Theme,** Institutional (Educational Facility), "Educating the Baby Boom: Postwar Expansion and the Functional, Modern School Plant, 1945-1969" **Area** Los Angeles

**Period of Significance:** 1953 (District) **Property Type:** Institutional (Educational Facility)

**Applicable Criteria:** CRHR: 1

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity)

The campus core of the 156<sup>th</sup> Street Elementary School appears eligible for the California Register of Historical Resources as a district under Criterion 1 as an excellent, intact example of a postwar finger-plan school in the Los Angeles Unified School District. The campus plan and buildings exemplify LAUSD design principles and ideals from the postwar period (as described in the *Los Angeles Unified School District Historic Context Statement, 1870 to 1969* [Sapphos Environmental, Inc. 2014]). While drawing on standardized plans used districtwide, the campus represents a relatively early example of LAUSD's postwar finger-plan school. Character-defining features include a unified site plan with mature landscaping, a network of arcades, Mid-Century Modern-influenced design, one-story massing, and incorporation of generous expanses of windows oriented to the outdoors. Due to alterations, such as the replacement of some windows, the campus is eligible for the California Register only.

B11. Additional Resource Attributes: None

\*B12. **References:** See Continuation Sheet

B13. Remarks: None

\*B14. **Evaluator:** Debi Howell-Ardila, MHP

\***Date of Evaluation:** 15 January 2014

(This space reserved for official comments.)

Sketch Map, with north arrow required



\*Recorded by Debi Howell-Ardila and Marilyn Novell

\*Date: 10 March 2014

☒ Continuation ☐ Update

**\*P3a. Description (continued):**

Buildings are capped with low-pitched shed roofs, terminating in thin, unadorned fascia and shallow eaves. Fenestration generally consists of multi-light, wood-frame windows in a variety of configurations. At the western elevations, classrooms display bands of awning clerestories. Eastern elevations display grouped, four-over-four, double-hung wood sashes. A network of sheltered arcades provides shade and circulation corridors between classroom wings and facilities. Windows occupy approximately 70 percent of the wall height on the eastern elevations and mark the location of the interior classrooms. Classroom entrances consist of wood doors topped with four-light transoms.

Located on the western portion of the campus, the assembly building/cafeteria is rectangular in plan and symmetrical in design composition. It consists of a two-story main block, capped with a flat roof and clad in stucco. The assembly building is accessed via a projecting one-story entrance wing, located on the north elevation. The entrance displays paired wood doors, flanked with thin, attached brick piers, and sheltered beneath a flat cantilevered roof. This roofline forms a continuous horizontal course across the façade and around side elevations. Projecting from the second story on the façade is a perpendicular stucco blade wall, which extends above the height of the building. The entrance is flanked by stack-laid brick piers and planters and two symmetrical bands of multi-light wood-framed windows. The brick motif is continued in the entrance steps and a wall extending from the Assembly Building to the campus entrance. Transoms over the entrance door and some of the windows on the main elevation appear to have been filled in. On the east elevation of the building is an open-air lunch pavilion.

The buildings and structures comprising the campus core are in good repair and enhanced with mature landscaping. Alterations include the removal of a number of windows on the east elevations of classroom buildings to accommodate air-conditioning units and the asphalt paving of open spaces between classroom buildings.

**P5b. Photo (continued): (view and date)**



*156th Street Elementary School, Assembly Building, viewed from the northwest.  
Source: Sapphos Environmental, Inc., 15 January 2014.*



## CONTINUATION SHEET

Primary #

HRI#

Trinomial

Page 4 of 6 \*Resource Name or #: 156th Street Elementary School

\*Recorded by Debi Howell-Ardila and Marilyn Novell \*Date: 10 March 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



156th Street Elementary School, procession of finger-like classroom buildings.  
Northwest perspective. Source: Sapphos Environmental, Inc., 15 January 2014.



156th Street Elementary School, Classroom Building 7, grouping of windows and door  
viewed from the southeast. Source: Sapphos Environmental, Inc., 15 January 2014.

\*Recorded by Debi Howell-Ardila and Marilyn Novell

\*Date: 15 January 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



156th Street Elementary School, asphalt hardscaping to the east of the Administration Building, viewed from the southeast. Source: Sapphos Environmental, Inc., 15 January 2014.

#### EXISTING CAMPUS PLAN



156th Street Elementary School, Site Plan, with permanent buildings marked in orange and portable buildings marked in purple. Source: Los Angeles Unified School District Pre-Planning Survey, 156th Street Elementary School, October 17, 2011.

\*Recorded by Debi Howell-Ardila and Marilyn Novell

\*Date: 15 January 2014

☒ Continuation ☐ Update

**\*B12. References (continued):**

- Bhatia, Pavan, "Modern Concept for Los Angeles Public Schools," Doctoral Dissertation (Cambridge, MA: Harvard University Graduate School of Design, Advanced Management Development Program in Real Estate, July 2009).
- Blumenson, John J.-G., *Identifying American Architecture* (New York: W.W. Norton & Company, 1977).
- California Office of Historic Preservation, *California Register and National Register: A Comparison (for Purposes of Determining Eligibility for the California Register)*, Technical Assistance Series No. 6. (Sacramento, CA, 14 March 2006).
- California Office of Historic Preservation, *Instructions for Recording Historical Resources* (Sacramento, CA, March 1995).
- "Contract for Gardena School Let." *Los Angeles Times* (28 April 1953).
- Donovan, John J., *School Architecture: Principles and Practices* (New York: The MacMillan Company, 1921).
- Eales, John R., "A Brief, General History of the Los Angeles City School System," Doctoral Dissertation (Los Angeles: University of California, June 1956).
- Gebhard, David, and Robert Winter, *A Guide to Architecture in Los Angeles and Southern California* (Santa Barbara, CA: Peregrine Smith, Inc., 1977).
- Harris, Cyril M., *American Architecture: An Illustrated Encyclopedia* (New York: W.W. Norton & Company, 1998).
- Heumann & Associates and Anne Doehne, Science Applications International Corporation, March 2002, "Historic Schools of the Los Angeles Unified School District," a presentation prepared for LAUSD Facilities Services Division (March 2002).
- Hille, R. Thomas, *Modern Schools: A Century of Design for Education* (Hoboken, NJ: John Wiley & Sons, 2011), 13.
- Lee, Antoinette, and Linda F. McClelland, U.S. Department of the Interior, National Park Service, *National Register Bulletin No. 16B, How to Complete the National Register Multiple Property Documentation Form* (1999).
- Los Angeles Unified School District. *Los Angeles Unified School District Pre-Planning Survey* (2011).
- McAlester, Virginia, and Lee McAlester, *A Field Guide to American House* (New York: Alfred A. Knopf, 2004).
- Mock, Elizabeth, *Built in USA, 1932 – 1944: A Survey of Contemporary American Architecture*, The Museum of Modern Art (New York: Simon & Shuster, 1944).
- Ogata, Amy F., "Building for Learning in Postwar American Elementary Schools," *Journal of the Society of Architectural Historians* 67, no. 4 (December 2008): 562–91.
- Los Angeles Unified School District. *Los Angeles Unified School District Pre-Planning Survey* (2011).
- Sapphos Environmental, Inc., *Los Angeles Unified School District Historic Context Statement, 1870 to 1969* (Pasadena, CA, March 2014).
- Science Applications International Corporation, *Historic Context Statement: Los Angeles Unified School District*, prepared for Los Angeles Unified School District (Pasadena, CA: March 2002).
- U.S. Department of the Interior, National Park Service, "How to Apply the National Register Criteria for Evaluation," National Register Bulletin No. 15 (Washington, DC, 2002).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Form," National Register Bulletin No. 16A (Washington, DC, 1997).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Multiple Property Documentation Form," National Register Bulletin No. 16B (Washington, DC, 1999).
- Whiffen, Marcus, *American Architecture since 1780: A Guide to the Styles* (Cambridge, MA: MIT Press, 1981).



PRIMARY RECORD

Primary # \_\_\_\_\_

HRI # \_\_\_\_\_

Trinomial \_\_\_\_\_

NRHP Status Code 3CD

Other Listings \_\_\_\_\_

Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 7 Resource name(s) or number (assigned by recorder) Castle Heights Elementary School

**P1. Other Identifier:**

**\*P2. Location:** ☐ Not for Publication ☒ Unrestricted

**\*a. County** Los Angeles County

**\*b. USGS 7.5' Quad** Beverly Hills, CA

**Date** 1981

**T R** N/A

c. Address 9755 Cattaraugus Avenue

City Los Angeles

Zip 90034

e. Other Locational Data: APN: # 4308-019-900

**\*P3a. Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries.)

Located on a 5.1-acre site in west Los Angeles, Castle Heights Elementary School is bounded by Beverlywood Street on the north, Cattaraugus Avenue on the south, Castle Heights Avenue on the east, and Beverwil Drive on the west. The campus core was constructed in 1951 in a predominantly residential neighborhood. Displaying a Mid-Century Modern architectural style, the original campus consists of four principal buildings: a one-story administration building/classroom, a two-story auditorium/cafeateria, separate kindergarten, and a one-story classroom wing. Following the curve of Castle Heights Avenue on the east is a curved classroom building, constructed in 1961.

(See Continuation Sheet)

**\*P3b. Resource Attributes:** (list attributes and codes) HP15. Educational Building. HP29. Landscape architecture.

**\*P4. Resources Present:** ☐ Building ☐ Structure ☐ Object ☐ Site ☒ District ☐ Element of District ☐ Other

P5a. Photo



**P5b. Photo:** (view and date)

Auditorium, view from southeast, 23 January 2014

**\*P6. Date Constructed/Age and Sources:**

☒ Historic ☐ Prehistoric ☐ Both  
1951/1961 (Los Angeles Unified School District)

**\*P7. Owner and Address:**

Los Angeles Unified School District

**\*P8. Recorded by:**

Debi Howell-Ardila and Marilyn Novell  
Sapphos Environmental, Inc.  
430 North Halstead Street  
Pasadena, CA 91107

**\*P9. Date Recorded:**

10 March 2014

**\*P10. Survey Type:** Intensive

**\*P11. Report Citation:** (Cite survey report and other sources, or enter "none")

Sapphos Environmental, Inc. March 2014. *Los Angeles Unified School District Historic Context Statement, 1870 to 1969*. Pasadena, CA.

Sapphos Environmental, Inc. June 2014. *Los Angeles Unified School District Historic Resources Survey Report*. Pasadena, CA.

**\*Attachments:** ☐ None ☐ Location Map ☐ Sketch Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record  
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record  
☐ Artifact Record ☐ Photograph Record ☐ Other (list)



**BUILDING, STRUCTURE, AND OBJECT RECORD**

\*NHRP Status Code 3CD

Page 2 of 7

\*Resource Name or #: Castle Heights Elementary School

- B1. Historic Name: Castle Heights Elementary School  
B2. Common Name: Same  
B3. Original Use: Institutional (Educational Facility)  
B4. Present Use: Institutional (Educational Facility)

\*B5. **Architectural Style:** Mid-Century Modern

\*B6. **Construction History:** (Construction date, alterations, and date of alterations):

According to records on file with the Los Angeles Unified School District (LAUSD), the campus core was constructed in 1951, with an additional classroom building added in 1961. All of the campus's permanent buildings, structures, and facilities date from this period. Portable buildings were added between 1990 and 1998 to the north of the campus core.

A number of alterations and repairs have taken place over the years, including seismic and systems upgrades and the removal/replacement of original windows to accommodate installation of air-conditioning units (the *LAUSD Pre-Planning Survey, Castle Heights Elementary School* lists repairs and improvements carried out since the late 1990s). Alterations to the original buildings on campus include the removal and infilling of original clerestory and transom windows.

\*B7. **Moved?** ☒ No ☐ Yes ☐ Unknown **Date:** \_\_\_\_\_ **Original Location:** \_\_\_\_\_

\*B8. **Related Features:** Landscaping/mature trees

B9a. Architect: Unknown

b. Builder: Unknown

\*B10. **Significance:** **Theme,** Institutional (Educational Facility), "Educating the Baby Boom: Postwar Expansion and the Functional, Modern School Plant, 1945-1969" **Area** Los Angeles

**Period of Significance:** 1951-1961 (District) **Property Type:** Institutional (Educational Facility)

**Applicable Criteria:** CRHR: 1

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity)

The core of the campus of Castle Heights Elementary School appears eligible for the California Register of Historical Resources as a district under Criterion 1 as an excellent, intact example of an indoor-outdoor postwar school in the Los Angeles Unified School District. The campus plan and buildings exemplify LAUSD design principles and ideals from the postwar period (as described in the *Los Angeles Unified School District Historic Context Statement, 1870 to 1969*). The campus retains integrity of location, design, setting, workmanship, feeling, and association. However, due to alterations, the campus is not eligible for the National Register of Historic Places and is eligible for the California Register only.

B11. Additional Resource Attributes: None

\*B12. **References:**

Sapphos Environmental, Inc., March 2014, *Los Angeles Unified School District Historic Context Statement, 1870 to 1969* (Pasadena, CA).

(See *Continuation Sheet*)

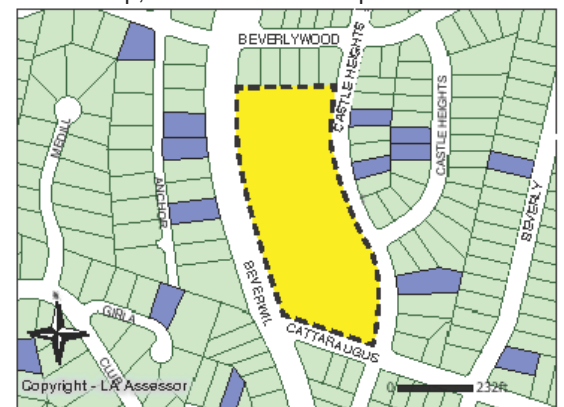
B13. Remarks: None

\*B14. **Evaluator:** Debi Howell-Ardila, MHP

\***Date of Evaluation:** 10 March 2014

(This space reserved for official comments.)

Sketch Map, with north arrow required



\*Recorded by Debi Howell-Ardila and Marilyn Novell

\*Date: 10 March 2014

☒ Continuation ☐ Update

**\*P3a. Description (continued):**

The principal entrance is set back from the street and fronted by a lawn with mature trees and landscaping. Through the entrance breezeway, the campus opens to an expansive central courtyard containing a small lawn and a number of mature trees in brick planters. The courtyard is flanked by classrooms on the east and west, the cafeteria/auditorium on the south, and recreational areas on the north.

Rectangular in plan and sheathed in smooth stucco, the auditorium/cafeteria is two stories in height and capped with a flat roof and no eaves. The principal entrance is located on the south elevation; it consists of recessed double doors elevated on two concrete steps. The entrance's original side lights appear to have been filled in. Attached brick piers and a planter accent the primary elevation of the auditorium. Fenestration generally consists of multi-light wood-framed windows in a variety of configurations, including hopper casements and fixed panes. On the north elevation, a breezeway with an open skylight provides a transitional space between the auditorium, the cafeteria, and classrooms.

Classroom wings are one story in height and rectangular in plan, capped with flat roofs and no eaves. Exterior walls are clad in smooth stucco, with minimal adornment. Classrooms display groupings of six four-over-four, wood-framed double-hung sashes with simple wood surrounds. Doors are integrated into the window grouping and include fixed-pane transoms. Attached brick piers accent the exterior of the buildings, echoing the ornamental theme displayed at the entrance to the campus.

A later addition to the campus is the curved classroom along Castle Heights Avenue. The stucco-clad building forms a continuous, curved line along Castle Heights Avenue, where it is setback from the sidewalk and lined by a series of concrete planters. Stack-bond brick planters and wall cladding at the north and south ends of the building reiterate the decorative elements throughout the campus. One classroom deep, the building displays a curved recessed corridor with pole supports that open onto a landscaped courtyard. Two single-light, double-hung sashes grouped with a unadorned door and a small filled-in transom mark each classroom.

Buildings and structures comprising the campus core are in good repair. Alterations include the removal and infilling of some original windows, including on the auditorium and 1961 classroom, the replacement of windows with air-conditioning units, and placement of storage sheds in the main courtyard outside of classrooms. The campus otherwise retains sufficient integrity to convey its period of significance.

**P5b. Photo (continued): (view and date)**



*Castle Heights Elementary School, Cafeteria/Auditorium, south elevation as seen from Cattaraugus Avenue. Source: Sapphos Environmental, Inc., 23 January 2014.*



Page 4 of 7    \*Resource Name or #: Castle Heights Elementary School

\*Recorded by Debi Howell-Ardila and Marilyn Novell

\*Date: 10 March 2014

☒ Continuation    ☐ Update

P5b. Photo (continued): (view and date)



*Castle Heights Elementary School, landscaping and Administration Building, viewed from the west. Source: Sapphos Environmental, Inc., 23 January 2014.*



*Castle Heights Elementary School, main courtyard, viewed from the south. Source: Sapphos Environmental, Inc., 23 January 2014.*

## CONTINUATION SHEET

Primary #

HRI#

Trinomial

Page 5 of 7 \*Resource Name or #: Castle Heights Elementary School

\*Recorded by Debi Howell-Ardila and Marilyn Novell

\*Date: 10 March 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



Castle Heights Elementary School, Kindergarten Building, viewed from the southwest. Source: Sapphos Environmental, Inc., 23 January 2014.



Castle Heights Elementary School, courtyard between classrooms, viewed from the south. Source: Sapphos Environmental, Inc., 23 January 2014.



Page 6 of 7 \*Resource Name or #: Castle Heights Elementary School

\*Recorded by Debi Howell-Ardila and Marilyn Novell

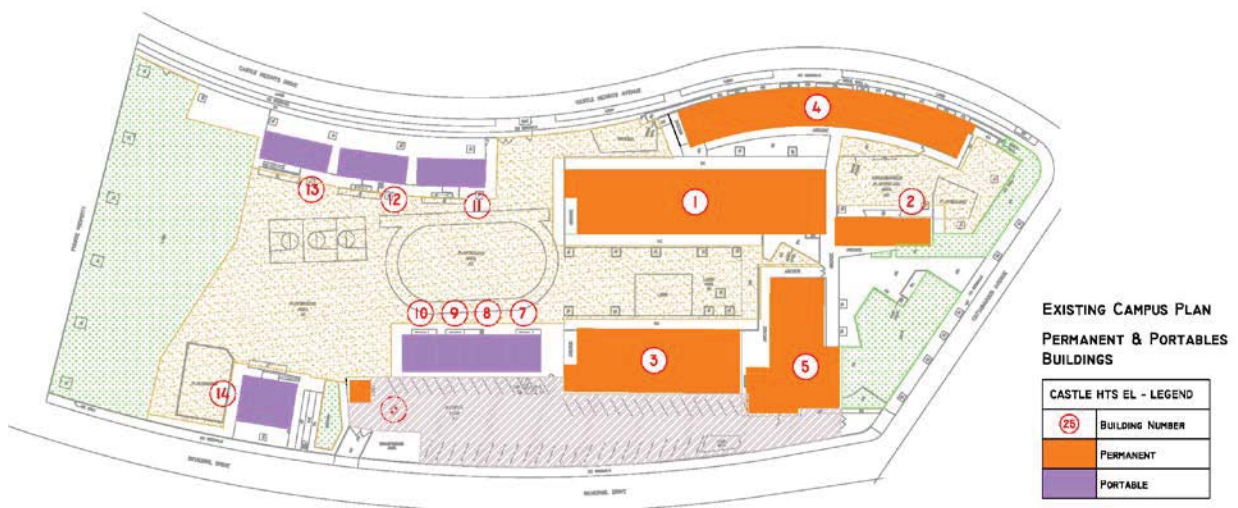
\*Date: 10 March 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



Castle Heights Elementary School, classroom building as seen from Castle Heights Avenue from the southeast. Source: Sapphos Environmental, Inc., 23 January 2014.



Castle Heights Elementary School, Site Plan, with permanent buildings marked in orange and portable buildings marked in purple. Source: Los Angeles Unified School District Pre-Planning Survey, Castle Heights Elementary School, 15 June 2010.

\*Recorded by Debi Howell-Ardila and Marilyn Novell

\*Date: 10 March 2014

☒ Continuation ☐ Update

**\*B12. References (continued):**

- Bhatia, Pavan, "Modern Concept for Los Angeles Public Schools," Doctoral Dissertation (Cambridge, MA: Harvard University Graduate School of Design, Advanced Management Development Program in Real Estate, July 2009).
- Blumenson, John J.-G., *Identifying American Architecture* (New York: W.W. Norton & Company, 1977).
- California Office of Historic Preservation, *California Register and National Register: A Comparison (for Purposes of Determining Eligibility for the California Register)*, Technical Assistance Series No. 6. (Sacramento, CA, 14 March 2006).
- California Office of Historic Preservation, *Instructions for Recording Historical Resources* (Sacramento, CA, March 1995).
- "Contracts Awarded for Two Schools Total \$1,174,571." *Los Angeles Times* (21 July 1950).
- Donovan, John J., *School Architecture: Principles and Practices* (New York: The MacMillan Company, 1921).
- Eales, John R., "A Brief, General History of the Los Angeles City School System," Doctoral Dissertation (Los Angeles: University of California, June 1956).
- Gebhard, David, and Robert Winter, *A Guide to Architecture in Los Angeles and Southern California* (Santa Barbara, CA: Peregrine Smith, Inc., 1977).
- Harris, Cyril M., *American Architecture: An Illustrated Encyclopedia* (New York: W.W. Norton & Company, 1998).
- Heumann & Associates and Anne Doehne, Science Applications International Corporation, March 2002, "Historic Schools of the Los Angeles Unified School District," a presentation prepared for LAUSD Facilities Services Division (March 2002).
- Hille, R. Thomas, *Modern Schools: A Century of Design for Education* (Hoboken, NJ: John Wiley & Sons, 2011), 13.
- Lee, Antoinette, and Linda F. McClelland, U.S. Department of the Interior, National Park Service, *National Register Bulletin No. 16B, How to Complete the National Register Multiple Property Documentation Form* (1999).
- Los Angeles Unified School District. *Los Angeles Unified School District Pre-Planning Survey* (2011).
- McAlester, Virginia, and Lee McAlester, *A Field Guide to American House* (New York: Alfred A. Knopf, 2004).
- Mock, Elizabeth, *Built in USA, 1932 – 1944: A Survey of Contemporary American Architecture*, The Museum of Modern Art (New York: Simon & Shuster, 1944).
- Ogata, Amy F., "Building for Learning in Postwar American Elementary Schools," *Journal of the Society of Architectural Historians* 67, no. 4 (December 2008): 562–91.
- Sapphos Environmental, Inc., *Los Angeles Unified School District Historic Context Statement, 1870 to 1969* (Pasadena, CA, March 2014).
- Science Applications International Corporation, *Historic Context Statement: Los Angeles Unified School District*, prepared for Los Angeles Unified School District (Pasadena, CA: March 2002).
- U.S. Department of the Interior, National Park Service, "How to Apply the National Register Criteria for Evaluation," National Register Bulletin No. 15 (Washington, DC, 2002).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Form," National Register Bulletin No. 16A (Washington, DC, 1997).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Multiple Property Documentation Form," National Register Bulletin No. 16B (Washington, DC, 1999).
- Whiffen, Marcus, *American Architecture since 1780: A Guide to the Styles* (Cambridge, MA: MIT Press, 1981).

## PRIMARY RECORD

Primary # \_\_\_\_\_

HRI # \_\_\_\_\_

Trinomial \_\_\_\_\_

NRHP Status Code 3D

Other Listings \_\_\_\_\_

Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 6

Resource name(s) or number (assigned by recorder) Chatsworth Senior High School

**P1. Other Identifier:**

**\*P2. Location:** ☐ Not for Publication ☒ Unrestricted

**\*a. County** Los Angeles County

**\*b. USGS 7.5' Quad** Oat Mountain, CA

**Date** 1969

**T** 2N **R** 16W; W ½ of SW ¼ of Sec 17. S.B.B.M.

**c. Address** 10027 Lurline Avenue

**City** Chatsworth

**Zip** 91311

**e. Other Locational Data:** APN: # 2741-002-900

**\*P3a. Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries.)

Located on a 37.5-acre site in northwestern San Fernando Valley, Chatsworth Senior High School is bounded by Lemarsh Street on the north, Lurline Avenue on the east, Vintage Street on the south, and De Soto Avenue on the west. The campus core displays the textbook features of the postwar indoor-outdoor school plant, with low (generally one story) classroom wings extending across a large site, and ample outdoor courtyards and landscaping, connected by an extensive system of arcades. Constructed in 1963 in a Mid-Century Modern architectural style, the focal point of the campus is an oval-shaped central lawn, with eight one-story classroom wings radiating outward from the lawn. The central lawn is bisected by a concrete walkway and accented with mature trees and landscaping. An outdoor auditorium, with concrete steps and stage, are located in the lawn's northwestern portion. Anchoring both sides of the lawn are the Administration Building in the southeast portion of the campus and the cafeteria, outdoor dining area, and multipurpose room in the northwest portion. Throughout the core of the campus, landscaped courtyards with walkways, benches, and landscaping line each classroom wing.

The Administration Building consists of a one-story building, rectangular in plan and capped with a low-pitched, front-gabled roof. The building is sheathed in stucco and brick. Windows display a variety of configurations, including fixed lights, transoms, multi-light double-hung sashes, and awning casements. (See Continuation Sheet)

**\*P3b. Resource Attributes:** (list attributes and codes) HP15. Educational Building. HP29. Landscape architecture.

**\*P4. Resources Present:** ☐ Building ☐ Structure ☐ Object ☐ Site ☒ District ☐ Element of District ☐ Other

P5a. Photo



P5b. Photo: (view and date) Southeast elevation, 7 November 2013

**\*P6. Date Constructed/Age and**

**Sources:** ☒ Historic ☐ Prehistoric

☐ Both 1963 (Los Angeles Unified School District)

**\*P7. Owner and Address:**

Los Angeles Unified School District

**\*P8. Recorded by:**

Debi Howell-Ardila, MHP  
Sapphos Environmental, Inc.  
430 North Halstead Street  
Pasadena, CA 91107

**\*P9. Date Recorded:** 2 January 2014

**\*P10. Survey Type:** Intensive

**\*P11. Report Citation:** (Cite survey report and other sources, or enter "none") Sapphos Environmental, Inc. March 2014. *Los Angeles Unified School District Historic Context Statement, 1870 to 1969*. Pasadena, CA.

Sapphos Environmental, Inc. June 2014. *Los Angeles Unified School District Historic Resources Survey Report*. Pasadena, CA.

**\*Attachments:** ☐ None ☐ Location Map ☐ Sketch Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record  
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record  
☐ Artifact Record ☐ Photograph Record ☐ Other (list)



**BUILDING, STRUCTURE, AND OBJECT RECORD**

\*NHRP Status Code 3D

Page 2 of 6

\*Resource Name or #: Chatsworth Senior High School

B1. Historic Name: Chatsworth Senior High School

B2. Common Name: Same

B3. Original Use: Institutional (Educational Facility)

B4. Present Use: Institutional (Educational Facility)

\*B5. **Architectural Style:** Mid-Century Modern

\*B6. **Construction History:** (Construction date, alterations, and date of alterations):

According to records on file with the Los Angeles Unified School District, construction was completed on Chatsworth Senior High School in 1963. A majority of the campus's extant buildings, structures, and facilities date from this period. The grounds also include several portable/temporary buildings from the 1940s and 1950s. After construction of the campus (especially during the 1980s and 2000s), additional modular, portable buildings and structures were added, primarily in the campus's southwestern portion. A number of alterations and repairs have taken place over the years, including seismic and systems upgrades, the installation of air-conditioner units, and safety improvements (see *LAUSD Pre-Planning Survey, Chatsworth Senior High School* for list of repairs and improvements carried out since the 1990s). Alterations to original buildings on campus include the infilling of original window openings with air-conditioners or other materials (such as wood paneling); such changes are visible on several classroom wings. The Multipurpose Room and Gymnasium also appear to have had window openings/doors altered or filled in.

\*B7. **Moved?** ☒ No ☐ Yes ☐ Unknown **Date:** \_\_\_\_\_ **Original Location:** \_\_\_\_\_

\*B8. **Related Features:** Landscaping/mature trees, hardscaping, benches

B9a. Architect: Unknown

b. Builder: Unknown

\*B10. **Significance:** **Theme,** Institutional (Educational Facility), "Educating the Baby Boom: Postwar Expansion and the Functional, Modern School Plant, 1945-1969" **Area** Los Angeles

**Period of Significance:** 1963 (District) **Property Type:** Institutional (Educational Facility)

**Applicable Criteria:** NRHP: A and C; CRHR: 1 and 3.

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity)

The campus core of Chatsworth Senior High School appears eligible as a district under Criteria A/1 as an excellent, intact example of an indoor-outdoor postwar school in the Los Angeles Unified School District. The campus plan and buildings exemplify LAUSD design principles and ideals from the postwar period (as described in the Los Angeles Unified School District Historic Context Statement, 1870 to 1969). The construction of Chatsworth Senior High School in 1963 also reflects the continuing postwar suburban expansion of the San Fernando Valley. The campus is also eligible under Criteria C/3 as an excellent example of the Mid-Century Modern style applied to institutional architecture.

With plans launched in 1961, Chatsworth Senior High School was designed to accommodate overflow student populations from Canoga Park, Cleveland, and Granada Hills high schools. The school was originally designed to accommodate up to 2,500 students. Although the campus shows some signs of alteration, such as the removal of original hardscaping, windows, and doors, the campus core retains integrity of location, design, setting, workmanship, feeling, and association.

B11. Additional Resource Attributes: HP15. Educational Facility.  
HP 29. Landscape Architecture.

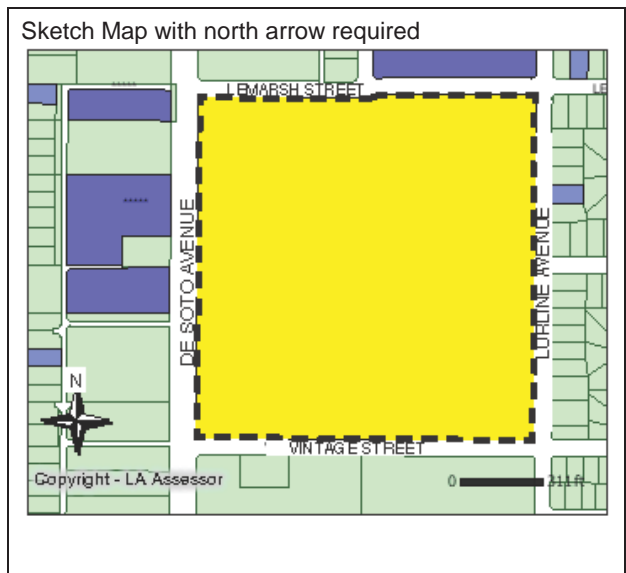
\*B12. **References:** (See Continuation Sheet)

B13. Remarks: None

\*B14. **Evaluator:** Debi Howell-Ardila, MHP

\***Date of Evaluation:** 7 November 2013

(This space reserved for official comments.)





\*Recorded by Debi Howell-Ardila

\*Date: 2 January 2014

☒ Continuation ☐ Update

**\*P3a. Description (continued):**

Swaths of wide horizontal louvers provide shade along the façade the Administration Building. The campus also displays a generous setback, with the Administration Building fronted by an expansive lawn and several mature trees.

The eight wings of the campus core, which include the main classroom wings and campus library, are largely identical in plan, configuration, and architectural detailing. Classrooms consist of rectangular, one-story buildings capped with low-pitched, front-gabled roofs. Roof lines terminate in thin gable bargeboards. At the ends of the roof gables, eaves extend and turn downward at a 90-degree angle, providing additional shading for the interior. These wings have double-loaded corridors with classrooms along each side. Generous bands of fixed and casement windows line the classroom wings; in a typical fenestration pattern for postwar LAUSD schools, windows occupy approximately 60 percent of the exterior wall height. Sheathing materials used on classroom wings vary; facing the central lawn, primary and secondary elevation walls are sheathed in smooth stucco, with some scoring detailing. The elevation facing the exterior of the campus displays patterned Roman brick sheathing and a cantilevered shelter over the entrance.

The entrances on both sides of the classroom wings feature similar architectural detailing. Flanking the entrances are thin, square piers, sheathed in off-white brick. Entrances consist of sets of metal doors with fixed and side lights, capped with clerestory windows. On all classroom wings, decorative tile work and horizontal vents accent the apexes of the roof gables. On the interior of the campus, the cantilevered roofs over entrances extend to form covered canopies. The concrete-clad canopies are capped with flat roofs and rest on thin, spider-leg supports.

Beyond the campus core, the school includes a music room, gymnasium, playing fields, and a shop building, as well as other ancillary buildings and structures. Alterations include the replacement of some original hardscaping and windows, and the infilling of original window openings with air-conditioner units. The core of the campus is otherwise intact. The original entrance of the gymnasium also appears to have been altered, with original windows and doors filled in on the eastern portion of the façade.

**P5b. Photo (continued): (view and date)**



*Chatsworth Senior High School, Classroom Wing D, northwest (outward facing) elevation.  
Source: Sapphos Environmental, Inc., 7 November 2013.*

**CONTINUATION SHEET**

Primary #

HRI#

Trinomial

Page 4 of 6 \*Resource Name or #: Chatsworth Senior High School

\*Recorded by Debi Howell-Ardila

\*Date: 2 January 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



*Chatsworth Senior High School, Classroom Building 8, seen from the curved arcade, which forms a network throughout the campus. West perspective. Source: Sapphos Environmental, Inc., 7 November 2013.*



*Chatsworth Senior High School, oval-shaped lawn and arcade system. Southeast perspective. Source: Sapphos Environmental, Inc., 7 November 2013.*



## CONTINUATION SHEET

Primary #

HRI#

Trinomial

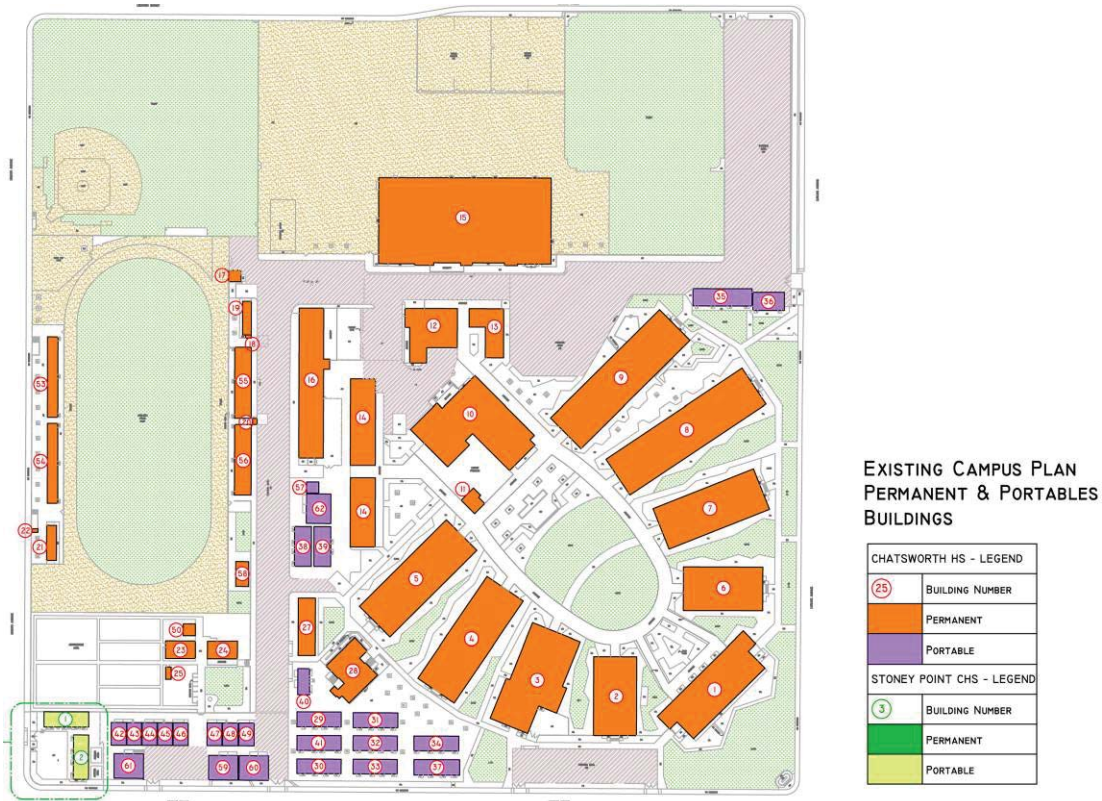
Page 5 of 6 \*Resource Name or #: Chatsworth Senior High School

\*Recorded by Debi Howell-Ardila

\*Date: 2 January 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



Chatsworth Senior High School, Site Plan, with permanent buildings marked in orange and portable buildings marked in purple. Source: Los Angeles Unified School District Pre-Planning Survey, Chatsworth Senior High School, December 2010.

\*Recorded by Debi Howell-Ardila

\*Date: 29 January 2014

☒ Continuation ☐ Update

**\*B12. References (continued):**

- Bhatia, Pavan, "Modern Concept for Los Angeles Public Schools," Doctoral Dissertation (Cambridge, MA: Harvard University Graduate School of Design, Advanced Management Development Program in Real Estate, July 2009).
- Blumenson, John J.-G., *Identifying American Architecture* (New York: W.W. Norton & Company, 1977).
- California Office of Historic Preservation, *California Register and National Register: A Comparison (for Purposes of Determining Eligibility for the California Register)*, Technical Assistance Series No. 6. (Sacramento, CA, 14 March 2006).
- California Office of Historic Preservation, *Instructions for Recording Historical Resources* (Sacramento, CA, March 1995).
- "Contracts Awarded for 2 Major Schools." *Los Angeles Times* (3 August 1961).
- Donovan, John J., *School Architecture: Principles and Practices* (New York: The MacMillan Company, 1921).
- Eales, John R., "A Brief, General History of the Los Angeles City School System," Doctoral Dissertation (Los Angeles: University of California, June 1956).
- Gebhard, David, and Robert Winter, *A Guide to Architecture in Los Angeles and Southern California* (Santa Barbara, CA: Peregrine Smith, Inc., 1977).
- Harris, Cyril M., *American Architecture: An Illustrated Encyclopedia* (New York: W.W. Norton & Company, 1998).
- Heumann & Associates and Anne Doehne, Science Applications International Corporation, March 2002, "Historic Schools of the Los Angeles Unified School District," a presentation prepared for LAUSD Facilities Services Division (March 2002).
- Hille, R. Thomas, *Modern Schools: A Century of Design for Education* (Hoboken, NJ: John Wiley & Sons, 2011), 13.
- Lee, Antoinette, and Linda F. McClelland, U.S. Department of the Interior, National Park Service, *National Register Bulletin No. 16B, How to Complete the National Register Multiple Property Documentation Form* (1999).
- Los Angeles Unified School District. *Los Angeles Unified School District Pre-Planning Survey* (2011).
- McAlester, Virginia, and Lee McAlester, *A Field Guide to American House* (New York: Alfred A. Knopf, 2004).
- Mock, Elizabeth, *Built in USA, 1932 – 1944: A Survey of Contemporary American Architecture*, The Museum of Modern Art (New York: Simon & Shuster, 1944).
- "New School Will Expect Much from Students, Says Principal." *Los Angeles Times* (23 January 1963).
- Ogata, Amy F., "Building for Learning in Postwar American Elementary Schools," *Journal of the Society of Architectural Historians* 67, no. 4 (December 2008): 562–91.
- Sapphos Environmental, Inc., *Los Angeles Unified School District Historic Context Statement, 1870 to 1969* (Pasadena, CA, March 2014).
- Science Applications International Corporation, *Historic Context Statement: Los Angeles Unified School District*, prepared for Los Angeles Unified School District (Pasadena, CA: March 2002).
- U.S. Department of the Interior, National Park Service, "How to Apply the National Register Criteria for Evaluation," National Register Bulletin No. 15 (Washington, DC, 2002).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Form," National Register Bulletin No. 16A (Washington, DC, 1997).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Multiple Property Documentation Form," National Register Bulletin No. 16B (Washington, DC, 1999).
- Whiffen, Marcus, *American Architecture since 1780: A Guide to the Styles* (Cambridge, MA: MIT Press, 1981).

## PRIMARY RECORD

Primary # \_\_\_\_\_

HRI # \_\_\_\_\_

Trinomial \_\_\_\_\_

NRHP Status Code 3D

Other Listings \_\_\_\_\_

Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 7

Resource name(s) or number (assigned by recorder) Cleveland Senior High School

**P1. Other Identifier:**

\*P2. Location: ☐ Not for Publication ☒ Unrestricted

\*a. County Los Angeles County

\*b. USGS 7.5' Quad Canoga Park, CA

Date 1967

T 2N R 16W; Unsectioned; S.B.B.M.

c. Address 8140 Vanalden Avenue

City Reseda

Zip 91335

e. Other Locational Data: APN: # 2104-004-905

\*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries.)

Located in northwest Reseda in the San Fernando Valley, Grover Cleveland Senior High School occupies a 33-acre site bounded by Roscoe Boulevard on the north, the Los Angeles River on the east, Wilbur Avenue on the southeast, Strathern Street on the south, and Vanalden Avenue on the west.

Constructed in 1959/1960 in the Mid-Century Modern style, the campus core displays the textbook features of the postwar indoor-outdoor school plant, with low (generally one story) classroom wings extending across a large site, and with outdoor courtyards and plantings, connected by an extensive network of arcades. The site plan combines the features of a finger-plan and a cluster-plan school, with axial, double-loaded classroom wings grouped around shared courtyard spaces and a large central lawn. The central lawn provides gathering spaces for students and doubles as an outdoor auditorium, with a raised concrete platform along the eastern portion of the lawn. A low wall, characterized by alternating panels of brick cladding and decorative grillwork, fronts the central lawn. The principal entrance to the school is located in the Administration Building, which is located along the northeastern portion of the lot. Classrooms extend outward from the main entrance, in a symmetrical plan linked by arcades. Courtyards and outdoor spaces throughout the campus exhibit mature trees and plantings, built-in concrete benches, planters and hardscaping. (See Continuation Sheet)

\*P3b. Resource Attributes: (list attributes and codes) HP15. Educational Building. HP29. Landscape architecture.

\*P4. Resources Present: ☐ Building ☐ Structure ☐ Object ☐ Site ☒ District ☐ Element of District ☐ Other

P5a. Photo



P5b. Photo: (view and date) Southwest elevation, 6 November 2013

\*P6. Date Constructed/Age and Sources: ☒ Historic ☐ Prehistoric  
☐ Both 1959/1960 (Los Angeles Unified School District)

\*P7. Owner and Address:  
Los Angeles Unified School District

\*P8. Recorded by:  
Debi Howell-Ardila and Marilyn Novell  
Sapphos Environmental, Inc.  
430 North Halstead Street  
Pasadena, CA 91107

\*P9. Date Recorded:  
29 January 2014

\*P10. Survey Type: Intensive

\*P11. Report Citation: (Cite survey report and other sources, or enter "none")

Sapphos Environmental, Inc. March

2014. Los Angeles Unified School District Historic Context Statement, 1870 to 1969. Pasadena, CA.

Sapphos Environmental, Inc. June 2014. Los Angeles Unified School District Historic Resources Survey Report. Pasadena, CA.

\*Attachments: ☐ None ☐ Location Map ☐ Sketch Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record  
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record  
☐ Artifact Record ☐ Photograph Record ☐ Other (list)



**BUILDING, STRUCTURE, AND OBJECT RECORD**

\*NHRP Status Code 3D

Page 2 of 7

\*Resource Name or #: Cleveland Senior High School

B1. Historic Name: Grover Cleveland Senior High School

B2. Common Name: Same

B3. Original Use: Institutional (Educational Facility)

B4. Present Use: Institutional (Educational Facility)

\*B5. **Architectural Style:** Mid-Century Modern

\*B6. **Construction History:** (Construction date, alterations, and date of alterations):

Grover Cleveland Senior High School was constructed in 1959–1960 at an estimated cost of \$5 million (*Los Angeles Times*, 22 September 1957). A majority of the campus's extant buildings, structures, and facilities date from this period. The grounds also include a number of portable/temporary buildings, most of which were added during the mid-1980s and early 2000s. A number of alterations and repairs have taken place over the years, including seismic and systems upgrades, the installation of air-conditioning units, and safety improvements (see *LAUSD Pre-Planning Survey, Cleveland Senior High School* for list of repairs and improvements carried out since the 1990s). Alterations to original buildings on campus include the infilling of some original window openings with air-conditioner units; such changes are visible on several of the classroom wings.

\*B7. **Moved?** ☒No ☐Yes ☐Unknown **Date:** \_\_\_\_\_ **Original Location:** \_\_\_\_\_

\*B8. **Related Features:** Landscaping/mature trees, hardscaping, benches

B9a. Architect: Charles O. Matcham, Stewart S. Granger and Associates

b. Builder: Unknown

\*B10. **Significance:** **Theme,** Institutional (Educational Facility), "Educating the Baby Boom: Postwar Expansion and the Functional, Modern School Plant, 1945-1969" **Area** Los Angeles

**Period of Significance:** 1959-1960 (District) **Property Type:** Institutional (Educational Facility)

**Applicable Criteria:** NRHP: A and C; CRHR: 1 and 3.

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity)

The campus core of Cleveland Senior High School appears eligible as a district under Criteria A/1 as an excellent, intact example of an indoor-outdoor postwar school in the Los Angeles Unified School District. The campus plan and buildings exemplify LAUSD design principles and ideals from the postwar period, specifically as an example of a finger-plan and cluster-plan school (as described in the *Los Angeles Unified School District Historic Context Statement, 1870 to 1969*). The construction of Cleveland Senior High School in 1959 also reflects the continuing postwar suburban expansion of the San Fernando Valley. The campus is also eligible under Criteria C/3 as an excellent example of the Mid-Century Modern style applied to institutional architecture.

With plans launched in 1957, Cleveland Senior High School was designed to accommodate 3,000 students in the rapidly expanding San Fernando Valley. Although the campus shows some signs of alteration, such as the removal of original hardscaping and windows, the campus core retains integrity of location, design, setting, workmanship, feeling, and association.

B11. Additional Resource Attributes: HP15. Educational Facility. HP 29. Landscape Architecture.

\*B12. **References:** (See *Continuation Sheet*)

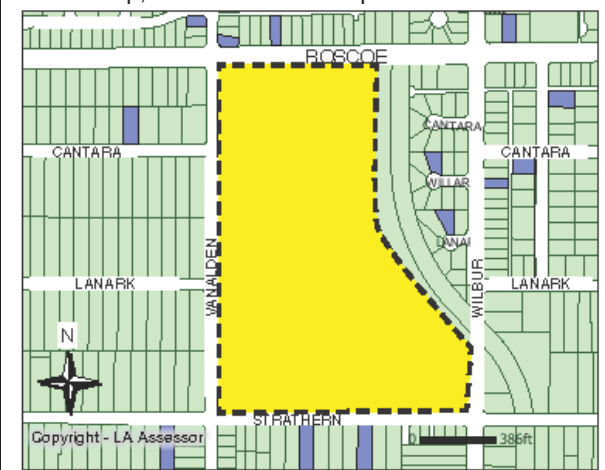
B13. Remarks: None

\*B14. **Evaluator:** Debi Howell-Ardila, MHP

\***Date of Evaluation:** 7 November 2013

(This space reserved for official comments.)

Sketch Map, with north arrow required



\*Recorded by Debi Howell-Ardila and Marilyn Novell

\*Date: 29 January 2014

☒ Continuation ☐ Update

**\*P3a. Description (continued):**

The defining feature of the campus is the Administration Building, which is located along the northeastern portion of the lot. The one-story building is rectangular in plan and capped with a very low-pitched, front-gabled roof. Projecting from the north half of the building, a brick-clad wall separates the entrance from an adjacent parking lot. On the primary (east) elevation, wood-framed, full-height windows face the drop-off area for students and look out onto extensive landscaping, brick planters, and mature trees. Decorative detailing is primarily reserved for the entrance, which is centered beneath the gable and displays Roman-patterned brick and a flat-roofed cantilevered shelter. Horizontal vents mark the gable apex. A recessed courtyard with landscaping is located on the south elevation.

The main entrance is centered on the building and consists of paired metal doors, sheltered by a flat-roof arcade that provides a transition from the exterior to the interior of the school. A wall composed of alternating panels of brick and decorative grillwork separates the entrance arcade from an adjacent parking lot. As on the campus interior, the arcade is characterized by a stucco-clad shelter supported on steel, spider-leg supports (along the central lawn, the arcade is supported on thick, brick-clad piers). The structure is frankly expressed, with exposed steel supports exposed beneath the arcades. In a configuration that also characterizes classroom wings throughout the campus, the gable of the Administration Building displays shallow eaves trimmed with thin bargeboards. Along the side of the building, the roof line ends in medium cantilevered eaves sheathed in stucco. (This roof configuration and detailing are echoed in the classroom wings throughout campus.)

Typical classroom wings follow this pattern, with one-story rectangular buildings, capped with low-pitched front-gabled roofs. Along the length of the classrooms, windows are recessed and generally consist of two-over-two, double-hung wood sashes, grouped in rows that mark the location of the classrooms inside. These window groupings mark the classrooms on the interior and occupy approximately 60 percent of the exterior wall height. A variety of fenestration types and patterns are seen throughout campus, including a number of fixed pane, clerestories, and casements. Sheathing materials include stucco, with some decorative scoring, and patterned Roman brick. (See *Continuation Sheet*, p. 4)

**P5b. Photo (continued): (view and date)**



*Cleveland Senior High School, Administration Building. Southwest perspective.  
Source: Sapphos Environmental, Inc., 6 November 2013.*

**CONTINUATION SHEET**

Primary #

HRI#

Trinomial

Page 4 of 7 \*Resource Name or #: Cleveland Senior High School

\*Recorded by Debi Howell-Ardila and Marilyn Novell

\*Date: 29 January 2014

☒ Continuation ☐ Update

**\*P3a. Description (continued):**

Beyond the campus core, the school includes a library (on the northwestern side of campus), cafeteria and sheltered outdoor dining area, gymnasium and recreational fields (in the southern portion of the lot), as well as a number of facilities and portable buildings/structures, installed primarily in the 1980s. All buildings on campus are one story with the exception of one classroom building, the cafeteria, and gymnasium. Overall, the campus core is in good repair and enhanced by extensive original (and new) landscaping. Visible alterations include some replaced hardscaping and concrete benches in the courtyards, the addition of security grills and air-conditioning units in some of the original window openings.

**P5b. Photo (continued): (view and date)**



*Cleveland Senior High School, typical classroom building. East perspective.  
Source: Sapphos Environmental, Inc., 6 November 2013.*



*Cleveland Senior High School, typical classroom building. Southwest perspective.  
Source: Sapphos Environmental, Inc., 6 November 2013.*



\*Recorded by Debi Howell-Ardila and Marilyn Novell

\*Date: 29 January 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



*Cleveland Senior High School, typical inter-classroom courtyard and landscaping. Southeast perspective. Source: Sapphos Environmental, Inc., 6 November 2013.*



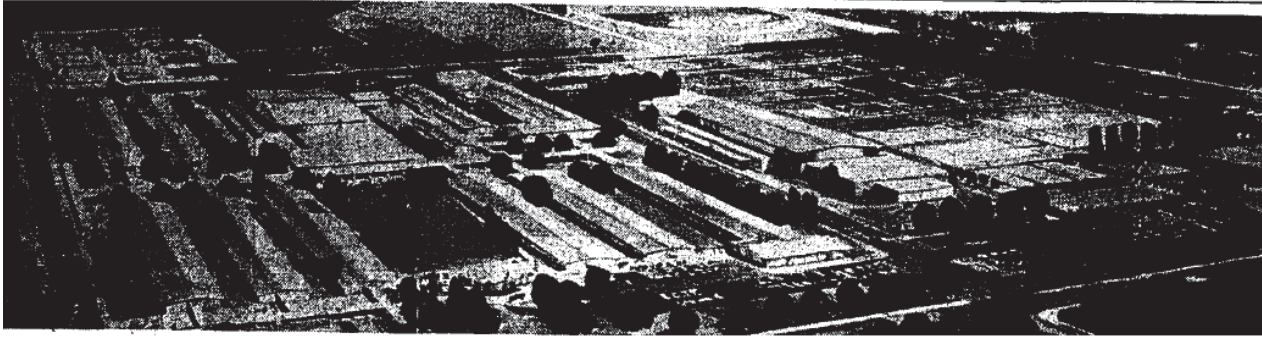
*Cleveland Senior High School, typical classroom building. Southwest perspective. Source: Sapphos Environmental, Inc., 6 November 2013.*

\*Recorded by Debi Howell-Ardila and Marilyn Novell

\*Date: 29 January 2014

☒ Continuation ☐ Update

**P5b. Photo (continued): (view and date)**



**MAJOR SCHOOL PLANNED**—This drawing indicates design and magnitude of Grover Cleveland Senior High School, \$5,000,000 project proposed to be built on Northridge site for accommodation

of 3000 students. Plans are by architectural firm of Charles O. Matcham, Stewart S. Granger and Associates. School will be constructed in two phases. Entire completion set September of 1959.

*Los Angeles Times, 22 September 1957. Announcement of construction of Grover Cleveland High School, to be constructed as an estimated cost of \$5 million, to accommodate 3,000 students. Campus design by Charles O. Matcham, Stewart S. Granger and Associates.*



*Cleveland Senior High School, Site Plan, with permanent buildings marked in orange and portable buildings marked in purple. Source: Los Angeles Unified School District Pre-Planning Survey, Cleveland Senior High School, March 2012.*



\*Recorded by Debi Howell-Ardila and Marilyn Novell

\*Date: 29 January 2014

☒ Continuation ☐ Update

**\*B12. References (continued):**

- Bhatia, Pavan, "Modern Concept for Los Angeles Public Schools," Doctoral Dissertation (Cambridge, MA: Harvard University Graduate School of Design, Advanced Management Development Program in Real Estate, July 2009).
- Blumenson, John J.-G., *Identifying American Architecture* (New York: W.W. Norton & Company, 1977).
- California Office of Historic Preservation, *California Register and National Register: A Comparison (for Purposes of Determining Eligibility for the California Register)*, Technical Assistance Series No. 6. (Sacramento, CA, 14 March 2006).
- California Office of Historic Preservation, *Instructions for Recording Historical Resources* (Sacramento, CA, March 1995).
- Donovan, John J., *School Architecture: Principles and Practices* (New York: The MacMillan Company, 1921).
- Eales, John R., "A Brief, General History of the Los Angeles City School System," Doctoral Dissertation (Los Angeles: University of California, June 1956).
- Gebhard, David, and Robert Winter, *A Guide to Architecture in Los Angeles and Southern California* (Santa Barbara, CA: Peregrine Smith, Inc., 1977).
- Harris, Cyril M., *American Architecture: An Illustrated Encyclopedia* (New York: W.W. Norton & Company, 1998).
- Heumann & Associates and Anne Doehne, Science Applications International Corporation, March 2002, "Historic Schools of the Los Angeles Unified School District," a presentation prepared for LAUSD Facilities Services Division (March 2002).
- Hille, R. Thomas, *Modern Schools: A Century of Design for Education* (Hoboken, NJ: John Wiley & Sons, 2011), 13.
- Lee, Antoinette, and Linda F. McClelland, U.S. Department of the Interior, National Park Service, *National Register Bulletin No. 16B, How to Complete the National Register Multiple Property Documentation Form* (1999).
- McAlester, Virginia, and Lee McAlester, *A Field Guide to American House* (New York: Alfred A. Knopf, 2004).
- Mock, Elizabeth, *Built in USA, 1932 – 1944: A Survey of Contemporary American Architecture*, The Museum of Modern Art (New York: Simon & Shuster, 1944).
- "New \$5,000,000 High School's Plans Stated." *Los Angeles Times* (September 22, 1957).
- Ogata, Amy F., "Building for Learning in Postwar American Elementary Schools," *Journal of the Society of Architectural Historians* 67, no. 4 (December 2008): 562–91.
- Los Angeles Unified School District. *Los Angeles Unified School District Pre-Planning Survey* (2011).
- Sapphos Environmental, Inc., *Los Angeles Unified School District Historic Context Statement, 1870 to 1969* (Pasadena, CA, March 2014).
- Science Applications International Corporation, *Historic Context Statement: Los Angeles Unified School District*, prepared for Los Angeles Unified School District (Pasadena, CA: March 2002).
- U.S. Department of the Interior, National Park Service, "How to Apply the National Register Criteria for Evaluation," *National Register Bulletin No. 15* (Washington, DC, 2002).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Form," *National Register Bulletin No. 16A* (Washington, DC, 1997).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Multiple Property Documentation Form," *National Register Bulletin No. 16B* (Washington, DC, 1999).
- Whiffen, Marcus, *American Architecture since 1780: A Guide to the Styles* (Cambridge, MA: MIT Press, 1981).

## PRIMARY RECORD

Primary # \_\_\_\_\_  
HRI # \_\_\_\_\_  
Trinomial \_\_\_\_\_  
NRHP Status Code 3CD

Other Listings \_\_\_\_\_  
Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 7 Resource name(s) or number (assigned by recorder) Colfax Avenue Elementary School

**P1. Other Identifier:**

**\*P2. Location:** ☐ Not for Publication ☒ Unrestricted

**\*a. County** Los Angeles County

**\*b. USGS 7.5' Quad** Sherman Village, CA

**Date** 1972

**T 2N R 16W;** Unsectioned; S.B.B.M.

**c. Address** 11724 Addison Street

City North Hollywood

Zip 91607

**e. Other Locational Data:** APN: # 2355-013-900

**\*P3a. Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries.)

Located on an 8-acre site in the Valley Village area of the San Fernando Valley, Colfax Avenue Elementary School is bounded by Colfax Avenue on the east, Huston Street on the south, Morella Avenue on the west, and Addison Street on the north. The campus exhibits the textbook features of a postwar, finger-plan school, with axial, one-story classroom wings, one room deep, extending across the site. Indoor-outdoor integration is created through the generous use of windows, which occupy approximately 80 percent of the wall height along eastern elevations, as well as through the incorporation of courtyards adjacent to classroom wings, outdoor gathering and recreational areas, and mature landscaping and trees.

The core of the campus consists of five rectilinear classroom wings, linked on both sides by continuous arcades. The arcades, which form circulation corridors throughout the main campus, display flat-roofed shelters, terminating in broad, unadorned wood fascia. Wood rafters and planks, visible from beneath the sheltered corridors, form the roof structure. Simple metal poles serve as supports for corridors throughout campus. Classroom wings display the differentiated fenestration patterns and roof eave treatment typical of postwar schools from this era (though ordinarily the orientation of the building would have been north-south, with fewer windows on the sunny, south side, and broad expanses of windows on the north side). In this case, the orientation of classroom wings is east-west, with fewer windows/clerestories on the west, and generous expanses of windows on the east. (See *Continuation Sheet*)

**\*P3b. Resource Attributes:** (list attributes and codes) HP15. Educational Building. HP29. Landscape architecture.

**\*P4. Resources Present:** ☐ Building ☐ Structure ☐ Object ☐ Site ☒ District ☐ Element of District ☐ Other

P5a. Photo



P5b. Photo: (view and date) Northwest elevation, 15 January 2014

**\*P6. Date Constructed/Age and Sources:** ☒ Historic ☐ Prehistoric  
☐ Both 1950-1955 (Los Angeles Unified School District)

**\*P7. Owner and Address:**  
Los Angeles Unified School District

**\*P8. Recorded by:**  
Debi Howell-Ardila, MHP  
Sapphos Environmental, Inc.  
430 North Halstead Street  
Pasadena, CA 91107

**\*P9. Date Recorded:** 20 January 2014

**\*P10. Survey Type:** Intensive

**\*P11. Report Citation:** (Cite survey report and other sources, or enter "none")  
Sapphos Environmental, Inc. March 2014. *Los Angeles Unified School*

*District Historic Context Statement, 1870 to 1969. Pasadena, CA.*

Sapphos Environmental, Inc. June 2014. *Los Angeles Unified School District Historic Resources Survey Report. Pasadena, CA.*

**\*Attachments:** ☐ None ☐ Location Map ☐ Sketch Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record  
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record  
☐ Artifact Record ☐ Photograph Record ☐ Other (list)

## BUILDING, STRUCTURE, AND OBJECT RECORD

\*NHRP Status Code 3CD

Page 2 of 7

\*Resource Name or #: Colfax Avenue Elementary School

- B1. Historic Name: Colfax Avenue Elementary School  
B2. Common Name: Same  
B3. Original Use: Institutional (Educational Facility) B4. Present Use: Institutional (Educational Facility)

\*B5. **Architectural Style:** Mid-Century Modern–influenced

\*B6. **Construction History:** (Construction date, alterations, and date of alterations):

According to records on file with the Los Angeles Unified School District, construction on the core of the campus was completed in 1950/1951. In 1955, a two-story auditorium was added in the northeastern corner of the parcel, at Colfax Avenue and Addison Street. The eastern portion of the campus grounds also includes several portable/temporary buildings from the late 1980s and early 1990s. A number of alterations and repairs have taken place over the years, including seismic and systems upgrades, the installation of air-conditioner units, replacement of original hardscaping, new fencing, and various safety improvements (see *LAUSD Pre-Planning Survey, Colfax Avenue Elementary School* for list of repairs and improvements carried out since the 1990s). In addition, alterations to original classroom wings include the infilling of some clerestory casements and entry glazing, as well as replacement of original windows with air-conditioner units; such changes are visible on several of the classroom wings.

\*B7. **Moved?** ☒ No ☐ Yes ☐ Unknown **Date:** \_\_\_\_\_ **Original Location:** \_\_\_\_\_

\*B8. **Related Features:** Landscaping/mature trees, hardscaping, benches

B9a. Architect: Unknown

b. Builder: Unknown

\*B10. **Significance:** Theme, Institutional (Educational Facility),

"Educating the Baby Boom: Postwar Expansion and the Functional, Modern School Plant, 1945-1969" **Area** Los Angeles

**Period of Significance:** 1950-1955 (District) **Property Type:** Institutional (Educational Facility)

**Applicable Criteria:** CRHR: 1.

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity)

The campus core of Colfax Avenue Elementary School appears eligible for the California Register of Historical Resources under Criterion 1 as an excellent, intact example of a modern, indoor-outdoor postwar elementary school in Los Angeles. The campus plan and buildings exemplify LAUSD design principles and ideals from the postwar period (as described in *the Los Angeles Unified School District Historic Context Statement, 1870 to 1969*). The construction of Colfax Avenue Elementary School in 1950/1951 also reflects the rapid postwar suburban expansion of the San Fernando Valley.

The campus exhibits some alterations, such as the removal of original hardscaping and windows and the infilling of original clerestory hopper casement windows, which spanned the length of classroom wings on the west elevations. While many of the casements appear to have been painted over or filled in with wood, the original size and configuration of the windows is still visible. Overall, the campus core (which includes the site plan, the relationship of buildings to outdoor spaces, and original plantings) retains integrity of location, design, setting, workmanship, feeling, and association. However, due to alterations, the campus is not eligible for the National Register and is eligible for the California Register only.

B11. Additional Resource Attributes: HP15. Educational Building. HP29. Landscape Architecture.

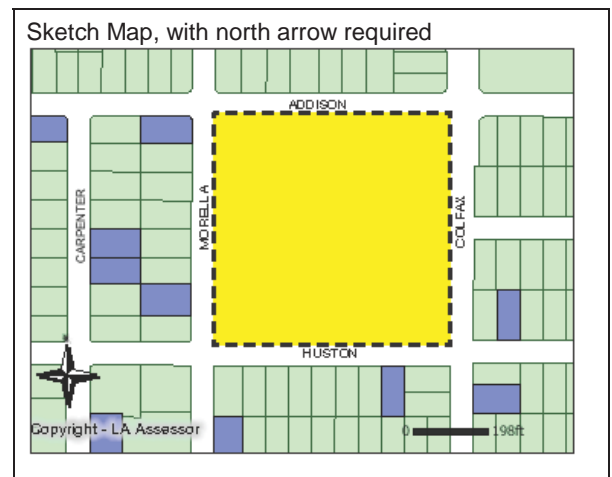
\*B12. **References:** (See Continuation Sheet)

B13. Remarks: None

\*B14. **Evaluator:** Debi Howell-Ardila, MHP

\***Date of Evaluation:** 24 January 2014

(This space reserved for official comments.)





Recorded by Debi Howell-Ardila

Date: 23 January 2014

☒ Continuation ☐ Update

**\*P3a. Description (continued):**

Along the west elevations, classroom windows are sheltered beneath wide cantilevered eaves, with wood beams and planks and broad, unadorned fascia boards. A slightly sloping shed roof caps the classroom buildings, with the slightly higher side located on the east. Clerestory windows appear to have originally spanned the west elevations of the classrooms (they are now filled in). On the east elevation, roof eaves are slightly shallower, also displaying wood beams and fascia boards. The main entrances to classrooms are located on the east elevation and generally consist of original metal doors with single-pane fixed windows. On the east elevations, classrooms are lined with generous expanses of wood-framed windows (which span roughly 80 percent of the wall height, from roof line nearly to the ground). Also on the east elevations of the classrooms are two square built-in mechanical service rooms, which appear to house air-conditioning units. These mechanical service rooms are flush with the roofline and accessed via paired metal doors.

The Administration Building, which serves as the main entrance to the campus, is located on the northeastern portion of the lot, on Addison Street. One story in height, the building is roughly rectangular in shape, with a street-level façade displaying recessed wings and features. The building is capped with a very low-pitched side-gable roof, terminating in shallow eaves with exposed wood beams. Broad, unadorned wood fascia boards terminate the roof line. A projecting, cantilevered shelter marks the entrance to the Administration Building. The entrance shelter has a flat roof with wide eaves and wood fascia boards, which display the school name. The roof line is trimmed with an open wood grid, marking a transitional space from the outside to the inside. The design composition of the façade is simple. The wall plane varies, with portions of the façade featuring wide expanses of wood-framed windows, set flush with the roof eaves, and recessed sheltered with sets of double-hung wood-framed windows, accented with brick planters along the ground. The façade includes a simple ornamental detail of a diamond-patterned metal screen and an angled wood grid serving as a roof support.

The campus exhibits many of the characteristics typical of Mid-Century Modernism. The Administration Building and classroom wings display a horizontal design composition, with very low-pitched or flat roofs and wide, cantilevered overhangs. There is an overall lack of applied ornament; campus buildings consist of simple, geometric volumes, with modular site planning. All classrooms are lined with windows, which appear to be wood-framed, multi-light double-hung sashes. (See *Continuation Sheet, p. 4*)

**P5b. Photo (continued): (view and date)**



*Colfax Avenue Elementary School, Administration Building, view from inside campus. Southwest perspective. Source: Sapphos Environmental, Inc., 21 January 2014.*

## CONTINUATION SHEET

Primary #

HRI#

Trinomial

Page 4 of 7 \*Resource Name or #: Colfax Avenue Elementary School

Recorded by Debi Howell-Ardila

Date: 23 January 2014

☒ Continuation ☐ Update

### \*P3a. Description (continued):

Extending southward from the classroom wings and library are an outdoor dining area, capped with a flat roof supported on metal poles, a playground and recreational fields, and other facilities extending through the south portion of the campus. Mature trees appearing to date to the original construction era (early 1950s) are located throughout the campus, in particular in the northern portion. In the northeastern corner of the campus is the two-story auditorium building, constructed in 1955.

Alterations include the infilling of clerestory lights along the west elevations of classrooms, the apparent addition of mechanical sheds along the east elevations, the replacement of original hardscaping, as well as the addition of security gates at the entrance and bars on some of the windows. In addition, since the school's construction, a number of portable structures have been added, primarily in the southeastern portion of campus. The campus is otherwise in good repair, intact, and enhanced through landscaping and mature trees (including a number of old eucalyptus along Addison Street).

### P5b. Photo (continued): (view and date)



*Colfax Avenue Elementary School, detail, Administration Building. Eaves extend to form an open grid around the entrance wing. Northeast perspective. Source: Sapphos Environmental, Inc., 21 January 2014.*



## CONTINUATION SHEET

Primary #

HRI#

Trinomial

Page 5 of 7 \*Resource Name or #: Colfax Avenue Elementary School

Recorded by Debi Howell-Ardila

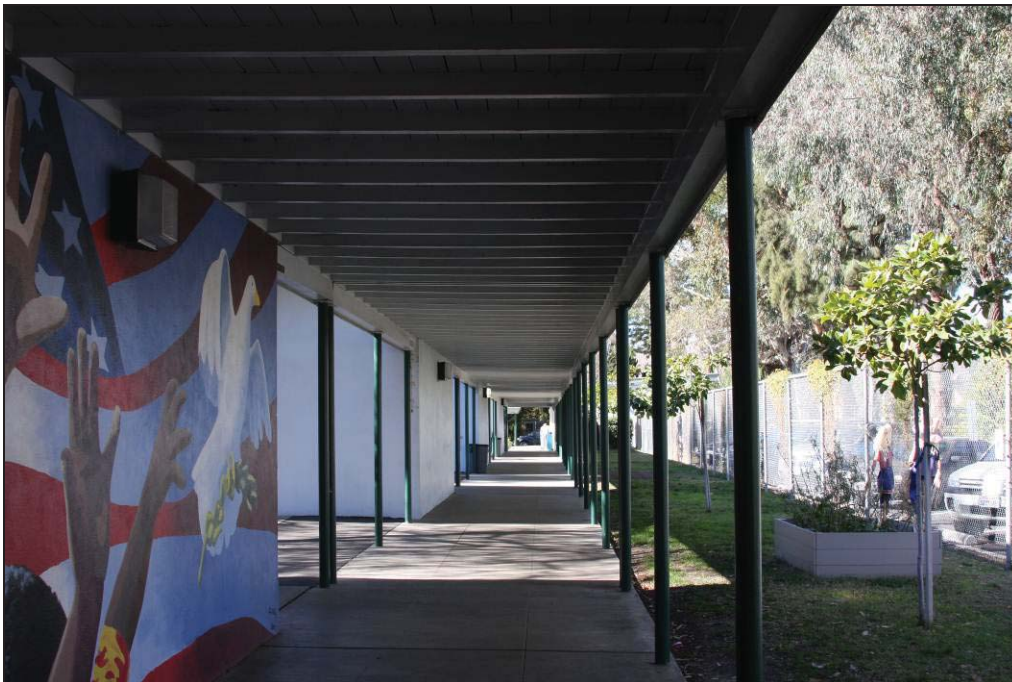
Date: 23 January 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



*Colfax Avenue Elementary School, typical west-elevation classroom wing and mature trees. North perspective. Source: Sapphos Environmental, Inc., 21 January 2014.*



*Colfax Avenue Elementary School, arcades connect all classrooms along the north and south expanses of campus. East perspective. Source: Sapphos Environmental, Inc., 21 January 2014.*

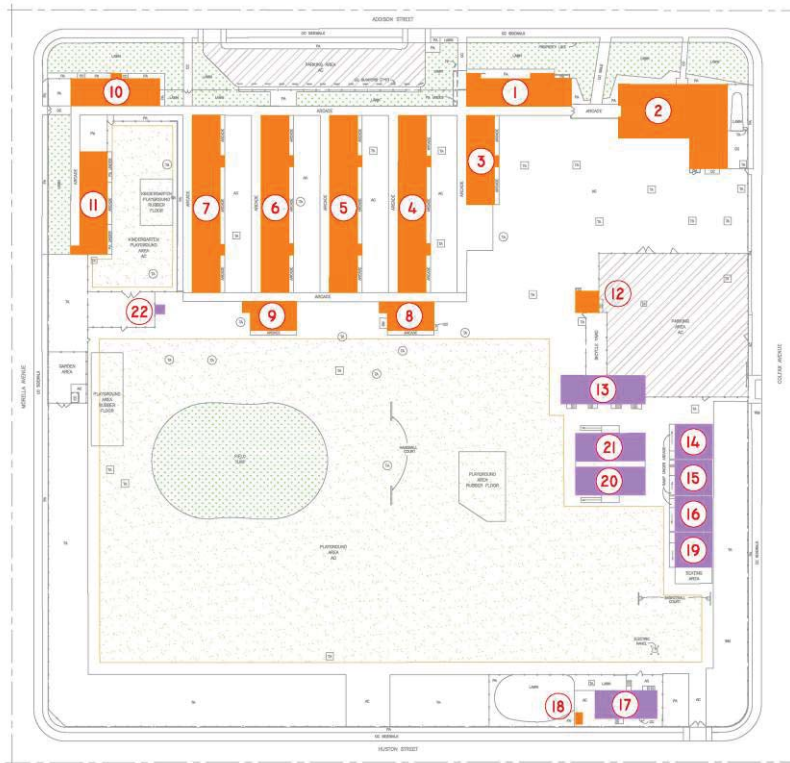


Recorded by Debi Howell-Ardila

Date: 23 January 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



EXISTING CAMPUS PLAN

PERMANENT & PORTABLES  
BUILDINGS

COLFAX ES - LEGEND	
(25)	BUILDING NUMBER
ORANGE	PERMANENT
PURPLE	PORTABLE

NTS  
↑

Colfax Avenue Elementary School, Site Plan, with permanent buildings marked in orange and portable buildings marked in purple. Source: Los Angeles Unified School District Pre-Planning Survey, Colfax Avenue Elementary

**CONTINUATION SHEET**

Primary #

HRI#

Trinomial

Page 7 of 7 \*Resource Name or #: Colfax Avenue Elementary School

Recorded by Debi Howell-Ardila

Date: 23 January 2014

☒ Continuation ☐ Update

**\*B12. References (continued):**

- Bhatia, Pavan, "Modern Concept for Los Angeles Public Schools," Doctoral Dissertation (Cambridge, MA: Harvard University Graduate School of Design, Advanced Management Development Program in Real Estate, July 2009).
- Blumenson, John J.-G., *Identifying American Architecture* (New York: W.W. Norton & Company, 1977).
- California Office of Historic Preservation, *California Register and National Register: A Comparison (for Purposes of Determining Eligibility for the California Register)*, Technical Assistance Series No. 6. (Sacramento, CA, 14 March 2006).
- California Office of Historic Preservation, *Instructions for Recording Historical Resources* (Sacramento, CA, March 1995).
- Donovan, John J., *School Architecture: Principles and Practices* (New York: The MacMillan Company, 1921).
- Eales, John R., "A Brief, General History of the Los Angeles City School System," Doctoral Dissertation (Los Angeles: University of California, June 1956).
- Gebhard, David, and Robert Winter, *A Guide to Architecture in Los Angeles and Southern California* (Santa Barbara, CA: Peregrine Smith, Inc., 1977).
- Harris, Cyril M., *American Architecture: An Illustrated Encyclopedia* (New York: W.W. Norton & Company, 1998).
- Heumann & Associates and Anne Doehne, Science Applications International Corporation, March 2002, "Historic Schools of the Los Angeles Unified School District," a presentation prepared for LAUSD Facilities Services Division (March 2002).
- Hille, R. Thomas, *Modern Schools: A Century of Design for Education* (Hoboken, NJ: John Wiley & Sons, 2011), 13.
- Lee, Antoinette, and Linda F. McClelland, U.S. Department of the Interior, National Park Service, *National Register Bulletin No. 16B, How to Complete the National Register Multiple Property Documentation Form* (1999).
- McAlester, Virginia, and Lee McAlester, *A Field Guide to American House* (New York: Alfred A. Knopf, 2004).
- Mock, Elizabeth, *Built in USA, 1932 – 1944: A Survey of Contemporary American Architecture*, The Museum of Modern Art (New York: Simon & Shuster, 1944).
- Ogata, Amy F., "Building for Learning in Postwar American Elementary Schools," *Journal of the Society of Architectural Historians* 67, no. 4 (December 2008): 562–91.
- Los Angeles Unified School District. *Los Angeles Unified School District Pre-Planning Survey* (2011).
- Sapphos Environmental, Inc., *Los Angeles Unified School District Historic Context Statement, 1870 to 1969* (Pasadena, CA, March 2014).
- Science Applications International Corporation, *Historic Context Statement: Los Angeles Unified School District*, prepared for Los Angeles Unified School District (Pasadena, CA: March 2002).
- "School Expansion Program Outlined." *Los Angeles Times* (May 3, 1952).
- U.S. Department of the Interior, National Park Service, "How to Apply the National Register Criteria for Evaluation," *National Register Bulletin No. 15* (Washington, DC, 2002).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Form," *National Register Bulletin No. 16A* (Washington, DC, 1997).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Multiple Property Documentation Form," *National Register Bulletin No. 16B* (Washington, DC, 1999).
- Whiffen, Marcus, *American Architecture since 1780: A Guide to the Styles* (Cambridge, MA: MIT Press, 1981).

## PRIMARY RECORD

Primary # \_\_\_\_\_

HRI # \_\_\_\_\_

Trinomial \_\_\_\_\_

NRHP Status Code 3CD

Other Listings \_\_\_\_\_

Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 7 Resource name(s) or number (assigned by recorder) Dodson Middle School

**P1. Other Identifier:**

**\*P2. Location:** ☐ Not for Publication ☒ Unrestricted

**\*a. County** Los Angeles County

**\*b. USGS 7.5' Quad** Torrance, CA

**Date** 1981

**T R** N/A

**c. Address** 28014 South Monterey Drive

**City** Rancho Palos Verdes

**Zip** 90275

**e. Other Locational Data:** APN: # 7552-017-900

**\*P3a. Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries.)

Located in Rancho Palos Verdes, south of Los Angeles, Rudecinda Sepulveda Dodson Middle School occupies a 20.7-acre site in a residential neighborhood. The campus is generally bounded by Avenue Aprenda on the north, Avenida Estudiante on the south, Avenida Cuaderno on the east, and South Monterey Drive on the west and south. The school was constructed in 1960, with a number of small relocatable/temporary classroom buildings dating from 1935 through 2002, located on the periphery of campus along the west and north. The site plan displays the features of a postwar finger-plan school, designed in the Mid-Century Modern style. At the core of the campus, the focal point is an outdoor assembly area, courtyard, and lawn, which are framed by a two-story Multipurpose Building and one-story Administration Building. Extending from this student quad is a series of axial, finger-like classroom wings, linked by a sheltered arcade. Sheathed in smooth stucco, classrooms are one-story in height, one room deep, and capped with slightly sloped shed roofs with no overhanging eaves. Along the south elevation of classroom wings, a covered arcade, with a wide, wood plank-and-beam roof and simple pipe supports, provides a sheltered circulation corridor. (See *Continuation Sheet*)

**\*P3b. Resource Attributes:** (list attributes and codes) HP15. Educational Building. HP29. Landscape architecture.

**\*P4. Resources Present:** ☐ Building ☐ Structure ☐ Object ☐ Site ☒ District ☐ Element of District ☐ Other

P5a. Photo



P5b. Photo: (view and date) Administration Building, Southwest perspective, 5 February 2014

**\*P6. Date Constructed/Age and Sources:**

☒ Historic ☐ Prehistoric ☐ Both

1960 (Los Angeles Unified School District)

**\*P7. Owner and Address:**

Los Angeles Unified School District

**\*P8. Recorded by:**

Debi Howell-Ardila and Marilyn Novell  
Sapphos Environmental, Inc.  
430 North Halstead Street  
Pasadena, CA 91107

**\*P9. Date Recorded:** 10 March 2014

**\*P10. Survey Type:** Intensive

**\*P11. Report Citation:** (Cite survey report and other sources, or enter "none")

Sapphos Environmental, Inc. March 2014. *Los Angeles Unified School District Historic Context Statement, 1870 to 1969*. Pasadena, CA.

Sapphos Environmental, Inc. May 2014. *Los Angeles Unified School District Historic Resources Survey Report*. Pasadena, CA.

**\*Attachments:** ☐ None ☐ Location Map ☐ Sketch Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record  
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record  
☐ Artifact Record ☐ Photograph Record ☐ Other (list)

## BUILDING, STRUCTURE, AND OBJECT RECORD

\*NHRP Status Code 3CD

Page 2 of 7

\*Resource Name or #: Dodson Middle School

- B1. Historic Name: Rudecinda Sepulveda Dodson Middle School  
B2. Common Name: Dodson Middle School  
B3. Original Use: Institutional (Educational Facility) B4. Present Use: Institutional (Educational Facility)  
\*B5. **Architectural Style:** Mid-Century Modern

\*B6. **Construction History:** (Construction date, alterations, and date of alterations):

According to records on file with the Los Angeles Unified School District, the core of the Dodson Middle School campus was constructed in 1960. Nine small portable/temporary buildings at the east and north sides of campus date from 1935 to 2002. A number of alterations and repairs have taken place over the years, including systems upgrades (the *LAUSD Pre-Planning Survey, Dodson Middle School* lists repairs and improvements performed at the school since the 1990s). Visible alterations include the removal of clerestory lights on some classroom wings and in-filling of windows with air conditioning units; expanses of locker storage added to the side elevations of some classroom wings also appear to be nonoriginal.

\*B7. **Moved?** ☒No ☐Yes ☐Unknown **Date:** \_\_\_\_\_ **Original Location:** \_\_\_\_\_

\*B8. **Related Features:** Landscaping/mature trees, hardscaping

B9a. Architect: Unknown b. Builder: Unknown

\*B10. **Significance:** **Theme,** Institutional (Educational Facility),  
"Educating the Baby Boom: Postwar Expansion and the Functional, Modern School Plant, 1945-1969" **Area** Los Angeles  
**Period of Significance:** 1960 (District) **Property Type:** Institutional (Educational Facility)

**Applicable Criteria:** CRHR: 1.

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity)

The campus core of Dodson Middle School appears eligible as a historic district for the California Register of Historical Resources under Criterion 1 as an excellent, intact example of a postwar finger-plan high school. The campus plan and buildings exemplify LAUSD design principles and ideals from the postwar period (as described in the *Los Angeles Unified School District Historic Context Statement, 1870 to 1969*).

The core of the campus is an outstanding example of a postwar, Mid-Century Modern school exhibiting a finger-plan campus design. Due to alterations, the campus is not eligible for listing on the National Register. Overall, the campus core retains historic integrity and continues to convey the reasons for its significance.

B11. Additional Resource Attributes: HP15. Educational Building. HP29. Landscape Architecture.

\*B12. **References:** (See Continuation Sheet)

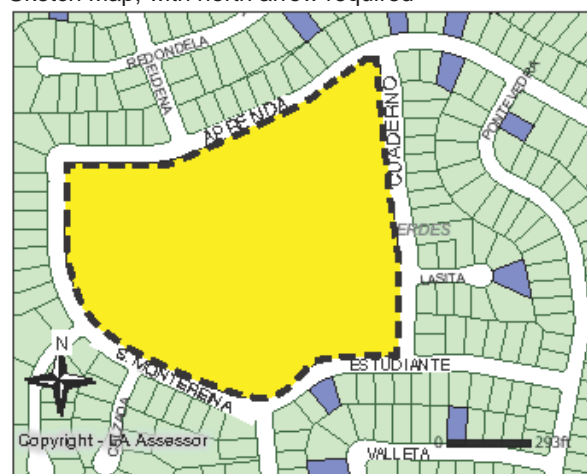
B13. Remarks: None

\*B14. **Evaluator:** Debi Howell-Ardila, MHP

\***Date of Evaluation:** 5 February 2014

(This space reserved for official comments.)

Sketch Map, with north arrow required





Recorded by Debi Howell-Ardila and Marilyn Novell

Date: 10 March 2014

☒ Continuation ☐ Update

**\*P3a. Description (continued):**

Lined with mature trees and plantings, the campus entrance is accessed via an open courtyard paved with patterned red brick. To the east is a one-story, stucco-clad administration building and to the west a one-and-a-half-story library, also clad in stucco. Screening the windows on the library's east side is a prominent band of wide, vertical metal louvers set in a rectangular frame. The administration building is capped with a shed roof and no eaves, with the roof edge trimmed with metal. Connecting the two buildings is an entrance portal capped with a flat roof and shallow overhanging eaves. The portal consists of alternating panels of metal screen gates, trimmed with decorative geometric patterning, and rusticated, faux stone.

The brick pavers continue into an entrance courtyard, where a lawn and elevated concrete stage with semicircular steps form a central gathering area. Clad in stucco, the classroom wings are one-story in height and one room deep, capped with slightly sloped shed roofs. South elevations of the classrooms are lined with sheltered arcades consisting of wood plank and beam ceilings, supported on steel pipe supports. Along most north elevations, the roof terminates in no eaves. Sheltering each window grouping on the north elevations are flat, cantilevered eaves. Windows along the north elevations consist primarily of expansive two-light double-hung sash windows. Windows occupy approximately 60 percent to 70 percent of the wall height, providing natural light and views of courtyards with lawns, foundation plantings, and mature trees.

The buildings and structures comprising the campus core are in good repair, and enhanced with mature landscaping and trees. Alterations include the replacement of some original windows as well as apparent removal of original materials/openings along some classroom exteriors to accommodate the addition of nonoriginal lockers. The campus core is otherwise intact.

**P5b. Photo (continued): (view and date)**



*Dodson Middle School, entrance gate, with rusticated, faux stone. Library appears in left portion of photo. Southeast perspective. Source: Sapphos Environmental, Inc., 5 February 2014.*

## CONTINUATION SHEET

Page 4 of 7

\*Resource Name or #: Dodson Middle School

Recorded by Debi Howell-Ardila and Marilyn Novell

Date: 10 March 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



*Dodson Middle School, Library, viewed from entrance. East perspective. Source: Sapphos Environmental, Inc.. 5 February 2014.*



*Dodson Middle School, Lunch Pavilion and Multi-Purpose Room, view from central courtyard. Southwest perspective. Source: Sapphos Environmental, Inc., 5 February 2014.*



## CONTINUATION SHEET

Page 5 of 7

\*Resource Name or #: Dodson Middle School

Recorded by Debi Howell-Ardila and Marilyn Novell

Date: 10 March 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



*Dodson Middle School, Lunch Pavilion, view through to central courtyard. Northeast perspective. Source: Sapphos Environmental, Inc., 5 February 2014.*



*Dodson Middle School, Building 14, showing patios. Northwest perspective. Source: Sapphos Environmental, Inc., 5 February 2014.*

Recorded by Debi Howell-Ardila and Marilyn Novell

Date: 10 March 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



*Dodson Middle School, Site Plan, with permanent buildings marked in orange and portable buildings marked in purple. Source: Los Angeles Unified School District Pre-Planning Survey, Dodson Middle School, Ver. 2, July 16, 2011.*



Recorded by Debi Howell-Ardila and Marilyn Novell

Date: 10 March 2014

☒ Continuation ☐ Update

**\*B12. References (continued):**

- Bhatia, Pavan, "Modern Concept for Los Angeles Public Schools," Doctoral Dissertation (Cambridge, MA: Harvard University Graduate School of Design, Advanced Management Development Program in Real Estate, July 2009).
- Blumenson, John J.-G., *Identifying American Architecture* (New York: W.W. Norton & Company, 1977).
- California Office of Historic Preservation, *California Register and National Register: A Comparison (for Purposes of Determining Eligibility for the California Register)*, Technical Assistance Series No. 6. (Sacramento, CA, 14 March 2006).
- California Office of Historic Preservation, *Instructions for Recording Historical Resources* (Sacramento, CA, March 1995).
- Donovan, John J., *School Architecture: Principles and Practices* (New York: The MacMillan Company, 1921).
- Eales, John R., "A Brief, General History of the Los Angeles City School System," Doctoral Dissertation (Los Angeles: University of California, June 1956).
- Gebhard, David, and Robert Winter, *A Guide to Architecture in Los Angeles and Southern California* (Santa Barbara, CA: Peregrine Smith, Inc., 1977).
- Harris, Cyril M., *American Architecture: An Illustrated Encyclopedia* (New York: W.W. Norton & Company, 1998).
- Heumann & Associates and Anne Doehne, Science Applications International Corporation, March 2002, "Historic Schools of the Los Angeles Unified School District," a presentation prepared for LAUSD Facilities Services Division (March 2002).
- Hille, R. Thomas, *Modern Schools: A Century of Design for Education* (Hoboken, NJ: John Wiley & Sons, 2011), 13.
- Lee, Antoinette, and Linda F. McClelland, U.S. Department of the Interior, National Park Service, *National Register Bulletin No. 16B, How to Complete the National Register Multiple Property Documentation Form* (1999).
- Los Angeles Unified School District. *Los Angeles Unified School District Pre-Planning Survey* (2011).
- McAlester, Virginia, and Lee McAlester, *A Field Guide to American House* (New York: Alfred A. Knopf, 2004).
- Mock, Elizabeth, *Built in USA, 1932 – 1944: A Survey of Contemporary American Architecture*, The Museum of Modern Art (New York: Simon & Shuster, 1944).
- Ogata, Amy F., "Building for Learning in Postwar American Elementary Schools," *Journal of the Society of Architectural Historians* 67, no. 4 (December 2008): 562–91.
- Sapphos Environmental, Inc., *Los Angeles Unified School District Historic Context Statement, 1870 to 1969* (Pasadena, CA, March 2014).
- Science Applications International Corporation, *Historic Context Statement: Los Angeles Unified School District*, prepared for Los Angeles Unified School District (Pasadena, CA: March 2002).
- U.S. Department of the Interior, National Park Service, "How to Apply the National Register Criteria for Evaluation," National Register Bulletin No. 15 (Washington, DC, 2002).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Form," National Register Bulletin No. 16A (Washington, DC, 1997).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Multiple Property Documentation Form," National Register Bulletin No. 16B (Washington, DC, 1999).
- Whiffen, Marcus, *American Architecture since 1780: A Guide to the Styles* (Cambridge, MA: MIT Press, 1981).

## PRIMARY RECORD

Primary # \_\_\_\_\_

HRI # \_\_\_\_\_

Trinomial \_\_\_\_\_

NRHP Status Code 3CD

Other Listings \_\_\_\_\_

Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 5 Resource name(s) or number (assigned by recorder) Fernangeles Elementary School

**P1. Other Identifier:**

\***P2. Location:** ☐ Not for Publication ☒ Unrestricted

\***a. County** Los Angeles County

\***b. USGS 7.5' Quad** Van Nuys, CA **Date** 1972 **T** 2N **R** 14W; Unsectioned Area **S.B.B.M.**

c. Address 12001 Art Street City Sun Valley Zip 91352

e. Other Locational Data: APN: # 2631-019-904

\***P3a. Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries.)

Located on a 6.7-acre site in San Fernando Valley immediately north of the Interstate 5 freeway, Fernangeles Elementary School is bounded by Wicks Street on the northwest, Oneida Avenue on the southwest, a residential neighborhood on the northeast, and Art Street on the southeast. The campus core displays many typical features of a cluster- and finger-plan campus, with classrooms grouped around a central courtyard and axial classroom wings. The focal point of the campus from the exterior is the Administration Building and Assembly Building, which create a distinctive, Mid-Century Modern-style entrance to the school at the southwestern portion of the property. The two buildings form an interior courtyard, which is ringed by a grid-like trellis near the entrance and covered arcade, consisting of a wood-plank roof and wood cross beams, resting on simple pole supports. While the campus classrooms display extensive alterations (mostly in the form of the removal and in-filling of original clerestory windows), the two buildings at the campus entrance remain relatively intact and are highly representative of LAUSD's standardized postwar school, both in terms of style and building plan/features. (See Continuation Sheet)

\***P3b. Resource Attributes:** (list attributes and codes) HP15. Educational Building. HP29. Landscape architecture.

\***P4. Resources Present:** ☐ Building ☐ Structure ☐ Object ☐ Site ☒ District ☐ Element of District ☐ Other

P5a. Photo



P5b. Photo: (view and date)  
Administration Building (left) and  
Assembly Building (right), southwest  
perspective, 15 January 2014

\***P6. Date Constructed/Age and Sources:** ☒ Historic ☐ Prehistoric  
☐ Both 1954 (Los Angeles Unified School District)

\***P7. Owner and Address:**  
Los Angeles Unified School District

\***P8. Recorded by:**  
Debi Howell-Ardila and Marilyn Novell  
Sapphos Environmental, Inc.  
430 North Halstead Street  
Pasadena, CA 91107

\***P9. Date Recorded:**  
15 January 2014

\***P10. Survey Type:** Intensive

\***P11. Report Citation:** (Cite survey report and other sources, or enter "none")  
Sapphos Environmental, Inc. March

2014. *Los Angeles Unified School District Historic Context Statement, 1870 to 1969.* Pasadena, CA.

Sapphos Environmental, Inc. May 2014. *Los Angeles Unified School District Historic Resources Survey Report.* Pasadena, CA.

\***Attachments:** ☐ None ☐ Location Map ☐ Sketch Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record  
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record  
☐ Artifact Record ☐ Photograph Record ☐ Other (list)

## BUILDING, STRUCTURE, AND OBJECT RECORD

\*NHRP Status Code 3CD

Page 2 of 5

\*Resource Name or #: Fernangeles Elementary School

- B1. Historic Name: Fernangeles Elementary School  
B2. Common Name: Same  
B3. Original Use: Institutional (Educational Facility) B4. Present Use: Institutional (Educational Facility)  
\*B5. Architectural Style: Mid-Century Modern

\*B6. Construction History: (Construction date, alterations, and date of alterations):

According to records on file with the Los Angeles Unified School District, construction was completed on most of the extant campus of Fernangeles Elementary School in 1954. To accommodate expanding enrollment, over 20 portable buildings have been added to the campus since its construction, with a majority of these located in the northern and eastern portions of the property. As of 2014, portable buildings represent 67 percent of the classroom space on campus, with most added in the 1990s. A number of alterations and repairs have taken place over the years, including systems upgrades and the installation of air-conditioner units (see *LAUSD Pre-Planning Survey, Fernangeles Elementary School* for list of repairs and improvements carried out since the 1990s). The most visible alterations on the exterior include the removal of original windows and in-filling and covering of original window openings with stucco; this includes bands of original clerestory windows lining the west elevations of classroom wings. In other areas, original windows have been replaced with air-conditioning units. The Administration Building and Multipurpose Room also appear to have some in-filled windows.

\*B7. Moved? ☒ No ☐ Yes ☐ Unknown Date: \_\_\_\_\_ Original Location: \_\_\_\_\_

\*B8. Related Features: Landscaping/mature trees, hardscaping, benches

B9a. Architect: Unknown

b. Builder: Unknown

\*B10. Significance: Theme, Institutional (Educational Facility),

"Educating the Baby Boom: Postwar Expansion and the Functional, Modern School Plant, 1945-1969" Area Los Angeles

Period of Significance: 1954 (District) Property Type: Institutional (Educational Facility)

Applicable Criteria: CRHR: 1.

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity)

The grouping of the Fernangeles Elementary School Administration Building, Assembly Building, interior courtyard and landscaping features appears eligible for the California Register of Historical Resources as a district under Criterion 1 in the context of institutional architecture/educational facilities in the Los Angeles Unified School District. The Administration Building and Assembly Building form a distinctive, Mid-Century Modern-style entrance to the school and represent a recognizable anchor for the neighboring residential community. The finding of eligibility applies to the identified buildings and features, which, while exhibiting some alterations, continue to convey the reasons for their significance. Subsequent survey of contributing and noncontributing features will be necessary to make a detailed determination regarding all contributors and noncontributors to the historic district within the campus grounds.

B11. Additional Resource Attributes: HP15. Educational Facility.

\*B12. References: (See Continuation Sheet)

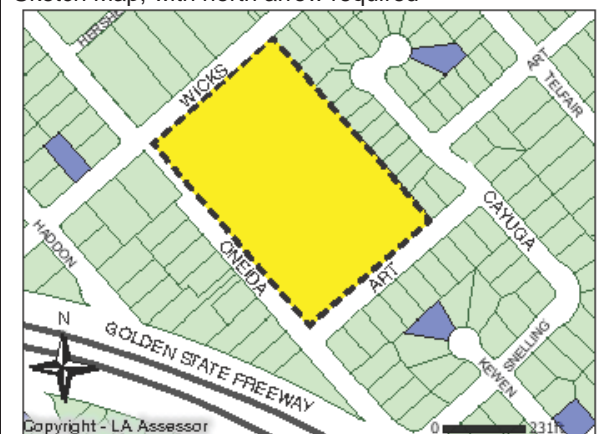
B13. Remarks: None

\*B14. Evaluator: Debi Howell-Ardila, MHP

\*Date of Evaluation: 15 January 2014

(This space reserved for official comments.)

Sketch Map, with north arrow required





## CONTINUATION SHEET

Page 3 of 5 \*Resource Name or #: Fernangeles Elementary School

Recorded by Debi Howell-Ardila and Marilyn Novell

Date: 15 January 2014

☒ Continuation ☐ Update

### \*P3a. Description (continued):

The Assembly Building and Administration Building are connected by a brick wall and gate capped by a flat-roofed arcade. This gate serves as the entrance to campus; on the interior, it passes beneath a wood-grid trellis and opens onto a courtyard ringed with covered arcades. The approach to the main entrance also displays a series of tiered brick planters with landscaping. Matching stack-bond brick sheathes the south elevation of the Administration Building. Set at a right angle with the Assembly Building, the Administration Building is rectangular in plan, one story in height, and capped with a flat roof and tapered, shallow eaves. Fenestration consists of various configurations and types, and the building is clad in stucco. In a feature typical for Southern Californian Mid-Century Modern architecture, the roof line extends on the northern portion of the Administration Building in a wood-grid trellis, which encloses a tree.

The Assembly Building is roughly two stories in height, rectangular in plan, and clad in smooth stucco. The main portion of the building is capped with a flat roof with no overhanging eaves. Located on the southwest elevation, the main entrance to the Assembly Building consists of a pair of doors elevated on brick steps. The entrance is flanked by thin, stack-bond brick piers, which project from the wall, and two identical bands of recessed multilight windows.

Alterations include the apparent removal and filling-in of windows in variation locations. It also appears that windows have been covered at the upper level of the southwest elevation of the Assembly Building. The buildings are otherwise relatively intact and in fair repair overall.

### P5b. Photo (continued): (view and date)



*Fernangeles Elementary School, Administration Building, view from southeast.  
Source: Sapphos Environmental, Inc., 15 January 2014.*

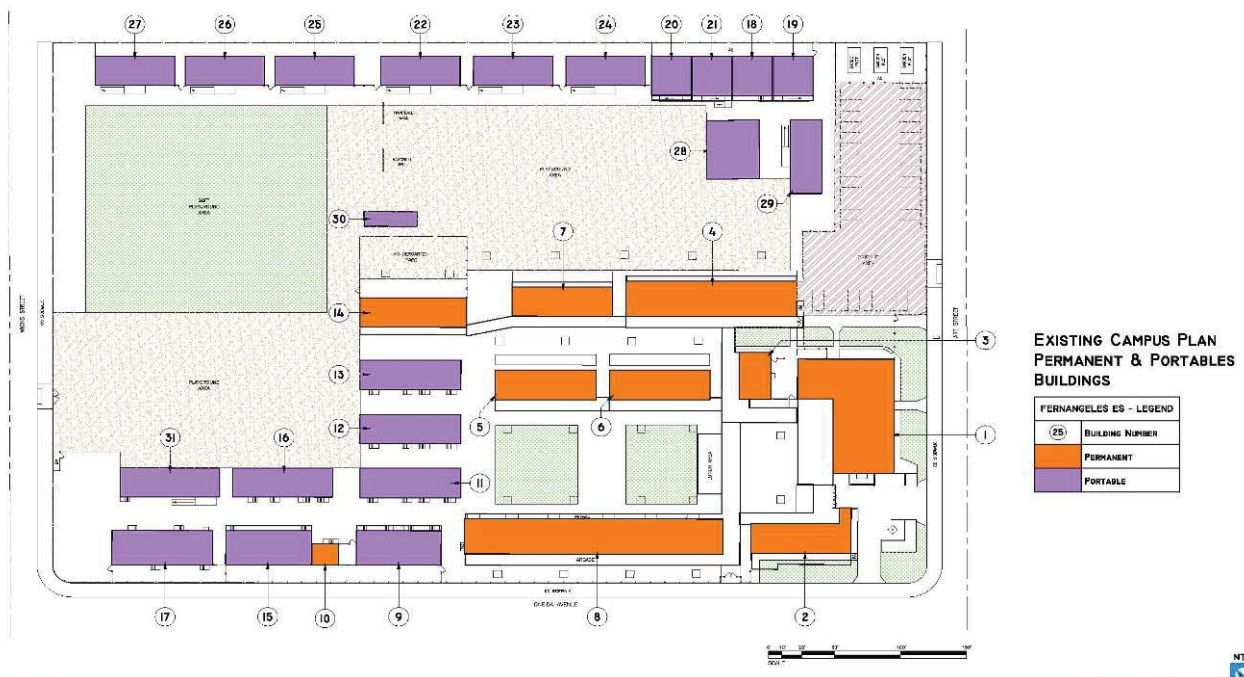
Recorded by Debi Howell-Ardila and Marilyn Novell

Date: 15 January 2014

☒ Continuation ☐ Update



*Fernangeles Elementary School, entrance trellis, courtyard, and covered dining area. Southern perspective.  
Source: Sapphos Environmental, Inc., 15 January 2014.*



*Fernangeles Elementary School, Site Plan, with permanent buildings marked in orange and portable buildings marked in purple. Source: Los Angeles Unified School District Pre-Planning Survey, Fernangeles Elementary School, October 11, 2011.*

Recorded by Debi Howell-Ardila and Marilyn Novell

Date: 15 January 2014

☒ Continuation ☐ Update

**\*B12. References (continued):**

- Bhatia, Pavan, "Modern Concept for Los Angeles Public Schools," Doctoral Dissertation (Cambridge, MA: Harvard University Graduate School of Design, Advanced Management Development Program in Real Estate, July 2009).
- Blumenson, John J.-G., *Identifying American Architecture* (New York: W.W. Norton & Company, 1977).
- California Office of Historic Preservation, *California Register and National Register: A Comparison (for Purposes of Determining Eligibility for the California Register)*, Technical Assistance Series No. 6. (Sacramento, CA, 14 March 2006).
- California Office of Historic Preservation, *Instructions for Recording Historical Resources* (Sacramento, CA, March 1995).
- Donovan, John J., *School Architecture: Principles and Practices* (New York: The MacMillan Company, 1921).
- Eales, John R., "A Brief, General History of the Los Angeles City School System," Doctoral Dissertation (Los Angeles: University of California, June 1956).
- Harris, Cyril M., *American Architecture: An Illustrated Encyclopedia* (New York: W.W. Norton & Company, 1998).
- Heumann & Associates and Anne Doehne, Science Applications International Corporation, March 2002, "Historic Schools of the Los Angeles Unified School District," a presentation prepared for LAUSD Facilities Services Division (March 2002).
- Hille, R. Thomas, *Modern Schools: A Century of Design for Education* (Hoboken, NJ: John Wiley & Sons, 2011), 13.
- Lee, Antoinette, and Linda F. McClelland, U.S. Department of the Interior, National Park Service, *National Register Bulletin No. 16B, How to Complete the National Register Multiple Property Documentation Form* (1999).
- Los Angeles Unified School District. *Los Angeles Unified School District Pre-Planning Survey* (2011).
- McAlester, Virginia, and Lee McAlester, *A Field Guide to American Houses* (New York: Alfred A. Knopf, 2004).
- Mock, Elizabeth, *Built in USA, 1932 – 1944: A Survey of Contemporary American Architecture*, The Museum of Modern Art (New York: Simon & Shuster, 1944).
- Ogata, Amy F., "Building for Learning in Postwar American Elementary Schools," *Journal of the Society of Architectural Historians* 67, no. 4 (December 2008): 562–91.
- Sapphos Environmental, Inc., *Los Angeles Unified School District Historic Context Statement, 1870 to 1969* (Pasadena, CA, March 2014).
- Science Applications International Corporation, *Historic Context Statement: Los Angeles Unified School District*, prepared for Los Angeles Unified School District (Pasadena, CA: March 2002).
- U.S. Department of the Interior, National Park Service, "How to Apply the National Register Criteria for Evaluation," National Register Bulletin No. 15 (Washington, DC, 2002).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Form," National Register Bulletin No. 16A (Washington, DC, 1997).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Multiple Property Documentation Form," National Register Bulletin No. 16B (Washington, DC, 1999).
- Whiffen, Marcus, *American Architecture since 1780: A Guide to the Styles* (Cambridge, MA: MIT Press, 1981).



## PRIMARY RECORD

Primary # \_\_\_\_\_

HRI # \_\_\_\_\_

Trinomial \_\_\_\_\_

NRHP Status Code 3D

Other Listings \_\_\_\_\_

Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 6 Resource name(s) or number (assigned by recorder) Leapwood Avenue Elementary School

**P1. Other Identifier:**

\*P2. Location: ☐ Not for Publication ☒ Unrestricted

\*a. County Los Angeles County

\*b. USGS 7.5' Quad Torrance, CA

Date 1981

T 4S R 13W; Unsectioned Area S.B.B.M.

c. Address 19302 Leapwood Avenue

City Carson

Zip 90746

e. Other Locational Data: APN: # 7321-018-900

\*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries.)

Leapwood Avenue Elementary School is located in a residential neighborhood in the city of Carson, south of Los Angeles. The campus occupies a 7.1-acre site bounded by Brenner Drive to the north, Eddington Drive to the east, East Elsmere Drive to the south, and Leapwood Avenue to the west. Constructed in 1962, the campus core consists of a series of two-story classrooms, assembly building, administration building, and two kindergarten buildings, all oriented around a central lawn and open-air lunch pavilion. A network of sheltered corridors and exterior stairways links the buildings throughout the campus core. Three temporary buildings are located at the eastern portion of the campus.

The campus entrance is set back from Leapwood Avenue by a lawn lined with landscaping and a row of mature trees. Defining the principal entrance are the assembly building to the south and the administration building to the north. Linking the two buildings is a sheltered entrance courtyard, capped with a low-pitched roof with a large, square skylight perforating the center. A concrete planter with landscaping is positioned beneath the skylight. The roof of the entry courtyard mirrors treatment of the arcades on the interior of the campus, with the low-pitched, side-gabled roofs and concrete-block piers. (See Continuation Sheet)

\*P3b. Resource Attributes: (list attributes and codes) HP15. Educational Building. HP29. Landscape architecture.

\*P4. Resources Present: ☐ Building ☐ Structure ☐ Object ☐ Site ☒ District ☐ Element of District ☐ Other

P5a. Photo



P5b. Photo: (view and date)  
Assembly and Administration Building,  
northwest perspective  
12 February 2014

\*P6. Date Constructed/Age and Sources:

☒ Historic ☐ Prehistoric ☐ Both  
1962 (Los Angeles Unified School District)

\*P7. Owner and Address:

Los Angeles Unified School District

\*P8. Recorded by:

Debi Howell-Ardila and Marilyn Novell  
Sapphos Environmental, Inc.  
430 North Halstead Street  
Pasadena, CA 91107

\*P9. Date Recorded: 1 March 2014

\*P10. Survey Type: Intensive-level

\*P11. Report Citation: (Cite survey report and other sources, or enter "none")  
Sapphos Environmental, Inc. March 2014. *Los Angeles Unified School District Historic*

Context Statement, 1870 to 1969. Pasadena, CA.

Sapphos Environmental, Inc. June 2014. *Los Angeles Unified School District Historic Resources Survey Report*. Pasadena, CA.

\*Attachments: ☐ None ☐ Location Map ☐ Sketch Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record  
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record  
☐ Artifact Record ☐ Photograph Record ☐ Other (list)

## BUILDING, STRUCTURE, AND OBJECT RECORD

\*NHRP Status Code 3D

Page 2 of 6

\*Resource Name or #: Leapwood Avenue Elementary School

B1. Historic Name: Leapwood Avenue Elementary School

B2. Common Name: Same

B3. Original Use: Institutional (Educational Facility)

B4. Present Use: Institutional (Educational Facility)

\*B5. Architectural Style: Mid-Century Modern–influenced

\*B6. Construction History: (Construction date, alterations, and date of alterations):

According to records on file with the Los Angeles Unified School District, construction of Leapwood Avenue Elementary School was completed in 1962. The total cost was just over \$834,000, which was financed with school bond funds (*Los Angeles Times*, 1961). Three portable/temporary buildings were added at the eastern perimeter of campus in the 1990s. A number of alterations have taken place over the years, including systems upgrades, the removal of windows to accommodate the installation of air-conditioning units, replacement of gutters and downspouts, new fencing, and various other improvements, including the addition of an access ramp at the campus entrance (the *LAUSD Pre-Planning Survey, Leapwood Avenue Elementary School* lists repairs and improvements performed since the 1990s). In addition, security grilles have been added to windows throughout the campus, and storage units have been placed outside some of the classrooms.

\*B7. Moved? ☒No ☐Yes ☐Unknown Date: \_\_\_\_\_ Original Location: \_\_\_\_\_

\*B8. Related Features: Landscaping/mature trees

B9a. Architect: Unknown

b. Builder: Unknown

\*B10. Significance: Theme, Institutional (Educational Facility), "Educating the Baby Boom: Postwar Expansion and the Functional, Modern School Plant, 1945-1969" Area Los Angeles

Period of Significance: 1962 (District) Property Type: Institutional (Educational Facility)

Applicable Criteria: NRHP: A; CRHR: 1.

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity)

The core of the campus of Leapwood Avenue Elementary School appears eligible for the National Register of Historic Places and California Register of Historical Resources under Criteria A/1 as an excellent, intact example of a postwar finger- and cluster-plan school campus in the Los Angeles Unified School District. The campus plan and buildings exemplify LAUSD design principles and ideals (as described in the Los Angeles Unified School District Historic Context Statement, 1870 to 1969). The campus combines one- and two-story massing with a finger- and cluster-plan site design. Overall, the campus core (which includes the site plan, the relationship of buildings to outdoor spaces, and original plantings) retains sufficient integrity to convey its period of significance.

B11. Additional Resource Attributes: HP15. Educational Building. HP29. Landscape Architecture.

\*B12. References: (See Continuation Sheet)

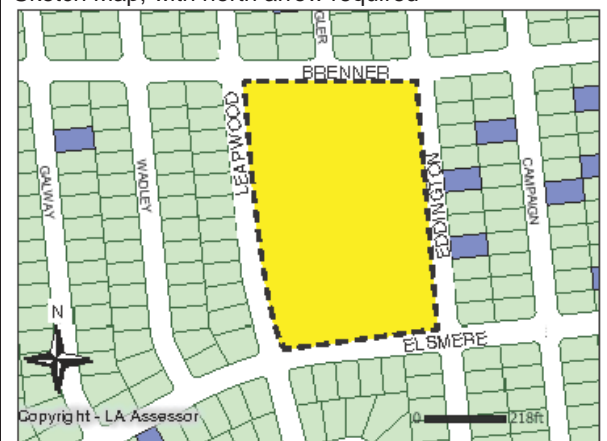
B13. Remarks: None

\*B14. Evaluator: Debi Howell-Ardila, MHP

\*Date of Evaluation: 12 February 2014

(This space reserved for official comments.)

Sketch Map, with north arrow required





Recorded by Debi Howell-Ardila and Marilyn Novell

Date: 10 March 2014

☒ Continuation ☐ Update

**\*P3a. Description (continued):**

Most buildings on campus are clad in stucco and capped with low-pitched, gabled roofs with wide overhanging eaves. The two-story classroom building displays a folded-plate overhang, which shelters the corridor below. The floor of the upper corridor is supported on concrete-clad beams. A railing made of metal mesh panels, with decorative geometric detailing, encloses the second-story corridor and walkway. The corridors of the classroom building are free of vertical roof supports, exhibiting a clean, open look. Arcades capped with flat roofs, supported on steel-pipe supports, provide circulation corridors throughout the campus core.

Throughout campus, fenestration consists of a variety of treatments and configurations. Classrooms are lined with grouped, steel-frame windows, with clerestories lining the top and opaque panels along the bottom. At each side of the window bays are classroom entrances. (These are topped with panels that appear to have originally been transom lights.) Connected to the main classroom building via sheltered corridors is a freestanding restroom facility, adjacent to the campus's central courtyard. The facility is capped with a low-pitched, gabled roof with shallow overhanging eaves. Covered corridors line the facility along three sides. On the north elevation, fenestration consists of a band of multi-light, awning-style casements, with a thin rectangular light fixed pane below. A vent pierces the gable. Located south of central courtyard is a freestanding lunch pavilion. Octagonal in form, the roof is supported by a central concrete block pylon, with thin concrete block piers supporting each point of the roof eaves.

In terms of design, the campus exhibits characteristics typical of 1960's Mid-Century Modernism. Although the main classroom building is two stories, its broad overhanging eaves, ample fenestration, and flat roof give the building a strong horizontality. The campus buildings exhibit simple orthogonal massing with minimal ornament and a strong site plan that clusters a variety of building types around a unifying courtyard. With generous use of windows and exterior corridors and access to courtyards and mature landscaped areas, the campus exhibits a high degree of indoor-outdoor integration. The buildings and structures comprising the campus core are in good repair, with minimal alterations.

**P5b. Photo (continued): (view and date)**



*Leapwood Avenue Elementary School, Classroom Building 5, view from inside campus. Southwest perspective. Source: Sapphos Environmental, Inc., 12 February 2014.*

Recorded by Debi Howell-Ardila and Marilyn Novell

Date: 10 March 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



*Leapwood Avenue Elementary School, Classroom building showing wide overhang with folded plate. Source: Sapphos Environmental, Inc., 12 February 2014.*



*Leapwood Avenue Elementary School, octagonal lunch pavilion. East perspective. Source: Sapphos Environmental, Inc., 12 February 2014.*

## CONTINUATION SHEET

Page 5 of 6 \*Resource Name or #: Leapwood Avenue Elementary School

Recorded by Debi Howell-Ardila and Marilyn Novell

Date: 10 March 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



*Leapwood Avenue Elementary School, Site Plan, with permanent buildings marked in orange and portable buildings marked in purple. Source: Los Angeles Unified School District Pre-Planning Survey, Leapwood Avenue Elementary School, December 16, 2010.*



Recorded by Debi Howell-Ardila and Marilyn Novell

Date: 10 March 2014

☒ Continuation ☐ Update

**\*B12. References (continued):**

- Bhatia, Pavan, "Modern Concept for Los Angeles Public Schools," Doctoral Dissertation (Cambridge, MA: Harvard University Graduate School of Design, Advanced Management Development Program in Real Estate, July 2009).
- Blumenson, John J.-G., *Identifying American Architecture* (New York: W.W. Norton & Company, 1977).
- California Office of Historic Preservation, *California Register and National Register: A Comparison (for Purposes of Determining Eligibility for the California Register)*, Technical Assistance Series No. 6. (Sacramento, CA, 14 March 2006).
- California Office of Historic Preservation, *Instructions for Recording Historical Resources* (Sacramento, CA, March 1995).
- Donovan, John J., *School Architecture: Principles and Practices* (New York: The MacMillan Company, 1921).
- "Double-Decking." *Los Angeles Times*, 5 November 1961.
- Eales, John R., "A Brief, General History of the Los Angeles City School System," Doctoral Dissertation (Los Angeles: University of California, June 1956).
- Gebhard, David, and Robert Winter, *A Guide to Architecture in Los Angeles and Southern California* (Santa Barbara, CA: Peregrine Smith, Inc., 1977).
- Harris, Cyril M., *American Architecture: An Illustrated Encyclopedia* (New York: W.W. Norton & Company, 1998).
- Heumann & Associates and Anne Doehne, Science Applications International Corporation, March 2002, "Historic Schools of the Los Angeles Unified School District," a presentation prepared for LAUSD Facilities Services Division (March 2002).
- Hille, R. Thomas, *Modern Schools: A Century of Design for Education* (Hoboken, NJ: John Wiley & Sons, 2011), 13.
- Lee, Antoinette, and Linda F. McClelland, U.S. Department of the Interior, National Park Service, *National Register Bulletin No. 16B, How to Complete the National Register Multiple Property Documentation Form* (1999).
- McAlester, Virginia, and Lee McAlester, *A Field Guide to American House* (New York: Alfred A. Knopf, 2004).
- Mock, Elizabeth, *Built in USA, 1932 – 1944: A Survey of Contemporary American Architecture*, The Museum of Modern Art (New York: Simon & Shuster, 1944).
- Ogata, Amy F., "Building for Learning in Postwar American Elementary Schools," *Journal of the Society of Architectural Historians* 67, no. 4 (December 2008): 562–91.
- Los Angeles Unified School District. *Los Angeles Unified School District Pre-Planning Survey* (2011).
- Sapphos Environmental, Inc., *Los Angeles Unified School District Historic Context Statement, 1870 to 1969* (Pasadena, CA, March 2014).
- Science Applications International Corporation, *Historic Context Statement: Los Angeles Unified School District*, prepared for Los Angeles Unified School District (Pasadena, CA: March 2002).
- U.S. Department of the Interior, National Park Service, "How to Apply the National Register Criteria for Evaluation," National Register Bulletin No. 15 (Washington, DC, 2002).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Form," National Register Bulletin No. 16A (Washington, DC, 1997).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Multiple Property Documentation Form," National Register Bulletin No. 16B (Washington, DC, 1999).
- Whiffen, Marcus, *American Architecture since 1780: A Guide to the Styles* (Cambridge, MA: MIT Press, 1981).

## PRIMARY RECORD

Primary # \_\_\_\_\_

HRI # \_\_\_\_\_

Trinomial \_\_\_\_\_

NRHP Status Code 3CD

Other Listings \_\_\_\_\_

Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 5 Resource name(s) or number (assigned by recorder) Narbonne Senior High School

**P1. Other Identifier:**

\*P2. Location: ☐ Not for Publication ☒ Unrestricted

\*a. County Los Angeles County

\*b. USGS 7.5' Quad Torrance, CA

Date 1981

T 4S R 14W; Unsectioned; S.B.B.M.

c. Address 24300 South Western Avenue

City Harbor City

Zip 90710

e. Other Locational Data: APN: # 7439-015-900

\*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries.)

Located on a 37.5-acre site in a residential neighborhood in the Harbor City area, Narbonne Senior High School is bounded by 242nd Street on the north, 247th Street on the south, President Avenue on the east, and South Western Avenue on the west. The spiral-shaped site plan exhibits an innovative adaptation of the finger-plan school, with classroom wings radiating outward, in a spoke-like arrangement. At the center of spiral plan is a curved arcade, capped with a flat-roof with a coffered concrete ceiling and oversized steel-pole supports. This arcade system provides circulation corridors throughout the campus core. Located in the center of the circular arcade is a circular central open lawn, with a raised concrete stage and outdoor seating area. Classroom wings are generally rectangular in plan, one story in height, and primarily double-loaded, with two rows of classrooms on each side and a central hallway. The design of the classroom wings emphasizes the horizontal axis through the use of flat roofs ending in wide cantilevered roof eaves. Generous expanses of steel-frame, multi-light windows face onto landscaped courtyards between the buildings. (See Continuation Sheet)

\*P3b. Resource Attributes: (list attributes and codes) HP15. Educational Building. HP29. Landscape architecture.

\*P4. Resources Present: ☐ Building ☐ Structure ☐ Object ☐ Site ☒ District ☐ Element of District ☐ Other

P5a. Photo



P5b. Photo: (view and date)  
Auditorium, West perspective  
4 February 2014

\*P6. Date Constructed/Age and Sources: ☒ Historic ☐ Prehistoric  
☐ Both 1955–1960 (Los Angeles Unified School District)

\*P7. Owner and Address:  
Los Angeles Unified School District

\*P8. Recorded by:  
Debi Howell-Ardila and Marilyn Novell  
Sapphos Environmental, Inc.  
430 North Halstead Street  
Pasadena, CA 91107

\*P9. Date Recorded: 4 February 2014

\*P10. Survey Type: Intensive

\*P11. Report Citation: (Cite survey report and other sources, or enter "none")

Sapphos Environmental, Inc. March 2014. *Los Angeles Unified School District Historic Context Statement, 1870 to 1969*. Pasadena, CA.

Sapphos Environmental, Inc. June 2014. *Los Angeles Unified School District Historic Resources Survey Report*. Pasadena, CA.

\*Attachments: ☐ None ☐ Location Map ☐ Sketch Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record  
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record  
☐ Artifact Record ☐ Photograph Record ☐ Other (list)

## BUILDING, STRUCTURE, AND OBJECT RECORD

\*NHRP Status Code 3CD

Page 2 of 5

\*Resource Name or #: Narbonne Senior High School

- B1. Historic Name: Nathaniel A. Narbonne Senior High School  
B2. Common Name: Same  
B3. Original Use: Institutional (Educational Facility) B4. Present Use: Institutional (Educational Facility)

\*B5. **Architectural Style:** Mid-Century Modern-influenced

\*B6. **Construction History:** (Construction date, alterations, and date of alterations):

According to records on file with the Los Angeles Unified School District, the core of the Narbonne Senior High School campus was constructed in phases between 1955 and 1960. (Contemporaneous accounts in the *Los Angeles Times* also track the development history of the site; see "Unique School Design Planned for Lomita Site," *Los Angeles Times*, 1954; "Work Started on Large New School Portion," *Los Angeles Times*, 1955). In addition, numerous small portable/relocatable buildings dating from 1950 to 2002 are located throughout the campus. A number of alterations and repairs have taken place over the years, including systems and seismic upgrades (including the apparent incorporation of concrete support beams beneath cantilevered roof eaves on some of the classroom wings) and the removal of windows to accommodate the installation of air-conditioning units (see *LAUSD Pre-Planning Survey, Narbonne High School*, for a list of repairs and improvements performed since the 1990s). Other visible alterations include the filling-in of numerous transom windows over classroom entrances.

\*B7. **Moved?** ☒ No ☐ Yes ☐ Unknown **Date:** \_\_\_\_\_ **Original Location:** \_\_\_\_\_

\*B8. **Related Features:** Landscaping/mature trees

B9a. Architect: Daniel, Mann, Johnson & Mendenhall

b. Builder: Morley Building Co.

\*B10. **Significance:** Theme, Institutional (Educational Facility),

"Educating the Baby Boom: Postwar Expansion and the Functional, Modern School Plant, 1945-1969" **Area** Los Angeles

**Period of Significance:** 1955-1960 (District) **Property Type:** Institutional (Educational Facility)

**Applicable Criteria:** CRHR: 1.

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity)

The campus core of Narbonne Senior High School appears eligible for the California Register of Historical Resources under Criterion 1 as an excellent, intact example of an innovative finger-plan school campus. The spiral campus plan represents a creative interpretation of LAUSD design principles and ideals from the postwar period (as described in the Los Angeles Unified School District Historic Context Statement, 1870 to 1969). Designed and engineered by architects Daniel, Mann, Johnson & Mendenhall, classroom wings and buildings extend outward in a spoke-like pattern from a central hub, a concept that the designers intended would reduce cross-campus travel distances and maximize available lot acreage. The plan was said to be a variation on the older finger plan, which included a long central corridor; in the spiral plan, the corridor is curved around a central open court ("Work Started on Large New School Portion," *Los Angeles Times*, 1955). Overall, the campus core retains sufficient integrity to convey the reasons for its significance. Due to alterations, the historic district does not appear eligible for listing on the National Register.

B11. Additional Resource Attributes: HP15. Educational Building. HP29. Landscape Architecture.

\*B12. **References:** (See Continuation Sheet)

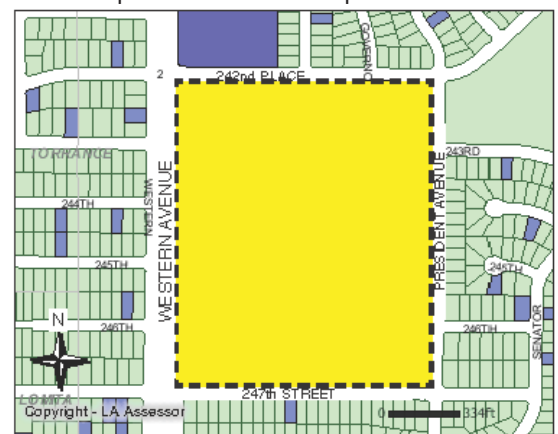
B13. Remarks: None

\*B14. **Evaluator:** Debi Howell-Ardila, MHP

\***Date of Evaluation:** 4 February 2014

(This space reserved for official comments.)

Sketch Map with north arrow required



Recorded by Debi Howell-Ardila and Marilyn Novell

Date: 4 February 2014

☒ Continuation   ☐ Update

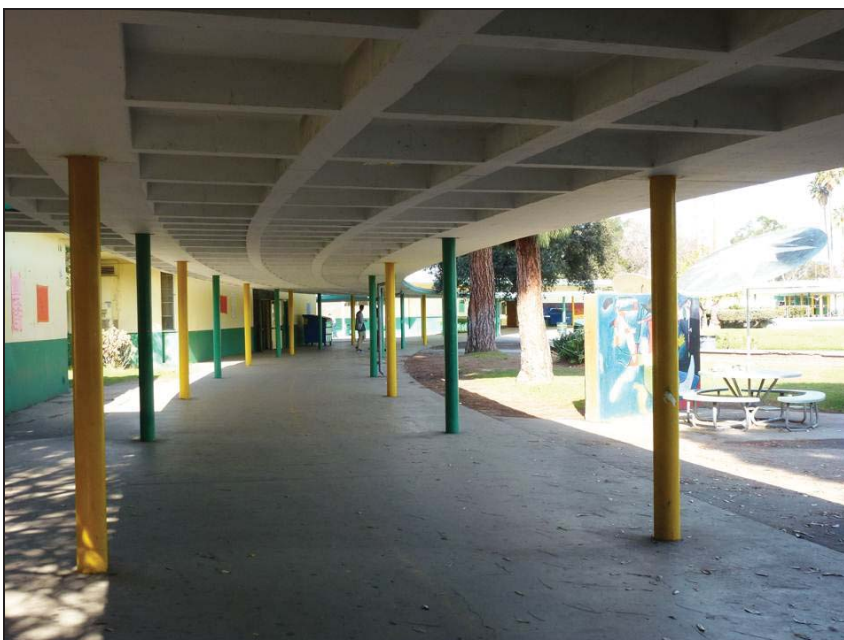
**\*P3a. Description (continued):**

Additional facilities on campus include an auditorium, a multi-purpose building, and two gymnasiums. All of the campus buildings are clad in smooth stucco. At the vehicle drop-off entrance to the campus, a semi-circular driveway is defined by low brick planters and is flush with a concrete walkway beneath a flat-roofed arcade.

**P5b. Photo (continued): (view and date)**



*Narbonne High School, Administration Building. North perspective. Source: Sapphos Environmental, Inc., 4 February 2014.*



*Narbonne High School, Arcade, South perspective. Source: Sapphos Environmental, Inc., 4 February 2014.*



State of California — The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
**CONTINUATION SHEET**

Primary #  
HRI#  
Trinomial

Page 4 of 5

\*Resource Name or #: Narbonne Senior High School

Recorded by Debi Howell-Ardila and Marilyn Novell

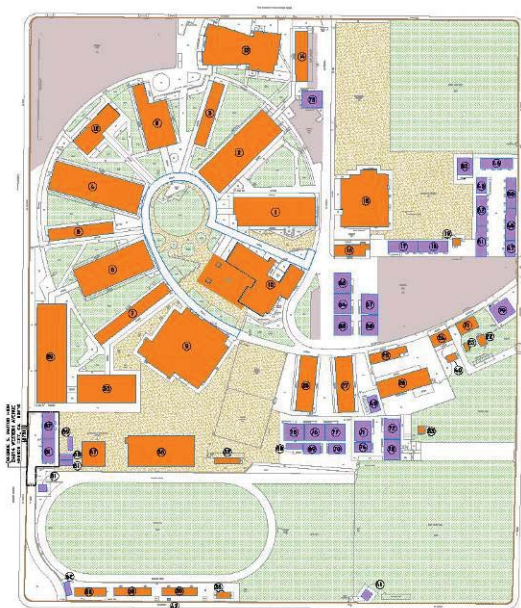
Date: 4 February 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



Narbonne High School, Central lawn. South perspective. Source: Sapphos Environmental, Inc., 4 February 2014.



EXISTING CAMPUS PLAN

PERMANENT & PORTABLES  
BUILDINGS

NARBONNE HS - LEGEND	
	BUILDING PERMANENT
	PORTABLE

Narbonne High School, Site Plan, with permanent buildings marked in orange and portable buildings marked in purple. Source: Los Angeles Unified School District Pre-Planning Survey, Narbonne High School, Ver. 5, March 15, 2012.



Recorded by Debi Howell-Ardila and Marilyn Novell

Date: 4 February 2014

☒ Continuation ☐ Update

**\*B12. References (continued):**

- Bhatia, Pavan, "Modern Concept for Los Angeles Public Schools," Doctoral Dissertation (Cambridge, MA: Harvard University Graduate School of Design, Advanced Management Development Program in Real Estate, July 2009).
- Blumenson, John J.-G., *Identifying American Architecture* (New York: W.W. Norton & Company, 1977).
- California Office of Historic Preservation, *California Register and National Register: A Comparison (for Purposes of Determining Eligibility for the California Register)*, Technical Assistance Series No. 6. (Sacramento, CA, 14 March 2006).
- California Office of Historic Preservation, *Instructions for Recording Historical Resources* (Sacramento, CA, March 1995).
- Donovan, John J., *School Architecture: Principles and Practices* (New York: The MacMillan Company, 1921).
- Eales, John R., "A Brief, General History of the Los Angeles City School System," Doctoral Dissertation (Los Angeles: University of California, June 1956).
- Gebhard, David, and Robert Winter, *A Guide to Architecture in Los Angeles and Southern California* (Santa Barbara, CA: Peregrine Smith, Inc., 1977).
- Harris, Cyril M., *American Architecture: An Illustrated Encyclopedia* (New York: W.W. Norton & Company, 1998).
- Heumann & Associates and Anne Doehne, Science Applications International Corporation, March 2002, "Historic Schools of the Los Angeles Unified School District," a presentation prepared for LAUSD Facilities Services Division (March 2002).
- Hille, R. Thomas, *Modern Schools: A Century of Design for Education* (Hoboken, NJ: John Wiley & Sons, 2011), 13.
- Lee, Antoinette, and Linda F. McClelland, U.S. Department of the Interior, National Park Service, *National Register Bulletin No. 16B, How to Complete the National Register Multiple Property Documentation Form* (1999).
- McAlester, Virginia, and Lee McAlester, *A Field Guide to American House* (New York: Alfred A. Knopf, 2004).
- Mock, Elizabeth, *Built in USA, 1932 – 1944: A Survey of Contemporary American Architecture*, The Museum of Modern Art (New York: Simon & Shuster, 1944).
- Ogata, Amy F., "Building for Learning in Postwar American Elementary Schools," *Journal of the Society of Architectural Historians* 67, no. 4 (December 2008): 562–91.
- "Pupils Go in Circles in 'Spiraled' School," *Los Angeles Times*, May 11, 1958.
- Los Angeles Unified School District. *Los Angeles Unified School District Pre-Planning Survey* (2011).
- Sapphos Environmental, Inc., *Los Angeles Unified School District Historic Context Statement, 1870 to 1969* (Pasadena, CA, March 2014).
- Science Applications International Corporation, *Historic Context Statement: Los Angeles Unified School District*, prepared for Los Angeles Unified School District (Pasadena, CA: March 2002).
- U.S. Department of the Interior, National Park Service, "How to Apply the National Register Criteria for Evaluation," National Register Bulletin No. 15 (Washington, DC, 2002).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Form," National Register Bulletin No. 16A (Washington, DC, 1997).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Multiple Property Documentation Form," National Register Bulletin No. 16B (Washington, DC, 1999).
- "Unique School Design Planned for Lomita Site," *Los Angeles Times*, April 4, 1954; "Work Started on Large New School Portion," *Los Angeles Times*, September 18, 1955.
- Whiffen, Marcus, *American Architecture since 1780: A Guide to the Styles* (Cambridge, MA: MIT Press, 1981).
- "Work Started on Large New School Portion," *Los Angeles Times*, September 18, 1955.

## PRIMARY RECORD

Primary # \_\_\_\_\_

HRI # \_\_\_\_\_

Trinomial \_\_\_\_\_

NRHP Status Code 3CD

Other Listings \_\_\_\_\_

Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 5 Resource name(s) or number (assigned by recorder) Pacoima Middle School

**P1. Other Identifier:**

**\*P2. Location:** ☐ Not for Publication ☒ Unrestricted

**\*a. County** Los Angeles County

**\*b. USGS 7.5' Quad** San Fernando and Van Nuys, CA **Date** 1988 and 1972 **T** 2N **R** 15W; Unsectioned, S.B.B.M.

**c. Address** 9919 Laurel Canyon Boulevard

City Pacoima

Zip 91331

**e. Other Locational Data:** APN: # 7552-017-900

**\*P3a. Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries.)

Located in San Fernando Valley in the community of Pacoima, the Pacoima Middle School occupies a 23.7-acre site bounded by Laurel Canyon Boulevard on the northeast, Kagel Canyon Street on the southeast, Cranford Avenue on the southwest, and Terra Bella Street on the northwest. Interstate 5 (Golden State Freeway) runs immediately adjacent to Cranford Avenue. The spoke-like site plan and general design and configuration of the classrooms display the typical features of LAUSD's standardized finger-plan school from the postwar era. Classroom buildings extend outward from the main entrance and courtyard, which include the Administration Building and Library at the eastern corner of the campus. Designed in a Mid-Century Modern-influenced style, classroom wings are one-story, single-loaded, stucco-clad rectangular buildings capped with slightly sloping shed rooms. Classroom entrances open off flat-roofed arcades, and a wall of windows defines each classroom on the opposite side. Covered arcades with steel pipe supports and flat roofs provide circulation throughout the campus. A central quad and the open areas between the classroom buildings are planted with lawns and mature trees. Typical of the postwar LAUSD high school campus, a two-story gymnasium is sited outside the campus core, near recreation areas. The auditorium and the cafeteria are also set apart from the classroom buildings on the edge of campus. Alterations include a number of removed and/or in-filled or stuccoed windows, including bands of clerestory lights. In fair repair, the campus core retains sufficient integrity to convey its period of significance.

**\*P3b. Resource Attributes:** (list attributes and codes) HP15. Educational Building. HP29. Landscape architecture.

**\*P4. Resources Present:** ☐ Building ☐ Structure ☐ Object ☐ Site ☒ District ☐ Element of District ☐ Other

P5a. Photo



P5b. Photo: (view and date)

Entrance, east perspective

13 March 2014

**\*P6. Date Constructed/Age and Sources:**

☒ Historic ☐ Prehistoric ☐ Both

1955 (Los Angeles Unified School District)

**\*P7. Owner and Address:**

Los Angeles Unified School District

**\*P8. Recorded by:**

Debi Howell-Ardila and Marilyn Novell  
Sapphos Environmental, Inc.  
430 North Halstead Street  
Pasadena, CA 91107

**\*P9. Date Recorded:** 27 March 2014

**\*P10. Survey Type:** Intensive

**\*P11. Report Citation:** (Cite survey report and other sources, or enter "none")

Sapphos Environmental, Inc. March 2014. *Los Angeles Unified School District Historic Context Statement, 1870 to 1969*. Pasadena, CA. Sapphos Environmental, Inc. June 2014. *Los Angeles Unified School District Historic Resources Survey Report*. Pasadena, CA.

**\*Attachments:** ☐ None ☐ Location Map ☐ Sketch Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record  
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record  
☐ Artifact Record ☐ Photograph Record ☐ Other (list)

## BUILDING, STRUCTURE, AND OBJECT RECORD

\*NHRP Status Code 3CD

Page 2 of 5

\*Resource Name or #: Pacoima Middle School

B1. Historic Name: Pacoima Junior High School

B2. Common Name: Pacoima Middle School

B3. Original Use: Institutional (Educational Facility)

B4. Present Use: Institutional (Educational Facility)

\*B5. **Architectural Style:** Mid-Century Modern-influenced

\*B6. **Construction History:** (Construction date, alterations, and date of alterations):

According to records on file with the Los Angeles Unified School District, the core of the Pacoima Middle School campus was constructed in 1955. Nine small portable/temporary buildings at the east and north sides of campus date from 1935 to 2002. A number of alterations and repairs have taken place over the years, including seismic and systems upgrades (the *LAUSD Pre-Planning Survey, Pacoima Middle School* lists repairs and improvements performed at the school since the 1990s). Other alterations include the removal of clerestory lights on some classroom wings and in-filling of windows with air-conditioning units.

\*B7. **Moved?** ☒ No ☐ Yes ☐ Unknown **Date:** \_\_\_\_\_ **Original Location:** \_\_\_\_\_

\*B8. **Related Features:** Landscaping/mature trees, hardscaping

B9a. Architect: Unknown

b. Builder: Unknown

\*B10. **Significance: Theme,** Institutional (Educational Facility),

"Educating the Baby Boom: Postwar Expansion and the Functional, Modern School Plant, 1945-1969" **Area** Los Angeles

**Period of Significance:** 1955 (District) **Property Type:** Institutional (Educational Facility)

**Applicable Criteria:** CRHR: 1.

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity)

The campus core of Pacoima Middle School appears eligible as a historic district for the California Register of Historical Resources under Criterion 1 as an outstanding example of the standardized indoor-outdoor postwar school. Considered in the context of institutional architecture/educational facilities in Los Angeles, the campus plan and buildings exemplify LAUSD design principles and ideals from the period (as described in the *Los Angeles Unified School District Historic Context Statement, 1870 to 1969*). A number of alterations, including many filled-in or stuccoed clerestories, appear to have compromised the integrity of some classroom wings. Because of these alterations, the campus is not eligible for listing on the National Register. Overall, the campus core (which includes the site plan, the relationship of buildings to outdoor spaces, and original plantings) retains sufficient integrity to convey the reasons for its significance. Of historic note was Pacoima Middle School's role as the site of a 1957 plane crash in which seven students were killed and 74 other people injured when a transport plane collided with a jet over the school yard ("7 Killed, 74 Hurt in School Air Crash" 1957).

B11. Additional Resource Attributes: HP15. Educational Building.

\*B12. **References:** (See Continuation Sheet)

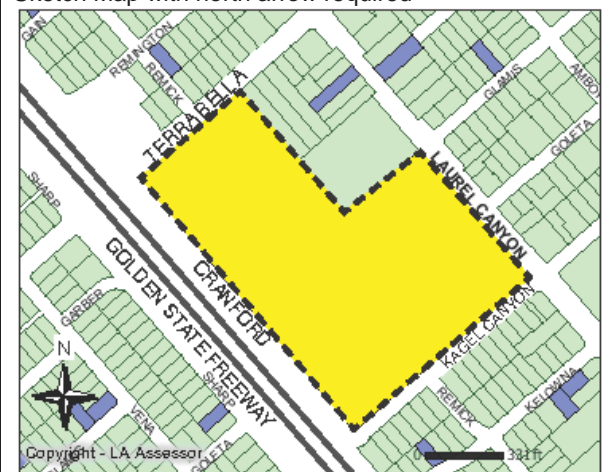
B13. Remarks: None

\*B14. **Evaluator:** Debi Howell-Ardila, MHP, and Marilyn Novell

\*Date of Evaluation: 27 March 2014

(This space reserved for official comments.)

Sketch Map with north arrow required





Recorded by Debi Howell-Ardila and Marilyn Novell

Date: 27 March 2014

☒ Continuation   ☐ Update

P5b. Photo (continued): (view and date)



*Pacoima Middle School, Central quad. Source: Sapphos Environmental, Inc., 13 March 2014.*



*Pacoima Middle School, Typical classroom building. Source: Sapphos Environmental, Inc., 13 March 2014.*

Recorded by Debi Howell-Ardila and Marilyn Novell

Date: 27 March 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



Pacoima Middle School, Windows on typical classroom building. Source: Sapphos Environmental, Inc., 13 March 2014.



Pacoima Middle School, Site Plan, with permanent buildings marked in orange and portable buildings marked in purple. Source: Los Angeles Unified School District Pre-Planning Survey, Pacoima Middle School, July 2010.



Recorded by Debi Howell-Ardila and Marilyn Novell

Date: 27 March 2014

☒ Continuation ☐ Update

**\*B12. References (continued):**

"7 Killed, 74 Hurt in School Air Crash," *Los Angeles Times*, February 1, 1957.

Bhatia, Pavan, "Modern Concept for Los Angeles Public Schools," Doctoral Dissertation (Cambridge, MA: Harvard University Graduate School of Design, Advanced Management Development Program in Real Estate, July 2009).

Blumenson, John J.-G., *Identifying American Architecture* (New York: W.W. Norton & Company, 1977).

"Boy's Suit for Damages in Air Tragedy Settled," *Los Angeles Times*, June 10, 1959.

California Office of Historic Preservation, *California Register and National Register: A Comparison (for Purposes of Determining Eligibility for the California Register)*, Technical Assistance Series No. 6. (Sacramento, CA, 14 March 2006).

California Office of Historic Preservation, *Instructions for Recording Historical Resources* (Sacramento, CA, March 1995).

"Crash Hero: Teacher's Act Saves Boy's Life," *Los Angeles Times*, February 1, 1957.

Donovan, John J., *School Architecture: Principles and Practices* (New York: The MacMillan Company, 1921).

Eales, John R., "A Brief, General History of the Los Angeles City School System," Doctoral Dissertation (Los Angeles: University of California, June 1956).

Gebhard, David, and Robert Winter, *A Guide to Architecture in Los Angeles and Southern California* (Santa Barbara, CA: Peregrine Smith, Inc., 1977).

"Flash! An Integration Program That Works," *Los Angeles Times*, January 24, 1978.

Harris, Cyril M., *American Architecture: An Illustrated Encyclopedia* (New York: W.W. Norton & Company, 1998).

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

Hille, R. Thomas, *Modern Schools: A Century of Design for Education* (Hoboken, NJ: John Wiley & Sons, 2011), 13.

Lee, Antoinette, and Linda F. McClelland, U.S. Department of the Interior, National Park Service, *National Register Bulletin No. 16B, How to Complete the National Register Multiple Property Documentation Form* (1999).

McAlester, Virginia, and Lee McAlester, *A Field Guide to American House* (New York: Alfred A. Knopf, 2004).

Mock, Elizabeth, *Built in USA, 1932 – 1944: A Survey of Contemporary American Architecture*, The Museum of Modern Art (New York: Simon & Shuster, 1944).

Ogata, Amy F., "Building for Learning in Postwar American Elementary Schools," *Journal of the Society of Architectural Historians* 67, no. 4 (December 2008): 562–91.

"Pacoimans Will Mark Air Tragedy," *Los Angeles Times*, January 26, 1958.

Los Angeles Unified School District. *Los Angeles Unified School District Pre-Planning Survey* (2011).

Sapphos Environmental, Inc., *Los Angeles Unified School District Historic Context Statement, 1870 to 1969* (Pasadena, CA, March 2014).

"Saw at Fall: Students Hurt by Debris Tell of Tragedy," *Los Angeles Times*, February 1, 1957.

Science Applications International Corporation, *Historic Context Statement: Los Angeles Unified School District*, prepared for Los Angeles Unified School District (Pasadena, CA: March 2002).

U.S. Department of the Interior, National Park Service, "How to Apply the National Register Criteria for Evaluation," *National Register Bulletin No. 15* (Washington, DC, 2002).

U.S. Department of the Interior, National Park Service, "How to Complete the National Register Form," *National Register Bulletin No. 16A* (Washington, DC, 1997).

U.S. Department of the Interior, National Park Service, "How to Complete the National Register Multiple Property Documentation Form," *National Register Bulletin No. 16B* (Washington, DC, 1999).

Whiffen, Marcus, *American Architecture since 1780: A Guide to the Styles* (Cambridge, MA: MIT Press, 1981).

## PRIMARY RECORD

Primary # \_\_\_\_\_

HRI # \_\_\_\_\_

Trinomial \_\_\_\_\_

NRHP Status Code 3D

Other Listings \_\_\_\_\_

Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 7 Resource name(s) or number (assigned by recorder) Palisades Charter Senior High School

**P1. Other Identifier:**

\*P2. Location: ☐ Not for Publication ☒ Unrestricted

\*a. County Los Angeles County

\*b. USGS 7.5' Quad Topanga, CA

Date 1981

T 1S R 16W; Unsectioned Area, S.B.B.M.

c. Address 14777 Bowdoin Street

City Pacific Palisades

Zip 90272

e. Other Locational Data: APN: # 4413-021-905

\*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries.)

Located on a 30.8-acre hillside site in Pacific Palisades, Palisades Charter Senior High School is bounded by Sunset Boulevard (north), Temescal Canyon Road (east), El Medio Avenue (west), and Bowdoin Street, which transects the campus. The two halves of campus are linked with pedestrian tunnels running beneath Bowdoin Street. Constructed in 1961 in an expressionist, Mid-Century Modern style, Palisades Charter Senior High School displays the textbook characteristics of a postwar indoor-outdoor high school campus. The heart of the campus consists of an expansive central lawn and gathering area, around which classrooms, an outdoor dining area, and other facilities are oriented. The central lawn includes mature trees, landscaping, benches, and an elevated stage. Classroom wings are generally two stories in height, rectangular in plan, and unified beneath a continuous folded-plate roof. Wall expanses are clad in patterned brick, with exposed stucco piers providing decorative accents. Broad, sheltered walkways fronted by simple metal grills and diagonal structural supports line upper stories of classrooms. Providing circulation corridors throughout campus is a network of sheltered arcades, which consist of steel I-beam roofs resting on simple, steel posts. To the east of the central lawn is an outdoor dining area, sheltered beneath a stylized zig-zag roof resting on simple pipe supports. South of Bowdoin Street, recreational facilities include a track, football stadium, and various recreational facilities and ancillary structures. (See Continuation Sheet)

\*P3b. Resource Attributes: (list attributes and codes) HP15. Educational Building. HP29. Landscape architecture.

\*P4. Resources Present: ☐ Building ☐ Structure ☐ Object ☐ Site ☒ District ☐ Element of District ☐ Other

P5a. Photo



P5b. Photo: (view and date)  
Southeast elevation  
23 January 2014

\*P6. Date Constructed/Age and Sources: ☒ Historic ☐ Prehistoric  
☐ Both 1961 (Los Angeles Unified School District)

\*P7. Owner and Address:  
Los Angeles Unified School District

\*P8. Recorded by:  
Debi Howell-Ardila and Marilyn Novell  
Sapphos Environmental, Inc.  
430 North Halstead Street  
Pasadena, CA 91107

\*P9. Date Recorded:  
3 February 2014

\*P10. Survey Type: Intensive

\*P11. Report Citation: (Cite survey report and other sources, or enter "none")

Sapphos Environmental, Inc. March 2014. *Los Angeles Unified School District Historic Context Statement, 1870 to 1969*. Pasadena, CA.

Sapphos Environmental, Inc. June 2014. *Los Angeles Unified School District Historic Resources Survey Report*. Pasadena, CA.

\*Attachments: ☐ None ☐ Location Map ☐ Sketch Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record  
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record  
☐ Artifact Record ☐ Photograph Record ☐ Other (list)

**BUILDING, STRUCTURE, AND OBJECT RECORD**

\*NHRP Status Code 3D

Page 2 of 7

\*Resource Name or #: Palisades Charter Senior High School

- B1. Historic Name: Palisades Charter Senior High School  
B2. Common Name: Pacific Palisades Senior High School  
B3. Original Use: Institutional (Educational Facility) B4. Present Use: Institutional (Educational Facility)

\*B5. **Architectural Style:** Mid-Century Modern/Expressionistic

\*B6. **Construction History:** (Construction date, alterations, and date of alterations):

According to records on file with the Los Angeles Unified School District, construction was completed on Palisades Charter Senior High School in 1961. A majority of the campus's extant buildings, structures, and facilities date from this period. The grounds also include several portable/temporary buildings, most of which were installed in the 1990s (and located primarily in the northern portion of campus and near the football stadium). A number of minor alterations have taken place over the years, including seismic and systems upgrades, safety and security improvements (see *LAUSD Pre-Planning Survey, Palisades Charter Senior High School* for list of repairs and improvements carried out since the 1990s). Alterations to original buildings on campus include the addition of X-shaped cross-bracing on outdoor walkways, the addition of security grills on some windows, and the in-filling/replacement of some original windows. The campus is otherwise highly intact and in good repair.

\*B7. **Moved?** ☒No ☐Yes ☐Unknown **Date:** \_\_\_\_\_ **Original Location:** \_\_\_\_\_

\*B8. **Related Features:** Landscaping/mature trees, hardscaping, benches

B9a. Architect: Adrian Wilson and Associates

b. Builder: Unknown

\*B10. **Significance:** Theme, Institutional (Educational Facility),

"Educating the Baby Boom: Postwar Expansion and the Functional, Modern School Plant, 1945-1969" Area Los Angeles

**Period of Significance:** 1961 (District) **Property Type:** Institutional (Educational Facility)

**Applicable Criteria:** NRHP: A and C; CRHR: 1 and 3.

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity)

The campus core of Palisades Charter Senior High School appears eligible for the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR) as a district under Criteria A/1 as an excellent, intact example of a postwar indoor-outdoor educational facility in Los Angeles. The campus plan and buildings exemplify the design principles and ideals of the Los Angeles Unified School District from the postwar period (as described in the *Los Angeles Unified School District Historic Context Statement, 1870 to 1969*). The campus core also appears eligible for the NRHP and CRHR as a district under Criteria C/3 as an excellent example of the Mid-Century Modern style (Expressionist subtype) applied to institutional architecture. (See *Continuation Sheet*)

B11. Additional Resource Attributes: HP15. Educational Facility. HP 29. Landscape Architecture.

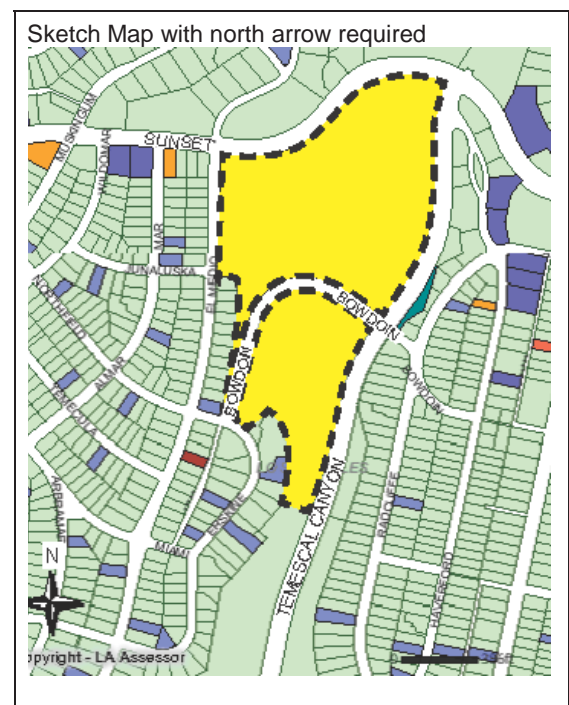
\*B12. **References:** (See *Continuation Sheet*)

B13. Remarks: None

\*B14. **Evaluator:** Debi Howell-Ardila, MHP

\***Date of Evaluation:** 4 February 2014

(This space reserved for official comments.)





Recorded by Debi Howell-Ardila and Marilyn Novell

Date: 4 February 2014

☒ Continuation ☐ Update

**\*P3a. Description (continued):**

The principal entrance to campus is located on Bowdoin Street, with the main entry flanked by the Administration Building on the west and the Assembly Room/Cafeteria on the east. Arcades extend to the sidewalk and lead into the main campus. Architectural details on these signature buildings are reflected throughout the campus. Features include exterior walls clad in brick and stucco, sheltered beneath cantilevered overhanging eaves. Marking the centered entrance bays are a set of floor-to-ceiling stucco-clad piers. Formed by gaps in the brick cladding, these full-height piers provide visual interest on the exterior walls, which consist of broad expanses of brick sheathing. Continuous bands of metal sunshades line the southern elevation of the Administration Building. A variety of fenestration patterns are seen throughout campus, including steel-framed casements, fixed panes, clerestories, and transoms. Exterior walls of classrooms have built-in lockers. Throughout the core of the campus, landscaped courtyards with walkways, benches, and greenery provide outdoor spaces for gathering.

School facilities include a shop building, outdoor pool, parking areas, portable buildings and structures, added primarily in the 1990s, as well as other ancillary buildings and structures. Alterations include various safety and systems upgrades, the installation of security grills on some windows, and the in-filling of some windows. The core of the campus is otherwise highly intact and in good repair.

**\*B10. Significance (continued):**

With its "ultra-modern" design and \$6-million cost, Palisades Senior High School was said to be the "most expensive and most architecturally distinctive plant in the Los Angeles city schools system" when it was built in 1961 ("Palisades High School Readied for Occupancy," *Los Angeles Times*, 1961). Due to its location—in a constricted valley, nestled in the hillsides of Pacific Palisades—the campus required \$1-million of earth-moving activities to prepare the site. Los Angeles firm Adrian Wilson and Associates, responsible for design and engineering specifications, envisioned the school as a series of classroom wings focused on a central quadrangle, in a compact but open campus plan accommodating up to 3,000 students ("Record Earth-Moving Job at School Site Told" 1961). The campus core exhibits few signs of alteration and retains a high degree of integrity of location, design, setting, materials, workmanship, feeling, and association.

**P5b. Photo (continued): (view and date)**



*Palisades Charter Senior High School, entrance arcade and courtyard.  
Southeastern perspective. Source: Sapphos Environmental, Inc., 23 January 2014.*

**CONTINUATION SHEET**

Primary #

HRI#

Trinomial

Page 4 of 7 \*Resource Name or #: Palisades Charter Senior High School

Recorded by Debi Howell-Ardila and Marilyn Novell

Date: 4 February 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



*Palisades Charter Senior High School, outdoor dining area with zig-zag roof canopy. Southwest perspective. Source: Sapphos Environmental, Inc., 23 January 2014.*



*Palisades Charter Senior High School, typical classroom and courtyard. Southwestern perspective. Source: Sapphos Environmental, Inc., 23 January 2014.*



**CONTINUATION SHEET**

Primary #

HRI#

Trinomial

Page 5 of 7 \*Resource Name or #: Palisades Charter Senior High School

Recorded by Debi Howell-Ardila and Marilyn Novell

Date: 4 February 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



*Palisades Charter Senior High School under construction, as of circa 1961.  
Source: J. Paul Getty Trust, Getty Research Institute, Julius Shulman Photography  
Archive, #gri\_2004\_r\_10\_b271\_f18\_001.*



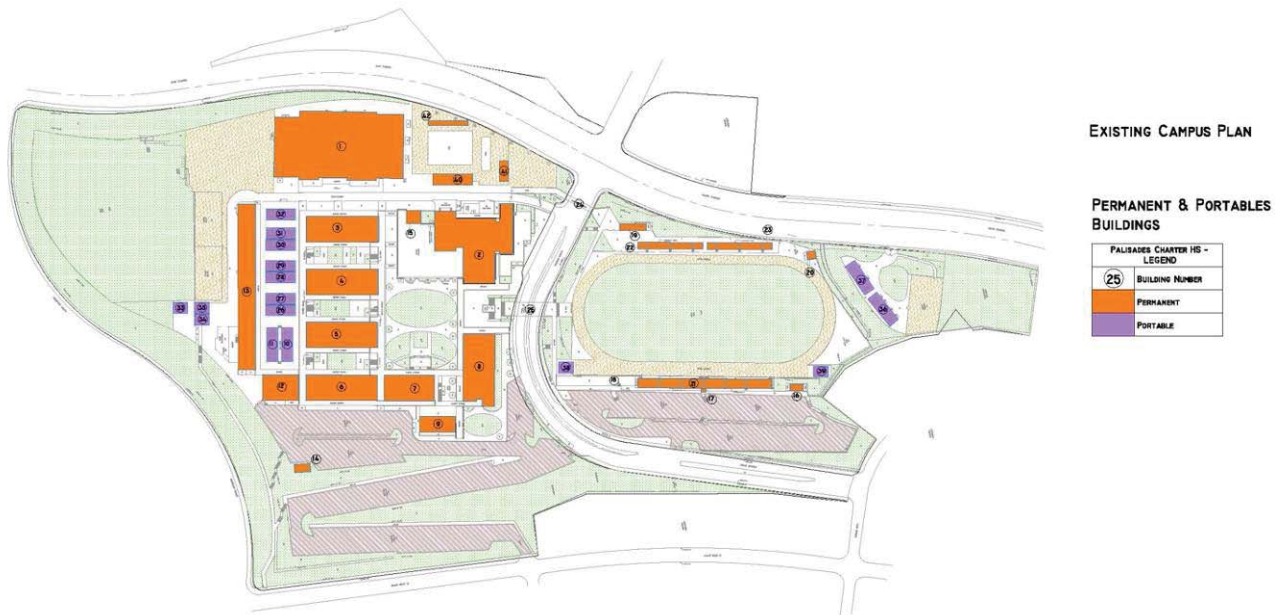
*Palisades Charter Senior High School, as of circa 1961. Source: J. Paul Getty  
Trust, Getty Research Institute, Julius Shulman Photography Archive,  
#gri\_2004\_r\_10\_b278\_f03\_007.*

Recorded by Debi Howell-Ardila and Marilyn Novell

Date: 4 February 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



*Palisades Senior High School, Site Plan, with permanent buildings marked in orange and portable buildings marked in purple.  
Source: Los Angeles Unified School District Pre-Planning Survey, Palisades Charter Senior High School, March 2012.*

Recorded by Debi Howell-Ardila and Marilyn Novell

Date: 4 February 2014

☒ Continuation ☐ Update

**\*B12. References (continued):**

- Bhatia, Pavan, "Modern Concept for Los Angeles Public Schools," Doctoral Dissertation (Cambridge, MA: Harvard University Graduate School of Design, Advanced Management Development Program in Real Estate, July 2009).
- Blumenson, John J.-G., *Identifying American Architecture* (New York: W.W. Norton & Company, 1977).
- California Office of Historic Preservation, *California Register and National Register: A Comparison (for Purposes of Determining Eligibility for the California Register)*, Technical Assistance Series No. 6. (Sacramento, CA, 14 March 2006).
- California Office of Historic Preservation, *Instructions for Recording Historical Resources* (Sacramento, CA, March 1995).
- Donovan, John J., *School Architecture: Principles and Practices* (New York: The MacMillan Company, 1921).
- Eales, John R., "A Brief, General History of the Los Angeles City School System," Doctoral Dissertation (Los Angeles: University of California, June 1956).
- Gebhard, David, and Robert Winter, *A Guide to Architecture in Los Angeles and Southern California* (Santa Barbara, CA: Peregrine Smith, Inc., 1977).
- Harris, Cyril M., *American Architecture: An Illustrated Encyclopedia* (New York: W.W. Norton & Company, 1998).
- Heumann & Associates and Anne Doehne, Science Applications International Corporation, March 2002, "Historic Schools of the Los Angeles Unified School District," a presentation prepared for LAUSD Facilities Services Division (March 2002).
- Hille, R. Thomas, *Modern Schools: A Century of Design for Education* (Hoboken, NJ: John Wiley & Sons, 2011), 13.
- Lee, Antoinette, and Linda F. McClelland, U.S. Department of the Interior, National Park Service, *National Register Bulletin No. 16B, How to Complete the National Register Multiple Property Documentation Form* (1999).
- McAlester, Virginia, and Lee McAlester, *A Field Guide to American House* (New York: Alfred A. Knopf, 2004).
- Mock, Elizabeth, *Built in USA, 1932 – 1944: A Survey of Contemporary American Architecture*, The Museum of Modern Art (New York: Simon & Shuster, 1944).
- Ogata, Amy F., "Building for Learning in Postwar American Elementary Schools," *Journal of the Society of Architectural Historians* 67, no. 4 (December 2008): 562–91.
- "Palisades School Readied for Occupancy," *Los Angeles Times*, September 3, 1961.
- "Record Earth-Moving Job at School Site Told," *Los Angeles Times*, June 11, 1961.
- Los Angeles Unified School District. *Los Angeles Unified School District Pre-Planning Survey* (2011).
- Sapphos Environmental, Inc., *Los Angeles Unified School District Historic Context Statement, 1870 to 1969* (Pasadena, CA, March 2014).
- Science Applications International Corporation, *Historic Context Statement: Los Angeles Unified School District*, prepared for Los Angeles Unified School District (Pasadena, CA: March 2002).
- "School Dedication Set for Saturday," *Los Angeles Times*, November 5, 1961.
- U.S. Department of the Interior, National Park Service, "How to Apply the National Register Criteria for Evaluation," National Register Bulletin No. 15 (Washington, DC, 2002).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Form," National Register Bulletin No. 16A (Washington, DC, 1997).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Multiple Property Documentation Form," National Register Bulletin No. 16B (Washington, DC, 1999).
- Whiffen, Marcus, *American Architecture since 1780: A Guide to the Styles* (Cambridge, MA: MIT Press, 1981).



## PRIMARY RECORD

Primary # \_\_\_\_\_

HRI # \_\_\_\_\_

Trinomial \_\_\_\_\_

NRHP Status Code 3CD

Other Listings \_\_\_\_\_

Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 7 Resource name(s) or number (assigned by recorder) Parmelee Elementary School

**P1. Other Identifier:**

**\*P2. Location:** ☐ Not for Publication ☒ Unrestricted

**\*a. County** Los Angeles County

**\*b. USGS 7.5' Quad** Inglewood, CA

**Date** 1981

**T** 2S **R** 13W; SE ¼ of NW ¼ of Sec 28, S.B.B.M.

**c. Address** 1338 E. 76th Place

**City** Los Angeles

**Zip** 90001

**e. Other Locational Data:** APN: # 6024-022-900

**\*P3a. Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries.)

Parmelee Elementary School is located in a residential area of the Florence-Graham neighborhood in the City of Los Angeles. The campus occupies a 6.3-acre site bounded by East 76th Place to the north, East 77th Place to the south, Parmelee Avenue to the east, and Hooper Avenue to the west. The school consists of three two-story classroom buildings and three two-story utility buildings, in addition to a one-story administration building and two kindergarten buildings, all constructed in 1962. An Assembly Building and associated lunch pavilion were added in 1964, and nine temporary/portable buildings were added between 1960 and 2005 to the east and south of the campus core. All permanent buildings on the campus core are linked by sheltered corridors and wide overhanging eaves.

Parmlee Elementary School exhibits the typical features of a finger- and cluster-plan school. With generous use of windows and exterior corridors and access to courtyards and mature landscaped areas, the campus displays the indoor-outdoor connection typical of this school typology. The use of exposed cast-concrete structural elements and sculptural forms is associated with the style as it transitioned to the 1960s. (See *Continuation Sheet*)

**\*P3b. Resource Attributes:** (list attributes and codes) HP15. Educational Building. HP29. Landscape architecture.

**\*P4. Resources Present:** ☐ Building ☐ Structure ☐ Object ☐ Site ☒ District ☐ Element of District ☐ Other

P5a. Photo



P5b. Photo: (view and date)

Assembly Building, northeast perspective  
21 February 2014

**\*P6. Date Constructed/Age and Sources:**

☒ Historic ☐ Prehistoric ☐ Both

1962, 1964, 1965 (Los Angeles Unified School District)

**\*P7. Owner and Address:**

Los Angeles Unified School District

**\*P8. Recorded by:**

Marilyn Novell  
Sapphos Environmental, Inc.  
430 North Halstead Street  
Pasadena, CA 91107

**\*P9. Date Recorded:** 21 February 2014

**\*P10. Survey Type:** Intensive

**\*P11. Report Citation:** (Cite survey report and other sources, or enter "none") Sapphos Environmental, Inc. March 2014. *Los Angeles Unified School District Historic Context Statement, 1870 to 1969*. Pasadena, CA.

Sapphos Environmental, Inc. June 2014. *Los Angeles Unified School District Historic Resources Survey Report*. Pasadena, CA.

**\*Attachments:** ☐ None ☐ Location Map ☐ Sketch Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record  
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record  
☐ Artifact Record ☐ Photograph Record ☐ Other (list)

## BUILDING, STRUCTURE, AND OBJECT RECORD

\*NHRP Status Code 3CD

Page 2 of 7

\*Resource Name or #: Parmelee Elementary School

- B1. Historic Name: Parmelee Elementary School  
B2. Common Name: Same  
B3. Original Use: Institutional (Educational Facility) B4. Present Use: Institutional (Educational Facility)

\*B5. Architectural Style: Mid-Century Modern

\*B6. Construction History: (Construction date, alterations, and date of alterations):

According to records on file with the Los Angeles Unified School District, the core of the Parmelee Elementary School campus was completed in 1962, with the assembly building added in 1964 and the lunch pavilion in 1965. Construction of the school cost more than \$1.2 million ("Pupils to Get Preview of New Parmelee School," *Los Angeles Times*, 1962). In 1965, an arson fire destroyed four classrooms ("School Hit by Two-Alarm Fire," *Los Angeles Times*, 1965). Three portable/temporary buildings were added at the eastern perimeter of the campus in the 1990s. A number of alterations and repairs have taken place over the years, including seismic and systems upgrades, the removal of windows to accommodate the installation of air-conditioning units, and various safety improvements (see *LAUSD Pre-Planning Survey, Parmelee Elementary School*, for a list of repairs and improvements performed since the 1990s). In addition, security grilles have been added to windows throughout the campus.

\*B7. Moved? ☒ No ☐ Yes ☐ Unknown Date: \_\_\_\_\_ Original Location: \_\_\_\_\_

\*B8. Related Features: Landscaping/mature trees, hardscaping

B9a. Architect: Unknown b. Builder: Unknown

\*B10. Significance: Theme, Institutional (Educational Facility),

"Educating the Baby Boom: Postwar Expansion and the Functional, Modern School Plant, 1945-1969" Area Los Angeles

Period of Significance: 1962-1965 (District) Property Type: Institutional (Educational Facility)

Applicable Criteria: CRHR: 1.

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity)

The campus core of Parmelee Elementary School appears eligible for the California Register of Historical Resources under Criterion 1 as an excellent, intact example of a postwar finger- and cluster-plan elementary school. The campus plan and buildings exemplify LAUSD design principles and ideals from the postwar period (as described in the *Los Angeles Unified School District Historic Context Statement, 1870 to 1969*). The campus core also appears eligible under Criterion 3 as an outstanding, intact example of the Mid-Century Modern style applied to institutional architecture. Due to alterations, the campus is not eligible for listing on the National Register and is eligible for the California Register only. Overall, the campus core (which includes the site plan, the relationship of buildings to outdoor spaces, and original plantings) retains integrity of location, design, setting, workmanship, feeling, and association.

B11. Additional Resource Attributes: HP15. Educational Building. HP29. Landscape Architecture.

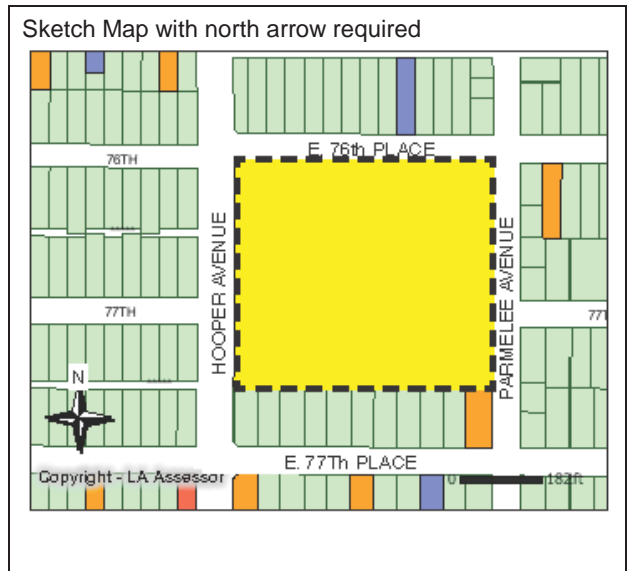
\*B12. References: (See Continuation Sheet)

B13. Remarks: None

\*B14. Evaluator: Debi Howell-Ardila and Marilyn Novell

\*Date of Evaluation: 21 February 2014

(This space reserved for official comments.)



## CONTINUATION SHEET

Recorded by Marilyn Novell

Date: 21 February 2014

☒ Continuation ☐ Update

### \*P3a. Description (continued):

The two-story auditorium and a small two-story classroom/utility building linking two of the classroom wings are clad in red brick over a convex barrel surface. The north and south elevations of the auditorium and the west elevation of the utility building display a curved façade that contrasts with rectilinear overhanging roofs and heavy cast-concrete beams. In plan, orthogonal one-story wings to the south and west of the curvilinear auditorium and a projecting one-story entrance at the east elevation present a complex arrangement of forms. At the main elevation, recessed entry doors are placed asymmetrically beneath a broad overhanging eaves supported by a brick pier.

The roof of the major east-west arcade is constructed of corrugated metal and suspended from the cross-beam of a single row of heavy cast-concrete pilons. Exposed vertical cast-concrete structural elements and exterior stairways contribute to a sturdy-appearing architecture throughout the campus. Inlaid blond brickwork on the north elevation of the auditorium and the west elevation of the administration building and a terra cotta screen on the curved façade of Building 6 contribute Mid-Century-Modern details to the campus. Cladding of the buildings throughout the campus varies between red brick and stucco, with structural concrete marking the locations of the classrooms and the corners of the classroom wings. Three two-story classroom buildings have back-to-back classrooms opening onto exterior corridors with views of courtyards. At the upper level, a metal handrail and mesh balustrade is supported by slender inward-curving metal stanchions. The floor of the upper-level corridor shelters the corridor below.

The lunch pavilion has a tripartite roof; the central section is in the form of a folded "butterfly" roof with the ends rising in a V shape above the two lower roofs at either side to allow circulation of air. The roofs are supported by steel poles. Otherwise, roofs throughout the campus are flat with wide fascia. Windows in the classroom wings are arranged in groups of four three-part fixed panes flanked by a plain metal door with a fixed transom on each side. The upper tier of windows and the transoms appear to be filled in on the administration building.

The campus design exhibits many of the characteristics typical of Mid-Century Modernism in the Expressionistic subtype as applied in the 1960s. Although the classroom buildings are two stories in height, their broad overhanging eaves and flat roof retain a simple, horizontal effect. The campus buildings have simple orthogonal massing with minimal ornament, and the site has a strong site plan that clusters a variety of building types around a unifying courtyard.



Recorded by Marilyn Novell

Date: 21 February 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



*Parmelee Elementary School, Utilities Building (Building 6), view from inside campus. Southwest perspective. Source: Sapphos Environmental, Inc., 21 February 2014.*



*Parmelee Elementary School, Administrative Building, viewed from entrance. Northwest perspective. Source: Sapphos Environmental, Inc., 21 February 2014.*

Recorded by Marilyn Novell

Date: 21 February 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



*Parmelee Elementary School, Lunch Pavilion with Auditorium behind. Southeast perspective. Source: Sapphos Environmental, Inc., 21 February 2014.*



*Parmelee Elementary School, main east-west arcade. Southeast perspective. Source: Sapphos Environmental, Inc., 21 February 2014.*



Recorded by Marilyn Novell

Date: 21 February 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



*Parmelee Elementary School, Classroom Building, Southwest perspective. Source: Sapphos Environmental, Inc., 21 February 2014.*



*Parmelee Elementary School, Site Plan, with permanent buildings marked in orange and portable buildings marked in purple. Source: Los Angeles Unified School District Pre-Planning Survey, Parmelee Elementary School, Ver. 4, May 7, 2011.*

Recorded by Marilyn Novell

Date: 21 February 2014

☒ Continuation ☐ Update

**\*B12. References (continued):**

- Bhatia, Pavan, "Modern Concept for Los Angeles Public Schools," Doctoral Dissertation (Cambridge, MA: Harvard University Graduate School of Design, Advanced Management Development Program in Real Estate, July 2009).
- Blumenson, John J.-G., *Identifying American Architecture* (New York: W.W. Norton & Company, 1977).
- California Office of Historic Preservation, *California Register and National Register: A Comparison (for Purposes of Determining Eligibility for the California Register)*, Technical Assistance Series No. 6. (Sacramento, CA, 14 March 2006).
- California Office of Historic Preservation, *Instructions for Recording Historical Resources* (Sacramento, CA, March 1995).
- Donovan, John J., *School Architecture: Principles and Practices* (New York: The MacMillan Company, 1921).
- Eales, John R., "A Brief, General History of the Los Angeles City School System," Doctoral Dissertation (Los Angeles: University of California, June 1956).
- Gebhard, David, and Robert Winter, *A Guide to Architecture in Los Angeles and Southern California* (Santa Barbara, CA: Peregrine Smith, Inc., 1977).
- Harris, Cyril M., *American Architecture: An Illustrated Encyclopedia* (New York: W.W. Norton & Company, 1998).
- Heumann & Associates and Anne Doehne, Science Applications International Corporation, March 2002, "Historic Schools of the Los Angeles Unified School District," a presentation prepared for LAUSD Facilities Services Division (March 2002).
- Hille, R. Thomas, *Modern Schools: A Century of Design for Education* (Hoboken, NJ: John Wiley & Sons, 2011), 13.
- "L.A. Schools Expected to Be Nation's Largest," *Los Angeles Times*, January 28, 1962.
- Lee, Antoinette, and Linda F. McClelland, U.S. Department of the Interior, National Park Service, *National Register Bulletin No. 16B, How to Complete the National Register Multiple Property Documentation Form* (1999).
- McAlester, Virginia, and Lee McAlester, *A Field Guide to American House* (New York: Alfred A. Knopf, 2004).
- Mock, Elizabeth, *Built in USA, 1932 – 1944: A Survey of Contemporary American Architecture*, The Museum of Modern Art (New York: Simon & Shuster, 1944).
- Ogata, Amy F., "Building for Learning in Postwar American Elementary Schools," *Journal of the Society of Architectural Historians* 67, no. 4 (December 2008): 562–91.
- "Pupils to Get Preview of New Parmelee School," *Los Angeles Times*, March 16, 1962.
- Los Angeles Unified School District. *Los Angeles Unified School District Pre-Planning Survey* (2011).
- Sapphos Environmental, Inc., *Los Angeles Unified School District Historic Context Statement, 1870 to 1969* (Pasadena, CA, March 2014).
- Science Applications International Corporation, *Historic Context Statement: Los Angeles Unified School District*, prepared for Los Angeles Unified School District (Pasadena, CA: March 2002).
- "School Hit by Two-Alarm Fire," *Los Angeles Times*, March 13, 1965.
- U.S. Department of the Interior, National Park Service, "How to Apply the National Register Criteria for Evaluation," National Register Bulletin No. 15 (Washington, DC, 2002).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Form," National Register Bulletin No. 16A (Washington, DC, 1997).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Multiple Property Documentation Form," National Register Bulletin No. 16B (Washington, DC, 1999).
- Whiffen, Marcus, *American Architecture since 1780: A Guide to the Styles* (Cambridge, MA: MIT Press, 1981).

## PRIMARY RECORD

Primary # \_\_\_\_\_

HRI # \_\_\_\_\_

Trinomial \_\_\_\_\_

NRHP Status Code 3CD

Other Listings \_\_\_\_\_

Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 7 Resource name(s) or number (assigned by recorder) Topanga Charter Elementary School

**P1. Other Identifier:**

\*P2. Location: ☐ Not for Publication ☒ Unrestricted

\*a. County Los Angeles County

\*b. USGS 7.5' Quad Topanga, CA

Date 1981

T 1S R 16W; W ½ of SW ¼ of Sec 7; S.B.B.M.

c. Address 22075 Topanga School Road

City Topanga

Zip 90290

e. Other Locational Data: APN: # 4445-005-902

\*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries.)

Topanga Charter Elementary School is located in the Santa Monica Mountains on the western edge of Los Angeles County on a 12.2-acre site in heavily wooded, rugged terrain. The campus is on a cul-de-sac at the end of Topanga School Road, a semi-private road off Topanga Canyon Boulevard. The acreage downslope from the campus core is geologically unstable, and approximately half of the site remains undeveloped.

Despite its unique mountainous setting and dense vegetation, the campus displays many of the classic features of the postwar indoor-outdoor school, with low, single-loaded classroom wings connected by a system of arcades and exterior corridors. Immersed in this natural setting, the buildings are placed on various levels on terraced hillsides to accommodate the steep topography, with one classroom placed downslope from the Administration Building and the Assembly Building at a higher level shared with the main playground and temporary buildings. Each classroom has access to the outdoors and abundant air and natural light. Constructed in 1953 and 1955, the steel-reinforced red brick buildings display clean, simple lines with steep shed roofs and extensive windows typical of the Mid-Century Modern architectural style of the period. (See Continuation Sheet)

\*P3b. Resource Attributes: (list attributes and codes) HP15. Educational Building

\*P4. Resources Present: ☐ Building ☐ Structure ☐ Object ☐ Site ☒ District ☐ Element of District ☐ Other

P5a. Photo



P5b. Photo: (view and date)

Administration Building, view from west

6 March 2014

\*P6. Date Constructed/Age and

Sources: ☒ Historic ☐ Prehistoric

☐ Both 1953, 1955 (Los Angeles Unified School District)

\*P7. Owner and Address:

Los Angeles Unified School District

\*P8. Recorded by:

Marilyn Novell  
Sapphos Environmental, Inc.  
430 North Halstead Street  
Pasadena, CA 91107

\*P9. Date Recorded: 6 March 2014

\*P10. Survey Type: Intensive

\*P11. Report Citation: (Cite survey report and other sources, or enter "none") Sapphos Environmental, Inc. March 2014. *Los Angeles Unified School District Historic Context Statement, 1870 to 1969*. Pasadena, CA.

Sapphos Environmental, Inc. June 2014. *Los Angeles Unified School District Historic Resources Survey Report*. Pasadena, CA.

\*Attachments: ☐ None ☐ Location Map ☐ Sketch Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record  
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record  
☐ Artifact Record ☐ Photograph Record ☐ Other (list)



## BUILDING, STRUCTURE, AND OBJECT RECORD

\*NHRP Status Code 3D

Page 2 of 7

\*Resource Name or #: Topanga Charter Elementary School

B1. Historic Name: Topanga Charter Elementary School

B2. Common Name: Topanga Elementary School

B3. Original Use: Institutional (Educational Facility)

B4. Present Use: Institutional (Educational Facility)

\*B5. Architectural Style: Mid-Century Modern

\*B6. Construction History: (Construction date, alterations, and date of alterations):

According to records on file with the Los Angeles Unified School District, construction was completed on Topanga Elementary School in 1953 and 1955. With the exception of a lunch shelter built in 1940, all of the campus's buildings, structures, and facilities date from this period. The grounds also include four portable/temporary buildings from the 1990s. A number of alterations and repairs have taken place over the years, including seismic and systems upgrades, the installation of systems on roofs, and safety improvements (see *LAUSD Pre-Planning Survey, Topanga Charter Elementary School*, for a list of repairs and improvements carried out since the 1990s). However, permanent alterations are minimal, apparently limited to the painting over and filling in of clerestory windows on the Assembly Building.

\*B7. Moved? ☒ No ☐ Yes ☐ Unknown Date: \_\_\_\_\_ Original Location: \_\_\_\_\_

\*B8. Related Features: None

B9a. Architect: Unknown

b. Builder: Unknown

\*B10. Significance: Theme, Institutional (Educational Facility),

"Educating the Baby Boom: Postwar Expansion and the Functional, Modern School Plant, 1945-1969" Area Los Angeles

Period of Significance: 1953-1955 (District) Property Type: Institutional (Educational Facility)

Applicable Criteria: NRHP: A and C; CRHR: 1 and 3.

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity)

The campus core of Topanga Charter Elementary School appears eligible as a district under Criterion A/1 as an excellent, intact example of a modern, indoor-outdoor postwar school in the Los Angeles Unified School District. The campus plan and buildings exemplify LAUSD design principles and ideals from the postwar period (as described in the *Los Angeles Unified School District Historic Context Statement, 1870 to 1969*). The campus core also appears eligible under Criterion C/3 as an excellent example of the Mid-Century Modern style applied to institutional architecture.

The campus shows minimal signs of alteration, and the campus core retains integrity of location, design, setting, workmanship, feeling, and association.

B11. Additional Resource Attributes: HP15. Educational Facility.

\*B12. References: (See Continuation Sheet)

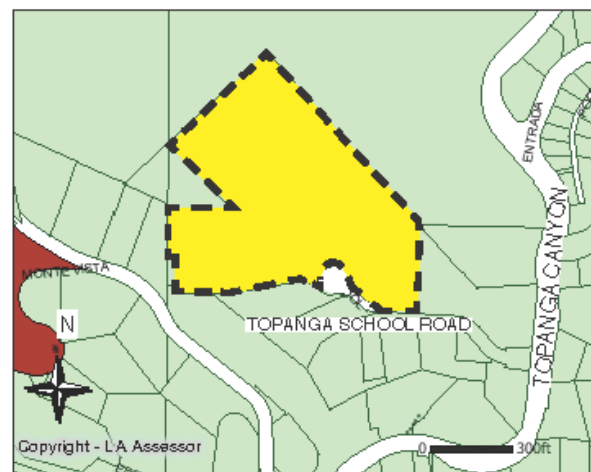
B13. Remarks: None

\*B14. Evaluator: Debi Howell-Ardila and Marilyn Novell

\*Date of Evaluation: 6 March 2013

(This space reserved for official comments.)

Sketch Map with north arrow required



## CONTINUATION SHEET

Primary #

HRI#

Trinomial

Page 3 of 7 \*Resource Name or #: Topanga Charter Elementary School

Recorded by Marilyn Novell

Date: 6 March 2014

☒ Continuation ☐ Update

### \*P3a. Description (continued):

Topanga Charter Charter Elementary School (formerly called Topanga Charter Elementary School) was featured in a *Los Angeles Times* photo feature focusing on the open-air architecture of new L.A. schools. In 1961, the financially strapped Topanga Charter Elementary School District, consisting of a single school, voted for annexation to Los Angeles ("More and Better Schools Rising in Southland for New Generations" 1954; "Plans Studied to Add Junior College Districts" 1961; "Topanga Charter School to Be Joined to L.A. Group" 1961).

The two main classroom buildings and the Administration Building were constructed in 1953, with a classroom/sanitary building and an assembly building added in 1955. Steep shed roofs slope down from the back of the building, with a wide overhanging eave sheltering the corridor below. The ceilings of the corridors are composed of diagonal wood planks with doubled cross-beams. The cross-beams are bolted to an additional single beam at an angle of approximately 30 degrees that serves as support for a series of horizontal aluminum louvers that run the length of the corridor.

Built of reinforced masonry with no interior wall cladding, all of the campus buildings display the exposed red brick of the exterior inside the classrooms, further contributing to a melding of indoors and outdoors. On the southeast elevations of the two main classroom buildings and the south elevation of a third classroom building are banks of windows filling approximately 70 percent of the height of the wall. The arrangement of each bank of windows consists of alternately fixed and awning-style steel-framed windows set in vertical wood mullions. Grouped with the banks of windows defining each classroom is a single, unadorned wood door to one side with an outward-opening wood-veneer hopper transom. On the back of each classroom is a bank of seven clerestory windows, each composed of a band of awning-type windows with a fixed window below, providing the classrooms with cross-ventilation and additional natural light.

The shed roof of the Administration Building slopes from a low point at the back up toward the front, where it faces the central courtyard. The roof has a wide, flat wood fascia with no overhanging eaves. At the courtyard side of the building, a flat-roofed corridor supported by plain steel posts sits just above the northwest-facing windows. A series of unadorned wide doors with fixed transoms open onto the corridor, with banks of windows in various groupings. Each set of windows consists of a large awning-type window with a fixed light above and below.

A paved trail leads up a wooded pathway to the upper level of the campus, where the Assembly Building and Lunch Shelter, as well as four temporary buildings and the main playground, are located. The Assembly Building is a double-height block with a side-gabled roof and clerestory windows, and a lower one-story, side-gabled wing that houses offices and auxiliary rooms extends along the south and east elevations. A wide overhanging eave at the set-back entrance on the southeast corner of the lower section is supported by three red-brick piers.

**CONTINUATION SHEET**

Primary #

HRI#

Trinomial

Page 4 of 7 \*Resource Name or #: Topanga Charter Elementary School

Recorded by Marilyn Novell

Date: 6 March 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



*Topanga Charter Elementary School, view of arcades connecting classroom buildings and Administration Building, from central courtyard, west perspective. Source: Sapphos Environmental, Inc., 6 March 2014.*



*Topanga Charter Elementary School, Classroom Building 3, east elevation. Source: Sapphos Environmental, Inc., 6 March 2014.*



**CONTINUATION SHEET**

Page 5 of 7 \*Resource Name or #: Topanga Charter Elementary School

Recorded by Marilyn Novell

Date: 6 March 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



*Topanga Charter Elementary School, typical classroom grouping of windows and door on southeast elevations. Source: Sapphos Environmental, Inc., 6 March 2014.*



*Topanga Charter Elementary School, view of corridor ceiling, classroom building. Source: Sapphos Environmental, Inc., 6 March 2014.*

Recorded by Marilyn Novell

Date: 6 March 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



Topanga Charter Elementary School, Assembly Building, east elevation. Source: Sapphos Environmental, Inc., 6 March 2014.



Topanga Charter Elementary School, Site Plan, with permanent buildings marked in orange and portable buildings marked in purple. Source: Los Angeles Unified School District Pre-Planning Survey, Topanga Charter Elementary School, Version 5, March 2012.

Recorded by Marilyn Novell

Date: 6 March 2014

☒ Continuation ☐ Update

**\*B12. References (continued):**

- Bhatia, Pavan, "Modern Concept for Los Angeles Public Schools," Doctoral Dissertation (Cambridge, MA: Harvard University Graduate School of Design, Advanced Management Development Program in Real Estate, July 2009).
- Blumenson, John J.-G., *Identifying American Architecture* (New York: W.W. Norton & Company, 1977).
- California Office of Historic Preservation, *California Register and National Register: A Comparison (for Purposes of Determining Eligibility for the California Register)*, Technical Assistance Series No. 6. (Sacramento, CA, 14 March 2006).
- California Office of Historic Preservation, *Instructions for Recording Historical Resources* (Sacramento, CA, March 1995).
- Donovan, John J., *School Architecture: Principles and Practices* (New York: The MacMillan Company, 1921).
- Eales, John R., "A Brief, General History of the Los Angeles City School System," Doctoral Dissertation (Los Angeles: University of California, June 1956).
- Gebhard, David, and Robert Winter, *A Guide to Architecture in Los Angeles and Southern California* (Santa Barbara, CA: Peregrine Smith, Inc., 1977).
- Harris, Cyril M., *American Architecture: An Illustrated Encyclopedia* (New York: W.W. Norton & Company, 1998).
- Heumann & Associates and Anne Doehne, Science Applications International Corporation, March 2002, "Historic Schools of the Los Angeles Unified School District," a presentation prepared for LAUSD Facilities Services Division (March 2002).
- Hille, R. Thomas, *Modern Schools: A Century of Design for Education* (Hoboken, NJ: John Wiley & Sons, 2011), 13.
- Lee, Antoinette, and Linda F. McClelland, U.S. Department of the Interior, National Park Service, *National Register Bulletin No. 16B, How to Complete the National Register Multiple Property Documentation Form* (1999).
- Los Angeles Unified School District. *Los Angeles Unified School District Pre-Planning Survey* (2012).
- McAlester, Virginia, and Lee McAlester, *A Field Guide to American House* (New York: Alfred A. Knopf, 2004).
- Mock, Elizabeth, *Built in USA, 1932 – 1944: A Survey of Contemporary American Architecture*, The Museum of Modern Art (New York: Simon & Shuster, 1944).
- "More and Better Schools Rising in Southland for New Generations," *Los Angeles Times*, January 2, 1954.
- Ogata, Amy F., "Building for Learning in Postwar American Elementary Schools," *Journal of the Society of Architectural Historians* 67, no. 4 (December 2008): 562–91.
- "Plans Studied to Add Junior College Districts," *Los Angeles Times*, March 2, 1961.
- Sapphos Environmental, Inc., *Los Angeles Unified School District Historic Context Statement, 1870 to 1969* (Pasadena, CA, March 2014).
- Science Applications International Corporation, *Historic Context Statement: Los Angeles Unified School District*, prepared for Los Angeles Unified School District (Pasadena, CA: March 2002).
- "Topanga School to Be Joined to L.A. Group," *Los Angeles Times*, October 5, 1961.
- U.S. Department of the Interior, National Park Service, "How to Apply the National Register Criteria for Evaluation," National Register Bulletin No. 15 (Washington, DC, 2002).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Form," National Register Bulletin No. 16A (Washington, DC, 1997).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Multiple Property Documentation Form," National Register Bulletin No. 16B (Washington, DC, 1999).
- Whiffen, Marcus, *American Architecture since 1780: A Guide to the Styles* (Cambridge, MA: MIT Press, 1981).



PRIMARY RECORD

Primary # \_\_\_\_\_

HRI # \_\_\_\_\_

Trinomial \_\_\_\_\_

NRHP Status Code 3CD

Other Listings \_\_\_\_\_

Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

Page 1 of 7 Resource name(s) or number (assigned by recorder) Daniel Webster Middle School

**P1. Other Identifier:**

**\*P2. Location:** ☐ Not for Publication ☒ Unrestricted

**\*a. County** Los Angeles County

**\*b. USGS 7.5' Quad** Beverly Hills, CA

**Date** 1981

**T R** N/A

**c. Address** 11330 Graham Place

**City** Los Angeles

**Zip** 90064

**e. Other Locational Data:** APN: # 4258-016-900

**\*P3a. Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries.)

Located on a 24-acre site in west Los Angeles, Daniel Webster Middle School is bounded on the north by Graham Place and, further north, Interstate 10, Sawtelle Boulevard and Interstate 405 (on the east), National Boulevard (on the south), and Butler Avenue (on the west). Constructed in 1954, the campus is located in a residential neighborhood of primarily single-family homes. The site plan is largely symmetrical, with a swath of landscaping, courtyards, and an open lawn forming an axis through the center. Classroom buildings, facilities, and circulation corridors form a ring around this central open space in the campus core. With a Mid-Century Modern-influenced style, the campus is generally low in scale and massing, with a decentralized, outdoor-oriented plan. The core of the campus consists of a series of finger-like classroom wings, radiating outward from a U-shaped, central lawn. An extensive network of sheltered arcades, made of wood plank roofs and beams, resting on simple steel pipe supports and railings, ring the central lawn and provide circulation corridors throughout campus. The central lawn and a landscaped courtyard at the entrance display an abundance of plantings and mature trees. At the southern portion of the central lawn is an elevated concrete stage. (See Continuation Sheet)

**\*P3b. Resource Attributes:** (list attributes and codes) HP15. Educational Building. HP29. Landscape architecture.

**\*P4. Resources Present:** ☐ Building ☐ Structure ☐ Object ☐ Site ☒ District ☐ Element of District ☐ Other

P5a. Photo



P5b. Photo: (view and date)

Northwest elevation

23 January 2014

**\*P6. Date Constructed/Age and**

**Sources:** ☒ Historic ☐ Prehistoric

☐ Both 1954 (Los Angeles Unified School District)

**\*P7. Owner and Address:**

Los Angeles Unified School District

**\*P8. Recorded by:**

Marilyn Novell  
Sapphos Environmental, Inc.  
430 North Halstead Street  
Pasadena, CA 91107

**\*P9. Date Recorded:**

4 February 2014

**\*P10. Survey Type:** Intensive

**\*P11. Report Citation:** (Cite survey report and other sources, or enter "none")

Sapphos Environmental, Inc. March 2014. *Los Angeles Unified School District Historic Context Statement, 1870 to 1969*. Pasadena, CA.

Sapphos Environmental, Inc. June 2014. *Los Angeles Unified School District Historic Resources Survey Report*. Pasadena, CA.

**\*Attachments:** ☐ None ☐ Location Map ☐ Sketch Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record  
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record  
☐ Artifact Record ☐ Photograph Record ☐ Other (list)

## BUILDING, STRUCTURE, AND OBJECT RECORD

\*NHRP Status Code 3CD

Page 2 of 7

\*Resource Name or #: Webster Middle School

- B1. Historic Name: Richland Junior High School (original name)  
B2. Common Name: Webster Middle School  
B3. Original Use: Institutional (Educational Facility) B4. Present Use: Institutional (Educational Facility)

\*B5. **Architectural Style:** Mid-Century Modern-influenced

\*B6. **Construction History:** (Construction date, alterations, and date of alterations):

According to records on file with the Los Angeles Unified School District, construction was completed on Webster Middle School in 1954. A majority of the campus's extant buildings, structures, and facilities date from 1954. The grounds also include some portable buildings, with clusters located primarily in the southeastern and northwestern portions of campus. A number of alterations have taken place over the years, including seismic and systems upgrades, safety and security improvements (see *LAUSD Pre-Planning Survey, Webster Middle School* for list of repairs and improvements carried out since the 1990s). Alterations to original buildings on campus include the removal and infilling of original windows (in particular a number of clerestories on classroom wings). The campus is otherwise intact and in good repair.

\*B7. **Moved?** ☒ No ☐ Yes ☐ Unknown **Date:** \_\_\_\_\_ **Original Location:** \_\_\_\_\_

\*B8. **Related Features:** Landscaping/mature trees, hardscaping, benches

B9a. Architect: Building Dept., Los Angeles Board of Education b. Builder: Building Dept., Los Angeles Board of Education

\*B10. **Significance:** Theme, Institutional (Educational Facility),

"Educating the Baby Boom: Postwar Expansion and the Functional, Modern School Plant, 1945-1969" Area Los Angeles

**Period of Significance:** 1954 (District) **Property Type:** Institutional (Educational Facility)

**Applicable Criteria:** CRHR: 1.

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity)

The campus core of Webster Middle School appears eligible for the California Register of Historical Resources (CRHR) as a district under Criterion 1 as an excellent, intact example of a postwar indoor-outdoor educational facility in Los Angeles. The campus plan and buildings exemplify the design principles and ideals of the Los Angeles Unified School District from the postwar period (as described in the Los Angeles Unified School District Historic Context Statement, 1870 to 1969). Following a major bond initiative in 1952, plans for the school were announced with fanfare. With a sketch of the school's design, the *Los Angeles Times* thus described plans for the school: "One of the biggest school projects slated for Los Angeles in recent years is the starter of the \$130,000,000 school building expansion program... It's the Richland Junior High School to be built on a 27-acre site at the west side of Sawtelle Boulevard. The new school group of structures, designed to accommodate 1600 students, is estimated to cost \$2,445,000" ("Big School Project Launches Program: Will Mark Start of \$130,000,000 Expansion Plan," *Los Angeles Times*, 1952). The campus core exhibits some signs of alteration but retains a high degree of integrity of location, design, setting, workmanship, feeling, and association.

B11. Additional Resource Attributes: HP15. Educational Facility. HP 29. Landscape Architecture.

\*B12. **References:** (See Continuation Sheet)

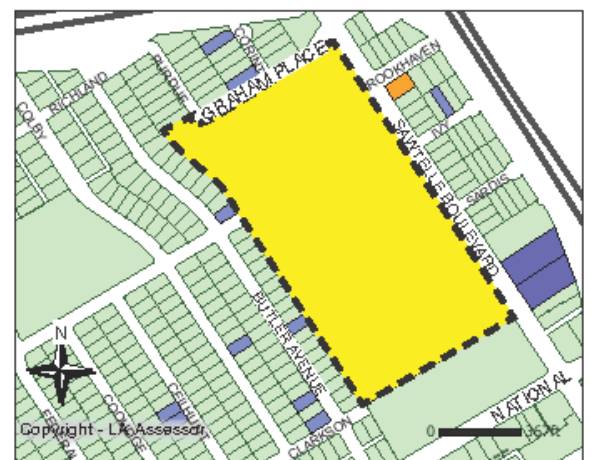
B13. Remarks: None

\*B14. **Evaluator:** Debi Howell-Ardila, MHP

\***Date of Evaluation:** 4 February 2014

(This space reserved for official comments.)

Sketch Map with north arrow required



Recorded by Marilyn Novell

Date: 4 February 2014

☒ Continuation ☐ Update

**\*P3a. Description (continued):**

The signature buildings for the campus are located along the north, on Graham Place: these consist of the Auditorium (a two-story, brick and stucco-clad building in the northeast corner of campus), the Health and Counseling Building (a one-story, brick and stucco-clad building, set back from the street), an entrance gate, arcades, and landscaped courtyard, and a Library (one- and one-half stories, sheathed in brick and stucco). A low wall, consisting of alternating panels of brick and decorative metal framing and grillwork, separate the campus from the public right-of-way. This wall is flanked by two gates made of large brick-clad piers, capped with a flat roof and flared cornice (the entrance on the eastern side has been closed off with a security gate).

The Health and Counseling Building and Library have little applied ornament; the focal point of the design is the use of continuous bands of windows, mostly grouped rectangular lights, with both fixed and casement windows.

Classroom buildings are generally one-story high, one-room deep, and rectangular in plan. Most classrooms are capped with a low-pitched shed roof, with thin, unadorned eaves. Along the north elevations, classrooms have continuous bands of windows, which occupy approximately 70 percent of the wall height. The north elevation windows primarily consist of four-over-four wood-framed double-hung sashes. Along south elevations, indirect light is provided through the use of clerestory lights, some of which appear to be operable casement windows. Projecting from the south elevations of classrooms are wide, one-story arcades, with flat roofs, wood plank and beam structure, and simple steel pipe supports.

Throughout the core of the campus, landscaped courtyards with walkways, benches, and landscaping provide outdoor spaces for gathering. Beyond the campus core, school facilities also include a gymnasium and recreational fields, portable buildings and structures, added primarily in the 1990s, as well as other ancillary buildings and structures. Alterations include various safety and systems upgrades, the installation of security grills on some windows, and the infilling of numerous windows. The core of the campus is otherwise intact and in good repair.

**P5b. Photo (continued): (view and date)**



*Webster Middle School, entrance courtyard. Southeastern perspective.  
Source: Sapphos Environmental, Inc., 23 January 2014.*



## CONTINUATION SHEET

Primary #

HRI#

Trinomial

Page 4 of 7 \*Resource Name or #: Daniel Webster Middle School

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P5b. Photo (continued): (view and date)



*Webster Middle School features an extensive system of arcades, lined by landscaping and trees. Northeast perspective. Source: Sapphos Environmental, Inc., 23 January 2014.*



*Webster Middle School, typical classroom and courtyard configuration. West perspective. Source: Sapphos Environmental, Inc., 23 January 2014.*

Recorded by Marilyn Novell

Date: 4 February 2014

☒ Continuation ☐ Update

**P5b. Photo (continued): (view and date)**



*Webster Middle School: the Auditorium is sited for easy public access and linked to the school by the campus's extensive arcade system. Northwestern elevation. Source: Sapphos Environmental, Inc., 23 January 2014.*



*Webster Middle School, typical south-elevation design and configuration of classroom wings. Southeastern elevation. Source: Sapphos Environmental, Inc., 23 January 2014.*



State of California — The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
**CONTINUATION SHEET**

Primary #  
HRI#  
Trinomial

Page 6 of 7 \*Resource Name or #: Daniel Webster Middle School

Recorded by Marilyn Novell

Date: 4 February 2014

☒ Continuation ☐ Update

P5b. Photo (continued): (view and date)



Webster Middle School, Site Plan, with permanent buildings marked in orange and portable buildings marked in purple. Source: Los Angeles Unified School District Pre-Planning Survey, Webster Middle School, February 2011.

Recorded by Marilyn Novell

Date: 4 February 2014

☒ Continuation ☐ Update

**\*B12. References (continued):**

- Bhatia, Pavan, "Modern Concept for Los Angeles Public Schools," Doctoral Dissertation (Cambridge, MA: Harvard University Graduate School of Design, Advanced Management Development Program in Real Estate, July 2009).
- "Big School Project Launches Program: Will Mark Start of \$130,000,000 Expansion Plan," *Los Angeles Times* (13 July 1952).
- Blumenson, John J.-G., *Identifying American Architecture* (New York: W.W. Norton & Company, 1977).
- California Office of Historic Preservation, *California Register and National Register: A Comparison (for Purposes of Determining Eligibility for the California Register)*, Technical Assistance Series No. 6. (Sacramento, CA, 14 March 2006).
- California Office of Historic Preservation, *Instructions for Recording Historical Resources* (Sacramento, CA, March 1995).
- Donovan, John J., *School Architecture: Principles and Practices* (New York: The MacMillan Company, 1921).
- Eales, John R., "A Brief, General History of the Los Angeles City School System," Doctoral Dissertation (Los Angeles: University of California, June 1956).
- Gebhard, David, and Robert Winter, *A Guide to Architecture in Los Angeles and Southern California* (Santa Barbara, CA: Peregrine Smith, Inc., 1977).
- Harris, Cyril M., *American Architecture: An Illustrated Encyclopedia* (New York: W.W. Norton & Company, 1998).
- Heumann & Associates and Anne Doehne, Science Applications International Corporation, March 2002, "Historic Schools of the Los Angeles Unified School District," a presentation prepared for LAUSD Facilities Services Division (March 2002).
- Hille, R. Thomas, *Modern Schools: A Century of Design for Education* (Hoboken, NJ: John Wiley & Sons, 2011), 13.
- Lee, Antoinette, and Linda F. McClelland, U.S. Department of the Interior, National Park Service, *National Register Bulletin No. 16B, How to Complete the National Register Multiple Property Documentation Form* (1999).
- Los Angeles Unified School District. *Los Angeles Unified School District Pre-Planning Survey* (2011).
- McAlester, Virginia, and Lee McAlester, *A Field Guide to American House* (New York: Alfred A. Knopf, 2004).
- Mock, Elizabeth, *Built in USA, 1932 – 1944: A Survey of Contemporary American Architecture*, The Museum of Modern Art (New York: Simon & Shuster, 1944).
- Ogata, Amy F., "Building for Learning in Postwar American Elementary Schools," *Journal of the Society of Architectural Historians* 67, no. 4 (December 2008): 562–91.
- Sapphos Environmental, Inc., *Los Angeles Unified School District Historic Context Statement, 1870 to 1969* (Pasadena, CA, March 2014).
- Science Applications International Corporation, *Historic Context Statement: Los Angeles Unified School District*, prepared for Los Angeles Unified School District (Pasadena, CA: March 2002).
- U.S. Department of the Interior, National Park Service, "How to Apply the National Register Criteria for Evaluation," *National Register Bulletin No. 15* (Washington, DC, 2002).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Form," *National Register Bulletin No. 16A* (Washington, DC, 1997).
- U.S. Department of the Interior, National Park Service, "How to Complete the National Register Multiple Property Documentation Form," *National Register Bulletin No. 16B* (Washington, DC, 1999).
- Whiffen, Marcus, *American Architecture since 1780: A Guide to the Styles* (Cambridge, MA: MIT Press, 1981).

***APPENDIX B***  
***LAUDS HISTORIC CONTEXT STATEMENT, 1870 TO 1969***  
***(ON CD)***

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# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969



**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

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*Cover illustrations, clockwise: Reseda Elementary School (1936), Music Room,  
Orville Wright Middle School (1948-1952), and Chatsworth Senior High School (1963).  
Source: LAUSD and Sapphos Environmental, Inc.*

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*Figure 1. Point Fermin Elementary School, Administration Building, Sumner P. Hunt & Silas Burns, San Pedro (1917–1925; remodeled in 1936 following Long Beach Earthquake). Source: LAUSD Point Fermin Elementary School Pre-Planning Survey, 2010.*

## I. INTRODUCTION

Behind every building type and feature comprising our built environment—whether commercial or residential buildings, urban plans, or parks—is a long history of practitioners who tried to harness the best ideas and technologies of their day to create quality environments for living and working. In California and throughout the United States, few other areas have generated as much debate and study, however, as environments for learning.

Whether in 1900 or 1960, reform-minded architects and designers, school boards, and educators used similar language to present their ideas for the most “modern” classroom and campus. Through this time, ideas evolved, of course. But the debate has always been shaped by the latest ideas about teaching methods and curricula, childhood development, and optimal environmental conditions for comfort, safety, and efficiency. Fueled by a national network of education-related organizations and publications, this has been a shared, ongoing project throughout the United States since the Progressive Era.

Spanning the early 1870s to 1969, this Historic Context Statement explores over a century of development of the Los Angeles Unified School District (LAUSD), examined in the context of school design in the United States. Since the Progressive Education Movement gained momentum in the early twentieth century, national standardization has been at the heart of school reform, in terms of both classroom curriculum and design. Therefore, the local story is best understood against the backdrop of the national context. This study explores the ways in which LAUSD’s schools and campuses reflect a century of national practice, reform, and regional variation.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969



Figure 2. Los Angeles Unified School District Boundary. Source: Sapphos Environmental, Inc., 2014.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

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*Figure 3. Children at Vernon Avenue Junior High School, Los Angeles, circa 1925. Source: LAPL Photo Collection.*

## **Project Summary and Scope**

With nearly 800 campuses and a geographic span of over 700 square miles, LAUSD is the second largest public school system in the United States. The district's northern portion spans the San Fernando Valley, including Granada Hills, Chatsworth, Reseda, Woodland Hills, Van Nuys, Sylmar, San Fernando, Pacoima, and Sunland. Along the west, the district includes western Los Angeles, Pacific Palisades, Venice, and Westchester. Along the east, LAUSD borders Glendale, Monterey Park, Montebello, Commerce, Downey, and Long Beach. Within the district, extending south from Los Angeles, are the communities of Vernon, Huntington Park, Maywood, Bell, South Gate, Gardena, and Carson. LAUSD's southernmost portion includes San Pedro, Lomita, and Rancho Palos Verdes.

Since its founding in 1872, the district has commissioned, designed, and acquired a remarkable collection of buildings, campuses, and facilities. These properties reflect over a century of social, architectural, and technological advances, as well as ongoing educational and curricular reform. Extant properties range from the wood-framed schoolhouse of the late nineteenth century to superblock campuses displaying Mid-Century Modern architectural styles.

In July 2013, in anticipation of district-wide modernization efforts, LAUSD contracted Sapphos Environmental, Inc. to provide historic resource consulting services to inform master planning efforts and environmental review under the California Environmental Quality Act (CEQA). The scope of work includes updating the LAUSD Historic Context Statement, conducting historic resource surveys of 55 unevaluated campuses, and preparing design and procedural guidelines to help guide facilities management and planning efforts.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC CONTEXT STATEMENT, 1870 to 1969



Figures 4 and 5. San Fernando Valley schools: on left, Grover Cleveland Senior High School (1959), Charles Matcham & Stewart Granger and Associates, Reseda-West Van Nuys. On right, Chatsworth Senior High School (1963), Adrian Wilson & Associates, Chatsworth. Source: Sapphos Environmental, Inc., 2013.

### ***Purpose of Historic Context Statements***

The *LAUSD Historic Context Statement* follows the National Register of Historic Places (NRHP) Multiple Property Documentation (MPD) format, which provides a consistent framework for evaluating properties sharing similar periods, geographic distribution, and historic themes.<sup>1</sup> The MPD approach defines themes of significance, eligibility standards, and related property types. Properties sharing a theme of significance are then assessed consistently, in comparison with resources that share similar physical characteristics and historical associations.

According to federal, state, and local law, landmark eligibility is not just tied to architectural style but also to significant people, events and patterns of development. Historic context statements facilitate the consistent consideration of these criteria. Three principal components go into context statements: historic themes, geographic areas, and chronological periods. Contexts offer more than a chronological history; they identify the patterns and events that drove development of an area—or, in this case, a building type, educational facilities—and caused the building type to acquire the form and appearance for which it became known.

Because of the high degree of national standardization of school curricula and facilities design, in particular during the postwar period, the *LAUSD Historic Context Statement* provides a framework for evaluating school plants not only in Los Angeles but also in other school districts throughout California and beyond.

### ***Historic Resources and CEQA***

The *LAUSD Historic Context Statement* is also designed to facilitate compliance with CEQA, which requires lead agencies to consider the impacts of proposed projects on historic resources. CEQA identifies a historic resource as a property that is listed on—or eligible for listing on—the NRHP, California Register of Historical Resources (CRHR), or local registers.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

NRHP-listed properties are automatically included on the CRHR. The criteria for both are similar and described below, with the NRHP letter (A, B, C, and D) followed by the corresponding CRHR number (1, 2, 3, and 4). In keeping with the 2001–2004 Phase 1 and 2 LAUSD historic resources survey, this survey does not include local criteria.<sup>2</sup>

Resources that may be eligible for listing include buildings, sites, structures, objects, and historic districts. To qualify as a historic resource under CEQA, a resource must be significant at the local, state, or national level under one or more of the following criteria:

- A/1: For an association with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States (NRHP Criterion A; CRHR Criterion 1);
- B/2: For an association with the lives of persons important to local, California, or national history (NRHP Criterion B; CRHR Criterion 2);
- C/3: As an embodiment of the distinctive characteristics of a type, period, region, or method of construction, representative of the work of a master or high artistic values (NRHP Criterion C; CRHR Criterion 3); or
- D/4: Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation (NRHP Criterion D; CRHR Criterion 4).

Resources eligible for listing in the California Register must retain enough of their historic character or appearance to be “recognizable as historic resources and to convey the reasons for their significance.”<sup>3</sup> Some resources that do not retain sufficient integrity for listing in the National Register may still be eligible for the California Register. There is no specific age threshold for California Register eligibility; rather, the regulations specify that enough time must have passed for a property to be evaluated within its historic context.

## **Focus and Parameters of the LAUSD Historic Context Statement**

This Historic Context Statement creates a framework for evaluating Los Angeles’s public schools at a critical juncture, as LAUSD begins planning for campus-wide modernization and redevelopment. Emphasized in this study, therefore, was the question of potential eligibility of schools under Criteria A/1, as outstanding examples of LAUSD design ideals and principles. The history and context of Los Angeles public school design and educational architecture are the particular focus of this study. Because the postwar era largely fell outside the scope of the 2002 LAUSD historic context statement, the postwar era is examined in detail.

This study represents not a comprehensive history but rather a first step in better understanding the evolution of school design in the district. Project limitations precluded extensive research on additional aspects of LAUSD’s history that might result in eligibility

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC CONTEXT STATEMENT, 1870 to 1969

under Criteria A/1 and Criteria B/2. Campus-specific research was conducted on all pertinent topics for each of the schools surveyed. Subsequent research that establishes additional themes for the district overall would be an excellent area for future study. For example, this study offers a short section on LAUSD and the Civil Rights Movement; in addition, this topic was addressed in the National Register of Historic Places Multiple Property Documentation form for African-Americans in Los Angeles.<sup>4</sup> Given how broad and rich the topic is, however, ample opportunities remain for further research.

In terms of evaluations under Criteria C/3, this study also includes a section on the typical architectural styles of LAUSD schools. This material draws on and expands the 2002 LAUSD Historic Context Statement as well as the guidelines prepared by the City of Los Angeles Office of Historic Resources for historic resource survey work.

Inclusion in this context does not indicate eligibility for listing. Rather, the range of LAUSD campuses, past and present, illustrated or described here serves to define the context, themes of significance, and features of properties that might be found significant upon further study.



Figure 6. Orville Wright Middle School (originally Westchester High School), Spaulding & Rex, architects (1948-1952). Source: LAUSD Orville Wright Middle School Pre-Planning Survey, 2012.

### ***Project Team***

Debi Howell-Ardila, senior architectural historian with Sapphos Environmental, Inc., served as project manager, principal investigator, and author of the LAUSD Historic Context Statement. Carole Zellie, historic resources manager, provided guidance and input. Marilyn Novell, historic resources coordinator, provided valuable research assistance, and Matthew Adams, senior technical editor, provided editorial expertise. Gwenn Godek of the LAUSD Office of Environmental Health and Safety served as project administrator and manager. The study also benefited from the feedback of LAUSD Facilities Services Divisions staff Mitra Nehorai; Janet Hansen, deputy manager of the City of Los Angeles Office of Historic Resources; and Linda Dishman, executive director, and Adrian Scott Fine, director of advocacy, of the Los Angeles Conservancy.

### ***Report Preparation and Methodology***

A wide range of repositories and archives were consulted in the course of this study. Among them were the combined collections of the University of Southern California (USC) libraries; the Los Angeles Public Library, including the Photo Collection, California Index, and Sanborn Fire Insurance Maps; the Getty Research Institute; and the historic *Los Angeles Times* and other digital newspaper collections. The photographic collections of the Getty Research Institute and the USC Digital Archive were also used. A variety of primary source materials were provided by LAUSD.

Research also explored an array of online and print sources. These included historic photographs and aerial images, reports, studies, and treatises on school architecture (ca. 1900 to 1950). Other sources included books, trade publication and newspaper articles, and architectural plans. Scholarly articles as well as specialized studies and chronologies of LAUSD were also consulted.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC CONTEXT STATEMENT, 1870 to 1969

Also informing this study was a review of past LAUSD historic resource contexts and surveys, including the multiphase survey conducted by Leslie Heumann and Associates and Science Applications International Corporation between 2001 and 2004. In addition, Sapphos Environmental, Inc. reviewed the findings of historic resource surveys conducted through SurveyLA, a citywide, multiyear initiative of the City of Los Angeles Office of Historic Resources. To complement the work of SurveyLA, this Historic Context Statement reflects and draws upon the basic structure of context, themes, and property types used in SurveyLA for institutional architecture in Los Angeles. With a focus on the patterns and trends that shaped LAUSD's history and schools, as well as on-site access to district campuses, this context provides a supplemental framework to help inform and guide evaluations.

In accordance with LAUSD and the City of Los Angeles Office of Historic Resources, once complete, the LAUSD Historic Context Statement and Historic Resources Inventory database will be provided to the Office of Historic Resources. The Historic Resources Inventory being developed by Sapphos Environmental, Inc. is Arc-GIS compatible and can easily be utilized as an Arc-GIS layer in future historic resource surveys carried out for the City of Los Angeles.

### ***Study Contents***

This report consists of six sections: Section I, Introduction; Section II, Summary of Themes of Significance; Section III, Historic Context and Background; Section IV, Architectural Character; Section V, Themes of Significance; Section VI, Conclusion and Recommendations; and Section VII, Selected Bibliography. Four distinct eras for LAUSD were identified: Founding Years, 1870s to 1909; Progressive Education Movement: Standardization and Expansion, 1910 to 1933; Era of Reform: Great Depression, Earthquake, and Early Experiments in the Modern, Functional School Plant, 1933 to 1945; and Educating the Baby Boom: Postwar Expansion and the Functional, Modern School Plant, 1946 to 1969.



Figure 7. Garvanza School, 1910.  
Source: USC Digital Library.



Figure 8. Circa 1900, Schoolhouse, West Los Angeles.  
Source: LAPL Photo Collection.

## II. SUMMARY OF THEMES OF SIGNIFICANCE

Themes of significance were prepared for extant school property types. No known examples exist of some important types, notably the monumental, early-twentieth-century big-block school that was once a LAUSD standard. This school type was usually constructed of unreinforced, fire-resistant masonry. However, the material's earthquake vulnerability meant that most of these schools were either destroyed or damaged beyond repair in the 1933 Long Beach earthquake, or were subsequently replaced to comply with new building codes.

In order to facilitate cross-agency coordination, this section draws on relevant material developed by the City of Los Angeles Office of Historic Resources for historic resource evaluations. Information used in SurveyLA to evaluate institutional properties was consulted and adapted where appropriate.

### CONTEXT: PUBLIC AND PRIVATE INSTITUTIONAL DEVELOPMENT | EDUCATION

#### THEME: LAUSD | FOUNDING YEARS, 1875–1894

This theme is embodied in Los Angeles's remaining one- and two-story wood-frame schoolhouses that generally display Late Victorian or vernacular styles. Only three nineteenth-century schoolhouses are known to remain from LAUSD's founding years. Schools constructed during this period display traditional modes of school design, before the Progressive Education Movement and widespread reform changed national construction standards and before increased urbanization necessitated larger-capacity school plants.

#### THEME: LAUSD | PRE–1933 LONG BEACH EARTHQUAKE SCHOOL PLANTS, 1910–1933

This theme reflects an important period for Los Angeles schools. First, it occurred after the Progressive Education Movement had triggered widespread reform of school design throughout the United States. This resulted in a more differentiated, expansive school plant, with specialized facilities and program-specific buildings and classrooms; this ended the era of the monumental, big-block school. Second, this period occurred before a statewide overhaul of school building codes and practices after the 1933 Long Beach earthquake.

This period also began as the 1920s ushered in a school building boom and period-revival golden age in Southern Californian architecture. The importance placed on public education was expressed through beautifully designed school buildings, often created by the region's leading architects. Campus design became more unified, with elaborate approaches and entrances. The advent of more grand entrances, as well as the incorporation of separate auditoriums, sited for ease of public access, reflected a growing sense that public education was a community affair.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

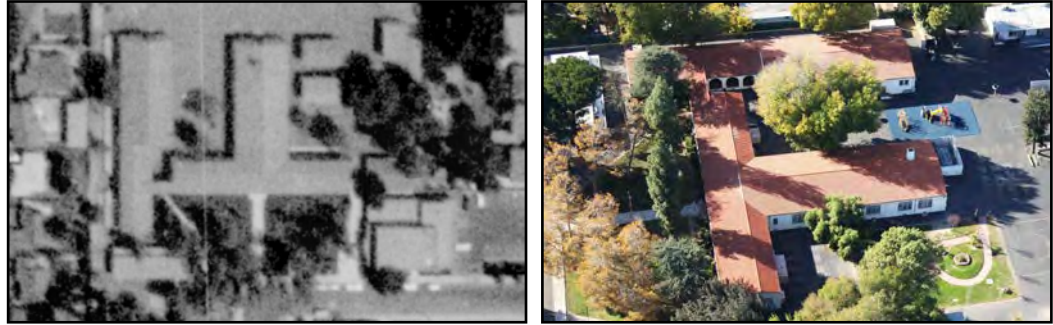


Figure 9. 10th Street Elementary School, Los Angeles (1922). Source: LAUSD.

Replacing the big-block school, with internal corridors, was a generally lower-massed, spread-out campus. In some examples, designers replaced hallways with covered outdoor walkways. Building plans also evolved, as the traditional rectangular plan took on adjacent wings, in H-shaped, T-shaped, or U-shaped buildings that facilitated the creation of sheltered outdoor spaces and patios. Lower massing was particularly common for elementary schools.

Because most pre-1933 schools were substantially remodeled following the Long Beach earthquake, intact examples from this era are relatively rare. It is common to find 1920s-era schools that were remodeled following the earthquake; such schools might exhibit the building plans and configurations typical of the 1920s but with 1930s PWA Moderne and Streamline Moderne detailing.





Figures 10 and 11. Post-Long Beach Earthquake school: H-shaped plan and Mission Revival style of Reseda Elementary School (1936). Aerial photographs from 1959 (left) and circa 2010 (right). Source: U.S. Dept. of Agriculture, [historicaerials.com](http://historicaerials.com) (left) and LAUSD Reseda Elementary School Pre-Planning Survey (right).

### THEME: LAUSD | POST-1933 LONG BEACH EARTHQUAKE SCHOOLS, 1933-1945

Following the 1933 Long Beach earthquake, state and city legislation regarding school building codes and practices shifted the character of LAUSD schools and campuses. Requirements of the Field Act (1934), such as maintaining one-story massing for elementary schools and no more than two stories for junior and high schools, mirrored reforms already under way. Classroom wings continued to be designed for connections to the outdoors, with L-, H-, U-, and T-shaped buildings accommodating sheltered courtyard and patio spaces. Continuing another trend under way in the 1920s, campuses displayed an increasingly unified site design, with sheltered corridors linking campus buildings.

The advances of the Progressive Education Movement also continued to shift school plant design. Campuses were increasingly differentiated, with administration buildings, auditoriums and gymnasiums, separate classroom, shop, and specialty wings, and cafeterias. Adequate indirect lighting and ventilation were provided through the use of generous bands of windows, including multilight sashes, casements, and clerestories. Stylistically, these buildings were less ornamental than their 1920s period-revival counterparts. An emphasis was placed on traditional Southern Californian styles, such as the Spanish Colonial and Mission Revival. Other styles included Streamline Moderne, Art Deco, and Late Moderne. Much post-earthquake reconstruction was funded through the Public Works Administration (PWA), and many schools exhibit a range of PWA Moderne styles.



Figure 12. Reseda Elementary School, 1936. The spare Mission Revival style was in keeping with the post-Field Act requirement for one-story massing and the post-Long Beach Earthquake trend to design in the "traditional Southern Californian" mode. Source: LAUSD.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969



Figure 13. Susan Miller Dorsey High School, Gogerty and Noerenberg, Los Angeles (1937). Source: LAUSD.

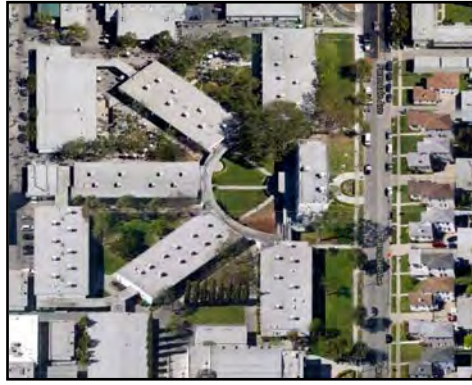


Figure 14. The inventive site plan of Dorsey High School. Source: Google Maps, 2013.

## THEME: LAUSD | EARLY EXPERIMENTS IN THE MODERN, FUNCTIONALIST SCHOOL, 1933–1945

Although this category shares general characteristics with the preceding theme (Post–1933 Long Beach Earthquake Schools), it is distinguished by an experimental approach to school design that emerged during the Great Depression. Such schools reflect the most avant-garde ideas of the era and the beginning of modern, functionalist school design. Stylistically, the proto-modernist school need not be purely “modern” in the sense of lacking any ornamental detailing. The significant changes reflected a philosophy that went a step further than did the schools of the 1920s in designing for function and integrating school buildings with exterior spaces. During the postwar construction boom, many of the same ideas that characterized these experimental schools became the norm throughout Los Angeles and the United States.

The notable differences between the two themes (or periods) relate to scale, site plan, and functional, child-centered design. The proto-modernist school has an explicitly domestic scale, with low ceilings and a lack of monumental design or massing. These schools generally exhibit a decentralized, nonhierarchical campus, with a strong geometric patterning applied to the site plan. Classroom wings generally consist of one-room-deep rectilinear buildings, lined with adjacent patios and landscaping. Building plans clearly express their function, with (usually) one-story massing, generous expanses of glazing, window sizes and configurations tailored to sun patterns and doors opening directly onto patio areas and courtyards. The preferred typology was the early version of the “finger-plan” school, with rectilinear classroom wings extending from a central axis.

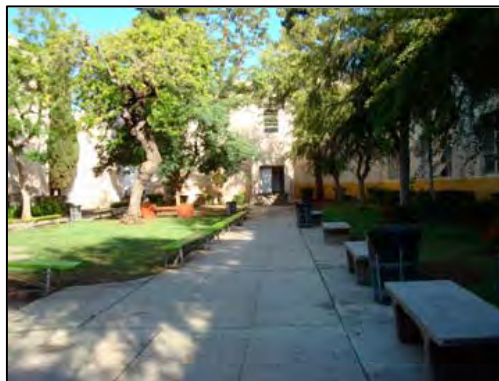


Figure 15. Emerson Middle School, Richard Neutra (1937–1940), example of open green spaces lining classroom wings. Source: LAUSD Emerson Middle School, Pre-Planning Survey, 2011.



Figure 16. Baldwin Hills Elementary School, Robert Alexander, architect, Los Angeles (1949–1951). Source: Getty Research Institute, Shulman Archives.



Figure 17. Early finger-plan school, Baldwin Hills Elementary School. Source: Google Maps, 2013.

### **THEME: LAUSD | EDUCATING THE BABY BOOM: THE POSTWAR MODERN FUNCTIONALIST SCHOOL PLANT, 1945–1969**

By the 1950s, many of the design ideas considered experimental in the 1930s had matured and become the national standard for schools. Stylistically, schools might include some historicist detailing reflecting popular styles (such as Colonial Revival). But, overall, a unified campus design, building types and plans that accommodated a high degree of indoor-outdoor integration, ample outdoor spaces, and sheltered corridors marked the typology as the mature version of the functionalist school plant. The priority remained the creation of a domestic scale for schools. Campuses displayed a one-story massing for elementary schools, and up to two stories for middle and high schools. Site plans, which often featured a decentralized, pavilion-like layout, lacked the formality and monumentality that characterized earlier eras of school design.

School types expressive of these ideals include the finger-plan (1940s–1950s) and cluster-plan (1950s), and variations on their basic themes. Combinations of these basic forms, which flexed according to available lot size and school enrollment, are also evident.

For LAUSD, the postwar years brought another round of reform as well as unprecedented expansion. Given the postwar classroom shortage, many campuses were constructed quickly, from standardized plans used district-wide, in designs that convey some of these ideas. The most intact and well-designed campuses among these, though, uniquely represent this era of reform and the midcentury modern school.



Figure 18. Orville Wright Middle School, Spaulding & Rex (1948–1952); balanced, indirect classroom lighting. Source: LAUSD Orville Wright Middle School, Pre-Planning Survey, 2012.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969



Figure 19. The “East LA Blow Out,” Lincoln High School, 16 September 1968. Students protested for “better schools for Mexican Americans. Sal Castro was a teacher there and spearheaded the movement.” Source: LAPL, Herald-Examiner Collection, 00041327.

## THEME: LAUSD AND THE CIVIL RIGHTS MOVEMENT, 1954–1980

This theme of significance begins with the filing of the landmark U.S. Supreme Court case *Brown v. The Board of Education, Topeka, Kansas*. Although *Brown v. Board of Education* addressed state laws that did not exist in California—namely, laws allowing for racially segregated public schools—this case and the Civil Rights Movement helped generate and focus attention on related issues in Los Angeles. Issues touched on racial division and cultural identity, equal access, and how to create more balance and diversity in public schools. Signaling the end of this period of significance is the U.S. Supreme Court decision effectively ending mandatory school busing as a solution to racial imbalance in California’s public schools. Although this issue continued to form part of the social context for LAUSD, this period captures an era of intense debate and activism on the part of community members, parents, politicians and jurists, as well as teachers and administrators.

A school eligible under this theme might be the site of significant integration initiatives, challenges, or community activities related to the Civil Rights Movement and school integration. This might include initiatives for equal access to schools and/or to employment opportunities in LAUSD schools.

In addition, a school might qualify under this theme for a long-term association with a figure who was significant in the Civil Rights Movement and school integration.



Figure 20. “School integrationists,” in a 1963 hunger strike for better racial integration of Los Angeles public schools. Source: LAPL, Shades of Los Angeles, #00041605.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969



Figure 21. Postwar school: Chatsworth High School (1963), curved outdoor corridor and mature landscaping of student quad and courtyard. Source: Sapphos Environmental, Inc., 2013.



Figure 22. Chatsworth High School, classroom. Source: Sapphos Environmental, Inc., 2013.



Figure 23. Chatsworth High School, aerial view of site plan and design. Source: Google Maps, 2013.



Figure 24. Chatsworth High School, courtyard. Source: Sapphos Environmental, Inc., 2013.



Figure 25. Chatsworth High School, courtyard. Source: Sapphos Environmental, Inc., 2013.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969



Figure 26. Old Farmdale School circa 1950. Source: LAPL Photographic Collection.

### III. HISTORIC CONTEXT AND BACKGROUND

This section provides a broad overview of the trends and patterns of development that shaped the facilities of the Los Angeles Unified School District since its founding in the 1870s. The following eras are covered:

- A. Founding Years, 1870s through 1909
- B. Progressive Education Movement: Standardization and Expansion, 1910 to 1933
- C. Era of Reform: Great Depression, Earthquake, and Early Experiments in the Modern, Functionalist School Plant, 1933 to 1945
- D. Educating the Baby Boom: Postwar Expansion and the Modern, Functionalist School Plant, 1945 through 1969

Each era is broken down into three sections: (1) National Context and Developments, exploring the trends in educational methods and curricula, as well as background information on school plant design; (2) Effects on School Buildings and Campuses, exploring how these trends resulted in changes to school plant facilities; and (3) Los Angeles City School Districts: Developments and Context, presenting Los Angeles–specific events that resulted in changes to educational policy and school plant design in Los Angeles and the region as a whole.

Sections also include a variety of historic and current photographs, with national and local examples illustrating the trends, patterns of development, and significant themes in the evolution of school plant design. Until 1961, what became the LAUSD comprised two separate entities: the Los Angeles City School District, covering primary education; and the Los Angeles City High School District. Throughout the Historic Context Statement, references to the district therefore reflect the administrative structure at the time (as the Los Angeles City school districts).



Figure 27. Los Angeles High School, 1891.  
Source: LAPL Photo Collection.



Figure 28. Palos Verdes High School, 1961.  
Source: Getty Research Institute, Shulman Archives.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

## A. FOUNDING YEARS: 1870s THROUGH 1909<sup>5</sup>

Only three schools are known to remain from this early era in the history of the Los Angeles Unified School District: the Old Vernon Avenue School (1876; 450 N. Grand Avenue); the Old Farmdale School (1889; 2839 N. Eastern Avenue, in El Sereno); and, in present-day Santa Monica, the Old Canyon School (1894), now serving as the library for an elementary school. The Old Farmdale School, a Queen Anne Revival–style building attributed to architects Bradbeer and Ferris, was restored and rededicated as a museum in 1976.

Few resources remain, but the late-nineteenth- and early-twentieth-century context helps set the stage for the eras that followed. During the period considered in this context, school architects and educators shared a sense of urgency in describing the importance of the safe, well-designed school. Whether in 1906 or 1966, they used remarkably similar language to describe their era’s contributions to designing the ideal “modern American school.”

Describing the district’s founding years helps illustrate the evolution of school plant design and the challenges faced by successive generations of architects and educators. Well into the postwar period, late-nineteenth-century educational philosophies and facilities remained a point of comparison, an example of what to avoid. In 1965, writing about modern Californian school design, State Department of Education official Charles D. Gibson declared that “big block schools with internal corridors and windowless classrooms are becoming a rarity, with most schools returning to the campus plan concept, using landscaped courts and natural materials to create informal environments.”<sup>6</sup>

In fact, by 1965, the battle against the big-block school had long since been won. But the specter of the imposing, factory-like school plant remained the example against which new ideas were measured.



Figure 29. Old Vernon Avenue School, built in 1876. Source: LAUSD Vernon City Elementary School Pre-Planning Survey, 2011.

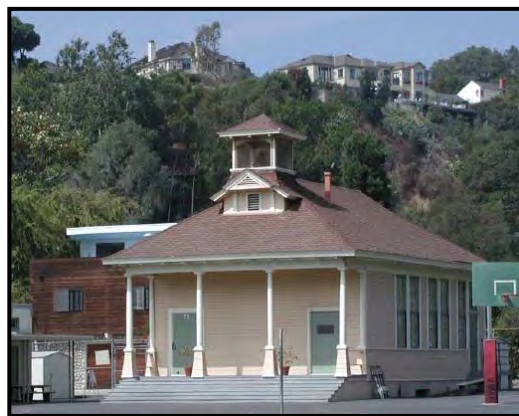


Figure 30. Old Canyon School, built in 1894. Source: LAUSD.

### NATIONAL CONTEXT | DEVELOPMENTS

In the early years of American school design, the most typical building type for educational facilities had been the wood-framed, one-room schoolhouse—a basic typology that attempted “to be all things for all children,” as well as all things for all teachers and educational methods.<sup>7</sup> Rapid urbanization throughout the United States called for a new approach. Large-scale schools, with classrooms accommodating several dozen pupils, were needed. With the increased demand, public schools started separating children into grades, with separate classrooms for each rather than a single large room housing all grades.

The new building typology tended to be rectangular in plan, with multistory massing, sanitation systems and facilities placed in a basement, and classrooms designed for large groups of students seated in rows. High ceilings accommodated tall windows, which provided the main source of interior illumination. In his study of the history of the American school, R. Thomas Hille observed that “a typical urban school from this era was organized in a single block of one or two floors, with standardized classrooms on each floor organized symmetrically around a central hallway. ... School furniture was already standardized and typically included individual desks organized in rows and bolted to the floor.”<sup>8</sup>

This typology fit the curricula and methods of the time. Before the Progressive Education Movement gained momentum throughout the United States, beginning in the 1880s, primary and secondary schools continued to follow traditional methods emphasizing rote memorization and discipline, in an atmosphere that was regimented and authoritarian (rather than flexible and participatory).

In this respect, Los Angeles’s early schools were similar to schools around the country. Los Angeles educators and administrators followed the philosophy of Johann Heinrich Pestalozzi (1746–1827), an influential Swiss pedagogue and reformer, and his “emphasis on the disciplinary values of the subjects taught.”<sup>9</sup>



Figure 31. Old Farmdale School, opened in 1899.  
Source: LAUSD.



Figure 32. 79th Street School, South Central Los Angeles (now McKinley Avenue Elementary School), shown in 1925 aerial photo. Source: LAPL Photo Collection.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

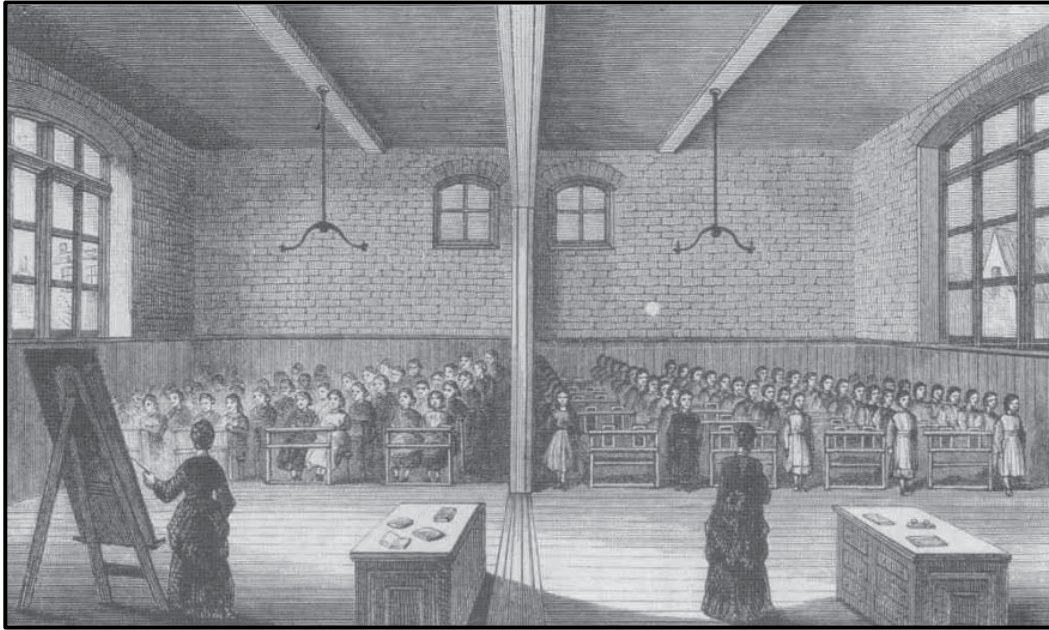


Figure 33. Typical British classroom design, as of 1900. Source: Baker, 2012.

Pestalozzi's thinking mirrored the trends of American education at the time, with an emphasis on memorization and recitation. In Los Angeles schools, "All pupils did the same lessons in the same way. There was no recognition of individual differences."<sup>10</sup> Early school officials emphasized the "disciplinary values of their subjects" and uniform teaching methods for all students and classes.<sup>11</sup>

At this time, the effects of the Progressive Era—the period of social activism and political reform associated with the 1890s through the 1920s—were becoming evident in the public schools. In Los Angeles, when promoting the activities and accomplishments of the schools, district officials began describing a general liberalization of teaching methods and curriculum. The new programs were based less on discipline—including, as one official proudly pointed out, a diminishing reliance on corporal punishment—and were more participatory and tailored to children's nature and needs.

In this way, as the nineteenth century came to a close, "the foundations were laid against regimented instruction," in Los Angeles as elsewhere; "the concept of the pupil as the passive recipient, the sponge soaking up information in preparation of adult life, was abandoned. The broader concept of education as an integral part of the life process, of learning by doing through creative participation, slowly replaced the old accepted theory."<sup>12</sup> In subsequent decades, these evolving philosophies would also shift ideas about school plant design.

### EFFECTS ON SCHOOL BUILDINGS AND CAMPUSES

It took time for school plant design to catch up with evolving educational methods. As noted Connecticut school architect Warren Richards Briggs (1850–1933) argued in 1906, “no one will deny [that] the public system of education has been carried in our country during the last half century to a degree of perfection heretofore unknown to any country of the world.” Yet, he wrote, “can it be said, however, with equal assurance that our school buildings have kept pace with our educational systems? Are they as complete in their design and construction as the educational system in its plan and equipment?”<sup>13</sup>

Among architects and educators it was widely recognized that reform and standardization were needed. During the late nineteenth century, especially in urban schools, systems for sanitation and safety “were less than ideal and varied considerably from location to location, with little in the way of regulatory oversight.”<sup>14</sup> This area was the first to be widely studied and significantly changed during this time, as many resources were devoted to developing and improving health and safety standards and systems.<sup>15</sup>

In Briggs’s 1906 book, *Modern American School Buildings*, the architect contributed one of many guides available for standardized schools. The scale of Briggs’s schools remained imposing and monumental, with the entire school contained within a single, multistory building. But the new standardized schools offered the best building infrastructure available at the time, with improved heating, ventilation, and sanitation systems, as well as recommendations for the ideal size and configuration for windows, doors, emergency exits, and other features.

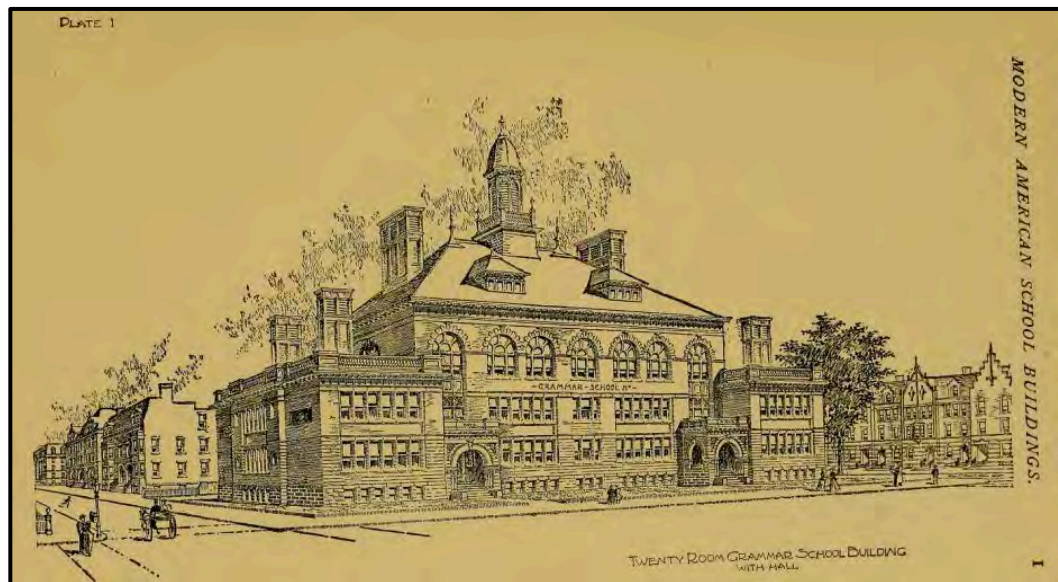


Figure 34. The “Modern American School,” as of 1906, a 20-room elementary school. Source: Briggs, 1906.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

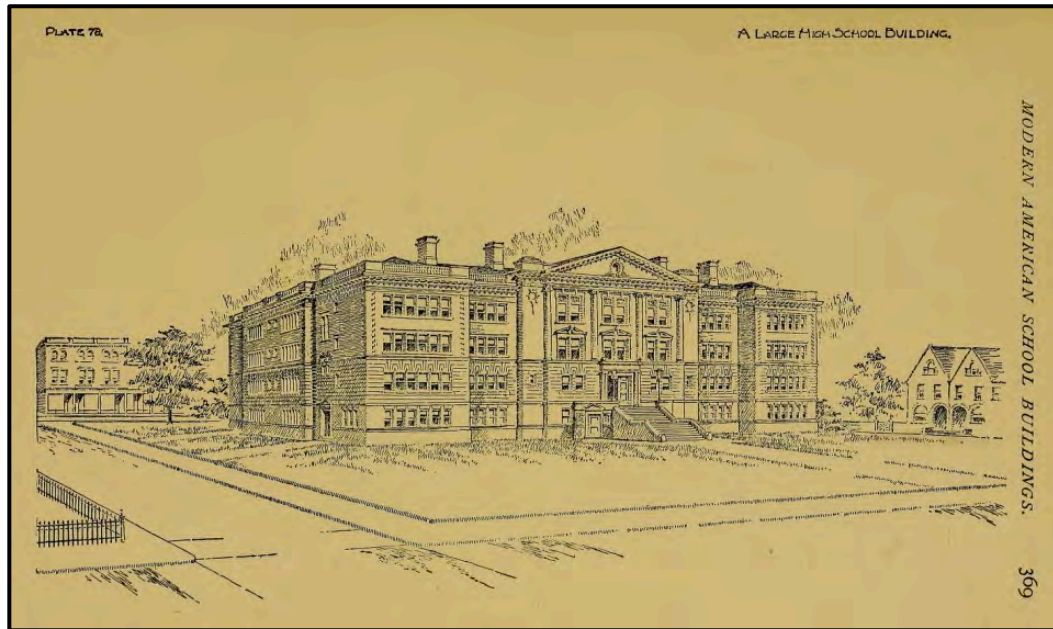


Figure 35. From *The Modern American School*, 1906. One of many available reference guides for standardized school construction. Illustration shows sketch for a four-story, neo-classical "Large High-School Building." Source: Briggs, 1906.

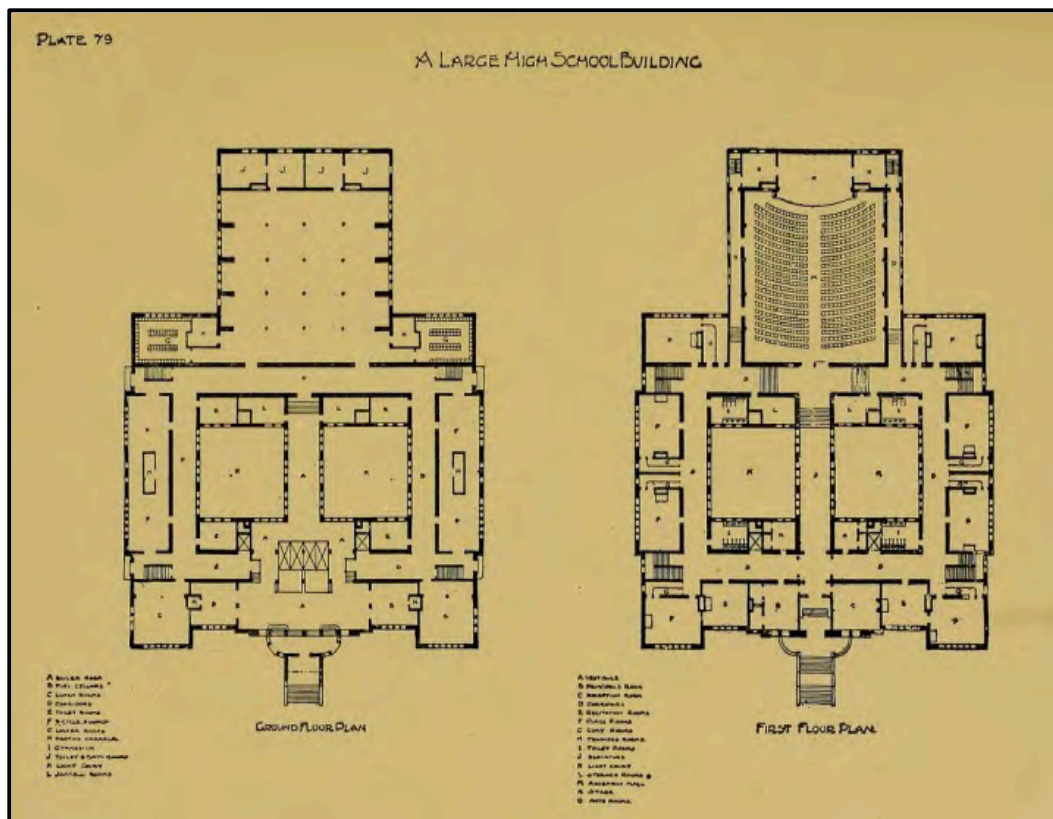


Figure 36. From *The Modern American School*, 1906. Plan for first two stories of neo-classical "Large High-School Building." Source: Briggs, 1906.





*Figure 37. Original Manual Arts High School (1910), shown in circa 1925 aerial photograph; demolished and rebuilt following the 1933 Long Beach Earthquake. Source: LAPL Photo Collection.*

In the early twentieth century, the movement to standardize and improve schools gained momentum and took off in earnest. American school architecture “advanced from the low point of complete neglect to a high point of monumentalism. School buildings changed from small, shabby units to large, beautiful edifices, glorifying the people’s devotion to education.”<sup>16</sup> Education-related organizations and trade publications around the country helped forward the cause. Overall, urban school plants still tended to be imposing “big-block” institutions “designed to house as many students as possible.”<sup>17</sup>

But the seed had been planted among a national network of educators and administrators that the classroom should be a comfortable, safe place. Advances in health and hygiene research translated into changes in school plant design. By the end of the nineteenth century, for example, a better understanding of ventilation and disease prevention, in particular for tuberculosis, affected approaches to fenestration and building siting and led to an increasing emphasis on cross-ventilation. Overall, the issue of how to design the most healthy and efficient school remained the topic of intense study and debate, as these ideas continued to evolve through the first quarter of the twentieth century.

### **LOS ANGELES CITY SCHOOL DISTRICTS | DEVELOPMENTS AND CONTEXT**

As elsewhere, the earliest schools in Los Angeles were utilitarian and vernacular in style, constructed to serve newly established communities emerging throughout the region during this time. Early schools were generally wood framed and sheathed, with a simple communal room or two serving all of the school’s needs. The late nineteenth century was the era that “introduced the bell tower as a signature element of a school building, perhaps modeling school buildings on early churches.”<sup>18</sup> Three late-nineteenth-century school buildings survive in Los Angeles.

As school buildings turned from vernacular, domestic-scaled forms to more monumental statements of civic pride, the model became Beaux-Arts Academic Classicism: “The Classical Revival was especially favored, and impressive porticos of colossal columns

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

proclaimed the importance attached to education.”<sup>19</sup> School buildings came to resemble grand civic buildings, with monumental scale, classical styling, symmetrical design composition, and a rational program. Spanning the nineteenth and twentieth centuries, this era brought improved technologies and industrial-strength materials, allowing buildings to rise to two or three stories in height. Most of these buildings were unreinforced masonry construction—more fireproof, but also more vulnerable to earthquakes—and many of these schools were destroyed or damaged beyond repair by the 1933 Long Beach earthquake.

## ***Formation of the Los Angeles City School Districts***

In 1872, little more than two decades after California’s entry to the United States, the Los Angeles City School District was founded. The timing of the district’s establishment was tied to state legislation requiring, among other things, that each city in California create a board of education. In 1879, amendments to the state constitution gave cities the authority to establish school curricula and methods, and Los Angeles educators set to the task of developing a program of study for their new district. Curricular improvements and reform in Los Angeles, as elsewhere, remained the topics of ongoing debate and refinement throughout the late nineteenth century and into the twentieth.



Figure 38. Central School (1873) at Temple and Broadway Streets in downtown Los Angeles, 1931 photo (demolished). Source: USC Digital Archive.

As the new district was launched, two schools were constructed in the early 1870s. One of these was the wood-framed Central School, located at Temple and Broadway Streets (then Fort Street) in downtown Los Angeles. Constructed in 1873 for \$25,000, Central School became home to the county’s first high school, which occupied four rooms of the two-story building.

In a 1936 series of articles exploring “landmarks almost forgotten in the march of progress,” the *Los Angeles Times* recalled that when the school was constructed, it was “so big and grand that they came from miles around to see it, quite the finest school south of San Francisco. Its lines were classic, and it had a cupola with a clock in it. ... The teachers like the wide corridors and generous windows and the transoms over the doors. The earthquake, which did so much damage to newer school buildings, didn’t harm the [Central] school in the least.”<sup>20</sup> In 1882, Los Angeles’s first teaching college, the State Normal School, was constructed downtown near the present-day site of the Los Angeles Public Library.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

## ***Early Currents of Change***

One shift during this period was a growing sense that public education and schools should be a community affair, with a mission to serve the needs of the population. One example of this is seen in a citywide poll launched in 1900 by the Los Angeles Board of Education. With an extended list of questions, the poll was distributed to all city residents in order to solicit input on district curricula and teaching methods. The stated goal of the board in creating the survey was to initiate “the freest and most open discussion of public school work by all interested.”<sup>21</sup> All citizens of Los Angeles were asked to offer opinions on the subjects taught at all grade levels, with a particular amount of attention going toward the newly established kindergarten program, as well as the amount of homework assigned and classroom conditions. After surveys were distributed throughout the city, results were tallied and discussed at a public meeting, in what would ultimately become an ongoing effort to solicit community input.

Similarly, in this era, a range of special-needs schools were established, including facilities for the deaf, blind, physically disabled, or cognitively impaired; special facilities were also provided for children suffering from tuberculosis. In addition, vocational schools with more hands-on, skills-related curricula were established in these early years. The 1904 Polytechnic High School was one example of this initiative.

## ***The Boom of the 1880s and Los Angeles City Schools***

In the 1880s, as has been well documented, Los Angeles experienced a significant population boom. One factor fueling this expansion was a speculative land rush, fueled by the completion of the transcontinental railroad and price wars between competing railway lines. The “boom of the 1880s” brought prosperity and development throughout Southern



Figure 39. Los Angeles's first teaching college, State Normal School (1882), downtown Los Angeles, in a circa 1900 photo. In the 1920s, this site became the location for the Los Angeles Public Library. Source: LAPL Photo Collection.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

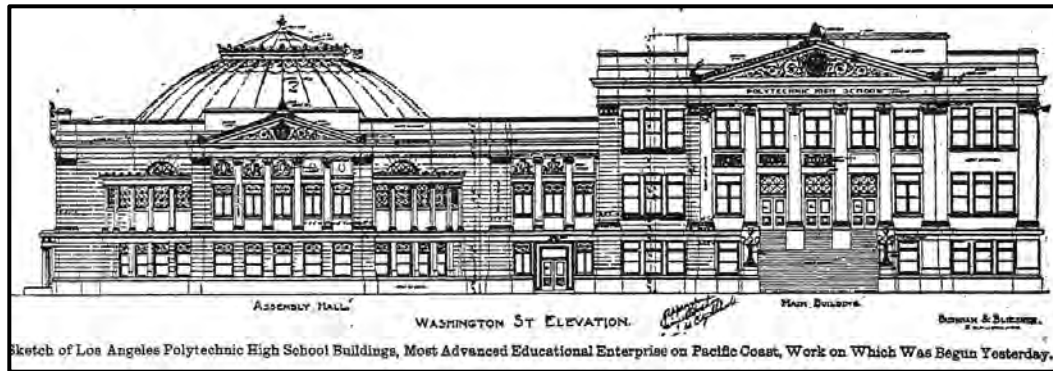


Figure 40. Elevation sketch of Los Angeles Polytechnic High School (1904), by Los Angeles architects Burnham & Bliesser. Source: Los Angeles Times, July 9, 1904.

California (though the boom had collapsed by 1890). Between 1880 and 1900, the population of Los Angeles expanded tenfold, growing from 10,000 to more than 100,000. In another decade, these numbers would triple, expanding to nearly 320,000 by 1910, greatly testing the capacity of the fledgling school district and board.

Although the district carried out an extensive building campaign during its first decade, keeping pace with population growth was a constant struggle. The city's schools quickly became overcrowded. As of 1874, the Los Angeles Board of Education recorded a total of six schools with nearly 900 students in the district. Within one decade, by 1884, the number of students within the district had nearly quadrupled, expanding to almost 3,500. By 1890, the Los Angeles Board of Education operated a total of 178 classrooms, which, in the spirit of the times, were classified not in terms of grade level but according to classroom capacity to house students.<sup>22</sup>

Rapid population growth produced multiple problems for the fledgling Los Angeles Board of Education and school districts. Among them, according to the board's 1884 annual report, were a lack of scholastic uniformity among schools; significant gaps in the educational levels of pupils; crowded classrooms, which necessitated turning students away; and poor financial support. In addition, board president Frank A. Gibson "bemoaned" a governing structure by which state boards of education lacked the authority to issue bonds for school-building campaigns.<sup>23</sup> Within five years of the publication of this annual report, state policy changed. Cities were given the authority to issue bonds for municipal projects and improvements, including school construction. In



Figure 41. Neo-Classical Los Angeles Polytechnic High School (1904), Burnham & Bliesser (demolished). Source: LAPL Photo Collection.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969



Figure 42. Grand, neo-classical high school beyond the city core: San Fernando Union High School (circa 1900), shown in a circa 1900 image (original location unknown). Source: USC Digital Archive.

1899, the City of Los Angeles sold bonds amounting to \$200,000, generating proceeds for a turn-of-the-century building campaign for new schools.<sup>24</sup>

The funding provided through the bond measure temporarily helped ease overcrowding. However, the respite was short-lived. The board and district struggled to accommodate ever-expanding enrollment figures. Reflecting on the school year 1892–1893, the superintendent of the Los Angeles Board of

Education wrote, “There seems to be no way to get entirely rid of these half-day schools in our rapidly and continuously growing city.”<sup>25</sup> In the 1900s, this problem remained an issue, with rapidly increasing enrollment each year. Indeed, overcrowding continued to represent one of the most pressing challenges facing Los Angeles school districts throughout this era (and throughout the twentieth century).

## ***Civic Pride and the Turn-of-the-Century School***

On the city periphery, as undeveloped lands slowly gave way to residential and farming communities, utilitarian wood-framed schoolhouses continued to serve the needs of new communities. But in the city core, grand new schools reflected the city’s economic and institutional success. In its first few decades, the district added many monumental large-scale schools. Designed by the city’s nascent field of architects, the buildings were generally self-contained, multistory buildings exhibiting the palette of styles popular in the era, including late Victorian, Romanesque, Classical Revival, and Beaux-Arts styles. The district’s educational facilities and slowly modernizing methods mirrored Los Angeles’s transformation from an outpost of 10,000 in 1880 to a metropolis of nearly 320,000 by 1910.<sup>26</sup> Of the district’s rapid growth, the *Los Angeles Times* noted in 1898 that

while it is altogether unnecessary to draw comparisons, it may be said that there is no other city in the United States that can show a proportionately great increase in school population. To say that Los Angeles is proud of her school record and of the large and well-appointed buildings erected for the education of her children is but to repeat that which the parents of the children well know and appreciate. No expense has been spared in providing every modern acquirement.<sup>27</sup>



# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969



Figures 43. and 44. A rare remnant of the neo-classical era in school design: San Fernando Middle School, Auditorium, John C. Austin, architect (1916). Source: Heumann & Associates and SAIC for LAUSD.

On January 1, 1898, the *Los Angeles Times* took stock of a decade of expansion of the city's public schools, which by then included 57 facilities with nearly 400 classrooms, estimated in value at \$1.25 million. The new, progressive tone was evident in the article. "Play is the business of childhood," the reporter wrote, so the new kindergarten facility is "the playschool for the little ones," with a day filled with varied arts and crafts activities. "By those simple methods, which afford an amusement rather than a task, the mind of the child is set in motion."<sup>28</sup>

The monumentality and beauty of the city's public schools were also celebrated as forwarding the cause of education. The fine buildings, along with updated classroom activities and subjects, would inspire the older pupil to attend school rather than "lie awake all night scheming how he might play hookey all next day." "How different it all is from days gone by," the reporter concluded wistfully.<sup>29</sup>

In this way, for Los Angeles, providing the most modern, up-to-date curricula and facilities became important symbols of the city's growth, economic success, and stature as an urban center worthy of comparison to San Francisco, its well-established rival to the north. With the 1908 groundbreaking for the Los Angeles Aqueduct, and the subsequent wave of land annexations to the city, the area covered by the Los Angeles City School Districts would expand even more in the 1910s and into the 1920s, bringing new challenges for the city's school districts.



Figure 45. 10th Street Elementary School, 10th St. and Olympic Blvd., Los Angeles, in 1926 photo. The oldest extant building on campus is the Administration Building, constructed in 1922. Source: LAPL Photo Collection.

### **B. PROGRESSIVE EDUCATION MOVEMENT: STANDARDIZATION AND EXPANSION, 1910 TO 1933**

“One of the important functions of school architecture is to sell education to the public. This is accomplished by making attractive that side of education the public sees most.”

—John J. Donovan, *School Architecture: Principles and Practices*, 1921

#### **NATIONAL CONTEXT | DEVELOPMENTS**

Throughout the early part of the twentieth century, Progressive Era reform inspired a broad restructuring of educational methods and curricula in the United States. Reform was guided by the theories of educators and philosophers such as John Dewey (1859–1952) of the Columbia University Teachers College. Dissatisfied with authoritarian teaching methods emphasizing passivity and rote learning—and factory-like schools—Dewey and others argued that a student’s natural curiosity and real-life needs should shape the classroom environment and curriculum. Dewey and the Progressive Education Movement stressed “learning both abstract concepts and real skills through projects ... children should move freely through classrooms, use materials other than textbooks ... explore the physical world through hands-on projects.”<sup>30</sup>

By the 1910s, the Progressive Education Movement had gained momentum. Educators and administrators interested in reform advocated for more hands-on, child-centered methods and curricula. Key to this movement was the notion that the classroom should flex to the needs of each student. Anthropologist William Henry Holmes (1846–1933) thus noted the change in 1912: “Within the past few years we have been coming to measure education by a new standard, the standard of individual achievement. This means that we have begun to differentiate the abilities of children ... not in terms of a general standard, but in terms of what each individual is able to do within the range of his own ability.”<sup>31</sup> This new standard brought changes to classroom dynamics, school structures, and to schools themselves.



Figure 46. Los Angeles High School (1917), in 1925 photo. Although the school still occupies this site, at 4600 W. Olympic Boulevard in Central Los Angeles, this building is no longer extant; most of the existing campus core was constructed between 1964 and 1978. Source: LAPL Photo Collection.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969



Figure 47. Lincoln High School (1918), northeast Los Angeles, shown here in circa 1925 photo. After sustaining significant damage during the 1933 Long Beach Earthquake, the school was reconstructed beginning in 1936/1937. Source: LAPL Photo Collection.

The 1910s in Los Angeles also brought a number of developments that ultimately affected public schools. In addition to the 1913 opening of the Los Angeles Aqueduct, the film industry settled in the Los Angeles area during this time, and its economic strength drew new residents. Also in the early 1910s, the region's first collegiate school of architecture was taking shape at USC. By 1925, USC began conferring the region's only professional degree in architecture.<sup>32</sup> This helped establish the city's architectural profession and culture by training architects and attracting faculty throughout the country.

During this period, the role of the public school also changed, with a greater focus on serving community needs. An expansion of specialized programs and facilities served new groups, including working teenagers and adults. The school plant itself also took on a greater role as a community-gathering place, with auditoriums, outdoor spaces, and public rooms sited and designed to double as gathering areas. Artfully designed and landscaped approaches and entrances to schools represented an acknowledgment of this change and the need for positive relations with the community. Summing up the changes to educational philosophy in the early twentieth century, W. H. Crocker (1861–1937), editor of *The American Architect*, wrote,

During the past quarter century, each succeeding year has witnessed the broadening development of public education. The relation of the school to the community has radically changed. Systems of education have been evolved as the result of the careful observation of those engaged in pedagogy, and these systems have become broadened and extended. ... With this evolution and extension of educational methods it was logical to assume that the modern schoolhouse would keep pace in its designing and planning.<sup>33</sup>

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969



Figures 48. and 49. Civic pride and the monumental public school. On the left: Historic postcard of Union High School (1910), later Hollywood High, Hollywood. Source: LAPL Photo Collection. On the right: Union High School in a circa 1915 photo. Located at 1521 N. Highland Avenue, the building is extant but significantly altered; it is currently in use as the Hollywood High School Museum. Source: LAPL Photo Collection.

In fact, modern schoolhouse design was initially slower to keep up with the times. But by the early 1920s, the Progressive Education Movement had brought significant changes to two main realms: first, teaching methods and curricula became more hands-on and individualized, less rigid and authoritarian; and second, environments for learning were transformed to facilitate these new ideas. As architectural historian Amy Ogata wrote, “Historians of education are still divided on the real impact of progressivism on American education, but its effect on the *architectural* discourse was profound and enduring.”<sup>34</sup>

## EFFECT ON SCHOOL BUILDINGS AND CAMPUSES

Educational philosophies and methods—and eventually schools themselves—changed substantially during this period. For their communities, school plants remained important symbols of civic identity and pride. The buildings were increasingly functional, but the wish to create beautiful temples to learning, reflecting the community’s aspirations for itself and its youth, remained strong: “There is nothing more impressive or hopeful in American democracy than the devotion of the people to education. ... Unconsciously the spirit has been to represent truly this national devotion to education in the architecture of public schools.”<sup>35</sup>

As architects and designers began experimenting with the new ideas of this period, school plants became “more flexible and adaptable, and more accommodating of the new methods of teaching.”<sup>36</sup> The keys became functionality, adaptability, and programmatic differentiation of buildings and spaces, for interiors and for the site overall. The increasing emphasis on natural light and fresh air brought the incorporation of bays of windows, which would march across the building elevations and span each floor of classroom wings.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

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Figure 50. Southern Californian flavor of Allison & Allison's Grammar School No. 2, Glendora, California. Source: Donovan, 1921.

With a growing network of education-related organizations and publications, the push for modernization was a shared project for architects and educators around the United States. One of the era's most defining documents in this respect—one that became a standard office reference for architects—was John J. Donovan's 1921 *School Architecture: Principles and Practices*. Encyclopedic in scope, Donovan's volume offered a richly illustrated guide with the latest ideas in everything from construction to costs, campus planning and landscape development, to each feature of a modern school plant, whether vocational, elementary, junior, or high school. A wealth of drawings and floor plans illustrated the ideas described by Donovan and other school architects in the volume. In 1954, renowned school architect William Wayne Caudill referred to Donovan's book as "the 'bible'": "Any account of the architectural development of school buildings in the United States certainly would not be complete without a statement concerning the writings of Donovan."<sup>37</sup>

## **John J. Donovan's School Architecture: Principles and Practices**

A native of Massachusetts and alumni of the Massachusetts Institute of Technology, John J. Donovan (1876–1949) moved to Oakland, California, in 1911 to supervise the construction of Oakland City Hall. Donovan resided and practiced in Oakland for the rest of his career, completing many high-profile commissions including libraries, schools, and infrastructure projects. Although he lived and practiced in Northern California, Donovan's book became a standard reference throughout the United States.

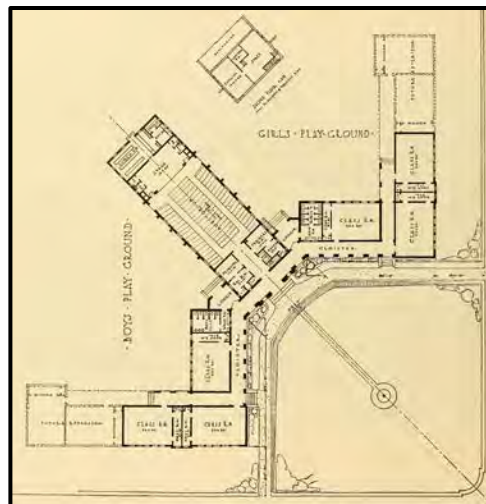


Figure 51. Open-air plan, Allison & Allison's Grammar School No. 2. Source: Donovan, 1921.



Figure 52. Open-air classrooms in northern and southern California. On left, Leland Stanford Jr. University Elementary School, Palo Alto, California. On right, Francis W. Parker Elementary School, San Diego, California. Source: Donovan, 1921.

### ***Shift away from Monumental Scale and Beaux-Arts Classicism***

Donovan documented and proposed examples of how to plan for the new school. In terms of scale, the schools were less monumental, less imposing. For primary grades especially, Donovan wrote, “Vainglorious attempts to build monumentally are fatal to both child and adult, for instead of attracting the child’s interest they are most likely to repel and make fearful.” Rather, he continued, “the architecture of the elementary school should be symbolic of quiet simplicity, expressing in permanent materials much the same charm that the little child has for those who appreciate and love children.”<sup>38</sup>

Stylistically as well, from the 1910s through the 1920s, there was a move away from Beaux-Arts Classicism and Classical Revival styles toward the period-eclectic styles commonly used in domestic architecture. The significant innovations and departures from earlier eras were in building plan, layout, and interior program. Using a range of national examples, Donovan’s illustrations and narrative showed a new approach to school design that was focused on artful, functional site planning, and coordination of campus buildings.

During this time in Southern California, as in many other parts of the region, architecture was entering a golden age. Responding to the boom in construction, architects and designers were both meeting and fueling demand for the menu of period-eclectic styles popular at the time. In Southern California, architects drew on the heritage of the region, including the Arts and Crafts movement and Spanish Colonial past, to forge a unique architectural identity.

### ***Importance of Indoor-Outdoor Integration***

One of the most significant shifts during this era was the emphasis on outdoor spaces in schools. In 1910, in another guide for designing “modern” schoolhouses, architect Alfred D. Hamlin observed that “however perfect the heating and ventilating plant, and however faultless its operation, let it be clearly understood and always remembered that no artificial

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969



Figure 53. A lack of monumentality, low scale, and U-shaped plan characterize John J. Donovan's Stanford University Elementary School, Palo Alto, California. Source: Donovan, 1921.

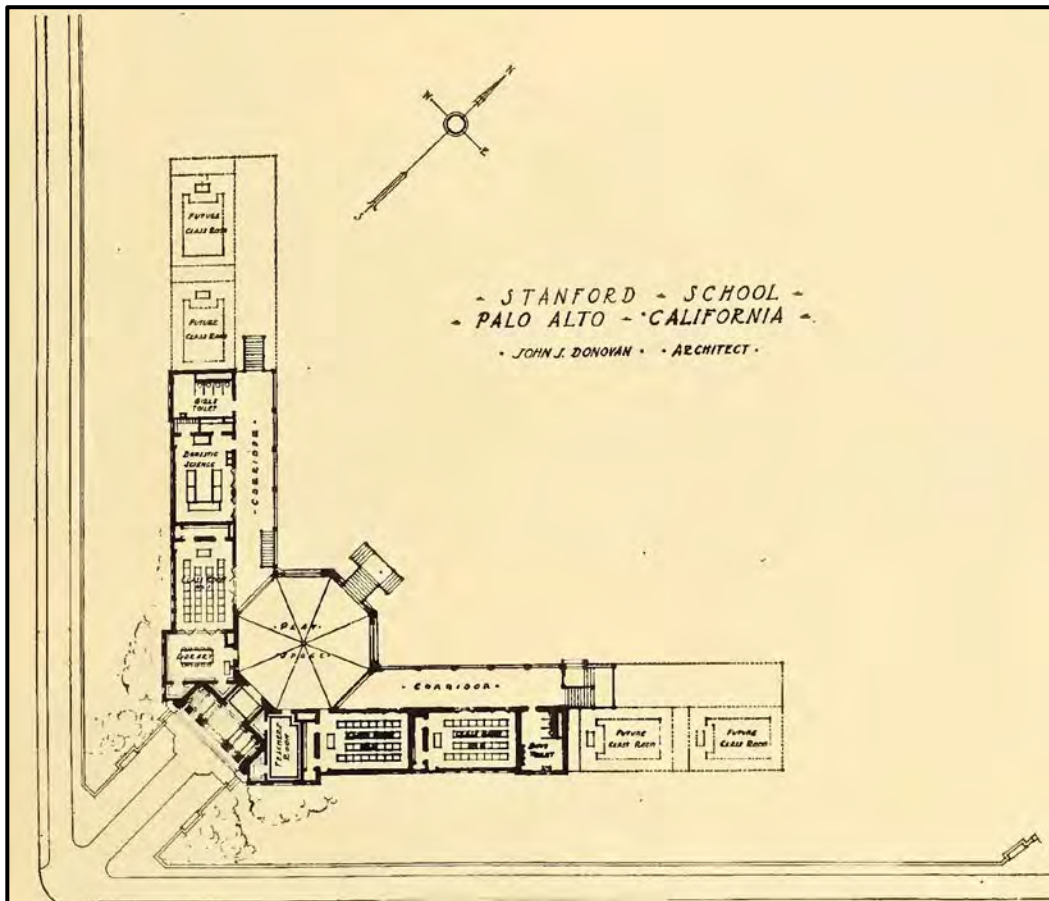


Figure 54. U-shaped campus plan, Stanford University Elementary School, Palo Alto, California. The plan allows for easy indoor-outdoor spaces as well as expansion as the school grows. The locations for four "future class rooms" are sketched in at each end of the plan. Source: Donovan, 1921.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

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heating and ventilation can ever take the place of fresh outdoor air and sunshine.”<sup>39</sup> Rapid urbanization throughout the United States brought increased acknowledgment of the need for and benefits of outdoor activities. During this era, Hille wrote, “Connections to the out-of-doors were important for reasons of health and hygiene, providing access to natural light, fresh air, and exercise, and places for new kinds of learning activities.”<sup>40</sup>

These ideas translated into clear changes in school design. Plans became “more open and interconnected, with more transparency and spatial complexity—both inside and out.”<sup>41</sup> Schools capturing these ideas in particular abounded in Donovan’s book. Simple changes to the traditional big-block school, such as adding adjacent or parallel wings, created numerous possibilities for outdoor spaces. The school branched out and turned in on itself, with building plans including elongated L shapes, T shapes, H shapes, or U shapes, all of which spread out the interior program and opened up possibilities for courtyard spaces and interconnections.

Many of the examples Donovan used to illustrate the latest ideas were drawn from Northern and Southern California. As Donovan said of these Californian schools, “Elevating the building and spreading its area over more ground brought forth many interesting developments in plan of single units and groups of units which of course led to delightful exterior compositions of the modified Romanesque, Spanish, Italian, English, and modern Renaissance. Thus it is that the school architecture of California has found a permanent spot in the sun.”<sup>42</sup>

In this respect, California led the way. With its relatively mild climate—not to mention rapidly growing population, need for new schools, and room to grow—Southern California in particular was an early proving ground for the open-air campus and school. (For the region’s residential architecture as well, outdoor living came to exemplify the good life and contemporary design in the “Californian” mode, a label that itself was becoming a marker for the latest ideas.)

This was an idea promoted by the Los Angeles school district officials as well. In 1911, M. C. Bettinger, assistant superintendent of the Los Angeles City School District, told the *Los Angeles Times* that in the city’s schools “the custom of studying and even reciting out of doors is growing. The children take their books and go out under the trees, sit on the benches or the ground.”<sup>43</sup> Bettinger said, “In my district I heartily encourage this custom.” He evoked the language of reform when he declared that outdoor study provided a means of “getting away from the factory system of education. ... This is especially desirable in the lower grades, when the children grow restless, and look longingly out toward the fields and the hills.”<sup>44</sup>



# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969



Figure 55. One-story scale and E-shaped plan of Fishburn Avenue Elementary School (1923), extant in Maywood, south of Los Angeles, shown here in 1927 aerial photo. Source: LAPL Photo Collection.



Figure 56. The grand approach, unified campus plan, and H-shaped building of John C. Fremont High School (1924), shown in 1932 aerial photo. Located in south Los Angeles, limited portions of the original campus are extant. Note series of window bays on each floor, letting in natural light and fresh air. Source: LAPL Photo Collection.

### ***Site Planning and Layout***

Unified site planning, the incorporation of landscape architecture, and a spread-out campus became increasingly important in this era. These qualities enhanced patterns of circulation, created more outdoor gathering spaces, and built connections between campus buildings based on use. Spreading out the plan, Donovan wrote, created “many opportunities for pleasing courts, and approaches, at the same time furnishing to the plan spaces for lawns, shrubs, trees.”<sup>45</sup>

Because of the acreage requirements for an extended campus plan, though, such schools were often added on the city periphery. Donovan wrote, “The trend of the times is to locate secondary schools in sparsely settled sections of the cities where the buildings may be spread out and their height reduced. This is desirable, as it means better lighting, better natural ventilation, fewer fire hazards.”<sup>46</sup> This was the case in Southern California as well, with many examples of open-air campuses located in what were, at the time, the expanding suburbs beyond the city core. This trend in campus planning also made school plant design, planning, and construction an interdisciplinary project, involving teams of architects, landscape designers, and school facilities personnel.

Buildings were designed with generous setbacks, taking into account adjacent traffic to ensure that classrooms were adequately buffered from street noise. More comprehensive site planning also allowed architects and school planners to think ahead to future expansion needs, in terms of both individual buildings that could be expanded and buildings and structures that might be added.



*Figure 57. Garfield High School (1925), in 1929 photo. While the campus still occupies this site, very little of the original campus appears intact. Note semicircular driveway and approach to school, generous setback, use of landscaping, and unified campus plan. Expanses of window bays span each elevation. Source: LAPL Photo Collection.*

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HISTORIC CONTEXT STATEMENT, 1870 to 1969



*Figure 58. Expansive site plan of Hyde Park Elementary School (1923), south Los Angeles, shown in 1927 aerial photo. The site is still occupied by a school (LAUSD's Young Empowered Scholars Academy), though little of the original campus appears extant. Source: LAPL Photo Collection.*

The notion of campus planning was becoming more important as well, especially for upper grades. High schools were expected to be “about double the size” of junior highs, with the “character of the college campus”: “The day has arrived when high schools are being planned as groups of buildings, not more than two or three stories high, with the different departments in separate buildings connected by open or inclosed arcades or wings.”<sup>47</sup> This trend was best suited to expansive lots, though, rather than dense urban environments. For urban schools without much acreage to work with, multiple stories were often necessary, with classrooms organized in blocks with adjacent wings and double-loaded corridors. Although Donovan conceded that in the “larger cities, due to the cost of land, it may be necessary to have the high school under one roof,” his book illustrated how variations in plans and programs still created opportunities for visual interest and outdoor spaces.

In addition to limited acreage, limited funding played a role in determining how far a campus could spread out across a site. Resources were not always available to design and construct an entire campus. In the Los Angeles city school districts in this period, buildings would be added as enrollment increased, usually starting with the administration building—usually the flagship building of the campus—and classroom wings, then eventually including additional classrooms, a cafeteria, and a gymnasium, depending on the grade level of the school. Purposeful site planning also allowed architects to factor into their designs the patterns of the sun and interior illumination, in order to make the best of natural light in the classroom.

According to Donovan, as of 1921, the finer points of building siting, orientation, and interior lighting had been “carefully documented and thoroughly understood by architects at the time.”<sup>48</sup> Conventional wisdom held that window areas should equal approximately 40 to 50 percent of the total wall area of the room’s longest side. Windows would extend up to 6 inches from the ceiling, to maximize light. In this way, the repetitive bays of windows, on

each floor with classroom space, became one of the trademark features of 1920s schools in particular. Views out the windows were also considered important, because students should have the chance to look out the window and “rest their eyes at times.”<sup>49</sup> Ceilings also tended to be high, ranging typically from 12 to 15 feet, “a minimum standard that in many places was regulated by building codes.”<sup>50</sup> High ceilings helped with ventilation and accommodated tall windows, which provided the main light source until the advent of fluorescent lighting in the 1930s.

### LOS ANGELES CITY SCHOOL DISTRICTS | DEVELOPMENTS AND CONTEXT

#### ***Building Program***

During this time in Southern California, the boom in construction and resources brought a golden age for period-revival architecture. Buildings reflected a wide palette of styles and stylistic hybrids; schools exhibited the ornamental programs of Romanesque, Italian Renaissance, Spanish Colonial, and Collegiate Gothic Revival styles. In terms of materials, schools during this period were generally, though not always, of masonry construction. Brick was a popular structural and decorative cladding material, as were hollow clay tile and concrete, the latter often manipulated to resemble stone or other materials.

While the 1920s boom provided opportunities to test new ideas, the era remained transitional, with some new construction showing the new lower massing and open site plans recommended by Donovan, and some schools still adopting a more monumental decorative program and higher massing. As elsewhere, the most common building plan types during this period were increasingly rectilinear with perpendicular wings in T, H, and U shapes, providing areas for courtyards and outdoor spaces. Ordinarily the interior would consist of classrooms lining a double-loaded corridor.



*Figure 59. Craftsman-style Morningside Elementary School (1915), George Lindsey, architect. Morningside Elementary remains LAUSD's oldest school building still serving its original purpose. Source: LAUSD.*



# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969



Figure 60. John Burroughs Middle School (1922), central Los Angeles, shown in 1926 aerial photo. This school is extant and shown in the illustration below. Source: LAPL Photo Collection.



Figure 61. John Burroughs Middle School, central Los Angeles, in recent aerial photo. Source: LAUSD John Burroughs Middle School Pre-Planning Survey, 2011.



Figure 62. John Burroughs Middle School (1922). This Renaissance Revival–style school is one of the most intact 1920s schools in the district. Source: LAUSD John Burroughs Middle School Pre-Planning Survey, 2011.

Construction generally unfolded in phases as school enrollment grew. Between the mid-1910s and 1930, elementary schools, for example, were typically constructed in three stages. The first stage usually brought an administrative office, the flagship building of the school, as well as a kindergarten and a nine-classroom wing. The second stage took place once enrollment reached 400, with the addition of more classrooms, facilities for home economics and manual education, and a cafeteria. When enrollment reached 900, the third stage took place, which usually brought a new auditorium, classrooms, or other service rooms as needed. Kindergartens tended to be self-contained and separate from other classes. Gymnasiums, shops, and specialized facilities for home economics, wood shop, and other coursework were also added for junior high and high schools.

During this era, newspapers of the day reflected much civic pride in—and promotion of—the city’s new public schools. In 1914, when Los Angeles’s public schools were singled out as “models for the rest of the state” (in comparison with San Francisco’s schools, which were declared substandard), the bragging rights this conferred made news in the *Los Angeles Times*:

A city is known by the schools it keeps and nobody can ignore the fact that Los Angeles owes no small measure of her astonishing growth, her rapidly increasing wealth and commercial stranding, her desirable American population, to the acknowledged high efficiency of her public school system.<sup>51</sup>

Keeping up with ever-expanding enrollment figures remained a struggle, however. By the end of the 1910s, high enrollment and little funding for new facilities had again led to overcrowded classrooms and the need for half-day sessions. In April 1919, the Los Angeles Board of Education took temporary measures, building 30 bungalows to relieve the overcrowding, in advance of bond funding for a wider building campaign.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC CONTEXT STATEMENT, 1870 to 1969



Figures 63 and 64. Spread-out plan and Renaissance Revival style of University High School (1924), west Los Angeles. Source: LAUSD University High School Pre-Planning Survey, 2011.

The 1920s brought dramatic expansion in school construction. By 1927, \$60 million in bond issues had been sold for the construction of new schools, as well as additions to existing facilities. More than 200 permanent facilities were constructed in 6 years. As a reporter for the *Los Angeles Times* wrote in 1927,

Los Angeles is in many respects such a super city that it is difficult to write about her without using superlatives. In speaking of her public schools, however, one may be pardoned—especially an outsider—for according them high praise, since they are the product of teachers and officers who are laboring unselfishly for the public good.<sup>52</sup>

### ***Alfred S. Nibecker Jr. and the District Architecture and Building Department***

Guiding the Los Angeles school districts through rapid expansion in 1920s, disaster and depression during the 1930s, and the great postwar boom through the mid-1950s was district architect and business manager Alfred S. Nibecker, Jr. In the 1920s, Nibecker began private practice in Los Angeles; he joined the Los Angeles City Board of Education as an architect in 1926, where he remained until his retirement in 1955. In his three-decade career with the school district, Nibecker oversaw the construction of, and contributed designs to, hundreds of school plant projects. Many commissions were completed by the district's in-house staff, but many others were handled by a range of the region's best architects and builders, with an increasing number of firms specializing in school design. In addition to his work with the Los Angeles City school districts, Nibecker was a fellow of the American Institute of Architects and served on the National Committee on School House Construction, the National Advisory Council on School Building Problems, run under the auspices of the U.S. Department of the Interior, Office of Education. In 1955, Nibecker was made an honorary member of the Structural Engineers Association of Southern California, the association's highest award.

### ***Building Code Reform***

New building codes attempted to keep pace with the construction boom and ensure safety. In 1914, with the focus still on fire hazards, Los Angeles voters approved a law requiring the replacement of wood-framed schools with masonry structures. Of course, the vulnerability

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of masonry construction to earthquakes was not yet fully known. Therefore, most schools constructed in Los Angeles post-1914 utilized masonry construction, with brick construction used for a majority of the new schools.

In 1925, in response to the devastating Santa Barbara earthquake, the state adopted new building codes aimed at strengthening seismic safety. In 1927, the City of Los Angeles followed suit and revised its local building ordinance and added supplemental steps and requirements to ensure the structural stability of schools. Improvements included fire-resistant corridors, stairs, and exterior walls and reinforced concrete beams within floors and roofs. When the March 1933 Long Beach earthquake hit, schools built after 1927, under the new requirements, proved more resilient than those constructed before the laws took effect.

As before, the new schools of the district generated much civic pride, with newspapers of the day praising new campuses for their beauty and modern facilities. As *Los Angeles Times* reporter Neeta Marquis wrote in 1928, "Let us of Los Angeles who often grow depressed at times over the inadequacies of our city administration in other departments take heart of grace from the efficiency and stability of the factory which is turned out our citizens of tomorrow, our public schools."<sup>53</sup>

## ***The Roaring '20s and Enrollment Expansion***

The basic shift in philosophy coincided with the continuing, remarkable expansion of Los Angeles, not only in terms of population growth but also geographical range. In anticipation of the ample water supply promised by the Los Angeles Aqueduct, constructed between 1908 and 1913, Los Angeles experienced rapid population and land growth through annexation of neighboring cities. As of 1910, the population of the City of Los Angeles stood at 319,000, and the area served by the Los Angeles City School District spanned more than 85 square miles, with more than 46,500 students enrolled. Within just 6 years, by 1916, enrollment in the Los Angeles City School District had nearly doubled to more than 78,000 students, and the expanse of the district quadrupled, growing from 85 square miles



Figures 65 and 66. Vernon City Elementary School (1929), with Spanish Colonial Revival arcades moving school corridors outside. Source: LAUSD Vernon City Elementary School Pre-Planning Survey, 2011.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

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Figure 67. One of Los Angeles's earliest middle schools, Lafayette Junior High School (1911), in 1925 photo. Located in southern downtown Los Angeles, the school closed in 1955 due to decreasing enrollment figures. Source: LAPL Photo Collection.



Figure 68. Winter 1933 class at Lafayette Junior High School. Source: LAPL Photo Collection.

to approximately 400.<sup>54</sup> Some areas annexed by the Los Angeles City School District already had schools to serve their own needs; more often, though, new schools were required. Between 1911 and 1915, a total of 22 schools had been annexed to the district, with an additional 31 elementary and high school buildings under construction.<sup>55</sup>

During the boom of the 1920s, Los Angeles film and aeronautics industries remained strong draws for new settlers. In one decade, between 1920 and 1930, Los Angeles's population doubled, climbing to 1.2 million, making the city the fifth largest in the United States. At a high point during the 1920s, new residential subdivisions were being established at the rate of 40 per week in the City of Los Angeles. By 1930, Los Angeles spanned 441 square miles.<sup>56</sup> This represented a twelvefold expansion in 30 years.

Concurrently, Los Angeles's public school enrollment grew nineteenfold during the 1920s. The construction boom in schools helped accommodate the enrollment increase, but the need for new schools and classrooms remained a constant issue. By 1933, the Los Angeles City School District included a student population of 300,000, attending 384 schools—293 of them elementary schools; 22 junior high schools; 32 senior high schools; and continuation, trade, and junior college facilities rounding out the remainder.<sup>57</sup>

## **Curriculum Shifts**

The Los Angeles City school districts followed the curriculum modernization and reform trends seen in the rest of the United States. By the early 1910s, the city's public schools had made a decisive move "away from the uniformity that was so much prized at the turn of the century. Diversification now marked the schools and the officials made that fact known."<sup>58</sup>

The heart of reform was designing curricula that flexed according to the students—their abilities, needs, psychological well-being, and their inherent curiosity and love of learning. For example, the new course of study in elementary schools was based on the idea that



Figure 69. Central Junior High School, as of circa 1925. Located in downtown Los Angeles on Hill Street, this school closed in 1946. Source: LAPL Photo Collection.

“individuals should progress in accordance with their individual capacities” and was organized in “large units with the activity approach emphasized throughout.”<sup>59</sup>

In 1911, Los Angeles established a new intermediate level for schools, launching the third junior high school system in the United States, behind Columbus, Ohio, and Berkeley, California. Vocational schools and junior colleges (as an extension of the high school curriculum) were also greatly expanded in this period.

### ***Social Responsiveness and a Broadened Mission for Public Schools***

In Los Angeles and elsewhere, this era saw a broadened role for public schools as community centers. Public education became more inclusive and socially responsive to underserved populations. During the first quarter of the twentieth century, a range of special-needs schools were established, including special facilities for the deaf, blind, physically disabled, or cognitively impaired; special facilities were also provided for children suffering from tuberculosis. National trends and legislation prompted the establishment of evening high schools, for adults seeking to broaden or finish their education; part-time high schools, to help meet the new requirement for working children between the ages of 14 and 18 to attend school part time; and vocational schools. Cafeterias and nurseries became part of schools—the first for nourishment, and the second to ensure that older children tasked with caring for younger siblings could attend school while their parents worked. Schools also offered assimilation and language programs for the city’s significant immigrant population.

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The first evening high school opened in 1907 in Los Angeles at the Polytechnic High School. Offered initially as a means for working adults to obtain a high school education or diploma, night schools blossomed in popularity; and by the post–World War I period, they served as informal community centers, with offerings expanding to include a variety of course offerings.

## ***Legislative Reform and Public Education***

The two other major changes to Los Angeles’s public schools were prompted by legislation at the state and federal level. Beginning in the early 1910s, legislation began emerging throughout the United States making part-time school compulsory for teenagers. The first such law was introduced in Wisconsin in 1911, with California following in 1919.

In 1913, a presidential commission was formed to assess the need for vocational training throughout the United States. One of the results of this commission was the 1917 Smith-Hughes Act, which, among other things, initiated new compulsory education requirements for school-aged children and provided federal funding for vocational schools and coursework, in particular in agriculture. In Los Angeles, specialized vocational training had been available as early as 1905, with Polytechnic High School. Throughout the early part of the twentieth century, technical schools offered specialized coursework, such as commercial courses at Polytechnic, industrial and household arts at the Manual Arts High Schools, and agriculture at Gardena High School.<sup>60</sup>

The state law that emerged from the Smith-Hughes Act required that all working children between the ages of 14 and 18 attend a minimum of 144 hours of class instruction per year.<sup>61</sup> In 1920, in response, Los Angeles public schools launched a program in part-time education, making use of “a large number of rented locations.”<sup>62</sup> In 1926, Los Angeles’s largest part-time high school—aptly named the Part-Time High School—became Metropolitan High School (located at 234 W. Venice Boulevard in Los Angeles, the campus became the Los Angeles Metropolitan Junior College in 1950).



*Figure 70. Frank Wiggins Trade School, circa 1925. Located in downtown Los Angeles on Olive Street, this school closed in 1951. Source: USC Digital Archive.*

The Frank Wiggins Trade School, the first of its kind in the district, was established in 1925 on Grand Avenue in downtown Los Angeles (though it was relocated in 1927 to South Olive Street). Named for the longtime secretary of the Los Angeles Chamber of Commerce, the Frank Wiggins Trade School provided a course of adult education in specific vocations and placement of students in the

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occupations for which they had been trained. Among its other curricula, the school offered the first professional culinary training program in the nation, an offshoot of the home economics program. The trade school evolved into the Los Angeles Trade-Technical College, still operational today as part of the nine campus, 882-square-mile Los Angeles Community College District.

The establishment of the District's first junior college in 1929 was represented as the crowning accomplishment of the administration then in office. The school district purchased the Vermont Avenue campus of the former State Normal School when it relocated to Westwood and established the Los Angeles Junior College, which was an immediate success. The curriculum constituted the freshman and sophomore years of college and included semiprofessional courses for students interested in a 2-year education, as well as certificate work for those planning to qualify for subsequent admission to a university.

Together with trade schools, junior colleges filled an important social need by supplying focused adult education and career training during the Depression years, and enrollment steadily increased as the war approached.

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Figure 71. Susan Miller Dorsey High School (1937), extant in mid-city Los Angeles near Baldwin Hills. The school's yearbook, "Circle," took its name from the innovative site plan and arc of outdoor corridors. Source: Circle, Dorsey High School Yearbook, 1942.

### C. ERA OF REFORM: GREAT DEPRESSION, EARTHQUAKE, AND EARLY EXPERIMENTS IN THE FUNCTIONALIST SCHOOL, 1933 TO 1945

“The old school was primarily designed to impress the adult and the new school primarily designed to impress and provide comfort to the pupil.”  
—William Wayne Caudill, *Better Design for Schools*, 1954

#### NATIONAL CONTEXT | DEVELOPMENTS

In the simple epigraph above, architect William Wayne Caudill (1914–1983) captured the evolving ideas about twentieth-century school design. Traditional schools had often been built as self-contained, monumental blocks, in Classical Revival and Beaux Arts–inspired styles designed to impart prestige. In the first quarter of the twentieth century, reformers started moving away from the multistory, block-style school in favor of a more flexible, program-differentiated school plant.

The reform movement was not concerned with bringing modernist style, per se, to school plant design. The real push was for a more “functional” school. If the function of a school was educating children—and if educational methods and curricula had improved and evolved—then school plant design had to evolve as well. Building plans, campuses, and interiors were increasingly designed to be more child-centered and flexible: “The broadening curriculum, the more active methods of learning, and emphasis upon doing and working with things rather than merely studying books—all have focused attention upon the importance of the physical environment.”<sup>63</sup>



Figure 72. Indoor-outdoor classroom, Corona Avenue Elementary School, Richard Neutra, 1935. Extant in Bell, California, south of Los Angeles. Source: USC Digital Archive.

Continuing the trend begun in the 1920s, integration of classrooms with the outdoors became one key factor for school plant improvement. The early-twentieth-century recognition of the importance of children’s playgrounds and an increasing emphasis on the benefits of outdoor living fueled this movement. Wrote Elizabeth Mock in 1943, “If we grant the importance of encouraging the child’s awareness of nature along with his sense of freedom, we can then understand the present tendency towards ground-level classrooms, each with its own door to the outside and its adjacent outdoor class area.”<sup>64</sup>



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Numerous proposals were forwarded for including more indoor-outdoor connections for classrooms and campuses, whether through the use of patios, courtyards, or playing fields. So central was the concern for outdoor classrooms and recreation that, by the 1930s, the

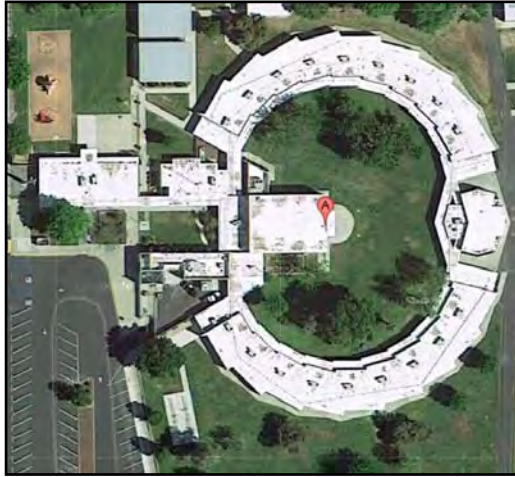


Figure 73. Richard J. Neutra School, Lemoore, California (Central Valley), 1960, based on Neutra's 1928 design. Source: Google Maps, 2013.

trend became known as the "open-air school" movement, with its emphasis on "air, light, outdoor learning, and easy circulation through the school buildings."<sup>65</sup> Site planning was also carried out with an eye toward environmental factors, such as sun patterns, interior cross-lighting, and ventilation. With its mild climate and room to grow, Southern California pioneered some of the nation's best and earliest examples of open-air schools in the 1930s.<sup>66</sup>

As in the 1920s, schools continued to play an increasingly important role as gathering places for the community. This was reflected in campus site planning, with auditoriums sited for public accessibility and separate entrances allowing for school-time access by the public that would not interrupt studies. Architects, designers, and school staff actively sought ways to adapt schools to this expanded function within the community, and innovations in this regard were amply noted in the education- and architecture-related trade magazines.

In the 1930s, an expanding field of research in the building sciences aided those tasked with designing comfortable classrooms for children. Controlling, designing for, and regulating the environmental conditions of classrooms became the topic of numerous studies, including in the science of proper lighting, ventilation, and safety systems (the field of acoustics came into play in the postwar period).

A new focus on defining and better understanding building typologies and their specific needs also grew out of this era, with the idea of creating better environments and lowering costs through standardization.<sup>67</sup>

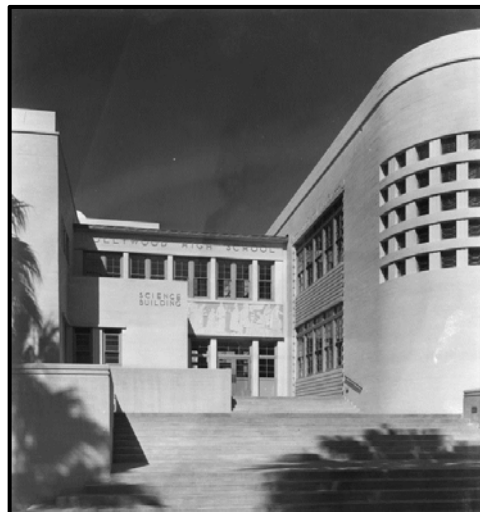


Figure 74. Hollywood High School, Marsh, Smith & Powell (1935), in 1939 photo. The school is still located in Hollywood on Sunset Boulevard and Highland Avenues. Source: LAPL Photo Collection.



Figure 75. Thomas Jefferson High School, Stiles O. Clements, 1936 image. Extant in south Los Angeles, on East 41<sup>st</sup> Street. Source: LAPL Photo Collection.

By the mid-1930s, the advent of the New Deal and the PWA (later the Works Progress Administration) sponsored a generation of new building. Throughout the United States, PWA funding helped buoy school construction during the Great Depression, with approximately 70 percent of all new school construction in the 1930s funded through the agency.<sup>68</sup> In Southern California, following the 1933 Long Beach earthquake and the urgent need for new facilities (described in detail below), PWA funding for school construction and reconstruction totaled over \$13 million, a sum accounting for 62 percent of the spending overall.<sup>69</sup>

Throughout the United States, PWA buildings, including dozens of schools, became known for their distinctive Streamline Moderne styling. In Southern California, Streamline Moderne ideas were also applied to historic-eclectic styles that had been popular in the 1920s, creating new stylistic hybrids.

### EFFECTS ON SCHOOL BUILDINGS AND CAMPUSES

#### *The Functionalist, Modern Movement in School Design*

By the 1930s, progressive educational reform had brought major changes: teaching methods and materials were becoming more hands-on, practical, and engaged; and the environments for learning were themselves transformed to facilitate the new ideas. As architectural historian Amy Ogata wrote, “Historians of education are still divided on the real impact of progressivism on American education, but its effect on the architectural discourse was profound and enduring.”<sup>70</sup>

Compared with school buildings and campuses just a decade before, schools were increasingly nonmonumental in their scale, site plan, and design. One-story buildings were increasingly used for all grade levels, in particular for elementary schools. In a companion piece to the Museum of Modern Art exhibit *Modern Architecture for the Modern School*, Elizabeth Mock wrote in 1943 that “if the architect is guided primarily by his desire to create a building for children, the result will almost certainly be a one-story school, built as close to the ground as possible. This is the easiest way to open each room to the outside, and the easiest way to attain suitable scale.”<sup>71</sup>



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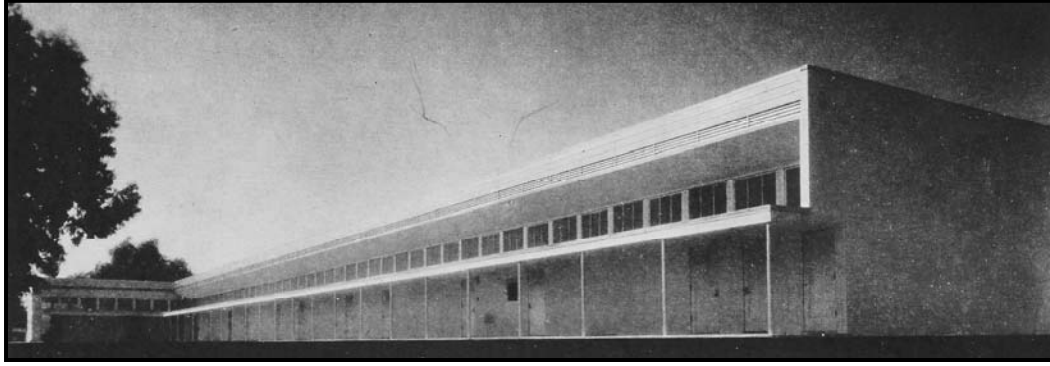


Figure 76. Richard Neutra's Corona Avenue Elementary School addition, 1934/1935. Extant in Bell, California, southeast of downtown Los Angeles. Source: *Built in USA*, 1944.

The emergence of modern architectural design provided a quantum leap forward for this new wave of reform. Modernism embraced honesty in structure and materials and a functional design driven not by a given style or ornamental program but by the building's purpose. By the postwar period, this debate had been settled, and modernism did become the preferred (though not exclusive) idiom for American school plants. But in the 1930s, this movement, which brought together ideas about educational reform, modern architecture, and research in building sciences, was just taking root.

## **William Edmond Lescaze**

One architect who actively advocated for a more modern, functional approach to school design in the 1930s was William Edmond Lescaze (1896–1969). Between 1929 and 1932, Lescaze, along with partner George Howe (1886–1955), designed one of the era's most significant modern buildings in the United States, the Philadelphia Savings Fund Society building, considered to be the country's first example of a skyscraper in the International Style.<sup>72</sup> In the mid-1930s, Lescaze published articles in architectural magazines as well as specialized education-related trade journals to argue for more functionalist, modern schools:

If buildings have an influence on us, should we not insist that our school buildings work well, and be good looking? Of course we should. But do they work well, and are they good looking? Alas, no! Most of the schools are massive, uninspiring, uninviting buildings. Pediments of limestone, a few columns and, when we can afford them, a tower or a cupola! Just as you may order lettuce salad with French dressing or mayonnaise, you may have a school building Gothic or Colonial!

There can be no school planning worthy of the name unless the functions of the building are clearly understood, clearly expressed: and that understanding, expressing clearly the functions of a building, has been achieved by all good architecture in the past, and is what modern architecture is today attempting to achieve.<sup>73</sup>



Figure 77. Corona Avenue Elementary School, 1935. Source: LAPL Photo Collection.



Figure 78. Same outdoor classrooms, circa 1950. Source: Getty Research Institute, Shulman Archives.

The key to this, Lescaze argued, was moving beyond historic eclecticism:

Modern functions cannot be fitted into old forms, nor can twentieth-century “uses” be combined with twelfth-century “beauties”! The buildings of the past are beautiful not because they are a “style.” They are beautiful because the men responsible for them devoted all their skill, their taste, their understanding, to fulfilling the purposes, the functions, of these buildings. In other words, these buildings grew out of the life of their time, to meet the requirements of their time. And that is exactly what our buildings must do.<sup>74</sup>

### **Richard Neutra**

As of 1936, Lescaze wrote, there was only one truly modern school building in the United States: Richard Neutra’s 1934/1935 Corona Bell Elementary School in Los Angeles. Like Lescaze, Neutra (1892–1970) was European-born and educated and had come to the United States in the 1920s. Neutra had long been working on the problem of the modern school plant, with a philosophy steeped in Progressive-era notions of deinstitutionalizing the classroom. As Esther McCoy wrote, Neutra’s ideas about school design

grew out of the conviction that tensions begin to accumulate in a child when he is taken from the home and living room into a school and classroom, to be moored to the floor, and forced to look up at a teacher sitting above him on a platform. ... Neutra saw great advantages in classrooms, especially for elementary grades, which resembled living rooms filled with group action—but a living room such as only a handful of architects had conceived at that time, one connected to a patio by a movable glass front.<sup>75</sup>

In 1928, Neutra had proposed a ring-plan school consisting of an outdoor, sheltered corridor providing circulation and access to finger-like classroom wings separated by landscaped patios and gardens. The elliptical plan was inventive and practical, as it made use of a compact lot and shortened distances between classrooms. (The plan was radical for 1928 but perfectly in the spirit of the times by 1960, when it was constructed as the Richard J. Neutra School by Neutra and his partner Robert Alexander in Lemoore, California.)

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969



Figure 79. Emerson Junior High (now Middle) School, Richard Neutra, 1937, Los Angeles. This school is extant and located on Selby Avenue near Santa Monica Boulevard in west Los Angeles. Source: Julius Shulman Archives, J. Paul Getty Trust, Getty Research Institute.



Figure 80. Seamless connections between classrooms and outside patios. Emerson Middle School, 1937. Source: Julius Shulman Archives, J. Paul Getty Trust, Getty Research Institute.



Figure 81. Richard Neutra's Emerson Middle School (1937), extant, west Los Angeles. Source: LAPL Photo Collection.

In 1934, Neutra was given the opportunity to translate theory into practice. In the wake of the Long Beach earthquake, the architect was chosen to design an addition for the Corona Avenue Elementary School. His simple, L-shaped plan quickly became a prototype for Californian (and American) schools and "a classic in its field."<sup>76</sup>

The addition consists of a linear, one-story wing of single classrooms. On one side, covered passageways provide circulation corridors and, as Esther McCoy noted, evoke the arcades of Spanish Colonial architecture. On the west elevation, sliding glass walls provide direct access to outdoor play areas and classrooms. Landscaping creates divisions between classes, and 6-foot roof eaves provide shelter and transitional space. With this, Neutra perfectly melded outside and in and presaged the ways in which postwar architects would create seamless indoor-outdoor spaces.

The construction system of earthquake-friendly wood framing with generous expanses of single-pane windows adds to the sense of weightlessness and integration with the site. With a band of high clerestories on one side and full-length windows on the other, Neutra controlled classroom illumination and provided cross-ventilation. As McCoy wrote, the Corona School "banished the 'listening classroom,' which had its effect upon education methods, for the teacher became a part of the group as soon as students were no longer restricted to fixed seats."<sup>77</sup>

As the decade progressed, the ideas of architects like Lescaze and Neutra started to take hold. In 1937, Neutra designed a second pioneering example of a functionalist school plant, with the steel-framed Ralph Waldo Emerson Junior High School in Los Angeles. In this school, the architect continued the same themes of indoor-outdoor integration on a more constricted urban site. Emerson Junior High's "basic plan organization and massing are clearly expressive of function, with classrooms efficiently organized along double-loaded hallways in freely arranged wings. ... The restrictions of the site are compensated by Neutra's inventive plan, making use of outdoor spaces, like a rooftop, for outdoor access."<sup>78</sup> As with the Corona Avenue project, Neutra created seamless connections between classrooms and patios with movable walls and landscaping.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

## ***Franklin & Kump and Finger-Plan Schools***

Beyond Los Angeles in this era, other prototypes that became influential in the postwar period were under construction. One of the most important of these was Franklin & Kump and Associates' Acalanes Union High School in Lafayette, California, east of San Francisco. Franklin & Kump's rational "finger-plan" school perfectly captured the ideas of the day and became the most common school plan typology in the United States in the 1940s.

Constructed in 1939/1940, Acalanes Union High School was designed for a large rural site, with one-story wings extending outward in finger-like wings. Classrooms consist of open lofts with adjustable plywood partitions dividing the interiors. The pavilion-like site plan, low scale, and finger-like classrooms provide ample opportunities for outdoor access.

As with Neutra's early experiments, Acalanes Union High School moved interior hallways outside, with sheltered outdoor corridors throughout the campus. A recessed terrace off the dining room provided outdoor seating areas for lunch, and lockers were installed on exterior walls. The finger-like plan also allowed for cross-lighting and ventilation for each classroom. To the north, students enjoyed outdoor views through full-length windows. To the south, bands of high clerestory lights provided balanced illumination without glare.

Modular design and construction allowed for easy expansion of the school as enrollment increased. The campus included a variety of facilities, including gymnasium and playing fields, workshops, dining room, a network of classroom wings, and a parking area, all

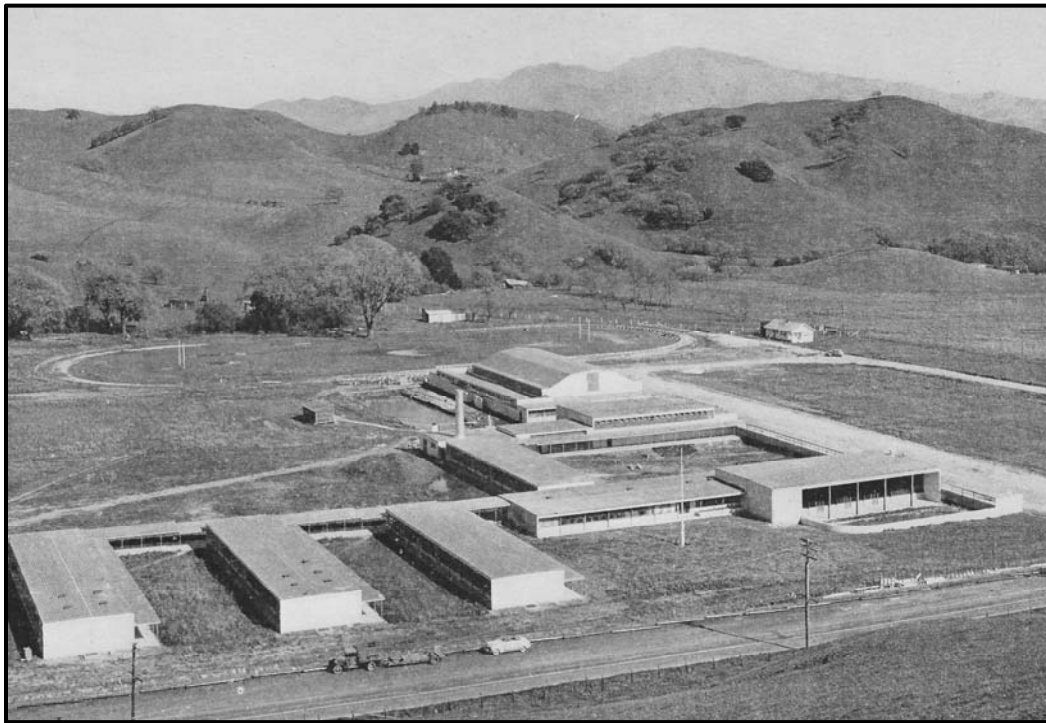


Figure 82. Acalanes Union High School, Franklin & Kump and Associates. Source: *Built in USA*, 1944.

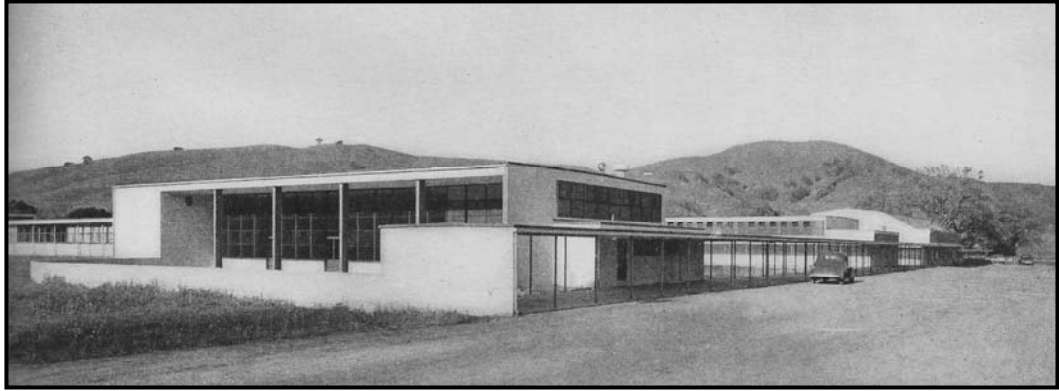


Figure 83. Franklin & Kump and Associates, Acalanes Union High School, Lafayette, California, 1939/1940. Source: *Built in USA*, 1944.

configured in a unified site plan. In keeping with 1930s planning trends, pedestrians and automobiles were separated through the use of a 500-foot-long canopied passageway, which connects the street and drop-off areas with the school entrance.

Although Franklin & Kump's school was published nationally on multiple occasions prior to 1945, it was in the postwar era that the school typology and plan took off. Pre-1945, Elizabeth Mock included the school in *Built in USA*, the Museum of Modern Art's 1944 exhibit and publication showcasing American regional modernism. Acalanes Union High School was one of only three other schools constructed between 1932 and 1944 included in the volume (Neutra's Corona Avenue project was among them).

Also included in the Museum of Modern Art's *Built in USA* was Eliel and Eero Saarinen's 1939/1940 Crow Island Elementary School in Winnetka, Illinois. Crow Island was another early experiment in how to interpret new ideas about education into function-driven, modern schools. The Saarinens, along with Perkins, Wheeler, and Will, proposed a domestic-scaled modular school, with an innovative pin-wheel plan, finger-like classrooms, plentiful opportunities for outdoor play, cross-lighting, and ventilation. This plan also was widely published and imitated in the postwar period.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

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Figure 84. Another highly influential pre-1945 modern, functional school design: Eliel and Eero Saarinen's Crow Island Elementary School in Winnetka, Illinois, 1939/1940. Source: *Built in USA*, 1944.

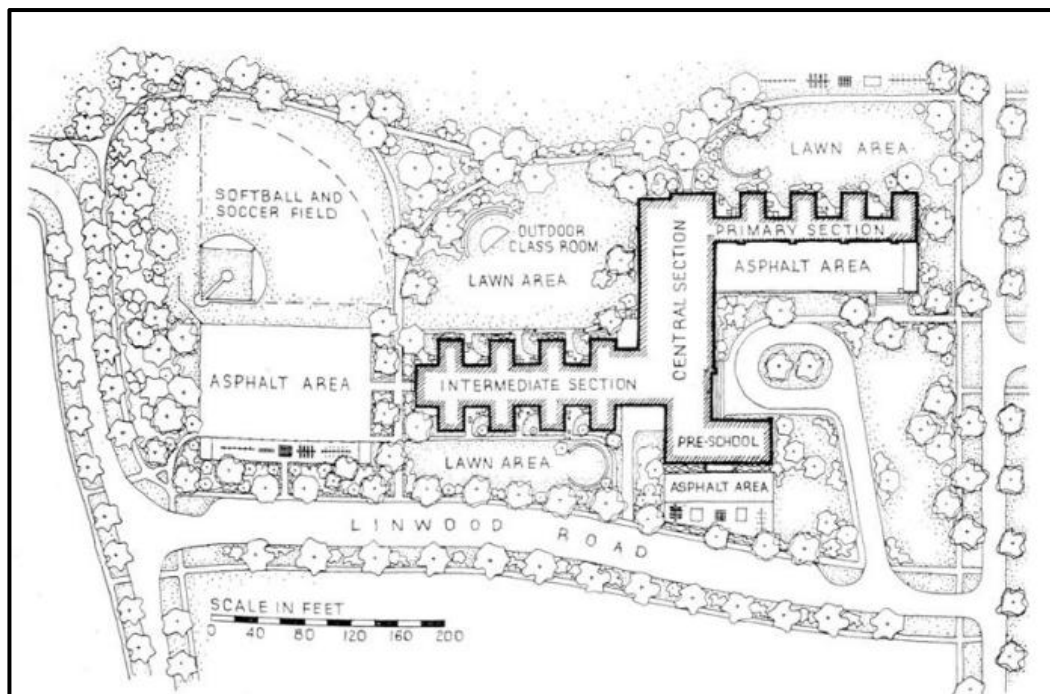


Figure 85. Plan, Eliel and Eero Saarinen's Crow Island Elementary School. Source: *Built in USA*, 1944.





Figures 86 and 87. Hollywood High School, Science Building, Marsh, Smith & Powell (1935), in 1939 (left) and 2002 (right). Extant in Hollywood, on Sunset Boulevard and Highland Avenue. Source: LAPL Photo Collection and LAUSD.

### ***Post–Long Beach Earthquake: The Era of the PWA Moderne | Streamline Moderne***

Not all examples of the functional school plant were modernist in the sense of being antihistoricist. Most 1930s schools continued to display stylistic programs and ornamentation, though tastes had shifted to PWA Moderne, Streamline Moderne, Art Deco, and streamlined versions of historic-eclectic styles, such as the Spanish Colonial Revival. School plants embracing the new ideas might express their function clearly, with a differentiated, unified campus plan, but they might also display a specific style. These examples were widely praised and published as representative of the 1930's movement toward more functional school plants.

Several of the most significant Southern Californian firms to point the way forward in this regard on a national scale were James Edward and David Clark Allison; Sumner Spaulding and John Rex; Donald and John Parkinson; and Norman Marsh, David Smith and Herbert James Powell (later Marsh, Smith and Morgridge). During this era, these firms, among others, participated actively in school construction, designing more functional, child-centered, open-air schools that were also historicist to varying degrees.

In the postwar period, Spaulding & Rex, Marsh, Smith & Powell, and the successor firm to the Parkinsons' partnership continued to play an active role in school plant design, by then in stylistic idioms that forwarded the cause of modernism.

### ***Marsh, Smith and Powell***

During the 1930s and early 1940s, Marsh, Smith and Powell designed numerous school commissions that garnered national attention. Their work brought together the latest ideas in functional site plans and child-centered buildings and classrooms, with the all-important indoor-outdoor spaces and connections. The same issue of *Architectural Record* featuring Lescaze's 1936 call to American architects used a Marsh, Smith and Powell school, Roosevelt Elementary School in Santa Monica, to illustrate the new trends.



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Figure 88. Post-Long Beach earthquake reconstruction at Manual Arts High School, Parkinson & Parkinson, circa 1935. Extant in mid-city Los Angeles, on South Vermont Avenue and West Martin Luther King Jr. Boulevard. Source: LAPL Photo Collection.



Figure 89. Manual Arts High School, Parkinson & Parkinson, circa 1935. Source: LAUSD.

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The firm, consisting of Norman Foote Marsh, David D. Smith, and Herbert James Powell, was also featured in a 1938 issue of *Architect and Engineer* in order to illustrate the “progress” made in American school design during the decade: “The architects of California can well take pride in that which has been accomplished during the last twenty-five years. Their school buildings are beautiful—they are practical, they are utilitarian, and they are economical. To the credit of the architectural profession, the architecture of educational buildings has kept abreast with the progress of education.”<sup>79</sup>

## ***Los Angeles City School District’s The Progressive Elementary School: A Handbook***

Southern California’s version of the open-air, functional school was also brought to a national audience in 1938’s *The Progressive Elementary School: A Handbook for Principals, Teachers and Parents*. The guidebook was written by Robert Hill Lane, the assistant superintendent of schools in Los Angeles and vice president of the Progressive Education Association. Published by Houghton Mifflin Company and prepared in conjunction with the Los Angeles City School District and State Department of Education, Lane’s handbook explored the region’s array of modern, functional, open-air school plants.

The handbook drew on the wealth of post-Long Beach earthquake examples with numerous illustrations and plates. It also described the philosophical underpinnings of the movement: the desire to create more child-friendly, inviting schools and classrooms. The handbook was one of many primers and guides on modern schools, but *The Progressive Elementary School* brought Los Angeles school plant design to a national audience.

The trend continued away from the institutional, monumental school block and toward more approachable, flexible facilities and plants. A few years before the end of World War II, the movement had footholds throughout the United States, just in time to decisively shape the character of schools designed during the postwar building boom. As one commentator noted in 1942,

Here and there throughout the country there appear signs of another basic change in school architecture. It is primarily a movement away from the monumentalism of the past four decades. People are not using their school buildings to sell their communities. The school building is being developed as a more intimate and better integrated element of the community, a place closely association with child and adult living.<sup>80</sup>

The era of reform in progressive educational methods and school plants had thus come of age by the end of the Great Depression and just prior to 1945. Many prototypes and proposals emerged throughout the 1930s, with many examples from Southern California. By the time the war ended and construction began in earnest, these pre-1945 examples suggested the direction and the future shape of the modern, functional American school plant.

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Figure 90. Franklin Junior High School, Long Beach, March 1933. Source: National Information Service for Earthquake Engineering, University of California, Berkeley.

## LOS ANGELES CITY SCHOOL DISTRICTS | CONTEXT AND DEVELOPMENTS

### ***Long Beach Earthquake and the Field Act***

The March 1933 Long Beach earthquake was one of the decade's most significant events for the region's built environment. The 6.5-magnitude earthquake caused significant damage and losses; in Long Beach, more than two-thirds of the city's schools were in need of demolition and reconstruction.<sup>81</sup> In Los Angeles, 40 unreinforced masonry school buildings were destroyed.<sup>82</sup> In addition, after a survey of Los Angeles schools within 10 days of the earthquake, all damaged or "precariously placed" chimneys, parapets, fire walls, and ornamentation were removed. Fortunately, the earthquake took place when school was not in session.

The Long Beach earthquake posed a disaster for the district but also an opportunity for the region's architects. While change and reform in school plant design were already underway, the Long Beach earthquake and the mini-school construction boom it triggered provided ample opportunities to test new ideas about school architecture and campus planning in Southern California.

These changes also affected the state overall. One month following the earthquake, through the efforts of California Assembly member Charles Field, the State of California adopted the Field Act. Similar legislation had already been passed following the 1925 earthquake in the City of Santa Barbara. With this, the state had adopted building codes tailored to upgrading seismic stability. In 1927, the City of Los Angeles revised its own City Building Ordinance and adopted additional requirements for schoolhouse construction. All new construction after 1927 adopted the updated building codes, which included requirements for fire-resistant corridors, stairs, and exterior walls and for reinforced concrete beams within floors and roofs. By the time the 1933 earthquake struck, these post-1927 schools indeed proved more resilient.



Figure 91. October 1934, Lincoln High Tent Village, awaiting reconstruction of classrooms. Source: LAPL Photo Collection.

Through the Field Act, the lessons learned in the Long Beach earthquake were used to further strengthen school building codes. The law directed the State Division of Architecture to design and enforce regulations to ensure earthquake-resistant buildings. State oversight and implementation of building codes/construction inspections were also established. Additionally, the City of Los Angeles Board of Education again revisited its own building codes. Post-1933 elementary school buildings were not to exceed one story in height, and high school buildings were limited to two stories (this would change over time, given the tremendous demand for classroom space in the postwar period and relative scarcity and expense of large lots). New buildings incorporated the latest construction techniques and prominently showcased the use of modern materials such as steel and reinforced concrete. On sites where soil load-bearing properties were found to be too low for steel and concrete, demolished schools were replaced with relatively earthquake-resistant wood-frame buildings. In cases where damaged buildings were rehabilitated, methods included installing reinforcing steel columns, beams, and diagonal bracing, exterior refacing with reinforced gunite and installation of reinforced concrete walls.

Some of the requirements of the Field Act were well aligned with the goals of progressive architects for more child-scaled, one-story schools. In a 1942 article on modern trends in school architecture, one commentator observed the overlapping influences: “Much emphasis has been given to the open plan in California. It is possible that this development has not grown so much from changing educational practice as it has from structural needs.”<sup>83</sup> The author’s insight had come from an *Architectural Record* article on a new

# LOS ANGELES UNIFIED SCHOOL DISTRICT

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“open plan” school in El Monte, California. As *Architectural Record* pointed out, however, “Two factors determined the choice of open plan, with departments housed in separate structures: the local soil-bearing value was very low; the buildings had to be designed to resist earthquake stresses.”<sup>84</sup> In this way, the new requirements were compatible with the trend of the times toward one-story, open-plan buildings and campuses.

## ***PWA Funding and the Post–Long Beach Earthquake Building Boom for Schools***

Following the earthquake, the district planned for phased reconstruction. Available at the time were a total of \$5.3 million in unsold bonds. The PWA purchased the bonds and granted additional matching funds for school reconstruction efforts. A total of \$12.1 million was ultimately raised for the 1933 to 1935 reconstruction program. Approximately \$250,000 funded the construction of temporary classroom housing, in order to minimize the interruption of the school year. An estimated 879 tents and 139 bungalows were initially erected to house the district's enrollment of 300,000 students.

As the school reconstruction program progressed, final steps included reinforcing or replacing 132 unreinforced masonry buildings, strengthening 275 buildings constructed



Figure 92. Children attending school in tents, one year following the Long Beach earthquake, March 1934. Source: LAPL Photo Collection.

since 1927, replacing 51 wood-frame buildings, and eliminating all temporary classroom housing. By 1937, over \$34 million had been spent on post-earthquake school construction, repairs, retrofitting, and rehabilitation. The advent of World War II put substantial investments in schools on hold (after war's end, a \$75 million bond issue kick-started these efforts).

As reconstruction began, Los Angeles City school districts intended to build new seismically sound buildings but also facilities with regionally inflected styles. As the *Los Angeles Times* reported in 1934, new and repaired buildings would be designed for “absolute safety with simplicity and beauty of architecture in harmony with

the atmosphere and traditions of Southern California.”<sup>85</sup> Many designs were executed by the district's architectural department, under the direction of Alfred Nibecker, but bids were also issued to outside architects, with the intention of awarding the work to a wide field of architects. In addition, new buildings were to be explicitly Southern Californian in design but “free of needless ornamentation.”<sup>86</sup> This represented a move away from 1920s period-





Figure 93. Reseda Elementary School, 1936. The spare Mission Revival style was in keeping with the post-Long Beach earthquake trend to design in the “traditional Southern Californian” mode. This school is extant and located on Wyandotte Street, Reseda, San Fernando Valley. Source: LAUSD.



Figure 94. South Gate Middle School, 1941. A streamlined mix of Moderne, classical and modern elements. This school is extant and located on Firestone Boulevard, South Gate. Source: LAUSD.

revival styles but also a nod to earthquake safety, since applied ornament often failed and fell to the ground during earthquakes.

### ***Early Experiments with the Finger-Plan School***

Other school plants began exploring the new currents in modern, function-driven design. Henry L. Gogerty and C. E. Noerenberg’s Susan Miller Dorsey High School is one such example. While the 1937 design drew inspiration from the PWA Moderne, the classrooms, patio spaces, and radial site plan, with classrooms extending outward like spokes of a wheel, were innovative for the time. With this site plan, the architects created an early form of condensed finger-plan school, which made use of a smaller site but provided the ample air, cross-lighting, and outdoor access possible with one-story finger-like classrooms. A circular outdoor corridor, sheltered beneath wide overhanging eaves with thin post supports, acted as the outdoor hallway for the campus, providing circulation to all classrooms and the main entrance. Adopting the language of functionalist reform, *Southwest Builder and Contractor* praised how the designs “architecturally and structurally express in functional form the outer envelope of a process of public education.”<sup>87</sup>

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969



Figure 95. Susan Miller Dorsey High School, 1937, Gogerty and Noerenberg, mid-city Los Angeles. Adopting the language of formalist reform, Southwest Builder and Contractor praised how the design expressed "in functional form the outer envelope of a process of public education." Source: LAUSD.

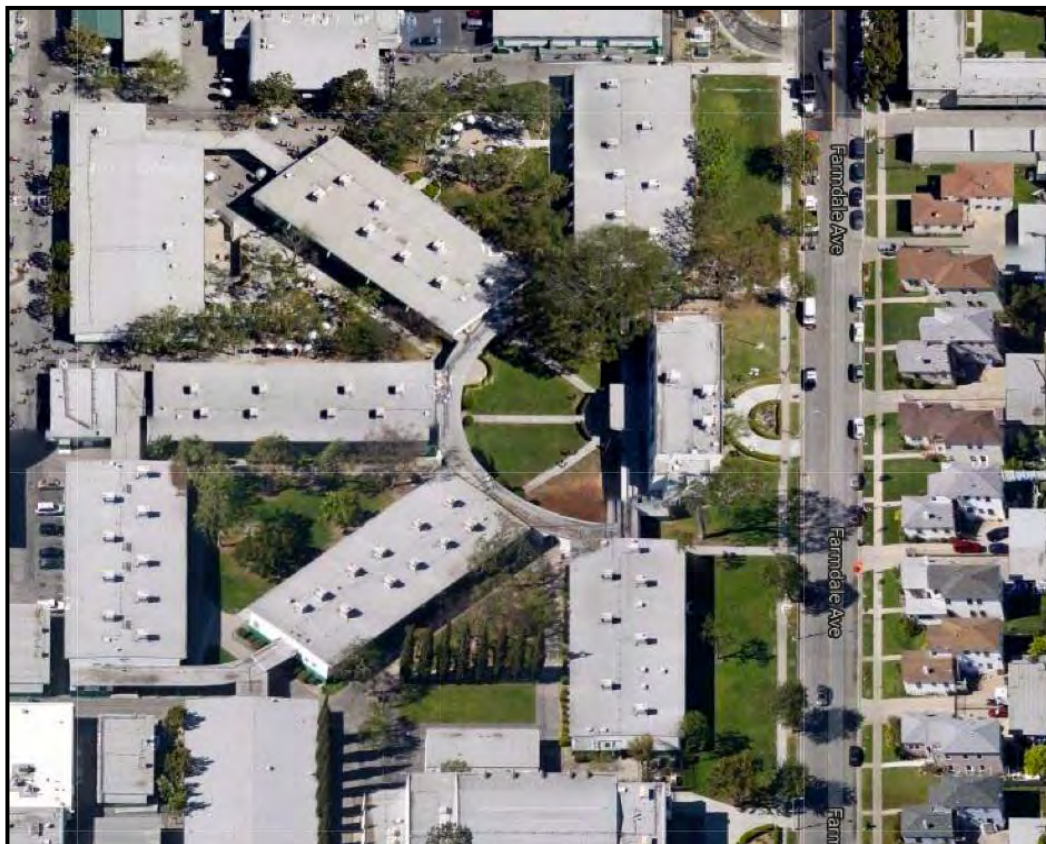


Figure 96. The inventive site plan and semicircle corridors of Dorsey High School. Source: Google Maps, 2013.



### ***Great Depression and World War II: Curriculum Shifts***

Just as the Long Beach earthquake struck in 1933, the Great Depression hit its nadir, and within the decade, the advent of World War II brought another round of readjustment. This period brought many changes to the operations and curricula of Los Angeles's public schools. Overall the decade was characterized by experimentation and liberalization of the curricula, in particular for secondary students. The general trend moved away from college preparatory studies and toward a more generalized program. Courses and new areas of emphasis came to reflect the realities of the era and the individual needs of students. A few examples include the expansion of social studies courses to consider contemporary issues and problems and a shift in the sciences toward more applied topics, aimed at the consumer rather than the future researcher.<sup>88</sup>

Through this era, the notion of the public school as an important gathering place for the community took a new turn. Schools became the focal point for a number of initiatives aimed at mitigating the social costs of the Great Depression, and later at supporting the troops during World War II.

By 1935, two federal programs had been launched that ultimately had a significant presence in Los Angeles public schools: the Emergency Education Program and the National Young Administration. Established in 1933, the Emergency Education Program provided federal



Figure 97. Lincoln High School War Bond Drive, 1945. Source: LAPL Photo Collection.

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Figure 98. The women of Frank Wiggins Trade School, 1943. Source: LAPL Photo Collection.

funding to hire unemployed teachers to provide instruction to adults. With this, teachers were again gainfully employed and adults were able to further their training and education. By 1934, Los Angeles public schools provided approximately 200 such classes at 52 different campuses.<sup>89</sup>

In 1935, Congress authorized the National Youth Administration (NYA) program, aimed at providing jobs to teenagers and young adults in order to help them remain in school. The program was open to those aged 16 to 25, who earned no more than \$6 a month. Through the NYA, Los Angeles public schools provided employment to thousands of students. After World War II began, this program continued but shifted its focus to defense-related classes.

## ***Los Angeles Public Schools and World War II***

World War II brought another round of adjustments to an educational system already reeling from the Great Depression. The focus on every front of American life for defense-related support brought major shifts. New classes for secondary students included defense-related training and specialized programs in aircraft recognition and aviation mechanics. At the city's vocational schools, applied skills were emphasized. The Frank Wiggins Trade School began teaching auto mechanics to female students, since the "war has taken away many a guy with the monkey wrench, and so today industrial schools are opening new courses for

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

women auto mechanics to fill the gap.”<sup>90</sup> Coursework during the war and immediately after reflected the sociopolitical background of the time, with school districts offering programs in democratic systems of government, the functions of the United Nations, and, for a short time, “moral and spiritual values.”<sup>91</sup> Geography courses took on a more international view, exposing students to a wider array of countries around the world.

The war also impacted activities in the city’s elementary schools, where students were given opportunities to participate in a variety of war-related drives and programs. By 1942, Los Angeles City school districts had created nearly 30 different ways for students to support the war effort. The goal was organizing “every school so that each pupil and teacher had a part in supporting the war program” and inspiring “each child to be so patriotic that he would, of his own volition, carry on a program which would help the war effort.”<sup>92</sup>



Figure 99. World War II in the Los Angeles public schools: materials drive, Crescent Heights Boulevard Elementary School, circa 1943. Source: LAPL Photo Collection.

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Figure 100. Victory Garden at Manual Arts High School, 1942: "Students in a gardening class at Manual Arts High School learning about vegetables. The students and teachers during the spring term of 1942 had over 500 Victory Gardens to help in the war effort." Source: LAPL Photo Collection.

Two federal programs brought significant changes to the operations and curricula of Los Angeles public schools. The first program was the National Defense Training (NDT) program, which provided \$15 million to American schools, \$400,000 of which went to Los Angeles, for vocational and war-related training programs. Congress authorized the program in 1940 (before the U.S. entry into the war); by September 1940, the Los Angeles Board of Education had launched programs in 13 high schools and 10 evening high schools. Training programs included welding and shipbuilding, mechanics, and aircraft production and maintenance. The program continued to grow, and by 1942, Los Angeles City public schools housed the largest NDT program in the United States.<sup>93</sup> In August 1942, the NDT program became the War Production Training program.

In 1942, following the U.S. entry into the war, Congress established the Rural War Production Training program. A branch was established in Los Angeles, with classes targeted to working teenagers and adults attending evening high schools. Referred to as the Out-of-School Youth and Adults program, this initiative was more geared toward food production than industrial production (as with the NDT program). Canneries were established in schools throughout the district as a result of the program, which was renamed "Food Production War Training" in 1943. After the war, though federal funding of the project ended, the Los Angeles Board of Education continued the program, and community canning projects remained in place at a number of area high schools.

**D. EDUCATING THE BABY BOOM: POSTWAR EXPANSION &  
THE FUNCTIONAL, MODERN SCHOOL, 1945 TO 1969**

“Above all the school must be childlike.... It must be a place for living, a place for use, good hard use, for it is to be successively the home for a procession of thousands of children through the years. It must be warm, personal and intimate [so] that it shall be to each of these thousands ‘My school.’”

—An American educator, writing to his architect, *Architectural Forum*, 1952<sup>94</sup>

**NATIONAL CONTEXT | DEVELOPMENTS**

With the end of World War II, the United States turned its attention to the long-awaited postwar—and post–Great Depression—expansion. The magnitude of the construction and population boom that followed, and its effect on the built environment, have been well documented. A wealth of literature has been devoted to the era’s severe housing crisis, for example, and the array of initiatives launched to address it.

Less widely explored in the literature, but equally pressing at the time, was a dire classroom shortage. In 1949–1950, enrollment at U.S. elementary and secondary schools stood at 25.1 million. In one decade, this number expanded by nearly 50 percent to approximately 36 million; by 1971, it reached 46 million.<sup>95</sup> In 1955, in the midst of this boom, “editors at the *Architectural Forum* worried, ‘every 15 minutes enough babies are born to fill another classroom and we are already 250,000 classrooms behind.’ The rising population of young American children made school building, together with housing, the most widely discussed architectural challenge after World War II.”<sup>96</sup>

Perhaps in no other state of the union was this growth felt more acutely than in California. The booming birth rate was accompanied by a wave of in-migration, as new settlers were drawn by established employment centers in, among other things, the aerospace industry, which had shifted operations to peacetime production. In Southern California, one region with a particularly strong pull in this regard was the San Fernando Valley. The postwar construction boom transformed miles of the San Fernando Valley’s agricultural lands into new residential communities, and the population—and demands on schools—expanded accordingly.

School districts around the country struggled to keep up with unprecedented demand and overcrowded classrooms. Adding to the challenges facing school districts was the need not only for new schools, in particular in emerging suburban communities, but also the need to repair and maintain aging school plants, facilities, and equipment.



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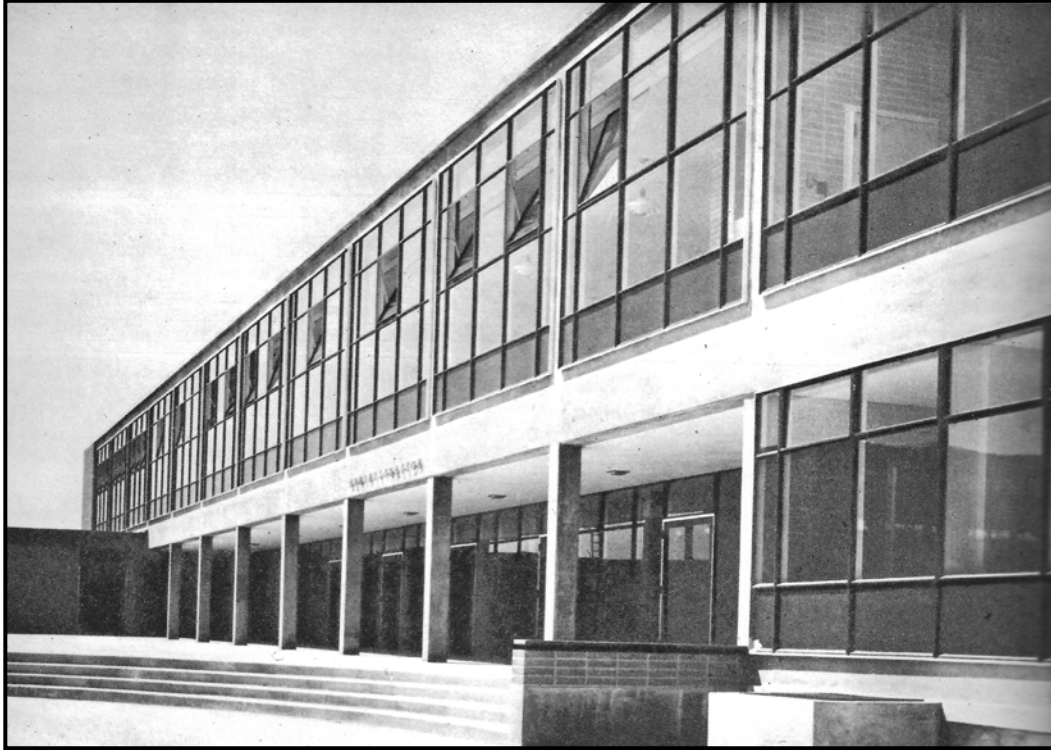


Figure 101. Modernism became the preferred (though not exclusive) style for postwar American schools. Ernst J. Kump, San Jose High School, 1952. Source: *Built in USA*, 1952.



Figure 102. Fern Drive School, 1956, Smith, Powell, & Morgridge, Fullerton. A functionalist postwar school need not also adopt a modern, machine-age aesthetic. The notion of providing a child-friendly environment often translated into incorporating forms and details commonly used in residential architecture. Source: J. Paul Getty Trust, Getty Research Institute, Julius Shulman Archives.



Figure 103. Oso Avenue Elementary School, 1959, Woodland Hills. Most students “come from new tracts still opening in West Valley.” Source: LAPL Photos.



Figure 104. Image for a 1959 article on the “back to back construction” of schools taking place in the San Fernando Valley. Source: LAPL Photos.

### 1930s Reform Comes of Age: The Modern, Child-Centered School

In this era, the functional, child-centered school plant that emerged in experimental form in the late 1930s became the norm. Newspapers, magazines, and trade journals in a variety of fields—including architecture, engineering, building trades, education, and school design—began forwarding proposals for the ideal modern school. Organizations devoted to the topic also helped standardize and disseminate these ideas; these included the American Institute of Architects Committee on School Buildings, the National Council on Schoolhouse Construction, the American Association of School Administrators, and the Council of Educational Facilities Planners. Journals and guidebooks proliferated with the latest ideas in school plant design, infrastructure and systems, and, above all, how to meet the demand in the most economical fashion possible. Within the architectural profession, a new subgroup of architects who specialized in school design also started to emerge.

Modernism—whether regionally inflected, wood post-and-beam or the machine-age International Style—became the idiom of choice for expressing the new ideas, for its relative economy, informality, accessibility, and, increasingly, “democratic” spirit:

All the architecture shall be a setting for childlife. Everywhere children and what they can do shall be the adornment of the structure. The building itself shall be the place of joy in living. But I must warn you. It must be a place which permits the joy in the small things of life, and in democratic living. These two things we must safeguard in children’s lives.<sup>97</sup>

While some school plants adopted the period styles popular at the time—including a postwar return to American Colonial Revival—the trend by not only modern architects but also educators was to move beyond historicist styles: “The building must not be too beautiful,” wrote one commentator, “lest it be a place for children to keep and not one for them to use. Its materials must be those not easily marred, and permitting some abuse. The



# LOS ANGELES UNIFIED SCHOOL DISTRICT

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Figure 105. Smith, Powell & Morgridge, Thomas Jefferson Elementary School, 1954. Source: J. Paul Getty Trust, Getty Research Institute, Julius Shulman Archives.

finish and settings must form harmonious background with honest child effort and creation.”<sup>98</sup>

While regional variations existed, this was a national project. The extent to which school districts throughout the United States adopted similar approaches and strategies to the modern school plant was noteworthy. Since the early twentieth century and the days of the Progressive Education Movement, national standardization was a key element of reform. But the avenues available to architects, builders, and schools in this regard proliferated in the postwar era.

The National Council on Schoolhouse Construction, for example, addressed the topic in its annual guidebook, *Guide for Planning School Plants*. Written for school facilities managers, planners, and architects, the 1946 version illustrates the extent to which ideas considered experimental just a few years before had become best practices for the nation. The emphasis remained designing schools around their function—serving and educating children. With the psychological well-being of the student the prime consideration, numerous studies were devoted to optimal interior conditions and controls, such as studies in proper lighting, color schemes, and surface reflectivity to “increase morale and to decrease fatigue.”<sup>99</sup>



Figure 106. John Lyon Reid, Manor Elementary School, Fairfax, California, 1958. Source: J. Paul Getty Trust, Getty Research Institute, Shulman Archives.



Figure 107. Henry Gogerty, Inglewood High, 1954. Source: J. Paul Getty Trust, Getty Research Institute, Shulman Archives.

### ***Educational Facilities Laboratories (EFL)***

The need for schools remained dire through the 1950s. In 1953, the American Institute of Architects established its Committee on School Buildings to address the issue. In 1956, the committee became the Educational Facilities Laboratories (EFL), a nonprofit funded by the Ford Foundation's Fund for the Advancement of Learning. The EFL "brought together educators, architects, manufacturers, and government officials" to "encourage new ideas about both curriculum and architecture."<sup>100</sup> The EFL conducted research, sponsored conferences, and held grant competitions.

With the rate of school construction continuing apace, EFL officials visited Southern California often. In 1962, the EFL sponsored a tour of one of the nation's early open-plan schools in West Covina, California. Attending the tour were Dr. James D. MacConnell, director of the school planning laboratory at Stanford University; Dr. Paul Salmon, superintendent, Covina Valley District; and Dr. Harold B. Gores, president of EFL in New York. In 1965, the EFL conferred an award on Covina High School as one of three outstanding Californian examples of "schools without walls" (the open-plan school, described in more detail below).<sup>101</sup>

In 1964, the EFL sponsored an airplane tour of the United States for 60 educators, including two from Orange County. The EFL flyover tour reflects two noteworthy points about this era in school design: (1) many innovations were best revealed from the air, by looking at the campus design and plan, building siting and configuration; and (2) ideas about how to create the best possible modern school were developed in tandem and shared among architects, builders, researchers, and school officials throughout the United States.<sup>102</sup> Between 1958 and 1976, the EFL invested over \$25 million in the rethinking and designing modern American educational facilities.<sup>103</sup>

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC CONTEXT STATEMENT, 1870 to 1969

By the early 1960s, a shortage of teachers, as well as ever-evolving ideas about childhood development and education, prompted a renewed wave of reform. At its heart was an updated version of the Progressive Education Movement: the idea was that schools—both in terms of facility design and teaching methods—were not adequately harnessing a child’s natural curiosity and creativity. There was a renewed sense that classrooms should nurture and capitalize on these qualities and adapt to the individual needs and pace of each student.

The national embrace of team teaching (an idea further promoted because of a shortage of qualified teachers) was one result of this movement. As the name implies, team teaching established a system whereby teachers shared pupils and class spaces, and classroom sizes varied throughout the day, depending on the wishes of the teachers. A few dozen students might gather to watch a movie, then break into smaller groups to work on projects. The classroom would be a dynamic rather than static place, with mixed grade levels, multimedia educational methods, and hands-on learning.

This push for more creative, flexible curricula and teaching methods flourished in Southern Californian schools. By 1968, reformed programs had been launched in 18 Southern Californian elementary schools, in conjunction with the League of Cooperating Schools. As in early eras, methods that appeared “traditional” were de-emphasized and a more experimental classroom environment was proposed. The coordinator of the program, Robert E. Keuscher, invoked many of the same ideas shaping curricular reform throughout the twentieth century, with a distinctively 1960’s spin:

Labels are disappearing, there are fewer graded classes. Schedules are more flexible. More and more, curriculum is not worked out in advance; the kids work it out as they go along, and it’s more advanced and more scholarly. The teacher is more of a guide than an oracle. The emphasis is shifting from the group to the individual; there is more emphasis on query and discovery.<sup>104</sup>

Of the Southern Californian schools making this transition, Keuscher said, “We’re helping these 18 become creative schools, but it’s a slow, painful process. Our biggest problem is to make teachers and principals comfortable with change. ... But it has been great to emancipate the creative teacher.”

Throughout this era, the debate on how to shape a curriculum that best served children, and how to keep up with ever-expanding enrollment figures, continued to evolve. Yet the basic ideas seen in the early twentieth century remained at the heart of educational reform at midcentury. The evolving experiments in curricula and school plant types grew out of the same wish to eliminate institutionalism and to fashion a child-centered curriculum and school plant. The variety of building plans and campuses that grew out of midcentury reform reflected the postwar boom of construction and population, the robust network of publications and organizations disseminating the ideas nationally, and evolving philosophies about childhood development and education.



Figure 108. Grover Cleveland High School, Charles O. Matcham & Stewart S. Granger and Associates, architects (1959), Reseda. Source: Sapphos Environmental, Inc., 2013.

### EFFECTS ON SCHOOL BUILDINGS AND CAMPUSES

The stylistic vocabulary of choice for American schools became modern—antihistoricist, decentralized, with function instead of style the driving concern. Of course, modernism did not take hold in earnest for residential design (to the dismay of many architects at the time). But for schools, by 1950, “the battle between ‘contemporary’ and ‘traditional’ was won. The public not only began to accept ‘modern,’ but also demanded it. ... This new movement ... brought together educators as well as architects, and together they are forwarding the cause of architecture for children.”<sup>105</sup>

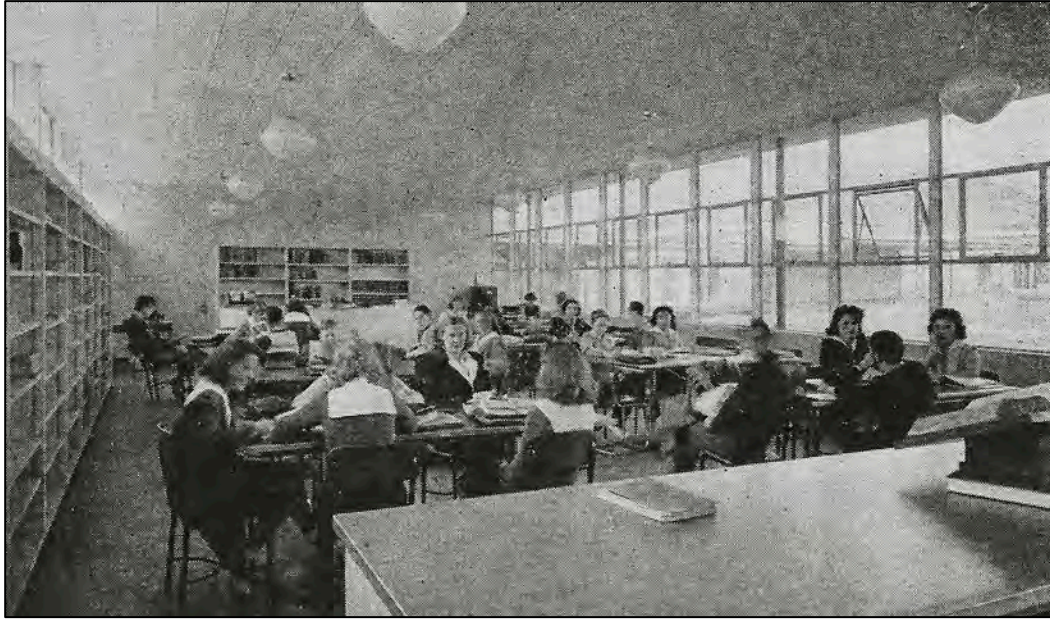
Although this era brought a major stylistic shift, from the architects’ perspective, designing in a modern “style” was not the main concern. Progressive architects at midcentury often sounded a tone of idealism about the social value of their work. As architect William Wayne Caudill explained about school design, “There is no ‘modern’ style as such. Each new building ideally is the product of specific solutions to individual problems peculiar to that building’s particular environs, site, function, budget, and designer. If two new schools are similar in appearance, they are ... only because they were designed to perform similar specific functions in similar environments.”<sup>106</sup>

This was especially true for architects trained and already practicing in the pre-1945 era. William Wayne Caudill was among them; the Texas architect graduated from MIT in 1939 and, by 1941, had already authored a pioneering study on modern school design, *Space for Teaching*. Throughout the 1940s and into the 1960s, Caudill and his firm specialized in functional, modern classrooms and campuses.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

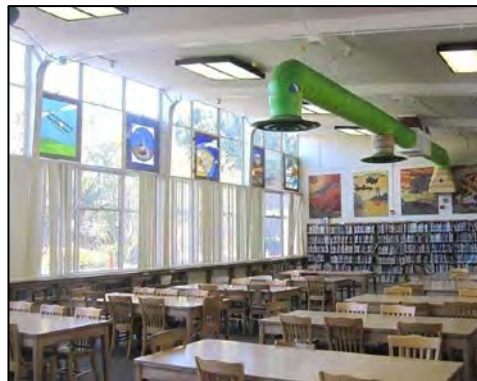
HISTORIC CONTEXT STATEMENT, 1870 to 1969



*Figure 109. Balanced cross-lighting is achieved through full-length windows on the north elevation and clerestories on the south. Franklin & Kump, Acalanes Union High School. Source: Built in USA, 1944.*

By 1969, Caudill had become an international authority on school design, and his firm, Caudill, Rowlett & Scott, had designed educational facilities in 28 states. Caudill's classic finger-plan schools in Blackwell, Oklahoma, designed in the late 1940s and early 1950s, epitomized the school planning ideals of the time. In 2009, all four schools—Huston, Northside, Parkside, and Washington Elementary—were listed on the National Register for their exemplification of postwar ideals of modern American school design.

Whether a postwar school exhibited a modern or mildly historicist design, they likely shared the same basic design principles. Postwar schools were designed to feel decentralized, nonhierarchical, approachable, informal, and child-centered (indeed, domestic-scaled for elementary schools, with lower ceilings making the class feel more like a living room). The preferred massing was one story, with an axial wing of classrooms usually one room deep, to provide cross-lighting, ventilation, and easy access to the outdoors.



*Figure 110. Orville Wright Middle School, library roof slopes upward on north elevation to allow for maximum indirect lighting. Source: LAUSD Orville Wright Middle School, Pre-Planning Survey, 2011.*

Postwar schools continued to emphasize and experiment with the limits of indoor-outdoor integration. By the postwar period, one feature that was still experimental in the 1930s was now essential: canopied outdoor corridors. Supports remained simple posts or pilotis, either in steel or wood post-and-beam. It was a feature used in schools throughout the United States. Outdoor corridors lined classroom wings, providing sheltered circulation throughout the campus as well as outdoor gathering spaces.

During this period, size and orientation of windows took cues from the environment: a building with north-south exposure, for example, might feature large-panel, floor-to-ceiling glazing on the north elevation, with bands of clerestory casement windows on south elevations modulating or softening illumination. Experiments in roof configuration and design also tackled the issue not only of lighting but acoustics.

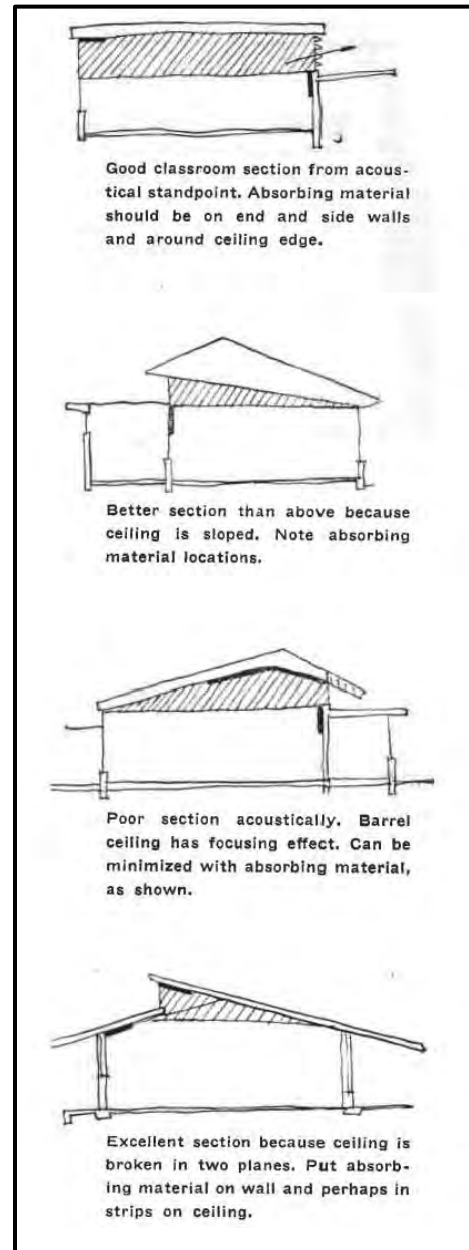


Figure 111. Architectural Forum, 1949, showing studies of roof configuration and acoustic properties. Source: Baker, 2008.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

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Figure 112. Fern Drive School reflected the latest ideas about roof-line configuration and classroom acoustics. Smith, Powell, & Morgridge, 1956, Fullerton. Source: Getty Research Institute, Shulman Archives.



Figure 113. Thomas Jefferson Elementary School, with covered corridors, outdoor courtyard spaces, ample awning casements and clerestories. A sloped shed-roof caps the building for good classroom acoustics. Smith, Powell, & Morgridge, 1954, Anaheim. Source: Getty Research Institute, Shulman Archives.





Figure 114. Hallways move outdoors in postwar schools. El Monte School (1956) Los Angeles County. Source: Getty Research Institute, Shulman Archives.



Figure 115. Classroom and patio are one in Neutra's Kester Avenue Elementary School (1951), extant, Sherman Oaks, San Fernando Valley. Source: Getty Research Institute, Shulman Archives.

When necessary, massing might climb to two (or rarely, three) stories, if real estate was scarce and demand was high. But this allowance was more commonly made for junior and high schools. Roofs were flat, sloped, or occasionally gabled, with simple, exposed construction systems of steel or concrete framing with large-pane in-fill windows. Wide overhanging eaves with simple porch or piloti supports were common for connecting corridors. In terms of materials, the treatment and finishing were simple and unpretentious.

In the postwar period, architects economized through the use of new prefabricated materials, such as plywood, glass, and steel, as well as modular design and coordination, a 1930's movement that took off in the postwar era following the 1945 adoption of the 4-foot module as the American Standard Measurement.<sup>107</sup> Modular design and construction allowed for easy expansion as school enrollment grew and was a common construction technique in Southern Californian schools. (Two early all-steel-frame schools in Los Angeles were the 1937 Emerson Junior High, by Richard Neutra, and the 1959 Justice Street Elementary School in Canoga Park; stylistically unpretentious, the school was promoted as durable, safe, and easily expandable, a concern that remained pressing at the end of the 1950s.)

Modular site planning and design also lent itself particularly well to creating the indoor-outdoor connections now considered essential. As with the residential architecture of the era, school design relied on generous expanses of windows and outdoor access to patios or courtyards to provide students with recreational areas and outdoor classrooms. Throughout the United States, the importance of indoor-outdoor living for both residential and educational architecture remained a central concern. In this respect, California schools continued to garner national attention. In its 1949 series on postwar American schools, for example, *Architectural Forum* commented that "possibly because California's balmy climate ventilates educators' minds as well as their houses, California schools have been less tradition-bound than most. As one of the fastest growing states in the union, California has had plenty of chance to experiment in school design."<sup>108</sup>

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

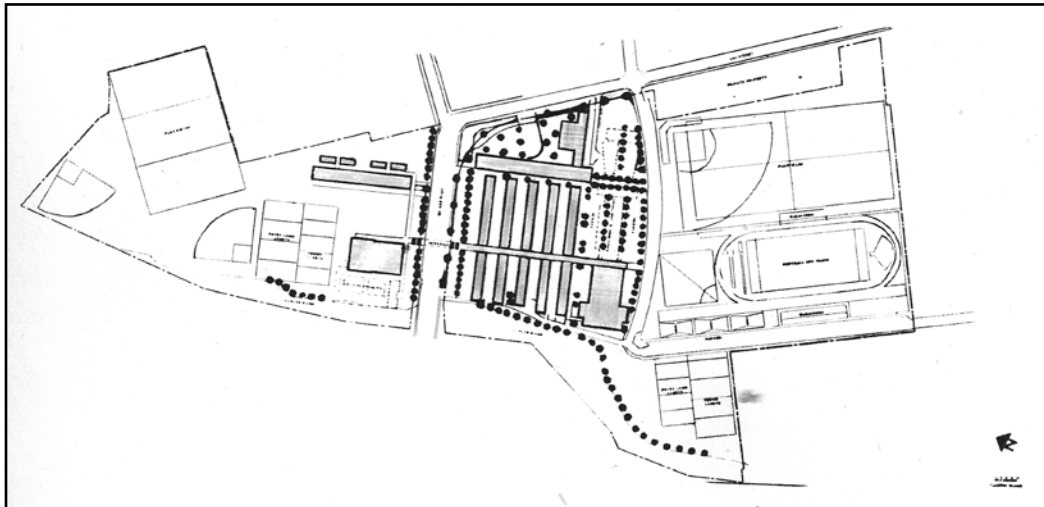


Figure 116. Ernst J. Kump, San Jose High School, San Jose, California, 1952. Source: *Built in USA*, 1952.

By the 1950s, school design had entered “a new age of innovation,” as the decade brought “a proliferation of standardized plans and facades.”<sup>109</sup> In California and elsewhere, three main plan types emerged during this period: the finger-plan school, the cluster-plan school, and the open-plan school. As the trends came and went, these plan typologies morphed, hybridized, and changed. But they shared basic design principles, and most reflected the tenets of midcentury modern design.

## ***The 1940s and the Decade of the Finger-Plan School***

The plan type that best captured the design principals of the immediate postwar years was the finger-plan school, which was launched in the late 1930s in Franklin & Kump’s Acalanes Union High School and the Saarinen’s Crow Island Elementary School. According to *Architectural Forum*, this plan type, dubbed the “western finger plan,” became the most influential building typology for schools in the 1940s. The finger-plan school resembled

a tree plan, based on a trunk corridor with side branches. It rests on radical standardization of classrooms; on absolute insistence that all classrooms share the best (north) orientation to sun and air; daylight for all of them from the open-corridor side as well as the main window side. This plan is not only flexible ... but extensible indefinitely outward like a tree, by growing at branch-ends and by sprouting new branches.<sup>110</sup>

To illustrate the advantages of the plan in 1949, *Architectural Forum* chose the 1939/1940 Acalanes Union High School, which it described as

the first large scale school which could serve as a complete demonstration of principles which amounted to a schoolhouse revolution—the revolution of the thirties. Since then, the Acalanes type of school, with its wide ranging, one-story classrooms arranged according to the “finger” plan, has swept the West Coast, is sweeping rapidly across the Midwest on its way to the East Coast.<sup>111</sup>

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Figure 117. An expanded Acalanes Union High School, Franklin & Kump. Source: *Schoolhouse: A Primer*, 1958.



Figure 118. Finger-plan school in Eugene, Oregon, 1947. Kelly Junior High. Source: *Pinyerd Historic Postcards*.



Figure 119. Exterior of a finger-plan school: G. Russell Wilkerson Elementary School, 1950, El Monte. Source: Getty Research Institute, Shulman Archives.

Acalanes had been published nationally, on multiple occasions, prior to 1945, but it was in the postwar period that the “schoolhouse revolution” it started took off in earnest. In the immediate postwar period, numerous examples could be found on the West Coast. Even though the plan type spread through the United States, the Californian roots and flavor of Acalanes Union High School were often highlighted.

In 1958, a self-described “primer” on how to build a good modern public school described Acalanes High School’s divided “rows of classrooms with open-ended corridors of greenery, to achieve good ventilation, sound isolation, and a remarkable California-like architectural comfort.”<sup>112</sup>

*Built in USA* included another California finger-plan school in its 1952 edition, San Jose High School, also by Ernest J. Kump. In San Jose High School, Kump proposed a slightly more condensed finger-plan, with concrete-frame construction, generous expanses of windows set flush to the wall plane, and a sheltered corridor with unadorned post supports providing circulation and outdoor spaces.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

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Figure 120. Huston Elementary School, Caudill, Rowlett & Scott, 1949, Blackwell, OK. Source: Getty Research Institute, Shulman Archives.



Figure 121. Huston Elementary School, Blackwell, OK. Source: Google Maps, 2013.

With many of the early experimental schools located in California, the issue arose of whether these prototypes would work in the rest of the country. In a 1943 article on modern American schools, Elizabeth Mock commented on this question: “Many people have the illusion that such schools are impractical. ‘Fine for California,’ they will say, ‘but not for this climate. Too costly to build and heat.”<sup>113</sup> However, Mock argued, modern materials and construction techniques were sound and economical enough to mitigate these problems. William Caudill appears to have agreed, as evidenced in his four classic finger-plan schools in Blackwell, Oklahoma (all now listed, as noted earlier, on the National Register of Historic Places).

As the popularity of the finger-plan school increased, its basic form changed to accommodate climate variations. Modifications on the plan included double-loaded hallways to provide the same level of indoor-outdoor connections, light, and ventilation, but with one less elevation exposed to the exterior. In the Midwest, the spread-out finger-plan became a compact trunk, with double-loaded corridors providing better insulation. Other plan innovations included a zigzag building plan, with an interior connecting walkway, in order to double-load corridors but also maximize window space for each classroom.

Two examples of more condensed finger-plan schools are seen in Richard Neutra’s Kester Avenue Elementary School in Sherman Oaks and Robert Evans Alexander’s Baldwin Hills Elementary School in Los Angeles, both from 1949 to 1951. Neutra designed the finger-plan of the Kester Avenue Elementary School around a compact central axis, with classroom wings alternating with landscaped patios. With its seamless connections between classrooms and outdoor play areas, the Kester Avenue facility displayed, in Esther



Figure 122. Kester Avenue Elementary School, Richard Neutra (1951), Sherman Oaks. Source: LAUSD Kester Avenue Elementary School Pre-Planning Survey, 2011.

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McCoy's word, the "essentials of the open-air classroom ... restated in a more refined form."<sup>114</sup> Canopied passageways supported with light steel columns provided circulation and outdoor gathering areas.

Baldwin Hills Elementary School was constructed as part of the groundbreaking garden city of Baldwin Hills Village. Architect Robert Alexander arranged the school along a central corridor/axis, with parallel classroom wings extending from each side in lengths tailored to fit the site. Swaths of greenery divide the classroom wings, which are sheltered beneath wide overhanging eaves. The focal point of the entrance is a dramatic, cantilevered canopy, resting on a simple steel I-beam. The design otherwise is spare, unpretentious, and modern.



Figure 123. Kester Avenue Elementary School, Richard Neutra (1951), Sherman Oaks. Source: LAUSD Kester Avenue Elementary School Pre-Planning Survey, 2011.



Figures 124 and 125. Neutra's conceptual sketch of Kester Avenue Elementary School and the current aerial view. Source: McCoy, Neutra (left) and LAUSD Kester Avenue Elementary School Pre-Planning Survey, 2011 (right).



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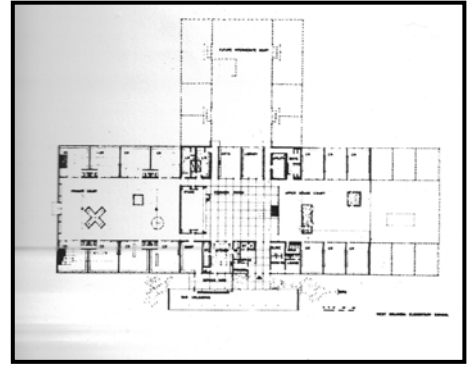
HISTORIC CONTEXT STATEMENT, 1870 to 1969



Figure 126. Robert Evans Alexander, Baldwin Hills Elementary School, 1949-1951. Source: The J. Paul Getty Trust, Getty Research Institute, Shulman Archives.



Figure 127. Neutra & Alexander, Baldwin Hills Elementary School. Aerial shows the condensed finger-plan design used to create the preferred one-story massing, set off by swaths of landscaping and patios, but with a more compact site plan. Source: Google Maps, 2013.



Figures 128 and 129. Cluster-plan school, Donald Barthelme & Associates, West Columbia Elementary School, West Columbia Texas, 1950. Source: *Built in USA*, 1952.

### ***The 1950s and the Advent of the Cluster-Plan School***

By the early 1950s, the popularity of the finger-plan school had begun to decline.<sup>115</sup> First, the design required large swaths of land to accommodate the extended site plan. Second, the plan increased cross-campus walk times and communication. In some scenarios, it also made more sense to build upward instead of outward. On hillside locations, where an expanded footprint meant doubling or tripling already expensive grading costs, the finger-plan school was not a viable option. In mass circulation and trade magazines of the day, though, the one-story scale was still preferred, in particular for elementary schools (the exception remained densely developed urban sites, where one could only expand upward).

The need for cost-effective school design and construction was an additional factor in the move away from the finger-plan. By the early 1950s, there were signs that the immediate postwar focus on carefully harnessing and controlling light—including orienting the building on a north-south axis to create the perfect blend of cross-lighting—was becoming too time-consuming. Not all sites would be large enough, and not all building programs well-funded enough, to justify having such an expenditure of design time devoted to fenestration alone. In 1952, *Architectural Record* observed that, in national school design,

in more and more localities we can expect substantially less emphasis on daylighting. Natural light is so variable that it can seldom be relied on during the entire school day without considerable recourse to electric light. Control of daylight to prevent glare has been found costly and involved.<sup>116</sup>

With high demand and restricted funding for new schools a constant issue, the possibility of a more compact campus plan became the subject of study, a few early prototypes, then a new trend, the cluster-plan school, by the early

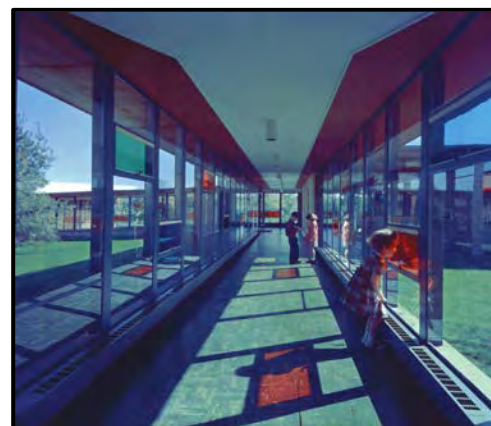


Figure 130. Cluster-plan school, Perkins & Will, Heathcote Elementary School, Scarsdale, New York, 1953. Source: Ogata, 2008.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

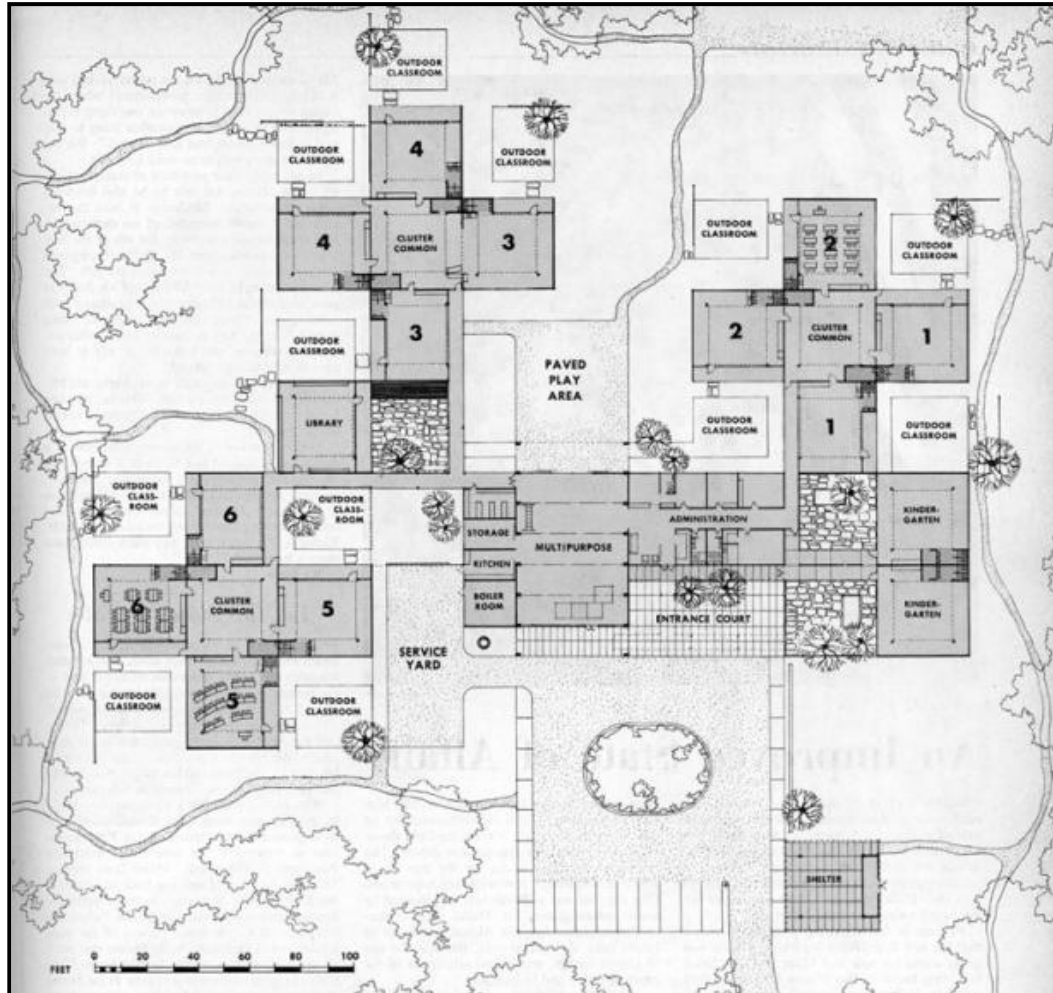


Figure 131. Prototype for a cluster-plan school and unified campus, *The Architect's Collaborative*, Walter Gropius, 1954. Source: Ogata, 2008.

1950s. The cluster-plan school offered a logical solution to these issues. It retained the low massing and indoor-outdoor access and views for all classrooms. But rather than extending wings along an axis, the plan called for grouping them as modular, standalone units around a shared central courtyard. Classrooms still had generous expanses of windows, but now views took in the courtyard and other classrooms, which provided a more communal, neighborhood-like setting. As architectural historian Amy Ogata observed, the plan type provided “both economy and a meaningful spatial experience. In organization and details, the prominent cluster schools of the early and mid-1950s reflected a new sensitivity to the child’s perception.”<sup>117</sup>

As with the finger-plan, the new typology was interpreted and designed in many different variations, but the basic ideas remained the same.

Even in California, with space to grow, the cluster-plan became the preferred typology in the 1950s. Finger-plan schools were still built—usually the condensed or modified typologies

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Figures 132 and 133. On left: Courtyard of a cluster-plan school: John Muir Elementary School (1951), John Lyon Reid, Martinez, California (northern California). Source: Ogata, 2008. On right, aerial of John Lyon Reid, John Muir Elementary School. Source: Google Maps, 2013.

already emerging by the late 1940s. But by the early 1960s, the cluster-plan school had “almost universally replaced the finger plan concept.”<sup>118</sup> In a five-year study of the state’s school plants, the California Department of Education praised the cluster-plan for more efficient land utilization and for encouraging “cooperation between teachers by allowing them to share multiuse classrooms, resources center, and teacher preparation areas, all adjacent to their classrooms. ... Better acoustical control and lighting is evident, and technology is enabling these comfort factors to be coordinated with flexible interiors.”<sup>119</sup>

The advantages of this plan were many: more child-friendly in its scale and setting, especially for younger children; more communal, with more shared spaces; and easier to supervise. With this plan, what had been the corner of the room on the interior became the front row on the courtyard.

One early example in California was John Lyon Reid’s 1951 John Muir Elementary School in Martinez, California, northeast of San Francisco. In his design, Reid employed a typical pavilion-like plan, with long one-story classrooms separated by patios and landscaping, accessed via sheltered walkways with wide eaves. The classroom wings are clustered around cross-wings, creating a courtyard setting. As with the Saarinen’s Crow Island school, Reid’s L-shaped classrooms created enclosed outdoor areas for outdoor play and recreation. In a demonstration of the nonhierarchical, informal campus, Reid also eliminated the formal auditorium and designed instead an all-purpose room, “for meetings, lunches, and play, that looked onto a central courtyard through large sharply angled windows.”<sup>120</sup>

Within the Los Angeles City School District, Sumner Spaulding and John Rex’s Orville Wright Middle School (originally Westchester High School) was another early example of a finger-plan and cluster-plan hybrid, this time for a high school campus. The school incorporated the best of midcentury modern design, by one of the region’s renowned firms, with the newest design principles for school plants. Completed in stages between 1948 and 1952, Orville Wright Middle School was constructed for a growing residential community near one of Los Angeles’s centers for the aerospace industry.

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Figure 134. Orville Wright Middle School (originally Westchester High School), Spaulding & Rex, 1948-1952. Source: Getty Research Institute, Julius Shulman Archive.



Figure 135. Orville Wright Middle School. Bands of clerestory windows provide balanced lighting for classrooms. Source: Flight, Westchester High School Yearbook, 1956, [www.e-yearbook.com](http://www.e-yearbook.com).





Figure 136. Westchester High School (now Orville Wright Middle School), Spaulding & Rex (1948-1952), west Los Angeles. Source: J. Getty Trust, Getty Research Institute, Shulman Archives.

In a spare, modernist design, Spaulding & Rex incorporated the same modular design, low massing, and easy indoor-outdoor connections typical of the era (and midcentury modernism in Southern California). Cross-lighting was provided through bands of clerestories and single-pane fixed and casement windows. A network of canopied corridors linked buildings and facilities throughout the campus. In a nod to the aerospace industry employing much of the adjacent community, the campus cafeteria featured a circular, space-age design.

The campus overall displays a decentralized but unified plan, zoned for automobile and pedestrian-only areas, with pavilion-like classrooms wings “clustered” around courtyards. In the “Curating the City” program for modern architecture, the Los Angeles Conservancy noted that Spaulding and Rex’s Westchester High School took the basic tenets of the International Style and Southern Californian educational architecture and “turned them into a spectacular example of a Mid-Century Modern school. ... This campus is a wonderfully intact and very vibrant testament to the power of good ‘design for learning.’”<sup>121</sup>

Another LAUSD example of a hybrid finger- and cluster-plan school is the George K. Porter Middle High in Granada Hills. Built in 1959 and designed by Rowland H. Crawford, the campus displays a pavilion-like plan, with axial classroom wings connected by a central corridor. Swaths of landscaped patios divide the classrooms. Interrupting the axis, the focal point of the campus is a landscaped quad, with an expansive lawn ringed by trees creating a neighborhood, park-like setting.

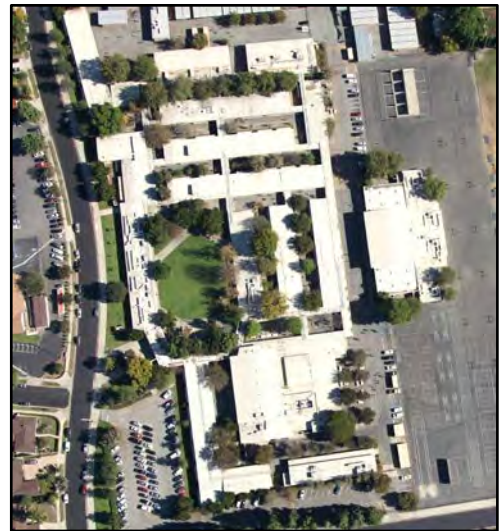


Figure 137. Combination cluster- and finger-plan, George K. Porter Middle School, Granada Hills, California, 1958. Source: LAUSD Porter Middle School Pre-Planning Survey, 2011.

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Figure 138. 1953 aerial, Orville Wright Middle School. Source: USDA, [www.historicaerials.com](http://www.historicaerials.com).



Figure 139. As of 2012, the campus plan of Spaulding & Rex's Orville Wright Middle School remains largely intact. Source: LAUSD Orville Wright Middle School Pre-Planning Survey, 2012.





Figure 140. George K. Porter Middle School (1958), Granada Hills, San Fernando Valley (extant). Source: Getty Research Institute, Julius Shulman Archives.

Typical of modern campus planning, and similar to Orville Wright Middle School, the site plan turns inward on itself. Automobile traffic and drop-off areas are located on the exterior, with extended canopied corridors providing access to the campus.

The George K. Porter Junior High also reflects how Los Angeles's still-expanding suburbs provided a testing ground for modern design and programming ideas school plants. The school is located in Granada Hills, also home of Joseph Eicher's celebrated midcentury modern tract of Balboa Highlands, now a Historic Preservation Overlay Zone in the City of Los Angeles. These buildings and so many others like them reflect how the suburbs continued to expand, especially throughout the San Fernando Valley, and how by the late 1950s midcentury modernism enjoyed wide acceptance among the public.

### ***The 1960s and the Open-Plan School***

Another wave of school plant reform in the early 1960s brought calls for more flexibility. To accommodate the new method of "team teaching," the focus became designing completely adaptable interiors, with movable walls and few built-ins, in a new typology known as the open-plan school.

In light of this new trend, the finger-plan of the 1940s—those "once-daring school plants with long corridors and classrooms located on one or both sides were now dismissed as hopelessly dull 'egg-crates.'" <sup>122</sup> Basic features like load-bearing interior walls came to be seen as too limiting. As the EFL wrote in a study, "'Old walls should not stifle new ideas. Identical boxes must not enforce the same program on all students and teachers; each is a unique individual. Fixed furnishings must not quash spontaneous inquiry.'" <sup>123</sup> The school capable of serving the needs of students, the EFL concluded, offered space to "accommodate groups of various sizes from 100 students down to one or two students studying by themselves" and "space allowing for the rapid shifting of group size or change in group's activity." <sup>124</sup>

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Figure 141. Caudill, Rowlett, & Scott, Paul Klapper School, New York, 1966-1967. Source: Ogata, 2008.

EFL findings were well publicized and widely published, first finding audience in the nation's many education-related trade publications and into mass-market newspapers. Reporting on the findings of an EFL study, the *Los Angeles Times* wrote that "if you were to take the roof off most schools and look in, you would see a series of identical rooms, approximately 30x40 ft., strung along both sides of a corridor. This is the floor plan of an obsolete school."<sup>125</sup> This description, of course, fit the classic finger-plan school, and many cluster-plan schools, considered cutting-edge just one decade before.

What this meant in terms of school design was a less low-slung, spread-out campus; the buildings were more compact, with higher ceilings. The idea of cross-lighting and ventilation provided by the long rectangular classroom wing fell out of favor. They were no longer as essential, since, in the early 1960s, improved air-conditioning systems diminished the importance of cross-ventilation and less glazing was generally



Figure 142. Thurston School, Open Plan Model (1967), Flewelling & Mood. Source: Getty Research Institute, Julius Shulman Photography Archive.



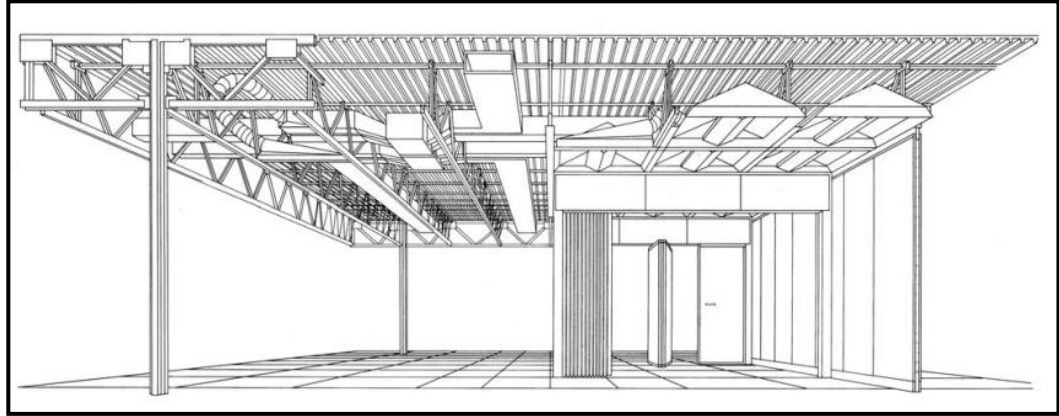


Figure 143. Standardized, demountable components for an open-school, *School Construction Systems Development*. Source: Ogata, 2008.

used. Since the open-plan school had to accommodate interior spaces separated by non-load-bearing walls, roof spans had to be long and high, with a steel structural system providing, essentially, a large high space into which the school's program could be designed. Massing increased, and corridors moved back inside.

Although the most obvious changes brought by the open-school plan were to school interiors, the shift was also discernible on the exterior. Some—but not all—open-plan schools adopted the circular form, with architect William Caudill arguing that the circular form best served team teaching, since the circular plan offered “continuous movement of children.”<sup>126</sup>

Architects also experimented with hexagonal building shapes, either with self-enclosed campuses or smaller circular classrooms clustered around a common area or courtyards (in yet another variation bringing together two plan types). One of the “most adventurous examples” of the plan type, according to architectural historian Amy Ogata, was Caudill, Rowlett & Scott's Paul Klapper School in New York, constructed in 1966/1967.

### ***School Construction Systems Development (SCSD)***

In efforts to promote the open-plan school, the EFL awarded a substantial grant to develop “an economical, standardized building system” through its School Construction Systems Development (SCSD) program.<sup>127</sup> The program developed, standardized and manufactured modular components and structural systems for open-plan schools. The SCSD school components and infrastructure were standardized but aesthetically flexible, allowing for design and plan variations so that “architects were not limited in plan layout.”<sup>128</sup> High roof spans of 60 to 70 feet provided the structural template into which the school's interior program could be designed.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

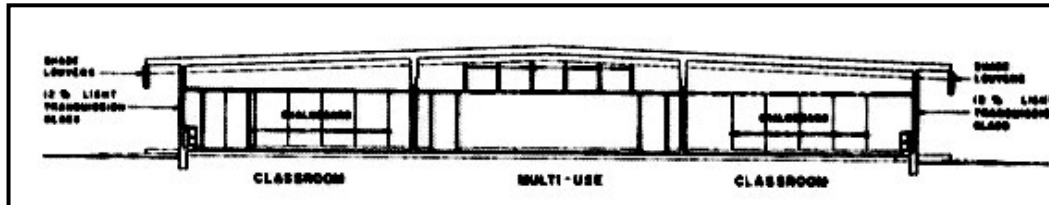


Figure 144. Section, Van Duzen Elementary School, open-plan school with cluster-plan configuration.  
Source: Gibson, 1965.

The SCSD system was promoted nationally. In 1962, the program “had the commitment of twelve California school districts to develop and build schools worth 25 million dollars.”<sup>129</sup> Ultimately, 13 SCSD schools were constructed in California. The formation of the SCSD also grew out of the astronomical costs facing school districts and boards to keep up with demand; the goal was creating prototypes that offered economical, good design, reflecting the latest ideas in educational methods and school plant design. Modern school architects around the nation experimented with the new ideas.

Ultimately, in spite of high expectations, open-plan schools “faced problems of practicality and perception.”<sup>130</sup> Problems related to acoustics plagued open schools, for example. The gap between theory and practice also became an issue, as the open-plan school did not in and of itself guarantee that teachers would adopt the creative, flexible team-teaching strategies that had prompted design reform in the first place. Much national debate and discussion about the open-plan school took place in the educational and architectural trade press. By the mid-1970s, the open-plan school had joined the finger-plan and cluster-core plan as experiments in school design that declining quickly in popularity.

As with the finger- and cluster-plans, there were many combinations of the main plan types. The Van Duzen Elementary School in Northern California, for example, represented one of first “cluster plan schools built in California with open planning.”<sup>131</sup> Constructed in the early 1960s for a cooperative/team teaching program, the school consisted of three parallel classroom wings, open and flexible on the interior, but configured around an exterior courtyard, for the benefits of the clustered site plan.

Constructed in 1964, the Round Meadow Elementary School, in Hidden Hills, was another example of an open-plan school, this time in Southern California. Again, the cluster-plan idea played a role in the design: “This school is designed so that each building can work as a cluster-type ‘little school.’”<sup>132</sup> At the center of each open-plan building was a multipurpose area, with a resource center and library. The buildings tended to be higher, with more wall space and fewer windows. The interior was made flexible through the use of folding walls, and a relative lack of windows was compensated for through a modern air-conditioning unit. As with the earlier postwar typologies, the open-plan type accommodated a variety of stylistic variations.



Figure 145. New community, new school: Hoover High School, Lakewood (1963). Source: The J. Paul Getty Trust, Getty Research Institute, Julius Shulman Archives.

### LOS ANGELES CITY SCHOOL DISTRICTS | CONTEXT & DEVELOPMENTS

#### *The Building Program*

In the postwar period, the order of the day for Los Angeles City school districts was keeping up with demand. Overseeing the first decade of postwar expansion was Alfred Nibecker, who had served as chief architect for the architectural department of the district since the 1920s. As before, Nibecker oversaw design and construction of schools, with a variety of commissions still shared between area architects, in particular those who had begun to specialize in school design, and the in-house team of the district. In 1955, Nibecker was made an honorary member of the Structural Engineers Association of Southern California, the association's highest award. That same year, he retired. Following his retirement, the board appointed Ernst Raymond C. Billerbeck as district architect.<sup>133</sup>

As school construction expanded in the suburbs, however, enrollment figures at several downtown schools were in sharp decline, resulting in the closing of a number of campuses in the postwar period (among them Central Junior High, founded in 1911 and closed in 1946; and Lafayette Junior High, founded in 1911 and closed in 1955). Between 1946 and 1953, the enrollment of Lafayette Junior High dropped by one-half, falling from nearly 1,400 in 1946 to 700 in 1953/1954, reflecting the population shift from the city to the suburbs.<sup>134</sup>

During this period, standardized construction techniques and components, with variations reflecting differences in site conditions and demand, allowed the district to expedite construction. Standardization meant that many campuses throughout the district, in particular schools constructed during the 1950s, display identical or similar elements and features. Common modular components (for elementary, middle, and senior high schools) included classroom wings that are one-room deep, one story in height, with a finger-link rectangular plan. These buildings are often capped with a slightly sloped shed roof. Along one side (intended for southern exposure), clerestories span the building below the roof line. Shade is provided through either wide (usually cantilevered) roof eaves, in steel or wood, or a wide, sheltered arcade. These arcades generally rise to the level of roof clerestories and are supported on simple pipe supports.

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Figure 146. San Fernando Valley expansion: Panorama City, Burton Elementary School, 1951. Source: The J. Paul Getty Trust, Getty Research Institute, Julius Shulman Archives.



Figure 147. Pacific Palisades Charter Senior High School (1961), Adrian Wilson & Associates, Pacific Palisades, west Los Angeles. Source: Sapphos Environmental, Inc., 2014.



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Figures 148 and 149. Fernangeles Elementary School (1954), Sun Valley, San Fernando Valley. Image on the left shows the Administration Building and Auditorium; image on right shows the student lawn and landscaping, from the vantage point of sheltered outdoor dining area. Source: Sapphos Environmental, Inc., 2014.

Along the opposite side (meant for northern exposure), window glazing is generous, usually occupying 60 to 80 percent of the wall height in grouped, multi-light, operable windows. The grouping of windows marks the location of the classroom inside, and treatments vary, from wood-framed, multi-light double-hung sashes to steel-framed casements.

By the 1960s, it became more common to see double-loaded classroom wings (for senior high schools especially, but also for some elementary schools where demand was high and available acreage was scarce). By double-loading corridors but retaining the preferred one-story massing, schools accommodated more students while also providing a more domestic scaled, indoor-outdoor campus. Also in the early 1960s, for sites with less acreage, campuses incorporated more two-story buildings, with designs still drawing upon the postwar ideals for an informal, indoor-outdoor campus.

Many slight variations of another classic feature of postwar schools, sheltered corridors, appear on campuses throughout the district as well. Intended to move hallways outside, sheltered corridors might display wood plank and beam roof structures, resting on simple piers or steel pipe supports, capped with a flat or slightly sloped roof. Many examples form an elaborate network connecting all buildings and facilities of the campus.

Many LAUSD schools constructed during this period, from the late 1940s through the 1950s, also display standard campus components and site designs. Some basic elements include an auditorium, usually cited close to the public entrance to the campus, with a low, one-story entrance wing giving way to a two-story high interior. Stylistically, the auditorium generally reflects the character-defining features or influence of Mid-Century Modern design. Detailing is spare, and materials vary. For the auditorium, and usually for the equally public administration building, brick cladding and piers flank entrances and/or accenting building bases. Other typical materials include stucco, steel, and scored concrete.

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Figure 150. Narbonne High School (1956), Daniel, Mann, Johnson & Mendenhall (DMJM), Lomita, southern Los Angeles. Image shows one example of the swaths of greenery and landscaping between classroom wings. Source: MSP Architects (McDonald, Soutar & Paz, Inc.).

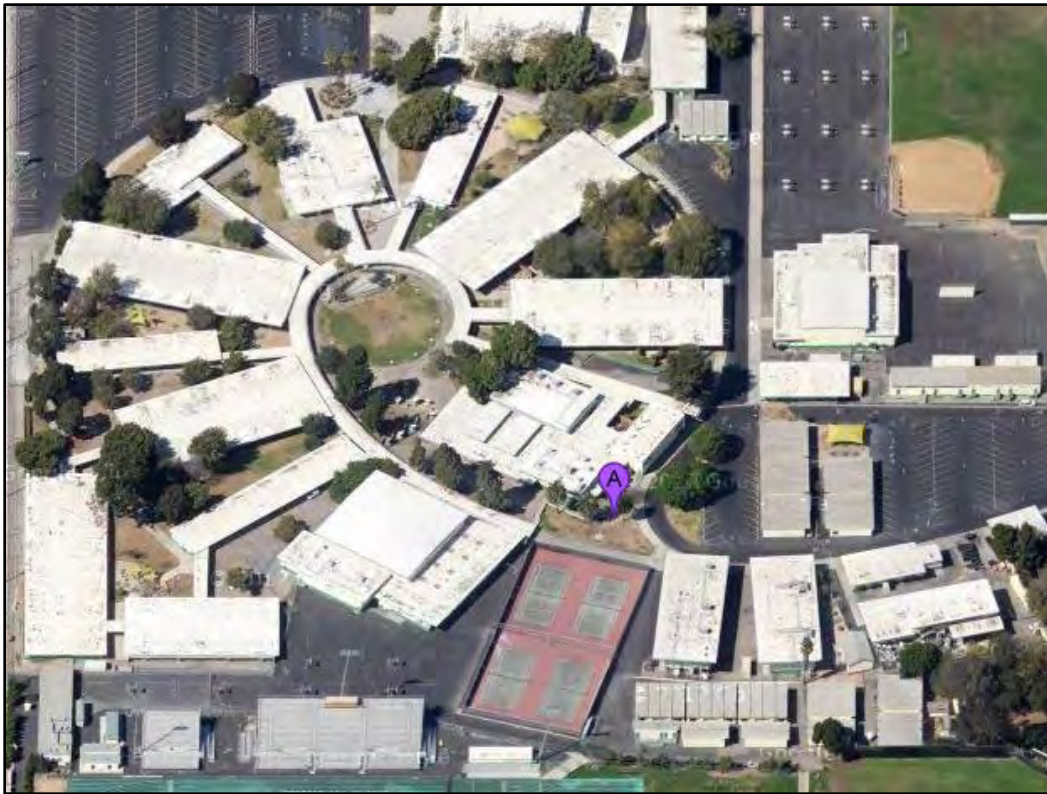


Figure 151. Narbonne High School (1956), aerial view. The finger-plan school forms a spiral, allowing for the benefits of the landscaped, expansive site plan and low, one- and two-story deep classroom wings providing easy outdoor access and views. The use of the spiral plan creates these features on a relatively restricted lot. Source: Google Maps, 2013.





Figure 152. Leapwood Avenue Elementary School (1962), Carson; image on left shows two-story, double-loaded classroom; image on right shows landscaping and patios between classrooms, connecting corridors, and wide arcade eaves. Source: Sapphos Environmental, Inc., 2014.

Other common features for elementary, middle, and senior high schools included the incorporation of a centrally located, sheltered outdoor dining area and adjacent Cafeteria/Multipurpose Building, outdoor assembly area and landscaped lawn/quad and recreation fields along the periphery of campus (the latter two features are more common for middle and senior high schools). Elementary schools often incorporated a separate area for kindergarten classes. Usually located near the Administration building, the kindergarten areas have their own patios and recreation areas, adjacent to the classroom wing.

### ***Postwar Expansion and Educating the Baby Boom***

After the tumult of Great Depression and World War II, the Board of Education of Los Angeles, in spite of a turn toward architectural modernism, shifted away from the experiments of the 1930s and back toward a more traditional, college-focused curriculum. In September 1945, the Board of Education added its voice to a movement to carry out district-wide achievement testing for students and reevaluate the curriculum, partly in order to stop the “drift toward laissez-faire, experimental, and lax methods.”<sup>135</sup> The curriculum was revamped, with a renewed emphasis on the “3 Rs” and additional coursework in American history and geography.

The biggest challenge facing the district at the time was keeping up with demand. In Southern California, one of the areas with the most rapid growth was the San Fernando Valley. Between 1930 and 1950, population expansion in the valley was remarkable even for Southern California. With new settlers drawn by the area’s emerging aerospace and entertainment industries, residential expansion had already been under way by the 1920s and 1930s. By the onset of the Great Depression, for example, the valley had become one of the United States’ most important hubs for the aviation industry. Given this concentration of jobs, population doubled from approximately 51,000 in 1930 to 112,000 by 1940. With the advent of World War II and an infusion of federal funds for wartime spending, these figures skyrocketed by another 50 percent in 5 years, from 112,000 in 1940 to 176,000 by 1945. Between 1945 and 1950, a nearly fourfold increase was recorded, with figures climbing to 402,000. Given the magnitude of this expansion, a majority of post-1945 school construction for the district overall took place throughout the San Fernando Valley.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969



Figures 153 and 154. Chatsworth High School (1963), San Fernando Valley. Double-loaded axial classroom wings fan out from a spoke-like plan, centered on a landscaped quad area. Photo on the right shows detail of courtyard spaces and landscaping lining all classrooms. Source: Sapphos Environmental, Inc., 2013.

This created another challenge for the Los Angeles City school district. Overcrowding led to the need to offer “half-day” sessions for children, where attendance happened in shifts of half-days. Bond issues in 1946, 1952, and 1955 addressed the pressing need for new school construction, and the resulting funds paid for the construction and expansion of numerous schools.<sup>136</sup> The 1946 bond issue provided \$75 million, which helped generate 66 new schools, with a total of over 2,300 classrooms, over 480 cafeterias, gyms, auditoriums, and other ancillary buildings.<sup>137</sup> In addition, over \$7.8 million went toward land for new schools, \$3.2 million for maintenance and improvements to an aging stock of facilities, \$4.5 million for grounds improvements, and \$10.6 million for equipment. In spite of these investments, another \$148 million was proposed for a 1952 bond issue.

In 1948, district-wide enrollment stood at 301,000 students; by 1949, this figure had increased by 15,000, with enrollment reaching over 316,000.<sup>138</sup> By the end of the 1950s baby boom, however, the student population of the Los Angeles City school district more than doubled, climbing from 316,000 to over 645,000. A further increase of 28,000 pupils was predicted for the school year 1960–1961.<sup>139</sup>

Although the district temporarily succeeded in decreasing the need for half-day sessions in 1948–1949, by 1952 the sheer numbers threaten to overwhelm its ability to keep up. Without a new building campaign, the number of students needing to attend half-day sessions was predicted to increase from 11,355 in 1952 to 100,000 by 1957.<sup>140</sup> By 1965, in the San Fernando Valley, demand was so great that school district officials began predicting that school plants would soon occupy high-rises, a trend that was not desired but seen as a possibility.



Figure 155. Chatsworth High School, aerial view of site plan and design. Source: Google Maps, 2013.

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Figures 156 and 157. Colfax Avenue Elementary School (1950-1955), North Hollywood-Valley Village.  
Source: Sapphos Environmental, Inc., 2014.

Funding was not the only challenge facing the district. There was a pressing need for new construction, but also a shortage of trained architects in the immediate postwar years (this tide started to turn in the 1950s). In 1949, the State of California issued a “renewed plea for draftsman and designers,” as the state’s ambitious postwar building program for institutional construction was falling behind schedule due to a personnel shortage.<sup>141</sup>

These years profoundly impacted the growth and organization of the school district. The geographic area served by the school district fluctuated over time, expanding during the 1920s and 1930s as it annexed adjacent school districts and served new areas. As of 1935, the school district enrolled 300,000 students housed in 384 schools, including 293 elementary schools, 22 junior high schools, 35 high schools, a trade school, and a junior college; and it served an area of over 1,095 square miles.

During the late 1930s and 1940s, the general trend in school district organization was toward decentralization; as communities grew and developed their own identities, they might split off and form stand-alone districts. For example, between 1936 and 1945, the Beverly Hills, Torrance, Culver City, and William S. Hart Union High School districts formed after leaving the Los Angeles City School District.

Even so, throughout the district, enrollment steadily increased. Rapid postwar residential development perpetuated the need for funds for additional classroom space, facilities, equipment, and other resources. To examine apportionment of state aid to school districts, in 1954 the state legislature created the State Commission on School Districts and directed it to examine unification and other means of reorganization of school districts in the state. The state's policy thereafter was the encouragement of unification for reasons of streamlining administrative functions and costs, enlarging tax bases and reducing dependence on state aid. Developing suburbs were, accordingly, encouraged to align themselves with the existing Los Angeles City School District, further contributing to its growth.

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Figure 158. Palisades Charter Senior High School (1961), Adrian Wilson & Associates, extant, Pacific Palisades. Source: The J. Paul Getty Trust, Getty Research Institute, Julius Shulman Archives.



Figure 159. Palisades Charter Senior High School (1961), Adrian Wilson & Associates, extant, Pacific Palisades. Source: Getty Research Institute, Julius Shulman Archives.



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Figures 160 and 161. On left, Palisades Charter Senior High School (1961), Adrian Wilson & Associates. On right, Daniel Webster Middle School (1954-1958), Palms-Mar Vista. Source: Sapphos Environmental, Inc., 2014.

## ***Formation of the Los Angeles Unified School District***

Through the 1950s, the Los Angeles City School District remained organized as three separate entities: an Elementary School District, High School District, and Junior College District. In the late 1950s, calls for unifying Los Angeles's elementary and high school districts into one unified entity began gathering momentum. The movement for district consolidation was seen throughout the region and state in this era. As of 1959, the State of California spent upwards of \$1.5 billion for public education, spread across 1,721 separate districts, "a maze related to the state's unending growth."<sup>142</sup>

Supported by the State Board of Education, the Los Angeles City School District and Board of Education, as well as California's governor at the time, Edmund Brown, district unification would "bring advantages in curriculum, staff and financing."<sup>143</sup> Proponents of the measure argued that unification would help bring costs under control by streamlining administrative procedures and eliminating duplication. In addition, a unified district would also provide a "continuity of education along a solid plane from the kindergarten to the senior year," as Los Angeles City School District superintendent Ellis Jarvis argued.<sup>144</sup>

These efforts culminated in three ballot measures, Propositions C, D, and E, included in the 1960 national primary elections. The propositions easily passed. As of July 1961, the LAUSD came into being as the second largest school system in the United States, and the Los Angeles Junior College District became an independent entity.

## ***Changing Times: LAUSD in the 1950s and 1960s***

In 1960, the *Los Angeles Times* education editor, Dick Turpin, observed that "growth, the word most nearly synonymous with California, has brought many problems to the state and education has had a major share of them."<sup>145</sup> At this juncture for LAUSD, enrollment in 1959–1960 stood at 645,000; by 1960–1961, enrollment figures were expected to climb by 28,000 pupils.<sup>146</sup> The school year 1960–1961 also brought the opening and staffing of 15 new schools.

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Figure 162. The 1960s arrive at LAUSD. Caption, left image: Teachers on strike, circa 1969. Source: LAPL, Shades of LA, #00003951. Caption, right image: "Thousands of teachers and supporters staged a mass demonstration in front of city hall." 19 September 1969. Source: LAPL, Shades of LA, #00058154.

The extended postwar boom of school construction and expansion had brought dozens of new schools to the district. Between 1946 and 1962, a total of \$649.5 million in bond issues had funded the expansion. But population growth continued through the 1960s, exerting a constant pressure for new classrooms.

In 1962, the *Los Angeles Times* reported that California had become the most populous state in the nation and that this population boom was having a negative impact on the state's schools. As a result, LAUSD had increased half-day sessions for the first time since the 1950s, during the height of the baby boom. Half-day sessions had hit a high mark in 1957, with over 48,000 classes adopting the partial schedule; this number had steadily dropped in the intervening years. But by 1962, the numbers were again on the rise, with an estimated 20,000 half-day sessions needed in the fall of 1962. Other solutions, such as the temporary fix of busing students from overcrowded to less crowded schools, was one proposed but problematic solution in the early 1960s.

Even as the need to expand and upgrade continued, signs of voter fatigue for school bond measures were becoming evident. In 1962, a defeated bond measure of \$128 million would have funded new schools and expansion in areas most impacted by enrollment increases and/or overcrowding, among them, the San Fernando Valley and central Los Angeles. By 1963, for example, enrollment in the San Fernando Valley accounted for one-third of the total for the district.<sup>147</sup> Even with the additional funds, keeping up with demand still would have proved onerous: "Had the measures passed," reported *Los Angeles Times* education editor Dick Turpin, "the city school system could barely have kept pace with the city's surging enrollment wave. Now additional half-day sessions are certain."<sup>148</sup>

# LOS ANGELES UNIFIED SCHOOL DISTRICT

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Through the 1960s, however, the tide continued to turn against school bond measures. In 1969, for the fourth time in a row, Los Angeles voters rejected a tax increase to provide funding for “the already troubled Los Angeles city schools. A bond issue for the construction of new schools was also a victim of nonsupport.”<sup>149</sup> This trend was statewide: joining Los Angeles voters in this rejection of school bond measures were Culver City, Ventura, and San Diego, among many others. Between 1966 and 1968, “52 percent of all propositions designed to provide more funds for California schools ... have been defeated.”<sup>150</sup>

In an editorial in the *Los Angeles Times*, Warren L. Steinberg, a consultant with LAUSD’s Center for Planned Change, commented on the trend:

California businessmen and politicians—in addition to exploiting the beauties of the California scenery and climate—have long attributed much of the success in luring business to the state to an educational system that provides a large source of skilled manpower. Again, why do Californians reject support for one of the state’s most precious assets—schools? Some will answer that it is a taxpayers’ revolt, that school taxes are the only taxes on which the average citizen gets to vote and that there is no other way that the individual can show his wrath at the steadily climbing tax bite.

Steinberg captured the mood of the era, not just with respect to funding, in his concluding comments in the piece:

Our children need to ponder basic educational problems: When will equal educational opportunity be a reality, what is the place of religion in the school, what should be taught in the schools, how much is good education worth, what is the role of home and school, how free should academic freedom be, what part should students have in determining the education they will receive? Unless schools turn out a better educational product and begin to teach students the history and place of education in our society, we can expect more propositions to fail their ABCs.<sup>151</sup>

As the decade ended, though, the “voter revolt” against school bond measures continued, and Los Angeles city schools were tasked with serving a substantial student population with ever-diminishing resources. In 1969, for the first time in its history, LAUSD’s student enrollment dropped. The news made headlines in the *Los Angeles Times*: “‘This is a new development for us,’ said a surprised Asst. Supt. Frederick Fox. ‘The trend (of growth) has been broken.’”<sup>152</sup>

# LOS ANGELES UNIFIED SCHOOL DISTRICT

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Figures 163 and 164. School busing, 1964. On left: Loyola Village School, Playa del Rey, welcomes 82 pupils from Manchester Avenue School. Source: LAPL Herald-Examiner Collection, #00042149. On right: "Miss Ina Metcalfe, principal of Osage Avenue School, greets some of 69 pupils who were transferred to Osage from the 66th Street School. The transfer of 151 pupils from two predominantly African American schools to two all-white schools was accomplished without incident." Source: LAPL Herald-Examiner Collection, #00055171.

## **Civil Rights and School Integration**

As the 1960s ended with this novel news—of an enrollment decrease—school officials cited the dual causes of decreasing birth rates as well as the widespread move of many families to new suburban areas outside the district. An additional factor in this shift was increasing racial tension and growing pressure on the district to correct the racial imbalance that had become evident in many schools.

In the postwar period, addressing and correcting decades of de facto racial segregation represented a significant challenge for LAUSD.<sup>153</sup> By the 1960s, as the Civil Rights movement gained momentum, this long-brewing issue finally came to a head and formed an important part of the social context shaping the district during this time.

Throughout the early twentieth century, racial discrimination and segregation in housing had been reflected in the demographics of Southern Californian schools. A new wave of openly discriminatory housing practices in the 1930s helped maintain and worsen these divisions. In the mid- to late 1930s, surveyors for the Home Owners Loan Corporation (HOLC) studied the demographic breakdown of communities throughout the United States, including in Southern California. The HOLC provided long-term mortgage loans to, mostly, Anglo-American clients. In addition to discriminating against potential clients, the HOLC's "security maps" helped lenders discriminate against entire neighborhoods. In this climate, ethnic diversity was considered to be a security risk.

In order to document the presence of what they termed "subversive races," HOLC surveyors went block by block throughout Los Angeles, interviewing residents and creating neighborhood profiles describing, among other things, racial composition. Hundreds of data sheets, with detailed demographic information, were created for Los Angeles alone. Neighborhoods would be assigned a color denoting the level of risk, with an inordinate amount of weight being assigned on the basis of who lived there: green usually meant that a



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neighborhood was entirely Anglo-American; yellow meant that a few ethnic minority members lived in the neighborhood; and red was reserved for neighborhoods with predominantly minority populations, usually African-American.

This practice, which became known as “redlining,” fueled discrimination and racially restrictive lending practices and intensified segregation in Los Angeles.<sup>154</sup>

As restrictive housing and lending practices continued in the postwar period, racial segregation became particularly

pronounced in newly constructed suburbs, in particular in the San Fernando Valley. The student populations of schools reflected this: “The Valley, regardless of the region—North, East, or West—was by far the most racially segregated region of the Los Angeles School District,” according to a 1967 report released by the school district.<sup>155</sup> Among thousands of students at Birmingham, Canoga Park, Chatsworth, Cleveland, Granada Hills, Grant, Reseda, Taft, and Van Nuys high schools, there was a combined total of 19 African-American students.<sup>156</sup>

However, additional factors contributed to the marked racial imbalance in so many Los Angeles public schools. As architectural historian Teresa Grimes, et al., noted:

According to Josh Sides, school segregation in Southern California was the product of racial geography, willful neglect, and racial gerrymandering. In this respect, the civil rights battle over education was very much tied to housing. If black families were restricted to living in certain areas with substandard schools, there was de facto school segregation.

While the LAUSD officially mandated that students attend the school closest to them, white students in racially mixed neighborhoods were able to seek a waiver and attend a predominately white school. This practice, combined with segregated residential patterns, resulted in de facto segregation well into the 1950s. When the NAACP started investigating the schools system in 1953 and U.S. Supreme Court handed down the landmark *Brown v. Board of Education* case in 1954, schools became a central focus of the Los Angeles civil rights movement. Resistance from both the LAUSD and white parents in affected neighborhoods throughout the city led to a protracted battle over school desegregation well into the 1970s.<sup>157</sup>



Figure 165. 1963 hunger strike by school integrationists: “A year-long study on the subject of de facto segregation was scheduled to be presented to the Board of Education.” Source: LAPL, *Shades of Los Angeles*. #00041605.

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Figure 166. The “East LA Blow Out,” Lincoln High School, 16 September 1968. Students protested for “better schools for Mexican Americans. Sal Castro was a teacher there and spearheaded the movement.” Source: LAPL, Herald-Examiner Collection, 00041327.

In the early 1960s, the NAACP and the American Civil Liberties Union (ACLU), along with a coalition of other organizations, launched a campaign of sit-ins, marches, and other nonviolent action, calling upon the Los Angeles Board of Education to adopt policies aimed at correcting racial segregation and broadening the curriculum. This coalition asserted the need for (1) the Los Angeles Board of Education to redraw its school boundaries, (2) black students in overcrowded schools to elect to attend predominantly white schools, and (3) black teachers to be hired throughout the district.<sup>158</sup> By the mid-1960s, a variety of groups joined forces, arguing for classes and subjects more reflective of the diverse histories and cultures of LAUSD students.

The issue also touched on school boundaries. In 1963, African-American leaders in Los Angeles staged protests, asking that “elementary and secondary school boundaries be redrawn around these ‘Negro districts,’ that that minority students be transferred from crowded schools to less crowded ones in a 15-mile radius, and that “barriers” to promotion of certified Negro personnel be eliminated.”<sup>159</sup> With the Watts uprising in 1965, attitudes were intensified on all sides of the integration issue. Some citizens became more adamant that de facto segregation should remain in place, while other community members, activists, and students began arguing for and asserting the legal rights of all students to equal educational facilities and opportunities.

In 1968, Latin-American students in East Los Angeles staged a series of school strikes popularly known as the “East L.A. Blowout.”<sup>160</sup> During the first week of March 1968, approximately 15,000 students walked out of classes at Woodrow Wilson, Garfield, Abraham Lincoln, Theodore Roosevelt, Belmont, Venice, and Jefferson high schools with demands for an “equal, qualitative, and culturally relevant education.”<sup>161</sup>

### ***Early Litigation***

In 1954, in the landmark case *Brown v. Topeka Board of Education*, the U.S. Supreme Court declared that separate public schools for black and white children were “inherently unequal” and therefore violated the constitutional rights for equal protection for minority children.<sup>162</sup> Impacts of this decision were felt in Southern California. The Los Angeles Board of Education had cited “color-blindness” as its official policy, stating that racial segregation in housing patterns was beyond their control.<sup>163</sup> However, when the policies of the nearby Pasadena School Board (which mirrored those of Los Angeles) were challenged in a 1963 lawsuit brought by the National Association for the Advancement of Colored People (NAACP), the California Supreme Court ruled that school boards must attempt to eliminate racial segregation, regardless of its causes.<sup>164</sup>

In 1963 in Los Angeles, the ACLU filed *Crawford v. Los Angeles City Board of Education*, a class-action school desegregation lawsuit filed behalf of two African-American high school students, Mary Ellen Crawford and Inita Watkins.<sup>165</sup> The lawsuit highlighted two schools—both located in the southern portion of the district, only one mile apart—with pronounced racial imbalance: Jordan Senior High School in Watts, whose student population was 99 percent African-American, and South Gate Senior High School, which had 97 percent Anglo-American students.<sup>166</sup>

The case of *Crawford v. Los Angeles City Board of Education* became a watershed for Los Angeles schools. Filed in 1963, and effectively ending in the U.S. Supreme Court in 1982, the case “encapsulated and propelled the legal and political framework of an era.”<sup>167</sup> As a result of the lawsuit, the California Supreme Court ordered LAUSD to formulate a plan to correct de facto racial imbalance in the schools. The most controversial solution proposed and implemented was busing students; programs were first established on a voluntary basis, then in a mandatory program that was hotly debated from the 1960s through the early 1980s, when a constitutional amendment passed by California’s voters and affirmed by the U.S. Supreme Court ended the practice.

*Crawford v. Los Angeles City Board of Education* initially sought to halt the expenditure of public funds to renovate Jordan Senior High School until it was desegregated.<sup>168</sup> The suit was filed in 1963 but amended twice: in 1966, it was broadened to include Mexican-American students, and in 1968, the ACLU further amended the case to call for district-wide desegregation.<sup>169</sup> In 1970, as a result of lawsuit, a Los Angeles City Superior Court affirmed the presence of segregated schools in Los Angeles and ordered the district to take steps to correct racial imbalance. This prompted “a protracted fight over how to desegregate the increasingly diverse and increasingly racially segregated Los Angeles Unified School District.”<sup>170</sup>

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

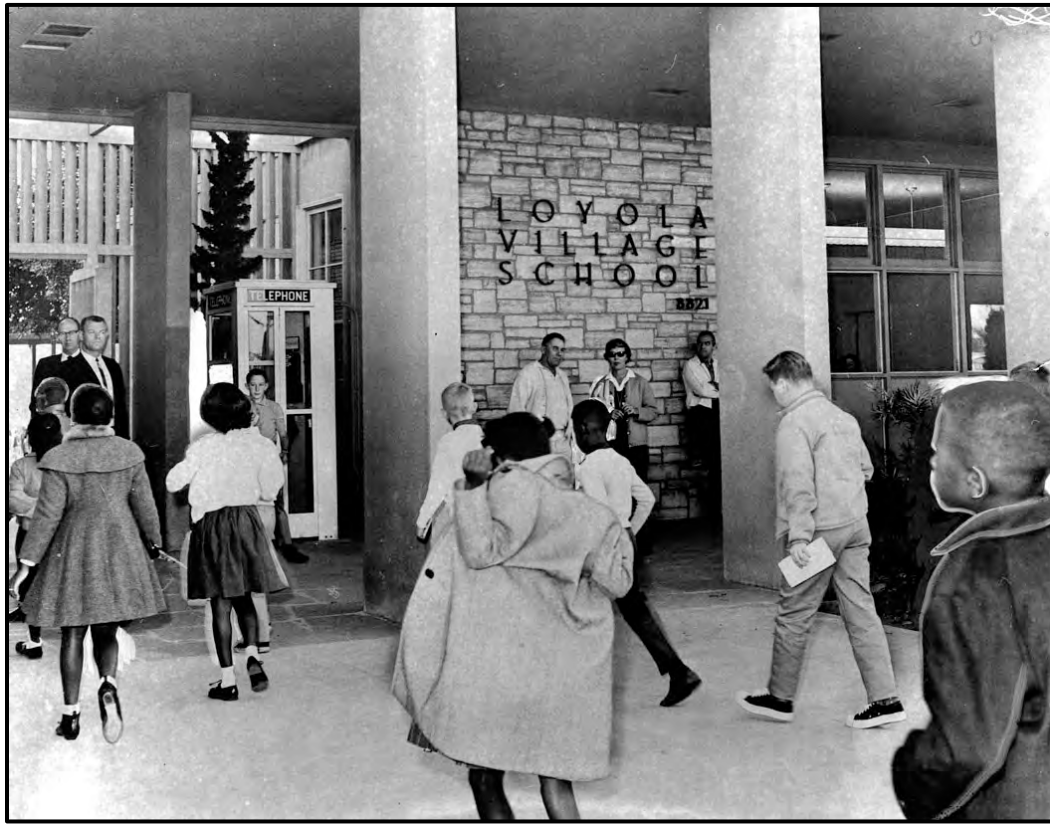


Figure 167. Voluntary busing as a solution to racial imbalance and overcrowding: This February 1964 photo shows children from Manchester Avenue School entering Loyola Village School. The caption read, "The transfer program is designed to cut half-day sessions at schools which are overcrowded by transporting pupils to schools with undersized classes." Source: LAPL, Herald-Examiner Collection, #LAPL00041639.

As mentioned, the most controversial solution involved busing students to correct racial imbalance as well as overcrowding. As early as the 1950s, and increasing in the 1960s, many communities and schools within LAUSD began exploring busing programs. In 1964, much attention was paid to a busing exchange program between relatively new schools in western Los Angeles (Loyola Village Elementary School and Osage Avenue School) and schools in older, more urbanized sections of Los Angeles (Manchester Avenue Elementary School and 66th Street School). In September 1967, a parents' group in Pacoima, in the San Fernando Valley, succeeded in establishing a busing program for 60 Pacoima students; the students would be taken by bus to the predominantly Anglo-American Encino Elementary School.<sup>171</sup>

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During this period, in the late 1970s, two schools launched a voluntary, experimental program. Hobart Boulevard Elementary School, a multiracial school within the City of Los Angeles, partnered with Dixie Canyon Elementary School in the San Fernando Valley. In a program funded for a limited time by the Los Angeles School Board, approximately 70 second- and third-grade students from each school made the half-hour trip by bus to attend their partner school for a semester. The next semester, a new group of children would participate in the program. When the program was approved, the *Los Angeles Times* described it as “two schools, and one big step to integration”: “The Anglo parents sat for more than two hours making a decision. Carefully, thoughtfully, they weighed the arguments. ... But when the meeting was over, more than 100 parents of children in Dixie Canyon Elementary School in the San Fernando Valley agreed to participate in a voluntary two-way integration plan with Hobart Boulevard Elementary School, a multiracial inner-city school.”<sup>172</sup> Writing in support of the program in the *Los Angeles Times*, Judith R. Birnberg, a Dixie Canyon Elementary School parent, stated that

Socially, Hobart couldn't be more ideal: children attending the school have come from 42 different countries, and such a mix is already affecting my son. ... Too many parents base their resistance to integration on the unknown. They assume minority schools are inferior, they assume the time traveling by bus will be a burden to their children; they assume children are haunted by the same fears clouding their own lives. But the time has come for parents to learn from their children.<sup>173</sup>

In 1977, in response to a California Supreme Court ruling calling for a “reasonable and feasible” integration plan, the Los Angeles Board of Education designed a program for mandatory busing. Under the plan, approximately 55,000 fourth- through eighth-grade students would be bused to school in 1978, with an estimated 112,000 students to follow in 1979.<sup>174</sup> The program was controversial and contested on a number of fronts. Just two years after the Los Angeles Board of Education proposed its plan, California's Proposition 1 sought to reverse it through a constitutional ban on mandatory busing. On the ballot in November 1979, Proposition 1 passed handily, with 70 percent of voters supporting the end of the practice.<sup>175</sup> On appeal in 1982, the US Supreme Court found Proposition 1 constitutional and upheld the ban on mandatory busing.

While this ruling solved one question, the issue of racial imbalance, cultural sensitivity in hiring practices and curricula, and encouraging diversity continued to shape the local- and state-level conversations about public schools through the 1960s, into the 1980s, and beyond. This issue continued to unfold in the courts on many fronts, as well as local and state governmental offices, school boards and classrooms, communities and families throughout Southern California. In this way, civil rights, ethnic identity, culture, and equal access shaped the sociopolitical context for school districts such as LAUSD in this period.

### Summary: The Postwar Modern, Functional School Plant

In the postwar period, the functional modern school plant quickly became the norm throughout the United States and in Los Angeles. As school districts struggled to keep up with demand, architects had ample opportunities to test new ideas. The emphasis on the child-friendly school meant a continuing focus on improving and standardizing environmental controls, such as lighting, ventilation, heating and cooling systems, and interior design. While three main plan types emerged during this era—the finger-plan, cluster-plan, and open-plan school—there were many combinations and variations on the basic themes. Stylistically, as well, postwar schools might exhibit textbook features of the International Style, more regionally inflected modernism, or variations on the styles popular in the postwar period.

First and foremost, the postwar school was designed to be more informal, accessible, and child-friendly. A more accessible school generally signaled lower massing, though junior and high schools might still climb two or three stories, especially given the pressing need for more schools. In general, the preferred, more domestic scale was reflected in one-story massing and low ceilings, which made classrooms more intimate. Generous panels of glazing provided light and outdoor access, with larger windows on north elevations and often clerestory windows on southern sides, to balance cross-lighting. With the advent of air-conditioning, schools in the early 1960s tended to diminish generous expanses of glazing. The need for economical construction and finely tuned environmental features and controls accompanied a continued national call for standardization of school design.



Figure 168. Palos Verdes High School, Richard Neutra and Robert Alexander (1961). Source: The J. Paul Getty Trust, Getty Research Institute, Julius Shulman Archives.

Campus planning and site-specific design also became increasingly important, as new residential areas emerged from former agricultural lands, and school builders and planners had the acreage to plan an entire campus created for new residential communities. In this era, ideas about planning at the scale of the neighborhood included the generous use of outdoor spaces and landscaping and a zoned design that turned the campus inward and separated pedestrians and automobile traffic, for safety and accessibility. Although many variations were proposed, the modern campus plan called for “small separate units connected by arcades or passageways and attractively grouped. This type of arrangement is quite flexible and eliminates much of the institutional atmosphere of the large compact structures.”<sup>176</sup>

## SECTION IV ARCHITECTURAL CHARACTER

As described in Section III, early-twentieth-century reform brought a more functional approach to school design throughout the United States. Priorities shifted, and designing according to function rather than style became the starting point for architects and builders. In this way, Los Angeles's public schools generally display a scale and function that are unique to their purpose as educational facilities. Even so, as the focal point for the community's identity and commitment to education, public schools also showcased outstanding architectural design by the region's leading practitioners. Throughout the twentieth century, the public schools of Los Angeles have reflected both the increased emphasis on functionality as well as the significant stylistic trends of the day.

The following summary of the typical architectural styles reflected in LAUSD schools serves to introduce the topic and sketch the main character-defining features and eras for each style. This section draws upon and expands the architectural character section of the 2002 LAUSD Historic Context Statement and presentation prepared by Leslie Heumann & Associates and Science Applications International Corporation of Pasadena, California.<sup>177</sup> This updated version draws upon additional field observations, as well as recognized guides and studies.<sup>178</sup>

In order to ensure cross-agency compatibility, the authors of this section also considered and adapted, where appropriate, the standards used by the City of Los Angeles Office of Historic Resources and Department of Planning for historic resource surveys.

This section is not intended to be an exhaustive list of styles but rather an introduction and general framework for understanding the principal styles, as well as stylistic evolution, of LAUSD school plants. Descriptions of each style include the general period during which the style was used and its typical character-defining features.

The broad stylistic categories presented here were compiled with an understanding that architectural design is more dynamic than a fixed label might suggest. Styles and trends come together through a combination of architectural precedent, historical interpretation, creative license of designers, and the agency of clients. Therefore, architectural styles are best understood as cultural hybrids incorporating elements from a variety of sources. In this way, these descriptions offer a broad palette for identify stylistic influences and character.



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Figure 169. Old Vernon Avenue School (1876).  
Source: Heumann & Associates and SAIC for LAUSD.



Figure 170. Old Canyon School (1894).  
Source: Heumann & Associates/SAIC for LAUSD.

## LATE-NINETEENTH-CENTURY STYLES

Some of the earliest schoolhouses built in Los Angeles were one- and two-story, vernacular-type wood buildings, generally modeled at the scale of domestic and small civic buildings and easily enlarged or modified to accommodate growth or multiple uses. During this era of school construction, the bell tower, echoing church design, was introduced as a signature element. Three known examples of Los Angeles's early wood-framed schoolhouses have survived; in Los Angeles, this construction type was in use from the earliest years of the district through approximately 1910. The library building at Canyon Elementary School, for example, was built in 1894.

### ***Typical Character-Defining Features:***

- One- to two-story massing
- Wood-framed construction
- Horizontal wood or wood shingle siding
- Open cupola or bell tower
- Simple vernacular exteriors, or Queen Anne or Colonial Revival detailing
- Wood-framed, double-hung sash windows, often in groupings



Figure 171. Farmdale School, El Sereno (1892).  
Source: LAPL Photo Archive.

### EARLY TWENTIETH CENTURY: BEAUX-ARTS CLASSICISM & NEO-CLASSICAL REVIVAL

Early twentieth-century buildings brought a new architectural vocabulary to LAUSD school design. The monumental classical motifs of Beaux Arts Classicism, evident in courthouses and city halls accommodated a new scale of two and three stories. This scale was demanded by expanding enrollment and a need for increased capacity and rooms differentiated by grade level and curriculum.

Beaux Arts Classicism and Neo-Classical Revival styles were especially favored by designers following the lead of McKim, Mead and White and other prominent national firms. The impressive porticos, with classical orders and colossal columns, advertised the importance placed on public education. Primarily of masonry construction, most of these schools fell victim to the 1933 Long Beach Earthquake. The San Fernando Middle School Auditorium, constructed as part of a 6-year high school in 1916, is one of the few remaining examples of this era.



Figure 172. A rare remnant of the Neo-Classical era in school design: San Fernando Middle School, Auditorium, John C. Austin, architect (1916). Source: Heumann & Associates and SAIC for LAUSD.

#### **Typical Character-Defining Features:**

- Monumental scale
- Formal, symmetrical design composition
- Smooth stone, masonry, or concrete exteriors (often scored to resemble masonry)
- Elaborated entrance, often featuring portico with columns
- Classical detailing, such as use of gables and entablature, columns, and pilasters
- Multilight grouped windows with wood surrounds



Figure 173. Detail, San Fernando Middle School (1916). Source: Heumann & Associates and SAIC for LAUSD.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

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## EARLY TWENTIETH CENTURY: INDIGENOUS REVIVAL STYLES AND THE ERA OF HISTORIC ECLECTICISM

As of 2013, a substantial number of LAUSD's remaining school buildings were constructed between the early 1920s and World War II. These schools reflect the eclectic menu of revival styles popular at the time for a range of building types. Period-revival styles seen in LAUSD schools include Italian Renaissance Revival, Collegiate Gothic Revival, and Tudor Revival. In addition, for Southern California's emerging architectural profession and academy, this era brought a new emphasis on the region's indigenous architectural traditions and a desire to infuse design with local character. Indigenous revival styles that rose in popularity during this period included, most notably for LAUSD public schools, the Spanish Colonial and Mission Revival. Designers expressed regional character and flavor by relating buildings to the outdoors, with one-story schools easily opened to exterior spaces, and by providing open loggias and arcades for circulation.

Where design was a priority, the stylistic program of the school is generally most clearly expressed in the campus's public buildings, such as the auditorium or administration building, and at primary entrances to buildings or classroom wings.



Figures 174 and 175. Renaissance Revival Style: Joseph Le Conte Middle School, Edgar Cline (1922). Source: LAUSD Le Conte Middle School Pre-Planning Survey, 2012 (left) Heumann & Associates and SAIC for LAUSD (right).



Figures 176 and 177. Northern Italian Renaissance: Hamilton Senior High School Administration Building, John C. Austin & Frederick C. Ashley, (1931). Source: LAUSD Hamilton Senior High School Pre-Planning Survey, 2010 (left) Heumann & Associates and SAIC for LAUSD (right).



### MISSION REVIVAL AND SPANISH COLONIAL REVIVAL

Beginning with efforts to restore California's missions in the late nineteenth century, Southern Californian architects began looking toward regional history for stylistic cues. The region's climate and Hispanic heritage figured prominently in these new directions. The Mission Revival vocabulary, most popular between 1890 and 1920, drew inspiration from Southwestern missions. Identifying features include curved parapets and red tiled, low-pitched roofs. Arches were used liberally, and wall surfaces commonly displayed smooth stucco. The Spanish Colonial Revival flourished between 1915 and 1940, reaching its apex during the 1920s and 1930s. This movement was catalyzed by architect Bertram Goodhue's 1915 designs for Panama-California Exposition in San Diego. The Spanish Colonial Revival style became one of the most popular idioms for a range of building types. Architects and builders embraced the style, which was employed for many LAUSD schools. The rise in popularity of the Spanish Colonial Revival style also coincided with the move toward more child-scaled schools, with lower massing and open, expansive campuses. With its emphasis on arcaded corridors and patios, the style fit this movement particularly well.

Spanish Colonial Revival buildings tend to be asymmetrical and sheathed with smooth stucco. Roofs generally consist of gabled, gabled and flat, and (less commonly) hipped roofs, clad in red clay tiles. Arched openings, whether for windows, doors, or gates, are a textbook feature. Secondary materials—including wood, wrought iron, and polychromatic tile—provide decorative accents. Windows are generally wood framed or metal, with molded wood surrounds or lintels.

#### ***Typical Character-Defining Features:***

- Stucco-clad walls (usually smooth finish); occasionally might have brick or cast stone
- Asymmetrical design
- Use of towers, turrets, or cupolas
- Low-pitched gabled or hipped roof covered in red clay tiles or flat roof with parapet wall
- Shallow eaves or deeper eaves, lined with exposed carved wood brackets
- Arched openings for windows, doors, and use of arcades
- Secondary materials can include wrought iron, polychromatic tile, and cast stone
- Exterior patios and courtyards



Figure 178. Post-earthquake Mission Revival Style: Reseda Elementary School (1936). Source: Heumann & Associates and SAIC for LAUSD.



Figure 179. Late example of Spanish Colonial Revival: Verdugo Hills High School (1948). Source: Heumann & Associates and SAIC for LAUSD.

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## RENAISSANCE REVIVAL STYLE

In the late nineteenth and early twentieth centuries, the Renaissance Revival style began as a fairly literal translation of sixteenth-century Italian *palazzi* into two- and three-story buildings. The style evolved into one of the most popular of the 1920s, in particular for midrise office buildings. McKim, Mead, and White designed some of the United States' most elegant expressions of the revival during its earlier years. During the 1920s, local architects such as Walker and Eisen and John and Donald Parkinson designed many of Los Angeles's best examples.

Renaissance Revival buildings in Southern California are generally sheathed in brick or stucco. Facades are symmetrical or highly regular and divided into bays by the fenestration pattern or by piers, which are often treated as columns with bases and capitals. Variations in surface finishes, fenestration, and level of detail visually distinguish each section, creating a horizontal emphasis that is reinforced by prominent belt courses. A cornice, set above a frieze and/or architrave, traditionally tops a Renaissance Revival building. Windows on top stories are often distinguished from lower stories by different surrounds and configuration.



Figure 180. El Sereno Middle School, originally Woodrow Wilson High School (1937). Source: Heumann & Associates and SAIC for LAUSD.

### **Typical Character-Defining Features:**

- Rectangular massing
- Brick, stucco, and concrete, with trim of terra cotta or cast stone and bases of granite or masonry
- Horizontal emphasis; differentiated treatment of stories
- Symmetry and regularity
- Brick, stucco, or concrete exterior, often scored to resemble masonry
- Gabled and/or hipped roof, often sheathed in clay tiles
- Linear fenestration pattern
- Belt courses and cornices
- Classical detailing
- Cast stone or terra cotta architectural ornament



Figure 181. University High School (1924). A spring located on the school campus is registered as California Historical Landmark No. 522; the spring marks the location of three significant events: where the Portola Expedition camped in 1769, Father Junipero Serra gave Mass in 1770, and where the City of Santa Monica once obtained its water supply. Source: Heumann & Associates and SAIC for LAUSD.

### GOTHIC REVIVAL / COLLEGIATE GOTHIC

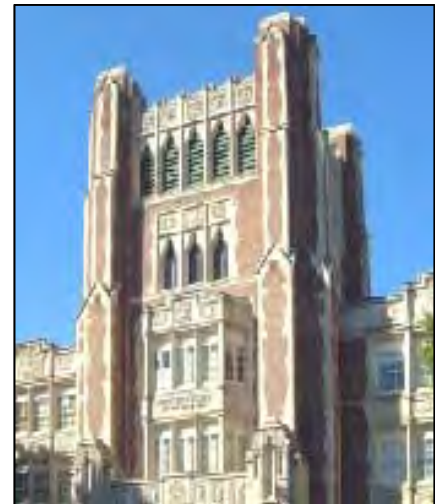
Popularized by writers and art critics such as John Ruskin (1819–1900), the English Gothic Revival movement looked back to and idealized the preindustrial Medieval era as a more pure and moral golden age, for society as well as for architecture. First popularized for religious buildings and for school buildings—the “Collegiate Gothic”—the style began appearing in the Los Angeles area in the late 1800s. Few buildings were constructed locally in this style, and even fewer remain.

Most extant Collegiate Gothic schools in Los Angeles were constructed during the height of the period-revival era. In the 1930s, in school design, the style fell out of favor as more up-to-date architectural idioms began emerging. The 1933 Long Beach earthquake, and then the 1934 Field Act, hastened the need for widespread school repairs and new construction, which accelerated the stylistic shift during this period.

Gothic Revival schools share the same emphasis on verticality that characterizes other applications of the style. The emphasis on the vertical is often expressed through the use of uninterrupted piers or attached ornament, which extend from the ground to the roof. The style also makes liberal use of mullions, towers, spires, and pinnacles. Windows are arranged in vertical channels of glass, sometimes topped with pointed arches. Brick and concrete were the materials of choice, often accented by cast stone.

#### ***Typical Character-Defining Features:***

- Concrete or brick exterior
- Emphasis on the vertical axis
- Attenuated windows and openings
- Use of full-length columns or pilasters
- Steeply gabled roof
- Liberal use of cast stone or terra cotta ornament and sculptural detailing
- Stylized openings, with Tudor, pointed, or round arches
- Windows and doorways outlined with archivolts and topped with decorative crowns
- Windows with mullions

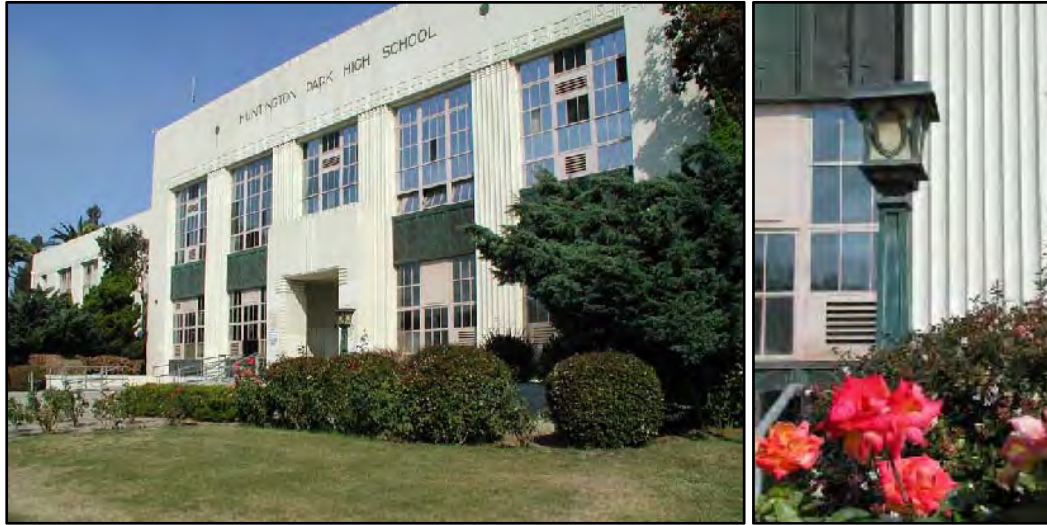


*Figure 182. John Marshall High School, George Lindsey, architect (1931). Source: Heumann & Associates and SAIC for LAUSD.*



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Figures 183 and 184. Huntington Park High School, Administration Building (1936). Source: Heumann & Associates and SAIC for LAUSD.

### ART DECO

As architects and designers began exploring alternatives to historic revival styles, one of the earliest modern alternatives was Art Deco. The term grew out of the 1925 exposition in Paris showcasing the “nouveau,” or new directions in design and decorative arts, at the *Le Musee des Arts Decoratifs*.

The idiom is highly decorative but rejects copying or adapting historical revival styles. Instead, ornamentation draws on geometric and foliate patterns and motifs, such as zigzags and chevrons, light, and color. Primarily in use between the 1920s and 1930s, the style was used most often in commercial, industrial, and institutional buildings.

#### ***Typical Character-Defining Features:***

- Emphasis on verticality through building massing, applied exterior features, and ornament
- Use of stylized, geometric motifs and decorative features, such as zigzags and chevrons
- Generally features smooth stucco- or concrete-clad wall surfaces
- Often features towers or other elements projecting beyond the roofline
- Often features steel-frame casement and fixed windows



Figure 185. PWA Moderne with Art Deco influence: Florence Nightingale Middle School, John C. Austin & Frederick M. Ashley, architects (1937-1939). Source: Heumann & Associates and SAIC for LAUSD.





Figure 186. Streamline Moderne: Thomas Jefferson High School, Stiles O. Clements (1933). Source: LAUSD.

### STREAMLINE MODERNE | MODERNE

The Streamline Moderne became a popular style during the Great Depression and World War II period. Its clean lines and minimalist ornament both celebrated the modern machine-age and signaled the period of austerity triggered by the Great Depression. Compared with its more ornamental predecessor, the Art Deco style, Streamline Moderne is more restrained in its ornamental program and emphasizes the horizontal rather than the vertical. This is achieved through incorporating bands of windows, decorative raised or grooved horizontal lines, flat canopies with banded fascia, and narrow coping at the roofline. Other characteristics include smooth wall surfaces, usually clad in stucco, glass block or porthole windows, and rounded corners. Reference to aerodynamic design is a signature of the style.

Compared with the Streamline Moderne, Moderne buildings also tend to be horizontal in emphasis but more clean-lined and rectilinear in their massing and detailing. Moderne designs are generally characterized by flat roofs, smooth stucco exteriors, and use of metal casement windows that often meet at the corners of the building.

#### **Typical Character-Defining Features:**

- Horizontal emphasis, massing, and accents, such as moldings and continuous sill courses
- Smooth stucco or concrete exterior finish
- Curvilinear/rounded wall surfaces, corners, and features
- Recessed windows with no surrounds
- Flat or nearly flat roof



Figure 187. Moderne: Venice High School, Austin & Ashley, architects (1935-1937). Source: Heumann & Associates and SAIC for LAUSD.

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Figure 188. Hollenbeck Middle School, Alfred P. Rosenheim, architect (1936). Source: Heumann & Associates and SAIC for LAUSD.



Figure 189. Hollywood Union High School, Marsh, Smith & Powell (1934-1935). Source: Heumann & Associates and SAIC for LAUSD.

### PWA MODERNE

Created by the National Industrial Recovery Act, the Public Works Administration (PWA) was founded within a few months of the March 1933 Long Beach Earthquake. Following widespread damage to Los Angeles public schools in the wake of the earthquake, much school reconstruction work was funded by the PWA. Consequently, a substantial number of Los Angeles public schools either built or remodeled during this time exhibit some degree of PWA Moderne styling. Also referred to as “Stripped Classicism,” the PWA Moderne often incorporates elements of a number of styles, including Classical Revival, Spanish Colonial Revival, Art Deco, and Streamline Moderne.

Compared with the Streamline Moderne, the PWA Moderne was more formal and symmetrical in its overall design, with less emphasis on curvilinear shapes and horizontality. This style is found throughout the United States, particularly for institutional buildings funded through the PWA. Although the PWA program was terminated in 1943, buildings continued to display these stylistic features.

#### **Typical Character-Defining Features:**

- Emphasis on the vertical axis
- Symmetrical, formal design composition and massing
- Smooth wall surfaces, generally exhibiting stucco, concrete, and/or polished stone (rarely includes brick exterior elements)
- Usually displays a flat roof
- Piers, often fluted or reeded, separating recessed window channels
- Incorporation of shallow relief panels and interior murals



Figure 190. PWA Moderne meets Spanish Colonial Revival style: Canoga Park High School Auditorium (1939). Source: Heumann & Associates and SAIC for LAUSD.



Figures 191 and 192. Emerson Middle School, Richard Neutra, architect (1937-1940). Source: LAUSD Emerson Middle School Pre-Planning Survey.

### EARLY MODERNISM | INTERNATIONAL STYLE (PRE-1945)

This style coincides with the emergence of modern architectural design and culture in Los Angeles, at a time when modernism was still in an experimental stage and carried out by a relatively small group of architects and designers. Although many of these same ideas informed postwar modern styles, this era was unique and experimental. The City of Los Angeles Office of Historic Resources describes this stylistic theme as follows:

With precedents in Europe dating to the first decades of the twentieth century, Los Angeles was one of the first American centers of the International Style due in large part to the import of ideas by Viennese expatriates Rudolph Schindler and Richard Neutra. Although never catching on as a widely-accepted style for domestic architecture, the International Style was embraced and regionalized by a number of Los Angeles architects and designers who established a formidable local Modernist tradition.

Rudolph Schindler came to Los Angeles from Austria in 1920 to oversee construction on the Barnsdall House (Hollyhock House) for the office of Frank Lloyd Wright. Fellow Austrian Richard Neutra came to Los Angeles at Schindler's urging in 1925. Schindler, Lloyd Wright and Neutra and the architects of the so-called "Second Generation" architects continued to design buildings in Los Angeles in the postwar years; however, by this time the work of these architects and their protégés took on an expression of a more regional modernism (see Mid-Century Modernism).<sup>179</sup>

#### ***Typical Character-Defining Features:***

- Horizontal emphasis
- Use of simple, geometric volumes
- Smooth, unadorned wall surfaces, often sheathed in stucco or concrete
- Flat or nearly flat roof, often with cantilevered eaves
- Use of corner and casement windows, often with steel frames
- Windows generally set flush with the wall plane, with minimal trim or surrounds
- Continuous bands of windows emphasize the horizontal axis



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Figures 193 and 194. On left, Fernangeles Elementary School (1954), Sun Valley. On right, Parmlee Avenue Elementary School (1962), southeastern Los Angeles. Source: Sapphos Environmental, Inc., 2014.

## MID-CENTURY MODERNISM / REGIONAL MODERNISM (POST-1945)

Mid-Century Modernism, or Regional Modernism, represents a middle ground between the formal, machine-age aesthetic of the International Style and a regional idiom reflecting local precedent and identity. In the postwar period through the 1960s, as practiced in Southern California, Mid-Century Modernism took its cues from the region's first-generation modernist architects such as Richard Neutra, Rudolph Schindler, Gregory Ain, Frank Lloyd Wright, and Harwell Hamilton Harris. In the postwar period, second-generation practitioners such as Raphael Soriano, Whitney Smith, and A. Quincy Jones, among many others, established Los Angeles as a center for innovative architectural design and culture.

Mid-Century Modernism is characterized by an honest expression of structure and function, with little applied ornament. Aesthetic effect is achieved through an asymmetrical but balanced, rhythmic design composition, often expressed in modular post-and-beam construction. Whether wood or steel, post-and-beam construction allowed for open floor plans, ease of expansion, and generous expanses of glazing to heighten indoor-outdoor integration. Infill panels of wood or glass are common, with glazing often extending to the gable. Buildings are generally one to two-stories, with an emphasis on simple, geometric forms. Capped with low-pitched gabled or flat roofs, a Mid-Century Modern building often displays wide eaves and cantilevered canopies, supported on spider-leg or post supports. Sheathing materials vary, with wood, stucco, brick and stone, or steel-framing and glass. Windows are generally flush-mounted, with metal frames.



Figure 195. Pacoima Middle School, Administrative Building (1955), Wilmington. Source: LAUSD Pacoima Middle School Pre-Planning Survey, 2010.

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Figures 196 and 197. Grover Cleveland High School, Administrative Building (left) and typical classroom wing (right), Matcham & Granger and Associates (1959), Reseda. Source: Sapphos Environmental, Inc., 2013.

This style was seen in postwar institutional and commercial buildings, as well as residences, from 1945 until circa 1975, when Title 24 restrictions on the use of glass curtailed the expansive glazing that characterizes the style.

## ***Typical Character-Defining Features:***

- Horizontal design composition and massing; generally one to two stories
- Simple, geometric volumes
- Flat or shed roof, often with wide, cantilevered overhangs
- Exterior materials include stucco, brick, or concrete
- Modular design and planning
- Aesthetic qualities derive from use of simply treated materials and excellent craftsmanship
- Direct expression of structural systems, often in wood or steel post-and-beam
- Lack of historicizing ornament
- Generous expanses of fenestration, including bands of grouped multi-light windows
- Extensive use of sheltered exterior corridors, with flat or slightly sloped roofs supported by posts, piers, or pipe columns

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Figure 198. Orville Wright Middle School, Cafeteria, Spaulding & Rex (1951). Source: LAUSD Wright Middle School Pre-Planning Survey, 2012.



Figure 199. Palisades Charter High School, Wilson & Associates (1961). Source: LAUSD Palisades Charter High School Pre-Planning Survey, 2012.

## **Mid-Century Modernism | Expressionistic/Organic Subtype:**

- Combines sculptural forms with basic geometric volumes
- Curved, sweeping wall surfaces
- Expressionistic roof forms, including butterfly, folded plate or barrel vault roof forms



# LOS ANGELES UNIFIED SCHOOL DISTRICT

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## ILLUSTRATIONS OF LAUSD ARCHITECTURAL STYLES

### COLLEGIATE GOTHIC



Figures 200 and 201. John Marshall High School, George Lindsey (1931). Source: Heumann & Associates and SAIC for LAUSD.

### TUDOR REVIVAL



Figure 202. Gulf Avenue Elementary School, Henry Harwood Hewitt & Norman Miller (1926). Source: Heumann & Associates and SAIC for LAUSD.



Figure 203. John Muir Middle School, John C. Austin (1922). Source: Heumann & Associates and SAIC for LAUSD.

### MEDITERRANEAN REVIVAL



Figures 204 and 205. Mediterranean Revival: Hamasaki Elementary School, originally Riggin School (1927). Source: Heumann & Associates and SAIC for LAUSD.



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## RENAISSANCE REVIVAL STYLE



Figure 206. Ritter Elementary School (1932). Source: Heumann & Associates and SAIC for LAUSD.



Figure 207. University High School (circa 1922). Source: Heumann & Associates and SAIC, LAUSD.



Figure 208. Italian Renaissance Revival: South Gate High School, George Lindsey & Erwood Elden (1930). Source: Heumann & Associates and SAIC for LAUSD.



Figure 209. Renaissance-inspired Walter Reed Middle School, originally North Hollywood Junior High School, John Austin (1939). Source: Heumann & Assoc. and SAIC for LAUSD.



Figures 210 and 211. John Burroughs Middle School (1922). Source: Heumann & Associates and SAIC for LAUSD.

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## SPANISH COLONIAL REVIVAL



Figure 212. Eagle Rock Elementary School (circa 1919). Source: Heumann & Associates and SAIC for LAUSD.



Figure 213. North Hollywood High School, Hunt & Chambers (1926). Source: Heumann & Associates and SAIC for LAUSD.



Figure 214. Aldama Elementary School, Charles Plummer (1924). Source: Heumann & Associates and SAIC for LAUSD.



Figure 215. Pacific Palisades Elementary School, Albert Nibecker (1930). Source: Heumann & Associates and SAIC for LAUSD.



Figure 216. Spanish Eclectic: Horace Mann Middle School (1926). Source: Heumann & Associates and SAIC for LAUSD.



Figure 217. Canoga Park Elementary School, Sumner Spaulding (1935). Source: Heumann & Associates and SAIC for LAUSD.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

## ARCHITECTS

Since the early years of the district, the school buildings and campuses of LAUSD have been designed by some of the region's most prominent master architects region as well as the district's own architectural department. The following architects and firms were responsible for numerous designs of extant buildings throughout the district, since the early twentieth century:

- Thornton Abell
- Ain, Johnson & Day (Gregory Ain, Joseph Johnson, and Alfred Day)
- Robert Evans Alexander
- Allison & Allison (David Clark Allison and James Edward Allison)
- John C. Austin
- Austin and Ashley (John C. Austin and Frederic Ashley)
- Austin, Field & Fry (John C. Austin, Robert Field, Jr., Charles Eugene Fry)
- Edwin Bergstrom
- Daniel, Mann, Johnson & Mendenhall, DMJM (Phillip Daniel, Arthur Mann, Kenneth Johnson, Irvan Mendenhall)
- Stiles O. Clements
- Roland Coate
- Edelman and Zimmerman
- Sidney Eisenshtat
- Henry L. Gogerty
- Heitschmidt & Thompson (Earl Heitschmidt and Whiting Thompson)
- Frank Hudson
- Hudson & Munsell
- Stewart S. Granger
- Myron Hunt
- Hunt & Chambers
- Hunt & Burns
- Gordon B. Kaufmann
- George Lindsey
- Marsh, Smith, & Powell (Norman Marsh, David Smith, and Herbert James Powell)
- A. C. Martin
- Matcham & Granger (Charles O. Matcham Sr. and Stewart S. Granger)
- Alfred S. Nibecker
- Richard Neutra
- C.E. Noerenberg and Johnson
- Parkinson and Parkinson
- Charles Plummer
- Alfred Rosenheim
- Sumner Spaulding
- Spaulding & Rex (Sumner Spaulding and John Rex)
- William Stockwell
- Whiting Thompson
- Walker and Eisen
- Adrian Wilson & Associates



## SECTION V THEMES OF SIGNIFICANCE

### CONTEXT: PUBLIC AND PRIVATE INSTITUTIONAL DEVELOPMENT | EDUCATION

#### THEME: LAUSD | FOUNDING YEARS

Property Type: Institutional/Educational  
 Property Subtypes: Wood-Framed School House  
 Period of Significance: 1872 to 1894  
 Area of Significance: Education  
 Geographic Location: Citywide (rare)  
 Area of Significance: A/1

#### Eligibility Standards:

- Is a rare example of an educational facility from the founding years of the Los Angeles City School District

#### Character-Defining Features:

- Retains most of the essential physical features from the period of significance
- Wood siding
- Bell tower; some Victorian-era ornamental detailing
- One-story massing
- Wood-framed, double-hung windows

#### Integrity Considerations:

- Should retain integrity of Design, Feeling, and Association from the period of significance
- Some materials may have been removed or altered
- Modern lighting and fencing of site acceptable alterations



Figure 218. Old Vernon Avenue School, built in 1876.  
 Source: LAUSD.



Figure 219. Old Canyon School, built in 1894.  
 Source: LAUSD.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

## THEME: LAUSD | PRE-1933 LONG BEACH EARTHQUAKE SCHOOL PLANTS, 1920-1933

### Pictorial Overview



Figures 220 and 221. The expansive plan and Renaissance Revival-style of University High School (1924). Designed open spaces have been retained for nearly a century. Source: LAUSD University High School Pre-Planning Survey, 2011.



Figures 222 and 223. Vernon City Elementary School (1929), with courtyards and Spanish Colonial Revival arcades placing school corridors outside. Source: LAUSD Vernon City Elementary School Pre-Planning Survey, 2011.



Figure 224. One-story scale and E-shaped plan of Fishburn Avenue Elementary School (1926), in 1927 aerial photo. Source: LAPL Photo Collection.

**CONTEXT: PUBLIC AND PRIVATE INSTITUTIONAL DEVELOPMENT | EDUCATION**

**THEME: LAUSD | PRE-1933 LONG BEACH EARTHQUAKE SCHOOL PLANTS,  
1910-1933**

Property Type:	Institutional/Educational
Property Subtypes:	Elementary, Junior High, and High School Buildings and Campuses
Period of Significance:	1910 to 1933
Area of Significance:	Education
Geographic Location:	Citywide
Area of Significance:	A/1

**Eligibility Standards:**

- Embodies LAUSD school planning and design ideals and principles of the era
- One of few remaining schools from the pre-1933 Long Beach earthquake era that was not substantially altered or remodeled
- Retains most of the associative and character-defining features from the period of significance

**Character-Defining Features | Buildings/Structures:**

- Articulated buildings plans, facilitating the creation of outdoor spaces (often T-shaped, E-shaped, U-shaped, and H-shaped plans)
- Generally low massing, usually one to two stories (with two to three stories more common for middle and senior high schools)
- Includes designed outdoor spaces, such as courtyards and patios, adjacent to classroom wings
- Exteriors usually lined with rows of grouped windows, including wood-framed multilight windows; expanses of windows often mark the location of classrooms
- Designed in popular period-revival styles of the era (including Spanish Colonial Revival, Renaissance Revival, Mediterranean Revival, and Collegiate Gothic)
- Often designed by prominent architects of the era

**Character-Defining Features | Campus/District:**

- Emphasis on a more spread-out site plan, with designed outdoor spaces
- More varied collection of buildings, differentiated by function and use (rather than a single building with all functions inside)
- Might include an elaborate administration building, usually the focal point of the campus, as well as classroom wings, auditoriums, gymnasiums, and outdoor recreation areas
- Middle or senior high schools might include a gymnasium designed in the style of the campus overall

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

## Integrity Considerations:

- Most pre-1933 schools were substantially remodeled following the Long Beach earthquake
- Designed outdoor spaces, such as courtyards and patios, should be intact in use, if not with landscape design and hardscaping; development pressures over the years often resulted in these open spaces being in-filled with new construction; overall sense of relationship of building to designed outdoor spaces should be intact
- Should retain integrity of Materials, Design, Workmanship, Feeling, and Association from its period of significance
- Intact campus groupings from a single period of time are not common
- Some materials and features may have been removed or altered
- Modern lighting and fencing of site acceptable

## Comments:

Schools from this period generally include additional buildings and structures added after the period of significance (in particular after World War II), which may be non-contributing.

Eligible properties under this theme may be a single building (generally the Administration Building, in combination with a classroom wings) or a grouping (campus) of buildings constructed during the period of significance.

Buildings and campuses exhibiting distinctive design features might also qualify under Criteria C/3, as the embodiment of the distinctive characteristics of a type, period, region, or method of construction, an excellent example of the work of a master architect, or for high artistic values.



*Figure 225. Marshall Senior High School (1931). The school has expanded over the years but also retains many of its designed open spaces and courtyards. Source: LAUSD Marshall Senior High School Pre-Planning Survey, 2010.*



# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

## **CONTEXT: PUBLIC AND PRIVATE INSTITUTIONAL DEVELOPMENT | EDUCATION**

**THEME: LAUSD | POST–1933 LONG BEACH EARTHQUAKE SCHOOL PLANTS, 1933–1945**

Property Type:	Institutional/Educational
Property Subtypes:	Elementary, Junior High, and High School Buildings and Campuses
Period of Significance:	1933 to 1945
Area of Significance:	Education
Geographic Location:	Citywide
Area of Significance:	A/1

### **Eligibility Standards:**

- Exemplifies post–Long Beach earthquake school planning and design concepts of the period, including requirements under the 1934 Field Act
- One-story massing for elementary schools; up to two-stories for junior/high schools
- Retains most of the associative and character-defining features from the period of significance

### **Character-Defining Features | Buildings/Structures:**

- One-story massing for elementary schools; up to two stories for middle and senior high schools
- Reinforced concrete, steel- or wood-frame construction
- Classroom wings designed for easy access and views to outdoors—with variations including L-, H-, T-shaped building plans
- Generous expanses of windows, including steel- and wood-framed multilight windows, awning and hopper casements, clerestories, and large-pane fixed windows; window groupings often mark the location of classrooms
- Stylistically more streamlined and less ornamental than 1920s period-revival styles
- Emphasis on “traditional Southern Californian” styles, such as Spanish Colonial and Mission Revival
- Styles can also include PWA Streamline Moderne, Art Deco, Late Moderne, and proto-modern styles
- May have been partially or fully funded through Works Progress Administration (WPA), 1935 to 1943
- WPA projects may include significant interior artwork such as murals, paintings and sculpture
- May have been designed by a prominent architect of the period

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

## **Character-Defining Features | Campus/District:**

- Unified site plan consisting of buildings and structures designed and sited according to their use
- Use of designed outdoor and landscaped spaces, for outdoor study, recreation and dining
- Often displays connecting sheltered corridors throughout campus
- Emphasis on a more expansive site plan
- Varied collection of buildings, differentiated by function and use (rather than a single building with all functions inside)
- Might include an elaborate administration building, located near the campus entrance; administration buildings usually serve as the focal point of the campus
- Campus often composed of groupings of classroom wings, auditoriums, gymnasiums, cafeterias, and outdoor recreation and dining areas
- Middle or senior high schools might include a gymnasium designed in the style of the campus overall

## **Integrity Considerations:**

- Should retain most of the essential physical features from the period of significance
- Some materials may have been removed or altered
- Modern lighting and fencing of site acceptable
- Schools from this period generally include buildings constructed after the period of significance, in particular post-World War II buildings, which may be non-contributing
- Eligible properties under this theme may be a single building, if it exemplifies the design ideals of the era, or a grouping (campus) of buildings constructed during the period of significance
- Intact campus groupings from the pre-1945 era are not common
- Many pre-1933 schools were substantially remodeled following the Long Beach earthquake—may retain a 1920s plan but with 1930s stylistic detailing.
- Pre-1933 schools rehabilitated post-1933 might exhibit added seismic supports of steel columns, beams, or diagonal bracing; original masonry might be covered by concrete/stucco sheathing
- Should retain integrity of Materials, Design, Workmanship, Feeling, and Association from its period of significance

**Comments:** Buildings exhibiting distinctive design features might also qualify under Criteria C/3, as the embodiment of the distinctive characteristics of a type/period or method of construction, as an example of the work of a master architect, or for high artistic values.

**CONTEXT: PUBLIC AND PRIVATE INSTITUTIONAL DEVELOPMENT | EDUCATION**

**THEME: LAUSD | EARLY EXPERIMENTS IN THE MODERN, FUNCTIONALIST SCHOOL PLANT, 1933–1945**

Property Type:	Institutional/Educational
Property Subtypes:	Elementary Schools, Junior High Schools, and High Schools
Period of Significance:	1933 to 1945
Area of Significance:	Education
Geographic Location:	Citywide; rare
Area of Significance:	A/1

**Eligibility Standards:**

- Clearly expresses the experimental ideas emerging during this period for the modern, functionalist school plant
- One-story massing for elementary schools; up to two-stories for junior/high schools
- Classrooms, in detailing and plans, clearly express their function, with axial, finger-like wings, plentiful fenestration, and connections to the outdoors
- Retains most of the associative and character-defining features from the period of significance

**Character-Defining Features | Buildings/Structures:**

- One-story massing for elementary schools; up to two stories for middle and senior high schools
- Usually reinforced concrete, steel- or wood-frame construction, clad in cement/stucco
- Classrooms are often single- or double-loaded finger-like wings, arranged along a central axis or semicircle
- Classrooms open directly onto patios/play areas through glass doors or movable walls
- Varying elevations might display differentiated window sizes and configurations, in order to tailor interior light to sun patterns and create cross-lit classrooms
- Windows are plentiful and include steel- and wood-framed multilight windows, in double-hung sashes, awning and hopper casements, clerestories, and fixed panes
- Displays an informal, nonmonumental scale and spare ornamental program
- Stylistically modern; might display influence of Late Moderne or PWA Streamline Moderne
- May have been partially or fully funded through WPA, 1935 to 1943; WPA projects may include significant interior artwork such as murals, paintings and sculpture
- May have been designed by a prominent architect of the period

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

## Character-Defining Features | Campus/District:

- A unified, nonmonumental, nonhierarchical site plan
- Displays inventive site plan incorporating buildings, landscaped courtyards, and circulation corridors into a unified campus design
- Swaths of landscaped patios and terraces adjacent to classroom wings
- Designed outdoor spaces, including patios, courtyards
- Use of outdoor corridors, with simple canopy supports and posts or *pilotis*, form links between classrooms and other buildings

## Integrity Considerations:

- School expansion and new construction over the years, in particular in the postwar period, might have resulted in the addition of in-fill buildings and structures in areas that were originally designed open spaces. Such new additions should not interfere with or serve as a visual impairment to the designed connections between buildings, in particular classroom wings, and adjacent outdoor patios and spaces.
- Some materials may have been removed or altered
- Modern lighting and fencing of site acceptable
- Should retain integrity of Materials, Design, Workmanship, Feeling, and Association from its period of significance

**Comments:** Buildings exhibiting distinctive design features might also qualify under Criteria C/3, as the embodiment of the distinctive characteristics of a type/period or method of construction, as an example of the work of a master architect, or for high artistic values.

**CONTEXT: PUBLIC AND PRIVATE INSTITUTIONAL DEVELOPMENT | EDUCATION**

**THEME: LAUSD | EDUCATING THE BABY BOOM: THE POSTWAR MODERN, FUNCTIONALIST SCHOOL PLANT, 1945–1969**

Property Type:	Institutional/Educational
Property Subtypes:	Elementary Schools, Junior High Schools, and High Schools
Period of Significance:	1945 to 1969
Area of Significance:	Education
Geographic Location:	Citywide; with concentrations in the San Fernando Valley and west Los Angeles
Area of Significance:	A/1

**Eligibility Standards:**

- Clearly embodies the characteristics of a postwar modern functionalist school campus
- Displays a unified, functional site design, with buildings extending across the site and oriented in relation to outdoor spaces (courtyards, patios, outdoor play areas)
- One-story massing for elementary schools; up to two-stories for junior/high schools
- Classrooms, in detailing and plans, clearly express their function, with axial, finger-like wings, plentiful fenestration, and connections to the outdoors
- Retains most of the associative and character-defining features from the period of significance

**Character-Defining Features | Buildings/Structures:**

- Building plans and site design clearly express their function; classroom wings often exhibit one-story “finger-like” wings, arranged on an axis
- Easily identifiable indoor-outdoor spaces, connections to classrooms through the incorporation of patios, courtyards, and outdoor canopied corridors
- One-story massing, particularly for elementary schools; up to two to three stories for junior and high schools
- Building types and plans expressive of postwar ideals in school design; these can include (1) finger-plan schools (usually in 1940s through 1950s); (2) cluster-plan schools (beginning in 1950s); and (3) variations and combinations of these typologies clearly expressive of the ideals for informality, indoor-outdoor connections, and zoned planning for the site
- Varying elevations might display differentiated window sizes and configurations, in order to tailor interior light to sun patterns and create cross-lit classrooms

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

## Character-Defining Features | Campus/District:

- Unified campus design includes most or all of the following attributes: lack of formality and monumentality; low massing (usually one stories for classrooms and up to two stories for auditoriums/multipurpose rooms); strong geometric ordering of buildings and outdoor spaces; decentralized, pavilion-like layout; rational, function-driven site design; buildings extend across the site; buildings are oriented to outdoor spaces (courtyards, patios, outdoor areas), purposeful indoor-outdoor integration
- Automobile traffic/drop-off areas separated from campus; linked to interior via extended canopied corridors
- Buildings often turn inward, toward green spaces and courtyards, lawns
- Outdoor corridors, sheltered beneath simple canopies, forming links between the buildings of the campus
- Classrooms often consist of a series of axial, modular units
- An informal, domestic scale for the buildings and campus might be especially evident in elementary schools
- Swaths of patios, terraces, and plantings adjacent to and alternating with buildings
- Generous expanses of windows, including steel- and wood-framed multilight windows, in awning and hopper casements, clerestories, and fixed panes
- Flat roof or broken-plane roof often used for lighting and acoustical issues
- Modular design, with a rhythmic, asymmetrical but balanced composition
- Usually displays a modern design idiom, usually either regional modernist (with use of native materials such as stone, brick, and wood siding and/or framing), International Style modernist, or, by the early 1960s, Late Modern (more expressive and sculptural)
- Some examples might include some degree of historicist detailing or styles popular in the postwar period (such as American Colonial Revival); these are less common than modernist examples
- May have been designed by a prominent architect of the period
- Often associated with post–World War II suburbanization and growth near major employment centers beyond the city periphery (such as the San Fernando Valley and southwest Los Angeles)
- Often built in residential neighborhoods on large expanses of land, with swaths of land devoted to landscape design and playing fields (in particular for high school campuses)

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

## **Integrity Considerations:**

- Retains most of the essential physical features from the period of significance
- School expansion and new construction over the years, in particular in the postwar period, might have resulted in the addition of in-fill buildings and structures in areas that were originally designed open spaces. Such new additions should not interfere with or serve as a visual impairment to the designed connections between buildings, in particular classroom wings, and adjacent outdoor patios and spaces.
- Many postwar schools were designed to be easily expandable as enrollment increased; the original site design and building types and plans should be readily discernible. If additional wings were added or the campus extended, the additions should be compatible with and visually subordinate to the original.
- Some materials may have been removed or altered
- Modern lighting and fencing of site acceptable
- Should retain integrity of Setting, Materials, Design, Workmanship, Feeling, and Association from its period of significance
- Addition of portable or permanent buildings after the period of significance acceptable as long as original campus design is intact

**Comments:** This theme would most often apply to a campus evaluated as a historic district. Individual buildings and/or campuses exhibiting distinctive design features might also qualify under Criteria C/3, as the embodiment of the distinctive characteristics of a type/period or method of construction, as an example of the work of a master architect, or for high artistic values.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

**CONTEXT: PUBLIC AND PRIVATE INSTITUTIONAL DEVELOPMENT | EDUCATION**  
**THEME: LAUSD AND THE CIVIL RIGHTS MOVEMENT, 1954–1980**

Property Type: Institutional/Educational  
Property Subtypes: Elementary Schools, Junior High Schools, and High Schools  
Period of Significance: 1954 to 1980  
Area of Significance: Education/Ethnic Heritage  
Geographic Location: Citywide  
Area of Significance: A/1 and/or B/2

## **Eligibility Standards:**

- Was constructed during the theme of significance
- Was the site of significant integration initiatives, challenges, or activities related to the Civil Rights Movement and school integration
- Directly reflects the movement for equal access to schools and/or to employment opportunities in LAUSD schools
- Has a well-established, long-term association with a figure who was significant in the Civil Rights Movement and school integration (eligibility under B/2)

## **Character-Defining Features:**

- Retains most of the associative and character-defining features from the period of significance

## **Integrity Considerations:**

- Retains integrity of Location, Design, Setting, Feeling, Association
- Some materials may have been removed or altered
- If there are multiple buildings on campus constructed during the period of significance, these should be evaluated as a potential historic district

### SECTION VI CONCLUSION | RECOMMENDATIONS

LAUSD is the second largest public school system in the United States and encompasses nearly 800 campuses distributed across more than 700 miles. Since its founding in 1872, the district has commissioned, designed, and acquired a remarkable collection of buildings, campuses, and facilities. These properties reflect more than a century of social, architectural, and technological advances, as well as ongoing educational and curricular reform. Extant properties range from a few late-nineteenth-century, wood-framed schoolhouses to mid-twentieth-century superblock campuses exemplary of modernist architectural design.

This Historic Context Statement represents a first step in creating a framework for context-driven evaluations of educational facilities in Los Angeles (and beyond). As LAUSD begins planning for campus-wide redevelopment and modernization under Measure Q, to be launched in 2014, this study provides a guide for conducting evaluations of LAUSD's many historically significant buildings and campuses.

Through research conducted for this study, four distinct periods emerged: (1) Founding Years, 1870s through 1909; (2) Progressive Education Movement: Standardization and Expansion, 1910 to 1933; (3) Era of Reform: Great Depression, Earthquake, and Early Experiments in the Modern, Functionalist School Plant, 1933 to 1944; and (4) Educating the Baby Boom: Postwar Expansion and the Modern, Functionalist School Plant, 1945 to 1969. Specific themes of significance associated with each era were prepared for this study, along with eligibility standards, character-defining features, and integrity thresholds for each.

Given the project need and parameters, this study focused on the potential eligibility of school buildings and campuses under Criteria A/1, as outstanding examples of LAUSD design ideals and principles, according to the era under consideration. Because the postwar era largely fell outside the scope of 2002 survey work, and postwar schools will be the focus of much of the modernization work for LAUSD in the coming years, the postwar era was explored in detail in the present study.

In addition, by identifying the character-defining features that lend campuses historic significance, this study also establishes a framework for the development of district-wide design guidelines. The guidelines are being prepared by Sapphos Environmental, Inc. to be included in environmental compliance documentation currently being prepared by LAUSD.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

## **Recommendations | Areas for Further Research**

Additional research on areas and topics beyond the current scope would further broaden the framework for evaluating significant events, people, and the architectural legacy of LAUSD. Recommendations related to the Historic Context Statement and historic resources survey are as follows:

### **1. Expand the LAUSD Historic Context Statement and Historic Resources Survey to include the period to 1980**

Pursuant to Measure Q, district-wide modernization and redevelopment will unfold gradually, over many years. Broadening the LAUSD Historic Context Statement and survey to consider all schools constructed in the past 35 years (rather than 45 years) would allow the district to take proactive steps to identify historically significant campuses (and therefore historic resources under CEQA) prior to redevelopment planning and work. This would also bring the LAUSD Comprehensive Historic Resources Survey up to date with the City of Los Angeles Office of Historic Resources citywide survey, SurveyLA.

### **2. Conduct additional archival research to expand property eligibility under additional criteria**

In the current scope, campus-specific work included research on events, patterns of development, and significant people associated with the schools included in the accompanying survey. However, project limitations precluded extensive research on LAUSD's history that might result in eligibility under Criteria A/1 (such as LAUSD and the Civil Rights Movement) and Criteria B/2 (for an association with significant figures in the history of public schools in Los Angeles). These areas represent excellent areas for further study. (The context of the Civil Rights Movement and Los Angeles schools was addressed, however, in the National Register of Historic Places Multiple Property Documentation form for African-Americans in Los Angeles.<sup>180</sup>)

### **3. Expand study of school plant property types and subtypes**

As a general framework, this treated senior high, middle, and elementary schools, as well as other LAUSD educational facilities, with a broad brush, as a single property type. Noteworthy distinctions, generally in scale and massing, were noted throughout the context. Should subsequent survey work reveal significant distinctions among educational property types, these differences could be incorporated into an updated Historic Context Statement.

#### **4. Update and expand the LAUSD Historic Resources Survey**

Sapphos Environmental, Inc. also recommends that LAUSD take proactive steps to update its comprehensive historic resources survey, in order to consider all as-yet unevaluated LAUSD assets. With planning for district-wide modernization work under way, it will be critical that the LAUSD survey be comprehensively updated.

The survey could be initially broadened to include all post-1945 school buildings and campuses that have not yet been subject to context-driven evaluation.

According to the *Los Angeles Unified School District History of Schools, 1855 to 1972*, this includes roughly 175 campuses constructed between 1955 and 1969, as well as approximately 125 campuses constructed between 1945 and 1954.<sup>181</sup> (The current scope with Sapphos Environmental, Inc. covers 55 campuses.)

A comprehensive survey update would help streamline and guide district-wide redevelopment plans and help LAUSD in its continuing stewardship of its many historically significant school buildings and campuses.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

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## ENDNOTES

1. Lee, Antoinette, and Linda F. McClelland, U.S. Department of the Interior, National Park Service, "How to Complete the National Register Multiple Property Documentation Form," *National Register Bulletin* No. 16B (1999).
2. Local criteria were not included in this study. Under the provisions of California State Government Code, Section 53094, the properties of California school districts, including LAUSD, are statutorily exempt from most provisions of local ordinances, including landmark designation. California State Government Code, Section 53094 permits "the governing board of a school district, by vote of two-thirds of its members . . . [to] render a city or county zoning ordinance inapplicable to a proposed use of property by such school district . . . ." The legislative history of Section 53094 indicates that "the Legislature deliberately accorded different treatment to school districts than to other local agencies because it was well aware that school construction was subject to almost complete control by the state. . . . The Legislature accordingly provided in section 53094 that school districts, as opposed to other local agencies, should retain the right to exempt themselves from local zoning ordinances (*Santa Clara, supra*, 22 Cal.App.3d at p. 158 fn. 3.)," Court of Appeal, State of California, Second Appellate District, Division 7, *Los Angeles Unified School District, Petitioner and Appellant, v. City of Maywood, et al.*, Respondents and Defendants, Nos. B238629, B238630, Los Angeles Superior Court, filed 13 February 2013.
3. California Office of Historic Preservation, "California Register and National Register: A Comparison (for Purposes of Determining Eligibility for the California Register)," *Technical Assistance Series* No. 6. (Sacramento, CA, 14 March 2006). Available at: [http://ohp.parks.ca.gov/pages/1056/files/06CalReg&NatReg\\_090606.pdf](http://ohp.parks.ca.gov/pages/1056/files/06CalReg&NatReg_090606.pdf)
4. Grimes, Teresa, "Historic Resources Associated with African Americans in Los Angeles, Los Angeles County, California," *National Register of Historic Places* (Washington, DC: U.S. Department of the Interior, National Park Service, 31 December 2008).
5. For additional background on the pre-1870s context of education in Los Angeles and the administrative structure of the district, see Science Applications International Corporation, *Historic Context Statement: Los Angeles Unified School District*, prepared for Los Angeles Unified School District (Pasadena, CA: March 2002), 12.
6. Gibson, Charles D., *California School Buildings, 1960 to 1965* (Sacramento: California State Department of Education, 1966), 1.
7. Bhatia, Pavan, "Modern Concept for Los Angeles Public Schools," Doctoral Dissertation (Cambridge, MA: Harvard University Graduate School of Design, Advanced Management Development Program in Real Estate, July 2009), 28.
8. Hille, R. Thomas, *Modern Schools: A Century of Design for Education* (Hoboken, NJ: John Wiley & Sons, 2011), 13.
9. Eales, John R., "A Brief, General History of the Los Angeles City School System," Doctoral Dissertation (Los Angeles: University of California, June 1956), 78.
10. *Ibid.*, 78.
11. *Ibid.*, 78.
12. Bhatia, "Modern Concept," 30.
13. Briggs, Warren Richard, *Modern American School Buildings* (New York: J. Wiley & Sons, 1906), 8.
14. Hille, *Modern Schools*, 13–14.
15. See, for example, Baker, Lindsay, "A History of School Design and Its Indoor Environmental Standards, 1900 to Today," PhD Dissertation (Berkeley: Department of Architecture, Center for the Built Environment, University of California, Berkeley, January 2012).

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC CONTEXT STATEMENT, 1870 to 1969

16. Engelhardt, N.L., Jr., "Trends in School Architecture and Design," *Review of Educational Research* 12, no. 2 (April 1942): 171–77, at 174.
17. Baker, "A History of School Design," 4.
18. Science Applications International Corporation, *Historic Context Statement: Los Angeles Unified School District*, 12.
19. Ibid.
20. Turner, Timothy G., "Rediscovering Los Angeles," *Los Angeles Times*, 13 April 1936.
21. "Course of Study: What Methods Best in Our Schools? All Citizens, Good and True, Appealed to by Committee of Ten," *Los Angeles Times*, 17 May 1900.
22. Eales, "A Brief, General History," 63.
23. Los Angeles Board of Education, *Annual Report, 1884-85*, cited in Eales, "A Brief, General History," 62–63.
24. Eales, "A Brief, General History," 63.
25. Ibid.
26. Population figures from Fogelson, Robert M., *The Fragmented Metropolis: Los Angeles, 1850-1903* (Berkeley: University of California Press, 1967), 78.
27. "Los Angeles Public Schools," *Los Angeles Times*, 1 January 1898.
28. "Los Angeles Public Schools: Schools and Teachers," *Los Angeles Times*, 1 January 1898.
29. Ibid.
30. Ogata, Amy F., "Building for Learning in Postwar American Elementary Schools," *Journal of the Society of Architectural Historians* 67, no. 4 (December 2008): 562–91, at 564.
31. Holmes, William Henry, *School Organization and the Individual Child: A Book for School Executives and Teachers* (Worcester, MA: The Davis Press, 1912), 1.
32. Howell-Ardila, Deborah, "Writing Our Own Program: The USC Experiment in Modern Architectural Pedagogy," Master of Historic Preservation Thesis (Los Angeles, CA: USC School of Architecture, December 2010)
33. Donovan, John J., *School Architecture: Principles and Practices* (New York: The MacMillan Company, 1921), ix.
34. Ogata, "Building for Learning," 564, emphasis added.
35. Donovan, *School Architecture*.
36. Hille, *Modern Schools*, 14.
37. Caudill, William Wayne, *Toward Better School Design* (New York: FW Dodge Corporation, 1954), 16. Caudill himself was an early leader in the community of reform-minded school architects and designers. In 1946, California Department of Education official Charles Gibson informed Caudill that his book, *Space for Teaching*, was often used in Californian schools. Wrote Gibson to Caudill, "Your reputation as an authority on school design is already established in California. We use your Bulletin 'Space for Teaching' almost as a Bible in this state." Cited in Ogata, "Building for Learning," footnote 76.
38. Donovan, *School Architecture*, 96.
39. Hamlin, Alfred D. F., *Modern School Houses, Being a Series of Authoritative Articles on Planning, Sanitation, Heating and Ventilation*, vol. 1 (New York: The Swetland Publishing Company, 1910), 9. Cited in Baker, "A History of School Design," 6.
40. Hille, *Modern Schools*, p. 17.
41. Ibid.
42. Donovan, *School Architecture*, 48.
43. "In the Public Schools," *Los Angeles Times*, 3 December 1911. "In the Public Schools" was a weekly column with news and notes of interest from Southern Californian schools, published in the *Los Angeles Times* in the early 1910s.



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44. Ibid. In the Los Angeles City School District, Bettinger singled out the outdoor study programs at Micheltoreno Street School, Griffin Avenue, Loreto Street, and 21st Street Intermediate School. Said Bettinger, "Nearly always at these schools the passer-by will note a happy group of children studying and discussing their lessons out in the fresh air and sunshine."
45. Donovan, *School Architecture*, 9.
46. Ibid.
47. Ibid.
48. Ibid., 6.
49. Ibid., 7.
50. Hille, *Modern Schools*, 14.
51. "City's Schools Highly Praised: Pamphlet Draws Comparisons Showing San Francisco System Interior," *Los Angeles Times*, 17 May 1914.
52. Barnhill, O.H., "The Los Angeles School's Business Department," *The American School Board Journal* (February 1927): 51–52.
53. Marquis, Neeta, "A Tour through a Great Modern Plant and a Glimpse into the Stupendous Development of the Mechanical and Business Side of Our Educational System," *Los Angeles Times*, 29 January 1928.
54. This figure of 400 square miles is equivalent to 112 more square miles than the City itself at the time. This reflects the fact that school districts, as state, rather than city, agencies, pursuant to the Education Code of 1872, included both incorporated cities and adjacent unincorporated land, as well as portions of other incorporated Cities. See Science Applications International Corporation, *Preliminary Historic Resources Survey of the Los Angeles Unified School District*, prepared for the Los Angeles Unified School District, Facilities Services Division (Pasadena, CA: June 2002), 6.
55. Leslie Heumann & Associates and Anne Doehne, Science Applications International Corporation, March 2002, "Historic Schools of the Los Angeles Unified School District," a presentation prepared for LAUSD Facilities Services Division (March 2002), 6.
56. Population statistics are drawn from Fogelson, *Fragmented Metropolis*, 78. School-related statistics are drawn from Eales, "A Brief, General History," 172.
57. Los Angeles City Board of Education, *The Reconstruction Program of the Los Angeles City Schools, 1933 – 1935 (inclusive)* (1933), 5.
58. Eales, "A Brief, General History," 164.
59. Ibid., 165.
60. Ibid., 158.
61. Ibid., 155.
62. Ibid.
63. Holy, T.C., "Needed Research in the Field of School Buildings and Equipment," *Review of Educational Research* 5, no. 4 (1935): 406–11. Cited in Baker, "A History of School Design," 8–9.
64. Mock, Elizabeth, and Rudolf Mock, "Schools Are for Children," *The American School and University* 15 (1943): 37–42.
65. Baker, "A History of School Design," 8.

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66. Throughout the United States, the Great Depression ushered in modern reform in many realms of architectural practice, pedagogy, and design. Two major examples in Southern California were in education and housing reform. In the early 1930s, Los Angeles's only collegiate school of architecture at USC shed its Beaux-Arts influenced curriculum and launched a modern curriculum. USC's design philosophy emphasized the same qualities advocated by school plant reformers: functional, modern design, thoughtful, integrated site planning, and indoor-outdoor integration as the key for the "good life." See Howell-Ardila, "Writing Our Own Program." In terms of housing reform, the Garden Apartment movement also emphasized these qualities as the key to providing better housing and living conditions for all. These movements shared practitioners and proponents, as well as the conviction that "modern" architecture was as much a social movement as it was an aesthetic one. For an outstanding history of the Garden Apartment movement in Los Angeles, see Architectural Resources Group, Inc., *Garden Apartments of Los Angeles Historic Context Statement*, prepared for the Los Angeles Conservancy (Los Angeles, CA, October 2012). Throughout the United States in the 1930s, these ideas occasioned a major shift in the national conversation about modern architecture.
67. Sachs, Avigail, "Research for Architecture: Building a Discipline and Modernizing the Profession," PhD Dissertation (Berkeley: University of California, 2009), 161.
68. Baker, "A History of School Design," 8.
69. Eales, "A Brief, General History," 228.
70. Ogata, "Building for Learning," 564.
71. Mock, Elizabeth, *Built in USA, 1932 – 1944: A Survey of Contemporary American Architecture*, The Museum of Modern Art (New York: Simon & Shuster, 1944), p. 41.
72. In 1938, Lescaze completed work on CBS Columbia Square in Los Angeles, another International Style building now enjoying Historic-Cultural Landmark status.
73. Lescaze, William, "The Functional Approach to School Planning," *Architectural Record* (June 1936): 481–97, at 481.
74. *Ibid.*, 482.
75. McCoy, Esther, *Richard Neutra* (New York: G. Braziller, 1960), 20.
76. Mock, *Built in USA, 1932 – 1944*.
77. McCoy, *Richard Neutra*, 20–21. McCoy observed that one precedent for Neutra's design would have been Bruno Taut's 1927 Municipal School in Berlin, which also featured a wall that opened onto a terrace sheltered beneath wide overhanging eaves, with clerestory lighting on other elevations.
78. Hille, *Modern Schools*, 81–82.
79. "Progress in School Design, As Evidenced in the Work of Marsh, Smith & Powell, Architects," *The Architect & Engineer* (November 1938): 14–22.
80. Engelhardt, p. 175.
81. Sapphos Environmental, Inc., *City of Long Beach Historic Context Statement*, prepared for the City of Long Beach Department of Development Services (Long Beach, CA, 2009).
82. Los Angeles City Board of Education, *The Reconstruction Program of the Los Angeles City Schools, 1933 – 1935 (inclusive)* (Los Angeles, CA: 1933), 5.
83. Engelhardt, "Trends in School Architecture and Design," 176.
84. *Ibid.*
85. "Safety, Simplicity and Old-California Beauty Combined in Mission-Type Schools of Reconstruction Program," *Los Angeles Times*, 9 January 1934.
86. *Ibid.*
87. *Southwest Builder and Contractor*, 8 October 1937, 12.
88. Eales, "A Brief, General History," 272.
89. *Ibid.*, 208.

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90. *Los Angeles Herald-Examiner*, 14 September 1943.
91. Eales, "A Brief, General History," 277.
92. Ibid.
93. Ibid., 236.
94. Quoted in Engelhardt, "Trends in School Architecture and Design," 175.
95. Ogata, "Building for Learning," 1.
96. Ibid.
97. Engelhardt, "Trends in School Architecture and Design," 175.
98. Ibid.
99. Ogata, "Building for Learning," 570.
100. Ibid., 581.
101. Diamond, Robert S., "'Ugly Duckling' School Wins Design Honors," *Los Angeles Times*, 12 August 1965.
102. "Educators Will Take Air Tour," *Los Angeles Times*, 21 June 1964.
103. Ogata, "Building for Learning," 581.
104. Murphy, Jean, "Panel Views New Trends in Education," *Los Angeles Times*, 22 February 1968.
105. Caudill, *Toward Better School Design*, 16.
106. Ibid., 17.
107. Greg Hise describes the origins of the movement for "a new conception of modern houses," and the work of Farwell Bemis, one of the early authors of the movement to place manufacturing technology in the service of housing. Hise, Greg, *Magnetic Los Angeles: Planning the Twentieth-Century Metropolis* (Baltimore, MD: Johns Hopkins University Press, 1997), 56–85.
108. "Case Studies" and "Pioneer School Has Proved the Value of Its Scientific Design," *Architectural Forum* 91 (October 1949): 103–14, at 104.
109. Tanner, C. K., and J. A. Lackney, *Educational Facilities Planning* (Boston: Pearson, Allyn & Bacon, 2005), 12; cited in Baker, "A History of School Design," 11.
110. "Case Studies" and "Pioneer School."
111. Ibid.
112. McQuade, Walter, *Schoolhouse: A Primer about the Building of the American Public School Plant* (New York: Simon & Schuster, 1958), 206.
113. Mock, *Built in USA, 1932 – 1944*, 41.
114. McCoy, *Richard Neutra*, 22.
115. If the finger-plan school remained the dominant trend for so long in spite of these shortcomings, it is in large part because the plan represented the perfect counterpoint to what reformers were still reacting against: the institutional "big block schools with internal corridors and windowless classrooms" (Gibson, *California School Buildings*, 1) These words came from the California Department of Education in 1965, long after the battle against the late-nineteenth-century big-block school had already been won. It is noteworthy that, even as late as 1965, the specter of the unfriendly, institutional school still provided the antithesis against which new ideas were measured.
116. Lopez, Frank G., "Schools: Architectural Record's Building Types Study Number 184: Some Trends in School Design," *Architectural Record* (March 1952): 132–141, 150–154.
117. Ogata, "Building for Learning," 572.
118. Gibson, *California School Buildings*, 1.
119. Ibid.
120. Ogata, "Building for Learning," 569.
121. Los Angeles Conservancy, "Curating the City: Modern Architecture in Los Angeles," Westchester High School. Available at: <https://www.laconservancy.org/locations/orville-wright-middle-school>.
122. Ogata, "Building for Learning," 581.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC CONTEXT STATEMENT, 1870 to 1969

123. Ibid., 581–82.
124. “‘Flexible’ School Called Teamwork Aid,” *Los Angeles Times*, 24 November 1961.
125. Ibid.
126. Ogata, “Building for Learning,” 583.
127. Ibid., 582.
128. Rydeen, James E., “Standardizing Schools,” *American School and University* 75, no. 1 (September 2002): 50.
129. Ogata, “Building for Learning,” 582.
130. Ibid., 583.
131. Gibson, *California School Buildings*, 129.
132. Ibid., 106.
133. “Prominent Architect Honored by Engineers,” *Los Angeles Times*, 1 January 1956.
134. Herriott, M. E., “Death of a School,” *The Clearing House* 30, no. 2 (October 1955): 90–93.
135. Los Angeles Board of Education, *Minutes*, 10 September 1945, 5–6. Quoted in Eales, “A Brief, General History,” 279.
136. For an excellent history of the San Fernando Valley, see Roderick, Kevin, *The San Fernando Valley: America’s Suburb* (Los Angeles: Los Angeles Times Books, 2001).
137. Zeman, Ray, “School Costs Rise with Enrollment, 100,000 Half-Day Students Seen in Five Years Unless Bonds Carry,” *Los Angeles Times*, 6 March 1952.
138. Ibid.
139. Turpin, Dick, “1960-61 School Budget of \$254,589,414 OKd,” *Los Angeles Times*, 9 August 1960.
140. Zeman, “School Costs Rise with Enrollment.”
141. “State Renews Appeal for Architects,” *Los Angeles Times*, 18 April 1949.
142. Turpin, Dick, “School Unity May Plug Tax Drain,” *Los Angeles Times*, 1 May 1960.
143. Callan, Mary Ann, “Officials Urge School Merger: Unification Plan Told to PTA School Merger,” *Los Angeles Times*, 5 November 1959.
144. The *Los Angeles Times* published a series of articles on this issue in late 1959. This quote is drawn from: Turpin, Dick, “Unified Schools Savings Viewed, Experts See Advantages in Child Training as Well as Substantial Economies in Plan,” *Los Angeles Times*, 10 November 1959.
145. Turpin, “School Unity Map Plug Tax Drain.”
146. Turpin, Dick, “1960-61 School Budget of \$254,589,414 OKd.”
147. “Quarter Million Students Expected at 176 Schools: Buildings and Personnel Ready for Huge Influx,” *Los Angeles times*, 15 September 1963.
148. Turpin, Dick, “Failure of Bond Issues, Tax Increase Linked to More Half-Day Sessions,” *Los Angeles Times*, 10 September 1962.
149. Steinberg, Warren L., “Down to Defeat Again: Education Tax and Bonds Victims of Our Ignorance,” *Los Angeles Times*, 6 April 1969.
150. Ibid.
151. Ibid.
152. McCurdy, Jack, “L.A. City School Enrollments Drop for First Time in History,” *Los Angeles Times*, 3 October 1969.
153. While a comprehensive history of the topic is beyond the scope of the current study, a topic is addressed in various secondary sources, including the in-depth study provided in Sosa, Herbert R, “Fragmented Diversity: School Desegregation, Student Activism, and Busing in Los Angeles, 1963–1982” (PhD dis., University of Michigan, Ann Arbor, 2013).
154. Nicolaides, Becky M., *My Blue Heaven: Life and Politics in the Working-Class Suburbs of Los Angeles, 1920–1965* (Chicago, IL: University of Chicago Press, 2002), 179.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

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155. Public Information Office of the LACSD, Results Announced of Mandated Racial, Ethnic Survey in Schools, 16 January 1967, fol. Race Question Genl Cont, 1966–1967 Part VII, Box 964, RQC-LAUSD; Sosa, “Fragmented Diversity.”
156. Ibid.
157. Grimes, “Historic Resources Associated with African Americans in Los Angeles.”
158. *California Eagle*, 13 June 1963; *South Gate Press*, 27 June 1963; [QQ:]Hendrick, *The Education of Non-Whites*, 104–105; in Nicolaides, *My Blue Heaven*, 288–9.
159. *Los Angeles Times*, 3 July 1963.
160. Schneider, Jack, “Escape from Los Angeles: White Flight from Los Angeles and Its Schools, 1960–1980,” *Journal of Urban History* 34: 995, 1003.
161. Simpson, Kelly, 7 March 2012, “East L.A. Blowouts: Walking Out for Justice in the Classrooms,” available from KCET:  
<http://www.kcet.org/socal/departures/landofsunshine/highland-park/east-la-blowout-walking-out-for-justice-in-the-classrooms.html> (10 September 2013).
162. *Brown v. Board of Education of Topeka, Kan.*, 347 U.S. 483 (1954).
163. Kurashige, Scott, *The Shifting Grounds of Race: Black and Japanese Americans in the Making of Multiethnic Los Angeles* (Princeton, NJ: Princeton University Press, 2010), 273.
164. *Jackson v. Pasadena City School District*, 59 Cal. 2d, 876.
165. Sosa, “Fragmented Diversity,” 1.
166. Nicolaides, *My Blue Heaven*, 288–9.
167. Sosa, “Fragmented Diversity,” xiv.
168. Nicolaides, *My Blue Heaven*, 291.
169. Sosa, “Fragmented Diversity,” 19.
170. Ibid., 2.
171. See, among others, Fanucchi, Ken, “Pacoima Pupils Transfer to Encino Blocked,” *Los Angeles Times*, 29 August 1967; “Compromise Reached to Bus Some Negro Students to Encino,” *Los Angeles Times*, 1 September 1967; “Parents Win Victory in Bus Campaign,” *Los Angeles Times*, 4 September 1967.
172. Boyarsky, Bill, “Dixie Canyon-Hobart Plan: Two Schools—and One Big Step to Integration,” *Los Angeles Times*, 17 August 1977.
173. Birnberg, Judith R., “Flash! An Integration Program That Works,” *Los Angeles Times*, 24 January 1978.
174. Lindsey, Robert, “Los Angeles Schools Plan Busing Amid White Flight,” *New York Times*, 11 October 1977.
175. Ettinger, David S., “The Quest to Desegregate Los Angeles Schools,” *Los Angeles Lawyer* (March 2003), 56; *Crawford v. Board of Educ. of the City of Los Angeles*, 113 Cal. App. 3d 633, 642 & n.2 (1980), 62–3.
176. Engelhardt, “Trends in School Architecture and Design,” 176.
177. The scope of the 2002 survey included a detailed look at all pre-1945 LAUSD campuses, with a focus on representative architectural styles and their character-defining features. This study reframes those results to ensure continuity. Photos in this section attributed to Heumann & Associates are drawn from: Leslie Heumann & Associates and Anne Doehne, Science Applications International Corporation, “Historic Schools of the Los Angeles Unified School District.”
178. Blumenson, John J.-G., *Identifying American Architecture* (New York: W.W. Norton & Company, 1977); Gebhard, David, and Robert Winter, *A Guide to Architecture in Los Angeles and Southern California* (Santa Barbara, CA: Peregrine Smith, Inc., 1977), 683–708; Harris, Cyril M., *American Architecture: An Illustrated Encyclopedia* (New York: W.W. Norton & Company, 1998); McAlester, Virginia, and Lee McAlester, *A Field Guide to American House* (New York: Alfred A. Knopf, 2004); and Whiffen, Marcus, *American Architecture since 1780: A Guide to the Styles* (Cambridge, MA: MIT Press, 1981).

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179. These descriptions are drawn and adapted from the City of Los Angeles Office of Historic Resources guidelines for evaluating modern resources in Los Angeles. Excerpts in this passage were drawn from: Architectural Resources Group, "Pre-War Modernism," prepared for the City of Los Angeles Office of Historic Resources (Los Angeles, CA, n.d.). The "Early Modern" category fits within the SurveyLA context as follows: Context: Architecture and Engineering, 1850 – 1980; Sub-Context: LA Modernism, 1919 – 1975; Theme: Pre-War Modernism, 1919 – 1945, International Style, 1920 – 1945.
180. Grimes, "Historic Resources Associated with African Americans in Los Angeles."
181. These figures are drawn from: Los Angeles Unified School District, Educational Housing Branch, School Planning Division, Los Angeles Unified School District History of Schools, 1855 to 1972 (January 1973).

## VII. SELECTED BIBLIOGRAPHY

- Architectural Resources Group, Pasadena, California, *Garden Apartments of Los Angeles Historic Context Statement*, prepared for the Los Angeles Conservancy (Los Angeles, CA, October 2012).
- Architectural Resources Group, Pasadena, California, "Pre-War Modernism," prepared for the City of Los Angeles Office of Historic Resources (Los Angeles, CA, n.d.).
- Baker, Lindsay, "A History of School Design and Its Indoor Environmental Standards, 1900 to Today," PhD Dissertation (Berkeley: Department of Architecture, Center for the Built Environment, University of California, Berkeley, January 2012).
- Barnhill, O.H., "The Los Angeles School's Business Department," *The American School Board Journal* (February 1927): 51–52.
- Bhatia, Pavan, "Modern Concept for Los Angeles Public Schools," Doctoral Dissertation (Cambridge, MA: Harvard University Graduate School of Design, Advanced Management Development Program in Real Estate, July 2009), 28.
- Birnberg, Judith R., "Flash! An Integration Program That Works," *Los Angeles Times*, 24 January 1978.
- Blumenson, John J.-G., *Identifying American Architecture* (New York: W.W. Norton & Company, 1977).
- Boyarsky, Bill, "Dixie Canyon-Hobart Plan: Two Schools—and One Big Step to Integration," *Los Angeles Times*, 17 August 1977.
- Briggs, Warren Richard, *Modern American School Buildings* (New York: J. Wiley & Sons, 1906), 8.
- California Office of Historic Preservation, "California Register and National Register: A Comparison (for Purposes of Determining Eligibility for the California Register)," *Technical Assistance Series No. 6*. (Sacramento, CA, 14 March 2006). Available at: [http://ohp.parks.ca.gov/pages/1056/files/06CalReg&NatReg\\_090606.pdf](http://ohp.parks.ca.gov/pages/1056/files/06CalReg&NatReg_090606.pdf)
- California Office of Historic Preservation, *Instructions for Recording Historical Resources* (Sacramento, CA, March 1995).
- Callan, Mary Ann, "Officials Urge School Merger: Unification Plan Told to PTA School Merger," *Los Angeles Times*, 5 November 1959.
- "Case Studies" and "Pioneer School Has Proved the Value of Its Scientific Design," *Architectural Forum* 91 (October 1949): 103–14, at 104.
- Caudill, William Wayne, *Toward Better School Design* (New York: FW Dodge Corporation, 1954), 16.
- Caughey, John W., *The Shame of Los Angeles: Segregated Schools, 1970–1971* (Los Angeles, CA: Quail Books, 1971).
- "City's Schools Highly Praised: Pamphlet Draws Comparisons Showing San Francisco System Interior," *Los Angeles Times*, 17 May 1914.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC CONTEXT STATEMENT, 1870 to 1969

"Compromise Reached to Bus Some Negro Students to Encino," *Los Angeles Times*, 1 September 1967.

"Course of Study: What Methods Best in Our Schools? All Citizens, Good and True, Appealed to by Committee of Ten," *Los Angeles Times*, 17 May 1900.

Diamond, Robert S., "'Ugly Duckling' School Wins Design Honors," *Los Angeles Times*, 12 August 1965.

Donovan, John J., *School Architecture: Principles and Practices* (New York: The MacMillan Company, 1921), ix.

Eales, John R., "A Brief, General History of the Los Angeles City School System," Doctoral Dissertation (Los Angeles: University of California, June 1956), 78.

"Educators Will Take Air Tour," *Los Angeles Times*, 21 June 1964.

Engelhardt, N.L., Jr., "Trends in School Architecture and Design," *Review of Educational Research* 12, no. 2 (April 1942): 171–77, at 174.

Ettinger, David S., "The Quest to Desegregate Los Angeles Schools," *Los Angeles Lawyer* (March 2003), 56.

Fanucchi, Ken, "Pacoima Pupils Transfer to Encino Blocked," *Los Angeles Times*, 29 August 1967.

Flamming, Douglas, *Bound for Freedom: Black Los Angeles in Jim Crow America* (Berkeley: University of California Press, 2005), 90.

"'Flexible' School Called Teamwork Aid," *Los Angeles Times*, 24 November 1961.

Fogelson, Robert M. *The Fragmented Metropolis: Los Angeles, 1850-1903* (Berkeley: University of California Press, 1967).

Gebhard, David, and Robert Winter, *Architecture in Los Angeles: A Complete Guide* (Salt Lake City, UT: Gibbs M. Smith, Inc., Peregrine Smith Books, 1985).

Gebhard, David, and Robert Winter, *A Guide to Architecture in Los Angeles and Southern California* (Santa Barbara, CA: Peregrine Smith, Inc., 1977), 683–708.

Gibson, Charles D., *California School Buildings, 1960 to 1965* (Sacramento: California State Department of Education, 1966), 1.

Grimes, Teresa, "Historic Resources Associated with African Americans in Los Angeles, Los Angeles County, California," *National Register of Historic Places* (Washington, DC: U.S. Department of the Interior, National Park Service, 31 December 2008).

Grimes, Teresa, "National Register of Historic Places Multiple Property Documentation Form" (Los Angeles, CA: Christopher A. Joseph & Associates, 31 December 2008).

Hamlin, Alfred D. F., *Modern School Houses, Being a Series of Authoritative Articles on Planning, Sanitation, Heating and Ventilation*, vol. 1 (New York: The Swetland Publishing Company, 1910), 9.

Harris, Cyril M., *American Architecture: An Illustrated Encyclopedia* (New York: W.W. Norton & Company, 1998).

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

- Harris, Dianne, *Little White Houses: How the Postwar Home Constructed Race in America* (Minneapolis: University of Minnesota Press, 2013).
- Herriott, M. E., "Death of a School," *The Clearing House* 30, no. 2 (October 1955): 90–93.
- Hille, R. Thomas, *Modern Schools: A Century of Design for Education* (Hoboken, NJ: John Wiley & Sons, 2011), 13.
- Hise, Greg, *Magnetic Los Angeles: Planning the Twentieth-Century Metropolis* (Baltimore, MD: Johns Hopkins University Press, 1997), 56–85.
- Holmes, William Henry, *School Organization and the Individual Child: A Book for School Executives and Teachers* (Worcester, MA: The Davis Press, 1912), 1.
- Holy, T.C., "Needed Research in the Field of School Buildings and Equipment," *Review of Educational Research* 5, no. 4 (1935): 406–11. Cited in Baker, "A History of School Design," 8–9.
- Howell-Ardila, Deborah, "Writing Our Own Program: The USC Experiment in Modern Architectural Pedagogy," Master of Historic Preservation Thesis (Los Angeles, CA: USC School of Architecture, December 2010).
- "In the Public Schools," *Los Angeles Times*, 3 December 1911.
- Kurashige, Scott, *The Shifting Grounds of Race: Black and Japanese Americans in the Making of Multiethnic Los Angeles* (Princeton, NJ: Princeton University Press, 2010), 273.
- Lee, Antoinette, and Linda F. McClelland, U.S. Department of the Interior, National Park Service, "How to Complete the National Register Multiple Property Documentation Form," *National Register Bulletin* No. 16B (1999).
- Lescaze, William, "The Functional Approach to School Planning," *Architectural Record* (June 1936): 481–97, at 481.
- Leslie Heumann & Associates and Anne Doehne, Science Applications International Corporation, March 2002, "Historic Schools of the Los Angeles Unified School District," a presentation prepared for LAUSD Facilities Services Division (March 2002), 6.
- Lindsey, Robert, "Los Angeles Schools Plan Busing Amid White Flight," *New York Times*, 11 October 1977.
- Lopez, Frank G., "Schools: Architectural Record's Building Types Study Number 184: Some Trends in School Design," *Architectural Record* (March 1952): 132–141, 150–154.
- Los Angeles Board of Education, *Minutes*, 10 September 1945, 5–6.
- Los Angeles City Board of Education, *The Reconstruction Program of the Los Angeles City Schools, 1933 – 1935 (inclusive)* (1933), 5.
- Los Angeles Conservancy, "Curating the City: Modern Architecture in Los Angeles," Westchester High School. Available at: <https://www.laconservancy.org/locations/orville-wright-middle-school>.
- Los Angeles Herald-Examiner*, 14 September 1943.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC CONTEXT STATEMENT, 1870 to 1969

"Los Angeles Public Schools," *Los Angeles Times*, 1 January 1898.

"Los Angeles Public Schools: Schools and Teachers," *Los Angeles Times*, 1 January 1898.

Los Angeles Unified School District, Educational Housing Branch, School Planning Division, *Los Angeles Unified School District History of Schools, 1855 to 1972* (January 1973).

Marquis, Neeta, "A Tour through a Great Modern Plant and a Glimpse into the Stupendous Development of the Mechanical and Business Side of Our Educational System," *Los Angeles Times*, 29 January 1928.

McAlester, Virginia, and Lee McAlester, *A Field Guide to American House* (New York: Alfred A. Knopf, 2004).

McCoy, Esther, "Arts and Architecture Case Study Houses," in *Blueprints for Modern Living*, ed. Elizabeth A.T. Smith (Cambridge, MA: MIT Press, 1989).

McCoy, Esther, *Case Study Houses* (Santa Monica, CA: Hennessey and Ingalls, 1977).

McCoy, Esther, *Richard Neutra* (New York: G. Braziller, 1960), 20.

McCurdy, Jack, "L.A. City School Enrollments Drop for First Time in History," *Los Angeles Times*, 3 October 1969.

McQuade, Walter, *Schoolhouse: A Primer about the Building of the American Public School Plant* (New York: Simon & Schuster, 1958), 206.

McWilliams, Carey, *Southern California: An Island on the Land* (Layton, UT: Gibbs Smith, 1946).

Mock, Elizabeth, *Built in USA, 1932 – 1944: A Survey of Contemporary American Architecture*, The Museum of Modern Art (New York: Simon & Shuster, 1944), p. 41.

Mock, Elizabeth, and Rudolf Mock, "Schools Are for Children," *The American School and University* 15 (1943): 37–42.

Murphy, Jean, "Panel Views New Trends in Education," *Los Angeles Times*, 22 February 1968.

Nicolaides, Becky M., *My Blue Heaven: Life and Politics in the Working-Class Suburbs of Los Angeles, 1920–1965* (Chicago, IL: University of Chicago Press, 2002), 179.

Ogata, Amy F., "Building for Learning in Postwar American Elementary Schools," *Journal of the Society of Architectural Historians* 67, no. 4 (December 2008): 562–91, at 564.

"Parents Win Victory in Bus Campaign," *Los Angeles Times*, 4 September 1967.

"Progress in School Design, As Evidenced in the Work of Marsh, Smith & Powell, Architects," *The Architect & Engineer* (November 1938): 14–22.

"Prominent Architect Honored by Engineers," *Los Angeles Times*, 1 January 1956.

"Quarter Million Students Expected at 176 Schools: Buildings and Personnel Ready for Huge Influx," *Los Angeles times*, 15 September 1963.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

HISTORIC CONTEXT STATEMENT, 1870 to 1969

Raftery, Judith Rosenberg, *Land of Fair Promise: Politics and Reform in Los Angeles Schools, 1885-1941* (Stanford, CA: Stanford University Press, 1992).

Roderick, Kevin, *The San Fernando Valley: America's Suburb* (Los Angeles: Los Angeles Times Books, 2001).

Rydeen, James E., "Standardizing Schools," *American School and University* 75, no. 1 (September 2002): 50.

Sachs, Avigail, "Research for Architecture: Building a Discipline and Modernizing the Profession," PhD Dissertation (Berkeley: University of California, 2009), 161.

"Safety, Simplicity and Old-California Beauty Combined in Mission-Type Schools of Reconstruction Program," *Los Angeles Times*, 9 January 1934.

Sapphos Environmental, Inc., *City of Long Beach Historic Context Statement*, prepared for the City of Long Beach Department of Development Services (Long Beach, CA, 2009).

Schneider, Jack, "Escape from Los Angeles: White Flight from Los Angeles and Its Schools, 1960-1980," *Journal of Urban History* 34: 995, 1003.

Science Applications International Corporation, *Historic Context Statement: Los Angeles Unified School District*, prepared for Los Angeles Unified School District (Pasadena, CA: March 2002), 12.

Science Applications International Corporation, *Preliminary Historic Resources Survey of the Los Angeles Unified School District*, prepared for the Los Angeles Unified School District, Facilities Services Division (Pasadena, CA: June 2002), 6.

Sides, Josh, *L.A. City Limits: African American Los Angeles from the Great Depression to the Present* (Berkeley: University of California Press, 2006).

Simpson, Kelly, "East L.A. Blowouts: Walking Out for Justice in the Classrooms," KCET (7 March 2012), available at:  
<http://www.kcet.org/socal/departures/landofsunshine/highland-park/east-la-blowout-walking-out-for-justice-in-the-classrooms.html>

Sosa, Herbert R, "Fragmented Diversity: School Desegregation, Student Activism, and Busing in Los Angeles, 1963-1982" (PhD dis., University of Michigan, Ann Arbor, 2013).

"State Renews Appeal for Architects," *Los Angeles Times*, 18 April 1949.

Straus, Emily, "The Making of the American School Crisis: Compton, California and the Death of the Suburban Dream" (PhD diss., Brandeis University, Waltham, MA 2006).

Steinberg, Warren L., "Down to Defeat Again: Education Tax and Bonds Victims of Our Ignorance," *Los Angeles Times*, 6 April 1969.

*Southwest Builder and Contractor*, 8 October 1937, 12.

Tanner, C. K., and J. A. Lackney, *Educational Facilities Planning* (Boston: Pearson, Allyn & Bacon, 2005), 12.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## HISTORIC CONTEXT STATEMENT, 1870 to 1969

Turner, Timothy G., "Rediscovering Los Angeles," *Los Angeles Times*, 13 April 1936.

Turpin, Dick, "1960-61 School Budget of \$254,589,414 OKd," *Los Angeles Times*, 9 August 1960.

Turpin, Dick, "Failure of Bond Issues, Tax Increase Linked to More Half-Day Sessions," *Los Angeles Times*, 10 September 1962.

Turpin, Dick, "School Unity May Plug Tax Drain," *Los Angeles Times*, 1 May 1960.

Turpin, Dick, "Unified Schools Savings Viewed, Experts See Advantages in Child Training as Well as Substantial Economies in Plan," *Los Angeles Times*, 10 November 1959.

U.S. Department of the Interior, National Park Service, "Architectural Character: Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character," *Preservation Brief No. 17* (Washington, DC, September 1988).

U.S. Department of the Interior, National Park Service, "Historic Residential Suburbs: Guidelines for Evaluation and Documentation for the National Register of Historic Places," *National Register Bulletin* (Washington, DC, 2002).

U.S. Department of the Interior, National Park Service, "How to Apply the National Register Criteria for Evaluation," *National Register Bulletin No. 15* (Washington, DC, 2002).

U.S. Department of the Interior, National Park Service, "How to Complete the National Register Form," *National Register Bulletin No. 16A* (Washington, DC, 1997).

U.S. Department of the Interior, National Park Service, "How to Complete the National Register Multiple Property Documentation Form," *National Register Bulletin No. 16B* (Washington, DC, 1999).

U.S. Department of the Interior, National Park Service, "Researching a Historic Property," *National Register Bulletin No. 39* (Washington, DC, 1998).

Whiffen, Marcus, *American Architecture since 1780: A Guide to the Styles* (Cambridge, MA: MIT Press, 1981).

Wollenberg, Charles, *All Deliberate Speed: Segregation and Exclusion in California Schools, 1855-1975* (Berkeley: University of California Press, 1978).

Zeman, Ray, "School Costs Rise with Enrollment, 100,000 Half-Day Students Seen in Five Years Unless Bonds Carry," *Los Angeles Times*, 6 March 1952.

## B-2 Historic Schools Design Guidelines 2015

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# **Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools**

Prepared for:

**Los Angeles Unified School District  
Office of Environmental Health and Safety**

Prepared by:

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# LOS ANGELES UNIFIED SCHOOL DISTRICT

Design Guidelines and Treatment Approaches for Historic Schools

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### Appendix A California Historical Building Code, 2013

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools

### I. INTRODUCTION

The provisions of the California Environmental Quality Act (CEQA) include the loss of character-defining features and, as a consequence, historic integrity among the significant adverse impacts to historic resources. Under CEQA, for qualifying projects, should the potential exist for an adverse impact to historic resources, it is necessary to conduct further environmental review and study, including impacts analyses and the preparation of mitigation measures and project alternatives.

Through the use of design guidelines, however, owners of historic properties have an effective tool for designing and implementing projects that avoid significant adverse impacts to historic resources. This is the goal of the *LAUSD Design Guidelines and Treatment Approaches for Historic Schools*: to recommend approaches for modernization and upgrade projects that also avoid significant adverse impacts to LAUSD's many historically significant schools. The guidelines presented in this document draw upon a thorough understanding of (1) LAUSD's history and property types; (2) best practices in historic preservation and CEQA, including application of the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (SOI Standards hereafter); and (3) the projects currently being planned for LAUSD's campuses districtwide.<sup>1</sup>

The point-of-departure for this study's recommendations are the SOI Standards. The SOI Standards are the industry-recognized guidelines for fostering the preservation, rehabilitation, and maintenance of historic properties. Pursuant to CEQA, the SOI Standards are also recognized as generally mitigating adverse impacts to historic resources to a less-than-significant level. Therefore, projects complying with the SOI Standards are eligible under CEQA for a Categorical Exemption from further environmental review. In this way, these guidelines provide a tool for streamlining environmental review and preventing delays in project implementation, while also protecting historic resources. Not all projects that depart from the SOI Standards automatically result in adverse impacts. But SOI Standards conformance generally ensures that alterations to a historic resource will not result in a loss of historic integrity.

Rather than providing prescriptive solutions, design guidelines offer general approaches for identifying significant features and maintaining, repairing, and treating historically significant features and materials in such a way that the resource's historic integrity remains intact. The basic principles of the SOI Standards are to identify, retain, and preserve the features and materials that convey the significance of historic properties.

All historically significant properties present different opportunities and constraints for carrying out upgrade projects, and therefore most projects must be studied on a case-by-case basis. However, these general approaches and guidelines offer LAUSD a sound first step for ensuring that much-needed modernization projects to LAUSD assets result in minimal impacts to historic resources. This manual is intended to be used in tandem with the districtwide procedural guidelines prepared by PCR Services Corporation and included the 2014 LAUSD Program EIR.

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<sup>1</sup> Weeks, Kay D., and Anne E. Grimmer. *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings* (Washington, D.C.: National Park Service, 1995).

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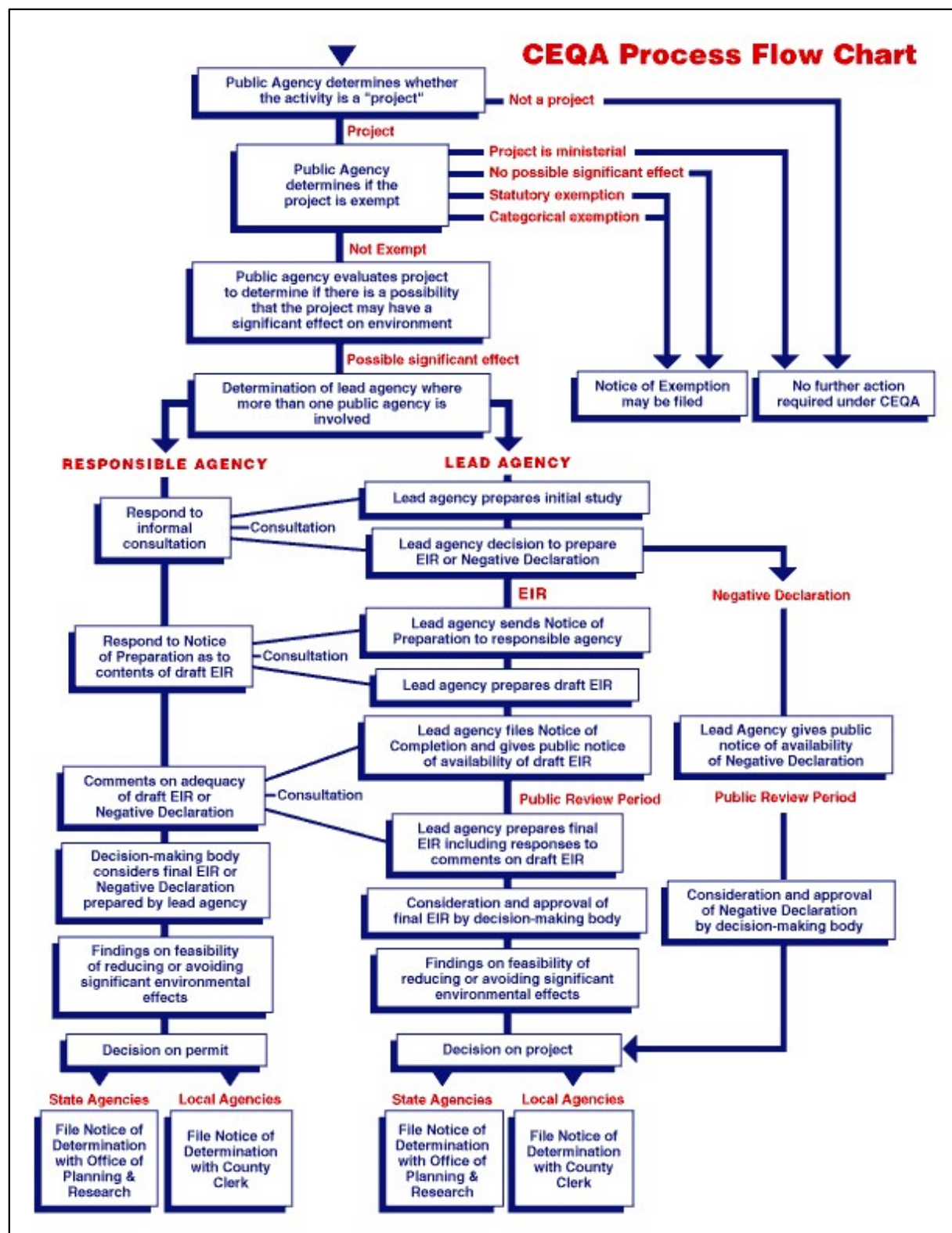


Figure 1. The upper right-hand corner of this CEQA flow chart illustrates the expedited path for environmental review for projects qualifying for a Categorical Exemption, such as the exemption offered through documented compliance with the SOI Standards. Source: California Environmental Quality Act Statute and Guidelines, 2013.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools

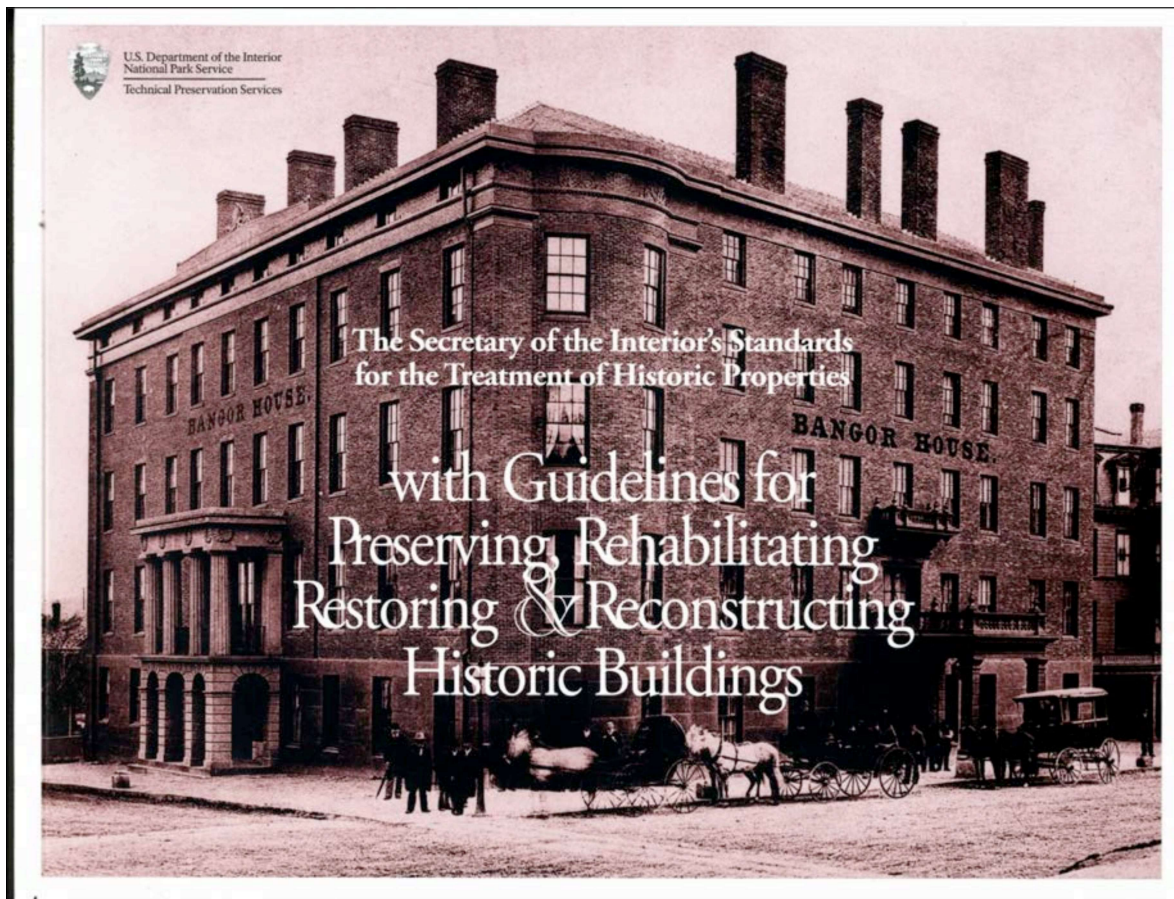


Figure 2. Under CEQA, a Categorical Exemption is possible for projects complying with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Source: National Park Service, Department of the Interior.

### Project Background

With nearly 800 campuses and a geographic span of over 700 square miles, LAUSD is the second largest public school system in the United States. Since its founding in 1872, the district has commissioned, designed, and acquired a remarkable collection of buildings, campuses, and facilities. Extant properties range from the wood-framed schoolhouse of the late nineteenth century to superblock campuses displaying Mid-Century Modern and post-Modern architectural styles.

As of November 2014, nearly 150 LAUSD schools have been identified as eligible for federal and/or state-level landmark designation. In addition, LAUSD campuses have also been found eligible as historical resources through the City of Los Angeles Office of Historic Resources undertaking, SurveyLA. In advance of district-wide modernization, LAUSD commissioned a comprehensive Historic Context Statement, a 55-campus historic resources survey, and the preparation of procedural guidelines to ensure compliance with CEQA. This study represents the final step in this project. In July 2014, LAUSD was recognized for this effort, receiving an award from the California Preservation Foundation for the *Los Angeles Unified School District Historic Context Statement, 1870 to 1969*. The *LAUSD Design Guidelines and Treatment Approaches for Historic Schools* draws upon the Historic Context Statement and complements the CEQA/NEPA Procedural Guidelines being prepared concurrently by PCR Services Corporation.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools

### Project Team

Debi Howell-Ardila, senior architectural historian with SWCA Environmental Consultants, served as the principal author and lead architectural historian for the *LAUSD Design Guidelines and Treatment Approaches* study. Leslie Heumann, who conducted LAUSD's original districtwide survey in 2001-2004, served as project advisor. Sketches and input were provided by James McLane, AIA, associate principal at Architectural Resources Group. Gwenn Godek of the LAUSD Office of Environmental Health and Safety and Margarita Wuellner of PCR Services Corporation served as project administrators. The study also benefited from the input of LAUSD Facilities Services Division (FSD) staff members and Linda Dishman and Adrian Scott Fine, executive director and director of advocacy, respectively, of the Los Angeles Conservancy.

### Study Contents

The *LAUSD Design Guidelines and Treatment Approaches* study consists of seven sections:

Section I, Introduction

Section II, Project Planning and Implementation: General Guidelines

Section III, Recommended Approaches: School Features and Components

Section IV, Recommended Approaches: School Upgrade and Modernization Projects

Section V, Overview of Principal Typologies, Property Types, Styles, and Character-Defining Features

Section VI, Conclusion

Section VII, National Park Service Technical Assistance: Select References

In addition to outlining the necessary steps for planning projects for historic schools, Section II incorporates observations about the SOI Standards for Rehabilitation. General and project-specific recommendations for treatments are presented in Sections III and IV. Section III includes recommendations according to school features and components, including: (1) architectural and ornamental detailing; (2) roof forms and features; (3) façade treatments; (4) site design and landscape features; interior spaces and features. Section IV presents guidelines according to project types, including: (1) window upgrades; (2) HVAC upgrades and installation; (3) ADA Compliance and Access; (4) Hazardous Materials Abatement; (5) Fire and Life Safety; (6) Seismic Upgrades; (7) Additions and New Construction; (8) Mechanical Systems Placement and Installation.

Additional guidance for project design involving historically significant LAUSD schools is provided in the 2013 *California Historical Building Code* (CHBC), which follows this study as Appendix A. As codified in Section 8 of the *California Code of Regulations, Title 24*, the CHBC offers flexibility for code requirements and "requires enforcing agencies to accept solutions that are reasonably equivalent to the regular code (as defined in Chapter 8-2) when dealing with qualified historical buildings or properties."<sup>2</sup> The CHBC

is intended to provide solutions for the preservation of qualified historical buildings or properties, to promote sustainability, to provide access for persons with disabilities, to provide a cost-effective approach to preservation, and to provide for the reasonable safety of the occupants or users.<sup>3</sup>

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<sup>2</sup> *California Code of Regulations, Title 24*, California Historical Building Code, Section 8-101.2. (Washington, DC: International Code Council, 2013), p. 1.

<sup>3</sup> *Ibid*, p. 1.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools

As defined in *California Health and Safety Code Section 18955*, historical buildings and properties qualifying for use of the CHBC include

Any building, site, object, place, location, district or collection of structures, and their associated sites, deemed of importance to the history, architecture or culture of an area by an appropriate local, state or federal governmental jurisdiction. This shall include historical buildings or properties on, or determined eligible for, national, state or local historical registers or inventories, such as the National Register of Historic Places, California Register of Historical Resources, State Historical Landmarks, State Points of Historical Interest, and city or county registers, inventories or surveys of historical or architecturally significant sites, places or landmarks.<sup>4</sup>

As shown in Appendix A, the CHBC offers guidance and alternatives for projects involving Fire Protection, Means of Egress, Accessibility, Structural Regulations, Archaic Materials and Methods of Construction, Mechanical, Plumbing and Electrical Requirements, and Qualified Historical Districts, Sites and Open Spaces. Pursuant to Section 18954 of the California Health and Safety Code, the state or local enforcing agency “shall administer and enforce the provisions of the CHBC in permitting repairs, alterations and additions necessary for the preservation, restoration, reconstructions, rehabilitation, relocations or continued use of a qualified historical building or property.”<sup>5</sup> Applications of the CHBC to qualifying LAUSD properties should be carried out on a case-by-case basis in conjunction with a qualified historic preservation professional.

Additional federal-level guidance is provided to LAUSD project planners and architects through technical bulletins and briefs published by the Technical Preservation Services division of the National Park Service Department of the Interior. The *Preservation Briefs* offer detailed, material-specific guidelines and recommendations; an annotated list of *Preservation Briefs* most applicable to LAUSD projects follows in Section VII, National Park Service Technical Assistance: Select References.

In addition, the series entitled *Interpreting the Secretary of the Interior’s Standards for Rehabilitation* offers case studies covering a range of project scenarios. A summary of topics covered in the ITS series includes: New Additions (ITS No. 3), Adding New Openings (ITS No. 14), Interior Finishes (ITS No. 19), Adding New Openings on Secondary Elevations (ITS No. 21), Adding New Entrances to Historic Buildings (ITS No. 22), Windows: Selecting New Windows to Replace Non-Historic Windows (ITS No. 23), Corridors: Installing New Systems in Historic Corridors (ITS No. 24), Entrances and Doors: Entrance Treatments (ITS No. 26), Corridors: Corridors in Historic School Buildings (ITS No. 40), Modifying Historic Interior Railings to Meet Building Code (ITS No. 46), Rooftop Additions on Mid-Size Historic Buildings (ITS No. 47), Installing New Systems in Historic Buildings (ITS No. 51), Designing New Additions to Provide Accessibility (ITS No. 53). A list of ITS Bulletins most applicable to LAUSD properties is included in Section VII.

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<sup>4</sup> *California Code of Regulations, Title 24*, California Historical Building Code, Section 8-101.2. (Washington, DC: International Code Council, 2013), p. 4.

<sup>5</sup> *Ibid*, p. 1.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools

### II. Project Planning and Implementation: General Guidelines

All historic buildings offer unique opportunities and constraints for implementing successful projects. The critical first step for project planning is always the same, however: identifying contributing properties and their character-defining features in conjunction with a qualified architectural historian. Equally important for LAUSD staff are determinations of non-eligibility, since additional flexibility, both in terms of project design and CEQA review, exists for properties that are not “contributing” (eligible for listing) and are therefore not considered historic resources under CEQA.

Early planning is the key to avoiding adverse impacts to historic resources. The project that successfully avoids impacts to historic resources is a creative one, designed with an eye toward achieving project objectives while also retaining historically significant features. Although no one recipe exists for project design, the following guidelines and review process will allow for successful project implementation and minimal impacts to historic resources. The SOI Standards offer four “treatments” for historic properties: preservation, rehabilitation, restoration, and reconstruction. For most, if not all LAUSD projects, rehabilitation is appropriate treatment. Rehabilitation accommodates changes and upgrades and does not require the sometimes expensive and time-consuming process of returning a historic property to a particular moment in time.

#### A. Planning and Designing Projects for Historic Schools: Three Phases

Early input from a qualified historic preservation professional will result in better project design, the avoidance of significant adverse impacts to historic resources, and a smoother environmental clearance process. Generally, three concise rounds of input by a qualified historic preservation professional will be required; the preservation professional will consult with the project team as necessary and document each review in a memorandum that will form part of the administrative record necessary for demonstrating CEQA compliance.

##### Phase 1: Commission Character-Defining Features Memorandum for the Record (MFR)

The first step for projects involving a historically significant school is to identify which buildings, structures and features are eligible for listing (and therefore contributing elements) and which elements are ineligible (and noncontributing). More flexibility exists for modifications or removal of noncontributing elements. In this way, concise data on the historic school and its significant and nonsignificant features is the most critical information for LAUSD as project planning begins.

For campuses including identified historic resources, LAUSD will commission a **brief, focused** Character-Defining Features MFR from a qualified architectural historian (as defined below). The memo will include:

1. 1-2 pages maximum: Brief campus history, including information on development/construction chronology; data to include primary and secondary sources, such as LAUSD Pre-Planning Surveys, historic aerial maps and photographs, as well as visual inspections;
2. 1 page maximum: Information on eligibility findings (date of evaluation, criteria, and theme of significance); data sources to include the 2001-2004 and/or 2014 LAUSD Historic Resources Survey, City of Los Angeles Office of Historic Resources SurveyLA data, LAUSD Historic

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools

Resources Inventory Database, and/or California Historic Resources Inventory, as well as previously prepared Department of Parks and Recreation Forms documenting LAUSD campuses;

3. Identification and documentation of contributing and noncontributing buildings, structures, objects, and elements of the historic campus (including Arc-GIS shape files mapping results for ease of use by LAUSD); this assessment to include contributing landscaping/site design features and/or artwork if present as well as brief descriptions of each contributing (eligible) element;
4. Identification and brief documentation and description of primary and secondary character-defining elevations of each eligible building, structure, object, and feature;
5. Depending on the project, the Character-Defining Features MFR can identify and document primary and secondary character-defining materials, design details, and features on the exterior and interior potentially impacted by the project, as supplementary data provided prior to schematic design review as requested by LAUSD. The specific data provided in the Character-Defining Features MFR will be determined by LAUSD on a case-by-case basis.
6. Depending on the project, Phases 1 and 2 can be combined by LAUSD as needed.

### **Phase 2: SOI Standards Compliance and Schematic Design Review: Preliminary and Final Phases**

- Task: Using baseline data of the Character-Defining Features MFR, project objectives and design options will be studied by qualified architectural historian and/or historic architect in the preliminary schematic design phase; this phase will also include a brief site-walk with LAUSD FSD staff and historic preservation professional.
- Purpose: Selection of optimal project options to fulfill project objectives and to ensure compliance with SOI Standards; site walk will clarify primary and secondary character-defining features, spaces, and elevations potentially affected by project.
- Work Product: MFR by qualified architectural historian and/or historic architect documenting selected design option and project compliance with SOI Standards. This memo will also identify any aspects of the proposed project that are not in compliance and make recommendations to bring these aspects into compliance.

### **Phase 3: Design Development or 50-percent Construction Drawings**

- Task: Review of construction drawings by qualified architectural historian and/or historic architect at 50% construction drawings stage. As needed, this stage can also include a site visit.
- Purpose: Providing input on details of project design and guidance for any issues that needed to be resolved following schematic review.
- Work Product: MFR by qualified architectural historian and/or historic architect summarizing project review and SOI Standards compliance.

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## Design Guidelines and Treatment Approaches for Historic Schools

### B. Professional Qualification Standards for Historic Preservation Professionals

To ensure CEQA compliance and an adequate administrative record, the historic resource analysis and preservation tasks described in this document must be completed by qualified historic preservation professionals. These requirements draw on the National Park Service Department of the Interior's *Secretary of the Interior's Standards and Guidelines: Professional Qualifications Standards*. This section summarizes the standards and roles for historic preservation professionals assisting LAUSD in upgrades and modifications to historic LAUSD campuses:

- **Qualified Architectural Historian:** Meets/exceeds the Secretary of the Interior's Professional Qualifications Standards for architectural history and possesses a minimum of eight years of experience (preferably including evaluations of school buildings and campuses)

Role and responsibilities: Historic resource evaluations; determinations of contributing and noncontributing buildings, structures, and objects, as well as primary and secondary character-defining features; schematic plan review and SOI Standards conformance review. Assistance with applications of the State Historic Building Code to projects carried out on qualifying schools.

- **Qualified Historic Architect:** Meets/exceeds the Secretary of the Interior's Professional Qualifications Standards for historic architecture and possesses a minimum of eight years of experience (preferably including work on school buildings and campuses).

Role and responsibilities: Project-level schematic and construction plan review and SOI Standards conformance review; provision of technical specifications and input on projects involving upgrades and modifications to historic campuses. Assistance with applications of the State Historic Building Code to projects carried out on qualifying schools.

### C. Construction Process

The construction process at a historic property must incorporate the following best practices. (1) Protect adjacent historic features, materials and finishes during construction. (2) Document appearance before, during and after construction to the extent necessary to inform the design and provide evidence for the environmental compliance process. (3) Job site decision tree: Change orders to be reviewed by qualified historic preservation professional or by a project team member fully versed in the requirements affecting historic resources. (4) No changes shall be made to project plans during construction without input from qualified historic preservation professional or team member.

Before construction process, if appropriate to the project, the qualified architectural historian and/or historic architect will provide CSI specifications for architectural features or materials requiring specific restoration, removal, or storage requirements. This will include detailed, clear instructions on maintaining and protecting in place relevant features in accordance with best practices and standards.

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## Design Guidelines and Treatment Approaches for Historic Schools

### D. SOI Standards: Overview and Principal Ideas

1. Identify and prioritize character-defining features and spaces in the project area (primary and secondary features as well as elevations, on exterior and interior). Additional flexibility exists for features, spaces, and elevations that are of secondary importance rather than primary importance.
2. Retain, preserve and repair where possible.
3. Where necessary, replace in-kind to match existing in materials, finishes, and details.
4. New features/additions should be compatible but differentiated from historic fabric; do not use conjectural evidence to re-create missing historic features.
5. It is possible that individual portions of project program may deviate from SOI Standards but the overall project can be determined to be in compliance. While the recommended approach will always favor the retention of historically significant elements, project objectives may at times require the removal of historic fabric. The effect of such removal on the historic integrity of the resource must be determined by a qualified architectural historian on a case-by-case basis.
6. The Rehabilitation standards do not necessarily entail the replacement of missing historic features that would be required for a Restoration.

### E. Overall Process and Procedures

In order to ensure that LAUSD's goal for protecting and maintaining its historically significant properties is realized, modernization and upgrade projects should generally follow these guidelines:

- Upgrade, modernization and new construction projects for schools identified as historic resources for the purposes of CEQA will conform with the SOI Standards to the maximum extent practicable;
- Master planning initiatives for schools identified as historic resources under CEQA shall be subject to environmental review and evaluation by a qualified historic preservation professional to ensure that potential negative impacts to historic resources are avoided through conformance with the SOI Standards and LAUSD cultural resource policies and procedures;
- Some modernization projects might include elements that do not conform with the SOI Standards, but the project overall might not result in significant adverse impacts to historic resources and might therefore be acceptable; such cases must be studied on a case-by-case basis;
- In cases where modernization of LAUSD's significant historic resources cannot be feasibly undertaken in conformance with the SOI Standards and significant adverse effects to historic resources result, the district shall, through the environmental review process, in conjunction with a qualified historic preservation professional, develop and implement mitigation measures to reduce adverse impacts. Mitigation monitoring will include consultation with a qualified historic preservation professional.

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## Design Guidelines and Treatment Approaches for Historic Schools

### III. School Features and Components

The following sections present feature-specific recommendations for the major components of historic schools. These include: (1) Architectural and Ornamental Detailing; (2) Roof Forms and Features; (3) Façade Treatment; (4) Site Plan and Landscaping Features; and (5) Interior Spaces and Features. (Windows are discussed in Section IV.)

The *Design Guidelines and Treatment Approaches for LAUSD's Historically Significant Schools* focuses on the "character-defining features" of schools that are eligible for national, state, or local landmark listing and are therefore historic resources under CEQA. Character-defining features are the distinctive physical elements, materials, details, and characteristics that convey the significance of a historic building. Character-defining features must be identified and retained in order to ensure that a historic resource continues to convey the reasons for its significance. Section V includes additional information on the character-defining features typical of LAUSD campuses and school buildings.

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## EXAMPLES OF ARCHITECTURAL AND ORNAMENTAL DETAILING



Figures 3. and 4. Art Deco detailing, Huntington Park High School (1936). Source: Leslie Heumann and Associates and SAIC for LAUSD.



Figures 5. and 6. From classical to modernist architectural detailing: San Fernando Middle School (1916) and Narbonne High School (1956). Source: LAUSD.



Figures 7. and 8. Mid-Century Modern details: stack-bond brick veneer, Fernangeles Elementary School (left), and patterned tile at classroom entries, Chatsworth High School (right). Source: LAUSD, 2014.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools

### ARCHITECTURAL AND ORNAMENTAL DETAILING

Contributing architectural details should be identified, retained and preserved. Such details might include ornament made of wood, brick, concrete, tile, stone or metal. Decorative treatments and elements also might include polychromatic or patterned brick or tile; string-courses or corbelling; decorative window or roof eave treatments; railings; or quoining.

Such architectural details convey the significance of a given architectural style or era of school building and should be maintained, repaired where possible, or replaced in-kind if necessary.

#### **Recommended Approaches, Architectural and Ornamental Detailing:**

- Where deteriorated or missing, architectural details should be repaired or replaced, to the extent feasible, to match originals (based on physical and/or documentary evidence)
- Significant architectural details should not be obscured, covered, or destroyed
- Any new elements added to character-defining spaces should be compatible with the style, size, scale, materials, finishes, and detailing of the historic property overall
- Repairs/Maintenance: periodically clean and re-finish to match existing architectural features that show signs of deterioration (such as deteriorating wood or metal with signs of corrosion)
- Clean and prepare surfaces using the gentlest methods possible, in order to avoid damaging historic materials



Figures 9. and 10. Decorative brick work and detailing, Burroughs Middle School and John Marshall High School. Source: SWCA Environmental Consultants, 2014.



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## EXAMPLES OF ROOF FORMS AND FEATURES



Figures 11. and 12. Roof brackets and exposed rafter tails, Morningside Elementary School (1915, left). Wide, unadorned cantilevered eaves, Leapwood Elementary School (1962, right). Source: LAUSD.



Figures 13. and 14. Modernist roof treatments: extended, trellis-like eaves, Colfax Avenue Elementary School (1950, left). Zig-zag roofline, Palisades High School (1963, right). Source: LAUSD, 2014 (left), SWCA Environmental Consultants (right).



Figures 15. and 16. Mid-Century Modern roof treatments: flat roof with no eaves combined with cantilevered projections, Fernangeles Elementary School (left) and roof cut-out/skylight at Castle Heights Elementary School (1951, right). Source: LAUSD, 2014.

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## Design Guidelines and Treatment Approaches for Historic Schools

### ROOF FORMS AND FEATURES

Character-defining roof features include the roof shape and form, height, pitch, eave treatments, as well as a variety of decorative features such as rafter tails and brackets, cupolas, towers, and dormers. Sheathing materials, such as clay tile, slate, wood, or metal, as well as their profile and patterns, might also be character defining. Features to identify, document and retain include the height/massing, form (e.g., flat, gabled, hipped), and eave treatment (e.g., wide overhanging cantilevers or shallow eaves with decorative elements). The character-defining features of arcade or covered walkway roofs should also be documented and considered in project planning.

#### Recommended Approaches, Roof Forms and Features:

- Historic roof features should be reinforced and repaired where possible.
- If historic materials are extensively deteriorated or missing, replace in-kind or with compatible substitute materials, selected in conjunction with a qualified historic preservation professional; replacements should match existing appearance (dimensions, profile/patterning, texture, and color). If using identical materials is not technically or economically feasible, select a compatible substitute material replicating the appearance of the original (in terms of dimensions, profile/patterning, texture, and color).
- To replicate missing features, design of replacement features should be based on physical/documentary evidence; avoid using conjectural evidence.
- For projects with components on or around roofs, avoid obstructing, covering, or damaging important roof features or adversely impacting roof detailing and design.
- The juncture of the roofline and exterior wall is an important part of the building's appearance. Running conduit beneath eaves near this juncture should be avoided. It is preferable to run conduit along the building's base and conceal the lines behind landscaping, where possible.



Figure 17. Shallow closed eaves and hipped-and-gable roof, clad in clay tiles, Point Fermin Elementary School, Administration Building (1917–1925; remodeled 1936). Source: LAUSD, 2010.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools

### FAÇADE TREATMENTS

Most historically significant LAUSD school buildings, in particular for signature buildings such as administration buildings, auditoriums, or main classrooms, will include façade treatments that uniquely denote their architectural style or era. Such treatments might include smooth stucco sheathing for 1920's Spanish Colonial Revival or 1930's Streamline Moderne styles, polychromatic, patterned brick for period-revival styles, or combinations of brick, steel, stucco, windows, and wood for Mid-Century Modern style postwar schools. Doors and framing are also important aspects of the façade's appearance; this can include doors themselves, as well as transoms, sidelights, thresholds, or pilaster, entablatures or other decorative framing elements. (Windows, also an important element of many school facades, are discussed in Section IV.)

Even for buildings of the same style, much variation exists. As previously noted, the first step is to identify and document character-defining features and elevations. This will allow for successful retention, maintenance or sensitive in-kind replacement of important features. Where portions of exterior materials, cladding and other elements must be replaced, new materials should match the existing to the maximum extent possible; re-creations should be based on physical or documentary evidence of the original.

#### Recommended Approaches, Façade Treatments:

- For wood: deteriorated wood siding or elements should be repaired by patching or piecing in, or through consolidation with individual pieces. Wood features that are exposed to the elements, such as beams or rafter tails, can be treated with preservatives to prevent deterioration.
- For masonry: deteriorated masonry can be repaired by patching or piecing in, or through consolidating individual masonry units. Ensure that new mortar matches the existing in color, texture, strength, and width/profile of the joints. Clean masonry surfaces using the gentlest means possible, such as low-pressure water, gentle detergents, and natural bristle brushes.



Figure 18. Generous expanses of fenestration, at times reaching the roofline, are typical of Mid-Century Modern schools; Grover Cleveland Senior High School (1959/1960). Source: LAUSD, 2014.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools

### Recommended Approaches, Façade Treatments (continued)

- For brick/masonry: identify mortar and joints and repoint where evidence exists of deterioration. This might include cracks, chipping, and erosion of mortar. Duplicate original mortar in width and joint profile, as well as color, texture, and strength.
- For stucco: where necessary, deteriorated stucco should be removed and reapplied to match the existing in texture, thickness, and color.
- Where there is extensive deterioration of original character-defining features, in-kind replacement may be appropriate. Widespread replacement is only recommended when the original fabric is deteriorated beyond repair. New materials should match the originals as closely as possible.
- If a material was originally not painted, such as stained wood, brick, stucco, or tile, the material should remain unpainted. The original finish/treatment is considered a character-defining feature.
- Removal of incompatible alterations from the past and restoration of original materials and features are encouraged. Restoration of original features should be based on documentary evidence.
- Repaint masonry, wood, and metal if these surfaces were originally painted and if they are in need of re-finishing. Preparation of surfaces, including the removal of paint, should be carried out with the gentlest means possible. The use of electric sanders, chisels, or chemical strippers is not recommended. Harsh methods can result in damage to historic materials and fabric.



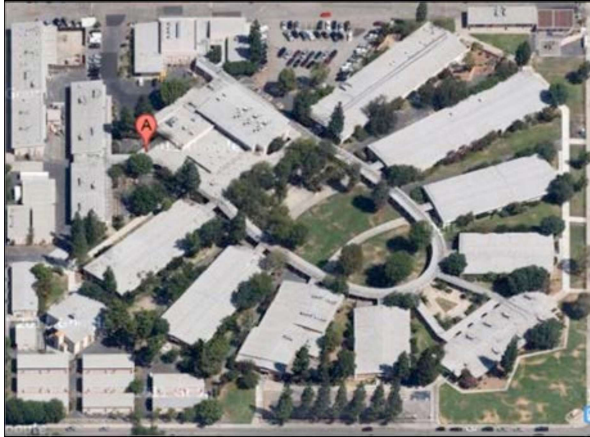
Figures 19. and 20. Façade treatments of Hollywood High School (left) and Eagle Rock Elementary School (right). Source: SWCA Environmental Consultants (left), LAUSD (right).



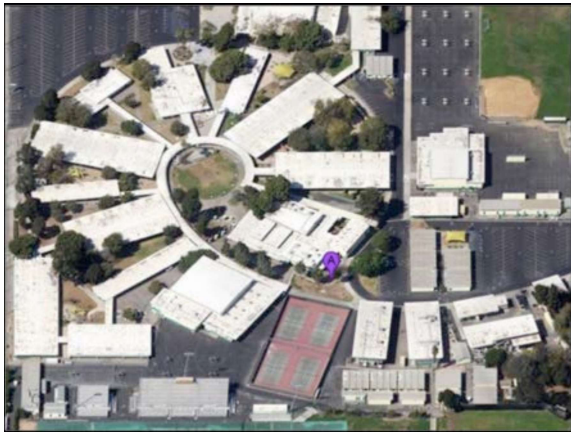
# LOS ANGELES UNIFIED SCHOOL DISTRICT

Design Guidelines and Treatment Approaches for Historic Schools

## EXAMPLES OF CHARACTER-DEFINING SITE PLAN DESIGN AND LANDSCAPE FEATURES



Figures 21. and 22. Circular spoke-like plan and extensive network of stylized arcades, Chatsworth High School (1963). Source: LAUSD, 2010.



Figures 23. and 24. Spiral plan and landscaped courtyards of Narbonne High School (1956). Source: LAUSD, 2012.



Figures 25. and 26. Character-defining site plan features of the postwar finger-plan school often include axial classroom wings, lined with open courtyards and connected by arcades. 156<sup>th</sup> Street Elementary School (left) and Daniel Webster Middle High School (right). Source: LAUSD, 2014.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools

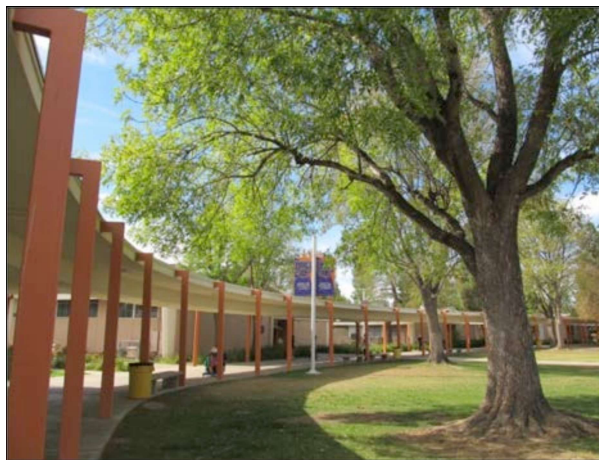
### SITE PLAN DESIGN AND LANDSCAPE FEATURES

Unified campus design and site planning, including the purposeful integration of buildings with landscaping and outdoor spaces, has been the cornerstone of LAUSD school planning ideals since the Progressive Era. With the objective of providing students with ample opportunities for viewing and enjoying outdoor courtyards, recreational and gathering areas, LAUSD campuses and classrooms have become increasingly integrated into outdoor spaces through the decades. Beginning in the 1930s and taking root in the postwar period, the norm became spreading out the campus in one-story buildings, arranged on axis, connected by outdoor corridors, and oriented toward designed courtyards and landscape. As a consequence, one important character-defining feature of many historically significant postwar schools includes the site plan itself, including the spatial configuration of buildings and outdoor spaces.

For these campuses, buildings, circulation corridors (such as arcades), outdoor spaces (such as courtyards and gathering areas), and landscaped features are highly representative of LAUSD design ideals of their era. The identification and documentation of these features by a qualified architectural historian represents a critical starting point for master planning projects, or for projects that seek to reconfigure buildings and/or structures or to remove original site plan features, arcades, courtyards, landscaping, or hardscaping.

#### Recommended Approaches, Site Plan Design and Landscape Features:

- Identify and maintain significant spatial relationships between buildings and landscaping. Building plans often intentionally created spaces for courtyards. New construction should not interrupt designed open spaces; identify alternative areas for new construction and additions.
- Identify opportunities to remove underutilized, nonoriginal/temporary buildings currently occupying areas originally designed as open space.



Figures 27. and 28. Arcades, one- to two-story classrooms, looking out onto landscaped courtyards, and ample outdoor spaces are among the signature LAUSD ideals for the postwar school. Chatsworth Senior High School (1963, left) and Leapwood Elementary School (1962, right). Source: LAUSD, 2014.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

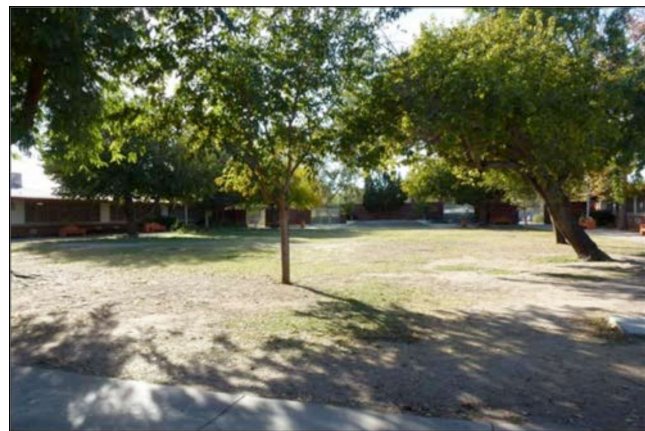
## Design Guidelines and Treatment Approaches for Historic Schools



Figures 29. and 30. Topanga Elementary School (1953/1955). Source: LAUSD, 2014.

### Recommended Approaches, Site Plan Design and Landscape Features (continued)

- Should it be necessary to replace character-defining hardscaping, such as original walkways, planters, or benches, replace in-kind and to match original in appearance and in use.
- New paving should be compatible with existing historic paving in terms of materials, patterning and design, color, and overall spatial relationships—axial, curving, etc.—with neighboring features. Vary the color and size of mortar to distinguish new areas from historic areas of hardscaping.
- Work should be undertaken in such a way that, if removed in the future, the integrity of the property and its environment would not be impaired.
- Identify opportunities to add landscaping; new landscape features should be compatible with scale and style of the campus overall. Protect and maintain significant plantings and landscaping.
- Irrigation: Installation and placement should be planned to result in the least possible impact to original hardscaping/landscaping features.
- Not recommended: replacing planting or trees with hardscaping, such as concrete or asphalt. Retain uses of outdoor spaces and landscaping/hardscaping features.



Figures 31. and 32. Outdoor assembly areas, Webster Middle High School (left) and Grover Cleveland Senior High School (right). Source: LAUSD, 2014.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

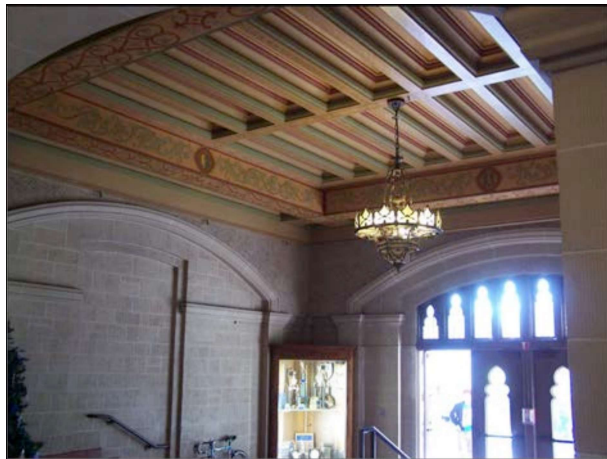
## Design Guidelines and Treatment Approaches for Historic Schools

### INTERIOR SPACES AND FEATURES

Character-defining interior features and spaces might range from public reception areas and lobbies, in particular in administration buildings and auditoriums, to staircases, hallways and corridors, classrooms, entrances, and restroom facilities. To avoid potential adverse impacts to character-defining interior spaces, important materials, design features, and finishes that comprise these spaces should be identified, documented and considered in upgrade projects involving interiors.

#### Recommended Approaches, Interior Spaces and Features:

- Early in the process, a qualified architectural historian should identify and document, in digital photography and an MFR, primary and secondary character-defining features on interior spaces. This information will provide the data necessary to evaluate potential project impacts to significant interior spaces.
- Character-defining features might include: windows with variations in glazing, wall materials, finishes, and detailing; doors and related features; baseboards, molding and framing; porcelain water fountains, etc.
- For projects involving identified character-defining interior features, avoid removing, obstructing, or damaging significant spaces, materials, finishes, and detailing.



Figures 33. and 34. Character-defining interiors: Marshall High School Administration Building, lobby (left) and Venice High School WPA mural by Grace Clements and Helen Lundeberg. Source: ICF Jones & Stokes for LAUSD, 19 December 2008, "John Marshall High School Historical Resources CEQA Analysis for Fire Alarm System Upgrade Project" and 13 July 2009, "Venice High School HVAC Project CEQA Analysis."

## IV. Recommended Approaches: Upgrade and Modernization Projects

### 1. WINDOW REHABILITATION

Fenestration is one of the most important character-defining features for a historic building. Contributing elements might include the window type, its glazing and opening size and shape, framing materials, profile and thickness of framing and muntins, as well as decorative molding or detailing.

A common misconception is that historic windows cannot be brought up to today's energy efficiency standards. However, in projects involving windows that are principal character-defining features, options for meeting energy efficiency requirements through project design should be explored, including quantifying/improving performance standards of historic materials or other features. The California Historical Building Code offers flexible, performance-based standards for meeting code requirements while also retaining important character-defining features of historically significant schools (the California Historical Building Code follows this document as Appendix A).

#### Preferred Approaches, Window Rehabilitation:

- A qualified architectural historian should identify and document character-defining window features early in project planning process, in order to plan for their retention.
- Identify, retain, repair, and preserve character-defining windows and their functional and decorative features. This includes window location and size, frame materials and design, sash types, muntin patterns, profile, and thickness, glazing, and sills, as well as paneled or decorative jambs/molding.
- If possible, retain or re-use existing hardware. Should replacement be necessary, match new hardware to existing in terms of basic stylistic detailing, materials, and finishes.
- Repair window frames and sash by patching, splicing, consolidating, or reinforcing. Depending on condition of materials, this might include in-kind replacement with compatible substitute materials; substitutes should match appearance of originals.



Figures 35. and 36. Classroom windows at Topanga Elementary School (1953) and Leapwood Elementary School (1962).  
Source: LAUSD, 2014.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools



Figures 37. and 38. Expanses of windows often mark the locations of classrooms inside. Baldwin Hills Elementary School (1949, left), and Orville Wright Middle High School (1948, right). Source: LAUSD, 2014.

### Alternative Approaches, Window Rehabilitation:

- Where repair is not technically or economically feasible, replace windows in-kind, taking care to match originals in opening size/shape, single pane or divided lights (with true divided lights replaced in-kind), materials and treatment, configuration, type, framing (profile and thickness), and decorative detailing.
- Should replacement of an entire window be necessary, match original in materials, sash, and pane configuration, profile and thickness, as well as other design details.
- Secondary elevations and non-character-defining windows offer the best options for window replacement.
- Where windows must be replaced, sample window and project design should be reviewed by qualified architectural historian and/or historic architect.
- Retain original opening size and shape, as well as original window frames, detailing, and depth of recessing within wall plane.

### Not Recommended, Window Rehabilitation:

- Wholesale / large-scale replacement of windows is not recommended. Pursue alternative, performance-based standards through the State Historic Building Code, which offers flexibility on energy standards for qualifying buildings.
- Avoid double-glazing or tinting. For improved energy efficiency, investigate use of thermal coated glass. Maintain appearance/function of original.
- The use of faux muntins to simulate true divided-light windows is not recommended.
- Replacement of original wood- or steel-frame windows with dual-pane vinyl windows is not recommended. Pursue performance-based standards through the State Historic Building Code, which offers flexibility on energy standards for qualifying buildings.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools



Figure 39. Removing inoperable HVAC units and returning windows to original use can greatly enhance a historic school building. Image on left shows HVAC unit currently in place at Castle Heights Elementary School; image on right simulates the building's appearance following replacement of HVAC unit. Source: Architectural Resources Group, 2014.

### Project Scenarios, Window Rehabilitation:

- HVAC installation: Avoid removing windows or transom lights to accommodate HVAC components.
- Window Mounted Air Conditioning Units: In cases where air-conditioning units replaced original windows (but units are now inoperable), consider removing out-of-date components and restoring original windows to match existing (in terms of materials, framing, function, openings, and glazing).
- Energy efficiency: Window frames in need of maintenance/repair are often the unseen source of energy loss. Investigate energy efficiency improvements through repairs to window frames, replaced/upgraded weather stripping, insulation, or use of interior blinds as alternative to replacement of original windows.
- Security: Should installation of security grilles be necessary, avoid damage to historic window surrounds and framing.
- Seismic Upgrades: Shear wall needed? Avoid removing character-defining windows on primary elevations where possible. Rework interior plan to avoid large-scale removal of windows. Use interior bracing or, if necessary, shotcrete for added seismic stability.
- Painting: Preparation work should use the gentlest, least invasive means possible (see Hazardous Materials section for information on lead paint removal). Remove damaged or deteriorated paint only to the next sound layer of paint using the gentlest method possible. Study and use compatible paint coating systems; it is preferable to paint with colors that are historically appropriate to the period and style. Do not paint window frames that were not originally painted (i.e., stained wood, brick, or masonry, etc.).



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools

### 2. HVAC UPGRADES AND INSTALLATION

If not carefully designed and planned, HVAC upgrades and installation can impact a variety of character-defining features. The placement of ductwork, registers, vents, and units can change the appearance of important interior spaces as well as the exterior. Early project review by a qualified architectural historian or preservation professional will help avoid visual impacts to character-defining spaces and features and therefore minimize impacts to historic resources.

#### Recommended Approaches, HVAC Upgrades and Installation:

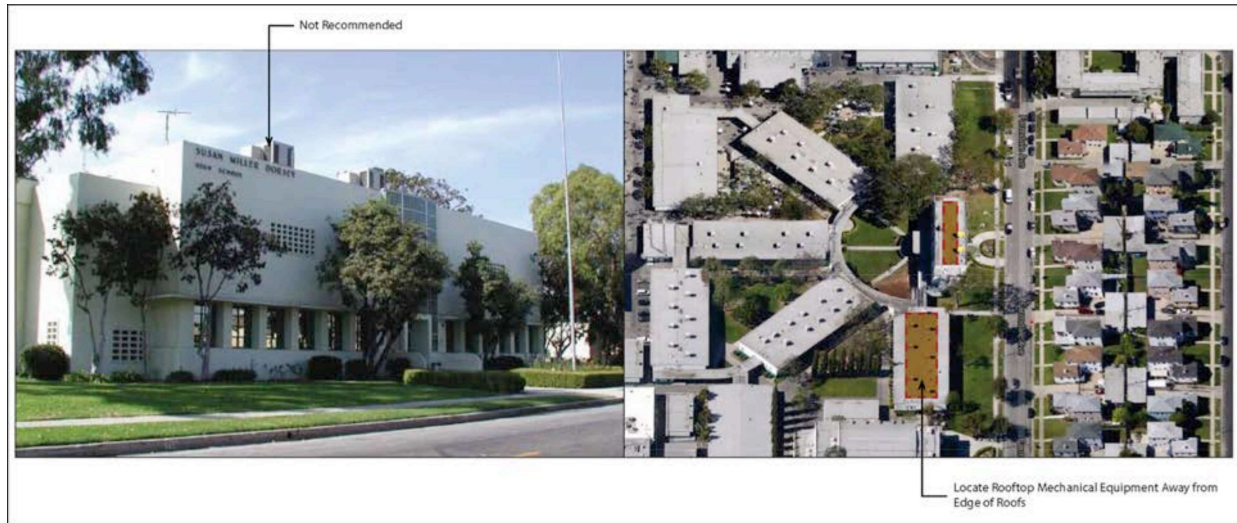
- Early in the process, a qualified architectural historian should identify and document, in digital photography and an MFR, primary and secondary character-defining elevations and features.
- Explore options for placing and installing HVAC components on secondary elevations or out-of-the-way spaces.
- Anticipate and plan for placement and installation of HVAC components that avoids damage or obstruction of character-defining features or visual impacts to character-defining spaces and materials.
- If a new HVAC system is required, identify and pursue alternatives for installation that result in the fewest possible changes to the building's floor plan, exterior elevations, and historic fabric.
- Avoid obstructing, removing, or damaging historic materials and features to the maximum extent feasible.
- If the interior of classrooms and hallways includes important character-defining features, including artwork, care should be taken to not destroy, remove, or obstruct these features in the course of installing supply and return air ducts.



Figures 40. and 41. For historically significant buildings, rooftop set-back of HVAC units helps mitigate visual impacts. Colfax Avenue Elementary School (left) and Kester Avenue Elementary School (right). Source: LAUSD, 2014.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools



Figures 42. and 43. Where possible, locate rooftop mechanical equipment away from edge of roof to minimize visual impacts. Susan Miller Dorsey High School, Los Angeles. Source: LAUSD and Architectural Resources Group, 2014.

### Recommended Approach, HVAC Upgrades (continued)

- Re-use existing paths and systems to the maximum extent feasible for ductwork, registers, and intake/exhaust paths.
- Ductwork should be routed, configured, and treated to create minimal visual impacts to character-defining features and spaces. Ductwork and registers should be painted to match surrounding walls in texture and color.
- Registers: Re-use existing where possible; for placement of registers on ceilings/walls, avoid removal or obstruction of historic features. If installed on ceiling between beams, center registers or follow basic design configuration to make new registers as compatible with existing historic fabric as possible.
- Alternatives to drop ceilings include: (1) use of well-designed soffits to enclose ductwork; if soffits are created, leave adequate space so as not to interrupt views in and out of neighboring windows; (2) use of existing beams or features to conceal ductwork; (3) leaving ductwork exposed is often an effective approach; ductwork should be sensitively placed, designed, and painted to match existing.
- Drain line: should be covered and painted to match the surrounding surfaces; and placed in an out-of-the-way area with limited visibility.
- For energy efficiency improvements, calculate the performance standards of existing rooms and spaces, including wall thickness and materials, roof eaves or porticos, as well as interior features such as blinds or shades.
- Where possible, identify opportunities to remove inoperable HVAC units and restore original features (for example, remove inoperable HVAC systems from in-filled windows and restore window to match existing).

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools

### Not Recommended, HVAC Upgrades:

- Avoid the removal or in-filling of existing windows for HVAC components. Should it become necessary as the only feasible solution, avoid removal or infill window on a primary elevation and retain original window opening dimensions, casing, and detailing, such as light divisions.
- Do not obscure, obstruct, or destroy original artwork, such as murals, or features, such as molding, ceiling beams, or windows, in the installation of HVAC components.
- Not recommended to install drop ceiling (i.e., lowering the ceiling height to enclose new systems) to hide HVAC components. Should drop-ceilings offer the only feasible solution, leave a minimum of 12-18" between drop ceiling and neighboring windows. Explore option/feasibility of leaving ductwork exposed as alternative.

### Recommended Locations of HVAC Components:

- Group system components in areas with similar systems already installed; explore secondary elevations and/or use of utility sheds for installation of new units.
- Vertical runs of ductwork: install in areas where ducts will not obscure, destroy, or damage character-defining features (such as inside of closets, wall cavities, service rooms, or corners). Horizontal and vertical placement: align components—soffits, ducts, registers, or vertical vents—with planes/configuration of walls.
- Interior installation: Identify hidden, out-of-the-way spaces (attics, basements, crawl spaces, closets, utility spaces) for placement and installation of HVAC components.
- Exterior installation: If roof installation offers the best alternative, attempt to set back unit to avoid visual impacts to the roofline, particularly as perceived from the public right-of-way, to the maximum extent practicable. For roof installation, where possible, install behind existing parapets or features that conceal the unit from the street view.



Figures 44. and 45. In this assembly hall, ducts and vents were placed and installed as unobtrusively as possible to avoid adverse impacts to many important character-defining interior features. Source: ICF Jones & Stokes, 13 July 2009, "Venice High School HVAC Project CEQA Analysis."



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools



Figures 46. and 47. Where possible, removing inoperable HVAC units and restoring windows to match originals enhances the appearance of historically significant LAUSD buildings. Source: LAUSD and Architectural Resources Group, 2014.

### Recommended Locations for HVAC Components (continued):

- Exterior: Should exterior/ground-level installation provide the best design option, select a secondary elevation for installation of units or a utility shed, as determined in conjunction with qualified architectural historian. Consider screening by landscaping or other means.
- One-story building: Avoid roof placement if possible. If roof placement offers best option, set back HVAC unit to minimize visual impacts. If decorative parapet or roof feature is present, place unit behind the feature to conceal it from view.
- Two-story building: If set back from roof's edge, toward center, and not visible from street, roof placement offers a good alternative for placement of HVAC unit.
- Rooftop installation of exhaust vents is an acceptable alternative; vents should be as inconspicuous and set back as possible. Avoid visibility from the street-level view.
- For exhaust vents, the building base often provides a good location for an exhaust vent. Should this solution offer the preferred design, the exhaust vent should be located on a secondary elevation, screened, and concealed with landscaping.
- Drain lines: vertical venting may be provided for by a small chase, installed in an out-of-the-way corner, to be selected in conjunction with qualified architectural historian.

### Recommendations for Installation Process:

- Avoid making new penetrations or openings on exterior walls by utilizing existing outlets, openings, and paths.
- Using existing vents and wall openings is ideal. New vents should be painted or finished to match existing similar features.
- Where wall penetrations are necessary, patch, repair and finish to match existing.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools

### 3. AMERICANS WITH DISABILITIES ACT (ADA) COMPLIANCE AND ACCESS

Given the variability of historic buildings and the importance of achieving ADA compliance as well as CEQA compliance, projects should generally be considered on a case-by-case basis in conjunction with a qualified historic preservation professional. These guidelines offer a starting point for project design that achieves ease of access while also protecting historically significant schools.

#### Recommended Approach, ADA Compliance and Access:

- Utilize State Historic Building Code to achieve ADA compliance while also retaining important character-defining features and meeting historic preservation goals.
- Review by qualified architectural historian and/or historic architect will identify opportunities to achieve project objectives while avoiding impacts to character-defining features and elevations.
- Identification of primary and secondary character-defining features and buildings by a qualified architectural historian should include significant site plan design and landscape features.
- Install ADA ramps, lifts, and elevators in such a way that character-defining features, spaces, and finishes are preserved. Consider alternatives and options such as locating ramps, lifts, elevators in secondary or non-character-defining spaces.
- In planning for ADA-accessible path of travel, install/modify access ramps in such a way that character-defining features, materials, spaces and finishes are preserved.
- In planning for path of travel, avoid removing historic site features, such as hardscaping, landscaping, setbacks, plantings. Explore alternative locations for path of travel that do not result in the removal/destruction of character-defining features. Signage: design signage to be compatible with historic scale and style; avoid removing, damaging or obstructing character-defining features.



Figures 48. and 49. If ADA-compliant access cannot be accommodated at primary entrance without damage to character-defining features, consider using the California Historical Building Code and its alternatives for ADA-compliant access on secondary entrances. Install ADA-accessible ramps in a way that allows for ease of access while also limiting visual obstruction of important character-defining spaces and features to the maximum extent feasible. Source: LAUSD, 2014.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools

### Recommended Approach, ADA Compliance and Access, Circulation Issues:

- Door widths: Should it be necessary to widen the opening of an original character-defining door, explore options for reducing overall impacts.
- Hardware: Replacement of historic hardware might be necessary to achieve ADA compliance. Should historic hardware be removed and replaced, match finishes for compatibility with existing hardware.
- Handrails: Explore options for retaining original handrails while installing ADA-compliant handrails (parallel handrails, handrails on opposite site of corridor, etc.). Should it be necessary to remove historic handrail, document the historic feature and finish the new material to match existing.
- Auditorium Seating and Stage Access: In the case of character-defining interior spaces/seating in auditoriums, identify best project options for ADA seating access and stage ramps or lifts in conjunction with qualified architectural historian and/or historic architect.
- Elevators: Best locations should be explored on a case-by-case basis, according to project needs, the character of significant interior spaces, and availability of secondary interior or exterior spaces, in conjunction with a qualified architectural historian and/or historic architect. One option for elevator placement includes closet spaces that occupy the same location on multiple stories.
- Ramps: In terms of design and scale, ensure that access ramp is appropriately styled and scaled to historic building and finishes are matched to existing. The ramp and railing should be sited and installed in such a way that minimal removal or obstruction of historic materials and features occurs.
- In conjunction with qualified historic preservation professional, if installation of ramp on primary elevation would negatively impact the integrity of the historic resource, explore options for ramp installation on equal, secondary entrance.



Figures 50. and 51. The decorative, monumental entrances of some historic schools pose design challenges for ADA compliance; with input by a qualified preservation professional, careful project design, and applications of the California Historical Building Code where appropriate, solutions can be identified that achieve project objectives while also preserving historic resources. Morningside Elementary School (1915, left) and Marshall Senior High School (right). Source: LAUSD.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools

### **ADA Compliance and Access, Restrooms:**

- A qualified architectural historian should identify and document, in digital photography and an MFR, character-defining features early in project planning process, in order to plan for their retention.
- In upgrades for ADA accessibility, where possible, retain original character-defining features and materials (i.e., original tile, floors, marble partitions, etc.).
- Where intact character-defining features are present in historic bathrooms but project requires removal and replacement, explore overall project options for retaining at least one example of a historic bathroom.
- New bathroom should follow/exhibit compatibility with the character of the school.

## 4. HAZARDOUS MATERIALS ABATEMENT

The identification and abatement of hazardous materials, whether in lead paint or asbestos-containing materials, must be carried out by a qualified specialist in hazardous material identification and abatement.

### **Recommended Approaches, Hazardous Materials Abatement:**

- Where required, hazardous materials abatement should be carried out using methods that are the least invasive but also effective.
- Before any abatement work begins, a qualified architectural historian will photograph/document project area, note primary and secondary character-defining features; qualified architectural historian and/or historic architect will provide input on carrying out abatement project, from beginning to conclusion, with the least possible impact to historically significant features.
- In addition to documenting character-defining features directly impacted by the project, the qualified architectural historian will identify and document features in surrounding areas to plan for and avoid any impacts or damages that could occur in the course of the abatement process.

### **Not Recommended, Hazardous Materials Abatement:**

- The use of power sanders or chisels for the removal of paint.
- The use of high-pressure cleaning for character-defining concrete or hardscaping.

### **Project Scenarios, Hazardous Materials Abatement:**

- A qualified architectural historian should identify and document, in digital photography and an MFR, character-defining features early in project planning process, in order to plan for their retention.
- Lead-based paint: The preferred treatment for lead-based paint is to encapsulate, if possible. An acceptable method for lead-based paint abatement is to remove by the gentlest means possible.
- Asbestos abatement (in linoleum flooring, siding, original ductwork). Should specialist determine that asbestos is present and in need of removal, ensure that all steps of abatement project are planned to avoid damage, removal, or destruction of original historic materials and features. Patch and match existing.
- Plan and consider each step of the project from beginning to conclusion. Does linoleum flooring need to be removed? If so, will this necessitate the removal of character-defining baseboards, chair railings, or other features?



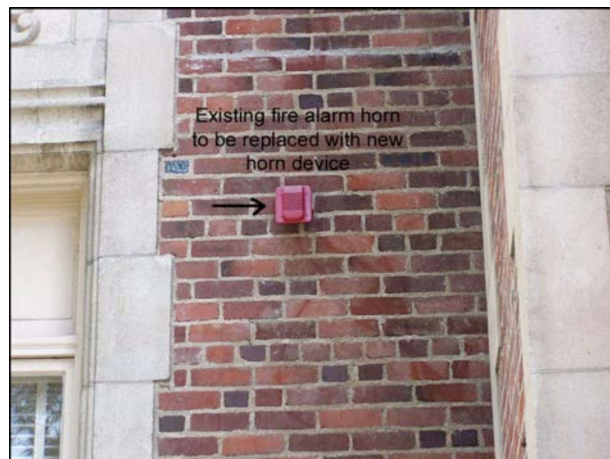
# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools

### 5. FIRE & LIFE SAFETY UPGRADES (1-HOUR CORRIDORS, STAIRWELLS, SPRINKLER AND ALARM SYSTEMS)

#### Recommended Approach, Fire & Life Safety Upgrades:

- A qualified architectural historian should identify and document, in digital photography and an MFR, character-defining features early in project planning process, in order to plan for their retention.
- Early in the process, identify alternatives for achieving project objectives while avoiding removal or damage to historic materials to the greatest extent possible. Traditional approaches to achieving one-hour corridors, for example, such as removal of interior corridor classroom doors and transom windows, will require alternative actions where those features are character defining.
- Emergency egress hardware: if upgrade involves the removal of original hardware, select hardware components that are compatible in terms of style and materials with historic hardware; finish new hardware with compatible finishes/colors.
- Fire alarms, interior and exterior, interior fire-sprinkling: Re-use existing conduit, runs, and wall penetrations for installing new components and wiring, unless the existing components were inappropriately located. If inappropriately located, consider relocating more compatibly with historic elements and repairing or replacing in kind any significant features that had been previously damaged or removed.
- Lighting: new or supplemental. To the extent possible, place new fixtures in unobtrusive location. New lighting should be compatible in design, scale, and detailing but should not present a false historic appearance. Avoid removing historical materials and features in the installation of new lighting; following installation, where necessary, patch and repair to match existing.
- Signage: ensure that new signage is compatible with the school's historic character in terms of style and scale. Avoid the removal of historic fabric, including landscaping/hardscaping.



Figures 52. and 53. Re-use existing conduit connections and wall penetrations wherever possible. Source: ICF Jones & Stokes for LAUSD, 19 December 2008, "John Marshall High School Historical Resources CEQA Analysis for Fire Alarm System Upgrade Project."

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools

### **Project Scenarios, Fire & Life Safety Upgrades: 1-hour corridors**

- In project design, one size doesn't fit all. Each project site will present different opportunities and constraints to achieve project objectives. Study alternatives in conjunction with a qualified historic architect and/or architectural historian; incorporate a number of available options in order to achieve the required 1-hour life safety objective for corridors.
- Balance available options for upgrades, including sprinklering (partial or full), alarm systems, special fire-retardant paint.
- To the extent possible, retain original doors and transoms. Transoms may need to be secured shut to achieve objectives.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

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### 6. SEISMIC UPGRADES

#### Recommended Approaches, Seismic Upgrades:

- A qualified architectural historian should identify and document important character-defining features of the project area (in terms of overall character and design composition) that should be considered in the planning of seismic upgrades.
- Early in the project planning process: in conjunction with a qualified historic preservation professional and structural engineer with demonstrable experience in historic preservation, identify opportunities and alternatives for achieving upgrade goals while limiting visibility of seismic improvements, to the greatest extent possible.
- In design of seismic upgrades, installation and placement, avoid removal or destruction of historic materials and features.
- If exterior bracing is determined to be an appropriate solution, look for opportunities to place on non-significant or secondary elevations, in particular for elevations visible from the public right-of-way. Consider how the bracing will be attached to the historic building, avoiding unnecessary damage and removal of historic features and fabric and leaving as much of the character-defining design visible as possible.
- In order to avoid interrupting the rhythm and design of exterior, explore options to place seismic bracing on the building interior rather than exterior.
- Exterior bracing: If exterior bracing is necessary, attempt to incorporate design elements that are compatible with the character of the building.
- Exposed bracing that strikes a bold, structural tone might be appropriate for certain styles and building types. Other building types/styles may call for more subtle bracing elements.
- Alternatives: shotcrete applied to interior walls can provide additional structural support. If shotcrete is used, the historic window and wall configuration should be duplicated as much as possible, and features such as window casing, window depth, and baseboards carefully considered. Finishes should be compatible with surrounding historic fabric and finishes.
- Windows and shear wall: try not to remove character-defining windows as part of shear wall construction. Flexibility exists depending on the relative importance of the window or feature (whether primary or secondary character-defining features or elevations).
- If it becomes absolutely necessary to remove windows in the course of seismic bracing, identify and document, in conjunction with qualified architectural historian, which windows provide the best options for removal that minimizes impacts to the historic resource.
- Not recommended: infill of windows with visible concrete masonry units (CMUs), indiscriminate use of anchor bolts on primary exteriors, removal of historic features such as cornices that could be safely braced and anchored to the building.

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Figures 54. and 55. If needed, identify secondary elevations for the placement of storage sheds and/or additions. Burton Avenue Elementary School, Panorama City. Source: LAUSD and Architectural Resources Group, 2014.

## 7. ADDITIONS AND NEW CONSTRUCTION

### Recommended Approaches, Additions and New Construction:

- Early in the process, consult a qualified architectural historian to review project plans and identify best options for expanding buildings or adding new space that minimize impacts to historic resources, including campus buildings and associated site design and landscaping features.
- The qualified architectural historian will identify and document important features that should be considered in the design of building additions and new construction. These features include building siting/placement, size, scale/height, roofline character and features, features/elements defining horizontal lines of buildings, windows (type, opening types and sizes, rhythm/placement), exterior wall planes and receding/projecting planes and spaces, materials, and style.
- New additions should be compatible with but differentiated from historically significant properties and site features.
- Incorporate design elements such as set-backs or hyphens in order to delineate old and new construction.
- Maintain the roofline of historic buildings and structures.
- Where possible, identify opportunities for removing underutilized/temporary buildings that interrupted the original site plan. These can include U-shaped, L-shaped, H-shaped buildings designed to create courtyards and outdoor areas. Restore original layout where possible.

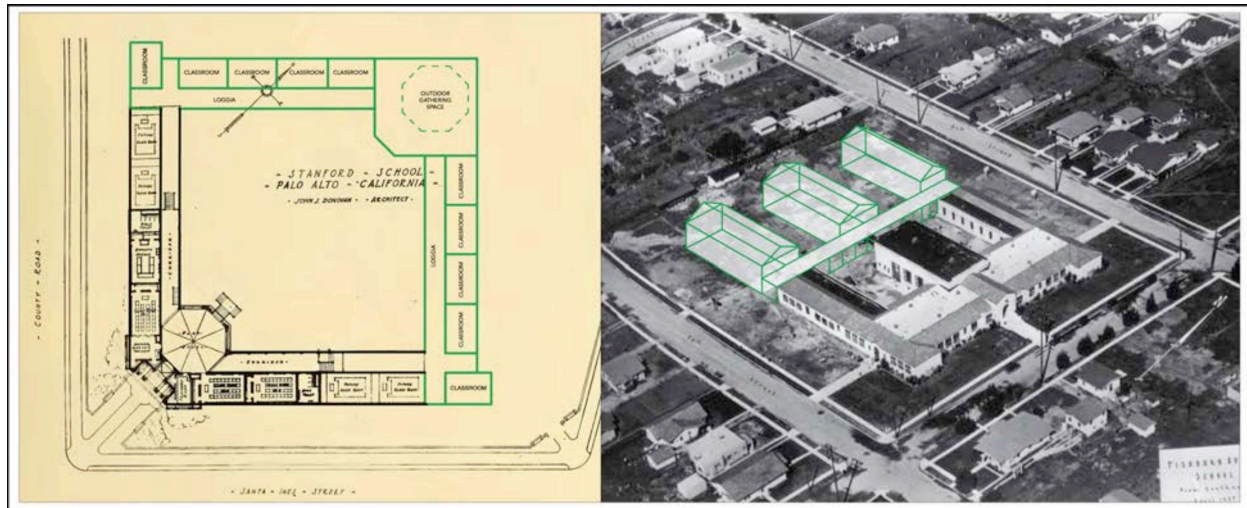
### Not Recommended, Additions and New Construction:

- In general, avoid adding additional, higher stories to historically significant buildings; identify opportunities for increasing building footprint or expanding elsewhere rather than adding stories.

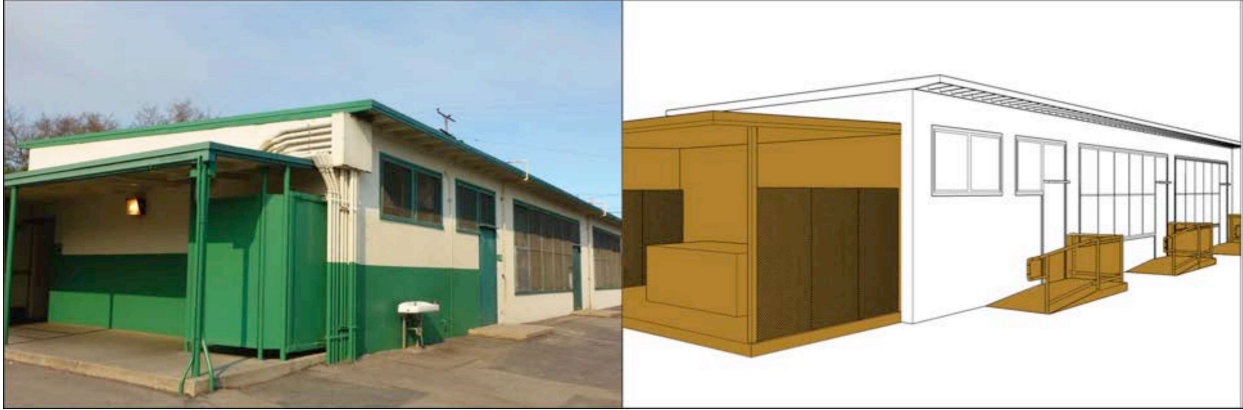
# LOS ANGELES UNIFIED SCHOOL DISTRICT

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- Additional stories may sometimes be appropriate if they can be set back on the roof so as to minimize visibility and impact.
- Avoid creating a stylistic carbon copy of original historic building; make the new construction compatible but differentiated. Modern (i.e., current) design can be appropriate if it is contextually sensitive, in terms of placement, massing, scale, materials, etc.
- Additions and new construction should avoid overwhelming the historic resource, in terms of both scale and design.



Figures 56. and 57. When planning new construction or additions, consider the important character-defining features of the extant site plan and maintain open spaces and indoor-outdoor connections where feasible. Source: LAUSD and Architectural Resources Group, 2014.



Figures 58. and 59. Identify secondary elevations for the placement and installation of mechanical equipment and storage sheds. Avalon Gardens Elementary School. Source: LAUSD and Architectural Resources Group, 2014.

### 8. MECHANICAL SYSTEMS: PLACEMENT AND INSTALLATION

#### Recommended Approach, Mechanical Systems:

- Attempt to limit visibility of mechanical equipment installed on exterior perimeter walls or beneath the roof.
- Where possible, identify secondary elevations for the placement and installation of mechanical equipment.
- For fastener installation, use expanses of grout or mortar rather than brick, stone, tile, or masonry for drilling or wall penetrations.
- Identify and use existing fasteners, attachments, or wall penetrations to the maximum extent feasible.
- Following drilling or installation/removal of wall mounts/fasteners, repair surrounding surfaces immediately to match existing in color, finish, profile, thickness and strength.
- Conduit: generally acceptable to mount conduit on easily repairable surfaces; these can include plaster, grout, non-decorative painting, etc.

#### Not Recommended, Mechanical Systems:

- Avoid drilling into any area of brick, stone, masonry, or tile. Choose area of grout or mortar for installation of fasteners.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools

### **V. Themes of Significance, Architectural Styles, and Character-Defining Features**

According to CEQA, significant adverse impacts will result if a historic resource is altered to such a degree or in such a way that it loses integrity and the ability to convey the reasons for its significance. The first step to avoiding this outcome is (1) identifying the character-defining features that lend the historic resource its significance and (2) planning for the retention, rehabilitation, and/or sensitive replacement of such features. While all projects and historic resources are different, character-defining feature identification is the first step to successfully upgrading, repairing, and maintaining a historic resource.

The following sections outline the character-defining features for schools and campuses representing the four principal eras of LAUSD school design: (1) 1910-1933: Period-Revival Era of Open-Air Schools; (2) 1933-1945: Post-Long Beach Earthquake Schools; (3) 1933-1945: Early experiments in the Modern, Functional School Plant; and (4) 1945-1969: Postwar expansion and the Modern, Functional School Plants.

Contributing properties might include administration buildings, auditoriums, classrooms, gymnasiums and recreational fields, multipurpose rooms, shops, cafeterias, as well as designed landscape and site features, site plan, arcades and other outdoor circulation corridors. Depending on the school and campus, contributing features of a historically significant building can include a range of aspects and characteristics, from the overall site plan and massing of the buildings, to architectural details and ornament.

Specific character-defining features of the architectural styles typical of LAUSD schools follow. These include the eras of period eclecticism in the 1920's, the 1930's advent of Art Deco/Streamline Moderne and PWA Moderne styles, as well as pre- and post-World War II Modernism. The style most typical among postwar schools are variations of Mid-Century Modernism/Regional Modernism.



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Figure 60. John Burroughs Middle School (1922). This Renaissance Revival-style school is one of the most intact 1920s schools in the district. Source: LAUSD, 2011.

### **Theme: LAUSD | Pre-1933 Long Beach Earthquake School Plants, 1910-1933**

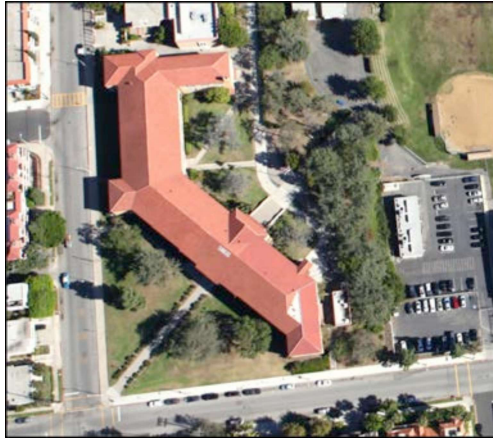
This theme reflects an important period for Los Angeles schools. First, it occurred after the Progressive Education Movement had triggered widespread reform of school design throughout the United States. This resulted in a more differentiated, expansive school plant, with program-specific buildings and classrooms. Second, this period occurred before a statewide overhaul of school building codes after the 1933 Long Beach earthquake.

This period also began as the 1920s ushered in a school building boom and period-revival golden age in Southern Californian architecture. The importance placed on public education was expressed through beautifully designed school buildings, often created by the region's leading architects. Campus design became more unified, with elaborate approaches and entrances. The advent of more grand entrances, as well as the incorporation of separate auditoriums, sited for ease of public access, reflected a growing sense that public education was a community affair.

Replacing the big-block school, with internal corridors, was a generally lower-massed, spread-out campus. In some examples, designers replaced hallways with covered outdoor walkways. Building plans also evolved, as the traditional rectangular plan took on adjacent wings, in H-shaped, T-shaped, or U-shaped buildings that facilitated the creation of sheltered outdoor spaces and patios. Lower massing was particularly common for elementary schools. Because most pre-1933 schools were substantially remodeled following the Long Beach earthquake, intact examples from this era are relatively rare. It is common to find 1920s-era schools that were remodeled following the earthquake; such schools might exhibit the building plans and configurations typical of the 1920s but with 1930s PWA Moderne and Streamline Moderne detailing.

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Figures 61. and 62. *The expansive plan and Renaissance Revival-style of University High School (1924). Source: LAUSD, 2011.*

### Character-Defining Features | Buildings/Structures:

- Articulated buildings plans, facilitating the creation of outdoor spaces (often T-shaped, E-shaped, U-shaped, and H-shaped plans)
- Generally low massing, usually one to two stories (with two to three stories more common for middle and senior high schools)
- Includes designed outdoor spaces, such as courtyards and patios, adjacent to classroom wings
- Exteriors usually lined with rows of grouped windows, including wood-framed multilight windows; expanses of windows often mark the location of classrooms
- Designed in popular period-revival styles of the era (including Spanish Colonial Revival, Renaissance Revival, Mediterranean Revival, and Collegiate Gothic)
- Often designed by prominent architects of the era

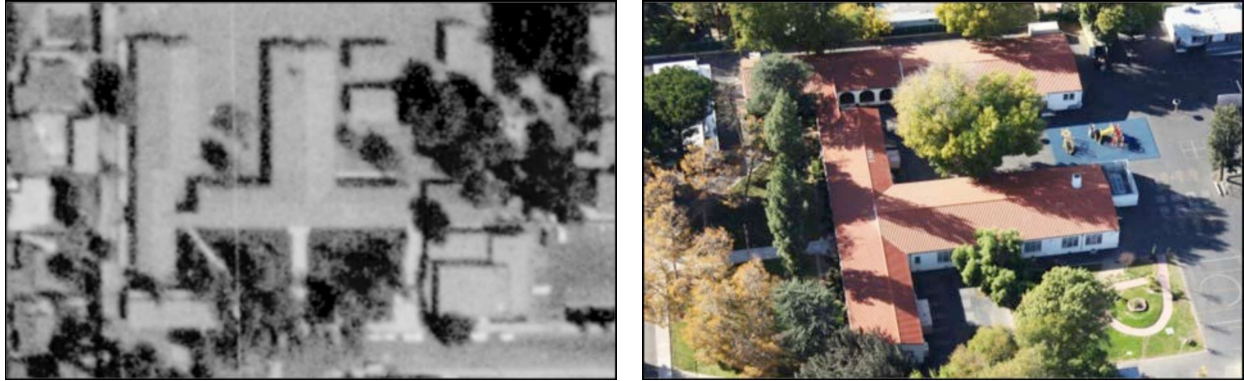
### Character-Defining Features | Campus/District:

- Emphasis on a more spread-out site plan, with designed outdoor spaces
- More varied collection of buildings, differentiated by function and use (rather than a single building with all functions inside)
- Might include an elaborate administration building, usually the focal point of the campus, as well as classroom wings, auditoriums, gymnasiums, and outdoor recreation areas
- Middle or senior high schools might include a gymnasium designed in the style of the campus overall



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Figures 63. and 64. Post-Long Beach Earthquake school: H-shaped plan and Mission Revival style of Reseda Elementary School (1936). Source: U.S. Dept. of Agriculture, *historicaerials.com* (left) and LAUSD (right).

### Theme: LAUSD | Post-1933 Long Beach Earthquake Schools, 1933-1945

Following the 1933 Long Beach earthquake, state and city legislation regarding school building codes and practices shifted the character of LAUSD schools and campuses. Requirements of the Field Act (1934), such as maintaining one-story massing for elementary schools and no more than two stories for junior and high schools, mirrored reforms already under way. Classroom wings continued to be designed for connections to the outdoors, with L-, H-, U-, and T-shaped buildings accommodating sheltered courtyard and patio spaces. Continuing another trend under way in the 1920s, campuses displayed an increasingly unified site design, with sheltered corridors moving the hallways outdoors.

The advances of the Progressive Education Movement also continued to shift school plant design. Campuses were increasingly differentiated, with administration buildings, auditoriums and gymnasiums, separate classroom, shop, and specialty wings, and cafeterias. Adequate indirect lighting and ventilation were provided through the use of generous bands of windows, including multilight sashes, casements, and clerestories. Stylistically, these buildings were less ornamental than their 1920s period-revival counterparts. An emphasis was placed on traditional Southern Californian styles, such as the Spanish Colonial and Mission Revival. Other styles included Streamline Moderne, Art Deco, and Late Moderne. Much post-earthquake reconstruction was funded through the Public Works Administration (PWA), and many schools exhibit PWA Moderne styles.



Figure 65. Reseda Elementary School, 1936. The spare Mission Revival style was in keeping with the post-Field Act requirement for one-story massing and the post-Long Beach Earthquake trend to design in the “traditional Southern Californian” mode. Source: LAUSD.

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Figures 66. and 67. Hollywood High School (1935), shown in 1939 (left) and 2002 (right). Source: LAPL Photo Collection (left) and LAUSD (right).

### Character-Defining Features | Buildings/Structures:

- One-story massing for elementary schools; up to two stories for middle and senior high schools; reinforced concrete, steel- or wood-frame construction
- Classroom wings designed for access and views to outdoors—with variations including L-, H-, T-shaped plans; generous expanses of windows, including steel- and wood-framed windows, awning and hopper casements, and clerestories
- More streamlined and less ornamental than 1920s period-revival styles; emphasis on “traditional Southern Californian” styles; styles can also include PWA Streamline Moderne, Art Deco, Late Moderne, and proto-modern styles
- May have been partially or fully funded through the WPA (also referred to as the Public Works Administration, or PWA); WPA projects may include significant interior artwork such as murals, paintings and sculpture; may have been designed by a prominent architect of the period

### Character-Defining Features | Campus/District:

- Unified site plan consisting of buildings and structures designed and sited according to their use; plentiful designed outdoor and landscaped spaces, for outdoor study, recreation and dining
- Might have connecting sheltered corridors throughout campus; expansive site plan
- Varied collection of buildings, differentiated by function and use (rather than a single building with all functions inside); might include an administration building, near the campus entrance, made to serve as the focal point of the campus
- Campus often composed of groupings of classroom wings, auditoriums, gymnasiums, cafeterias, and outdoor recreation and dining areas; middle or senior high schools might include a gymnasium designed in the style of the campus overall



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Figures 68. and 69. Susan Miller Dorsey High School (1937) and its inventive site plan. Source: LAUSD (left) and Google Maps, 2013 (right).

### Theme: LAUSD | Early Experiments in the Modern, Functionalist School, 1933-1945

Although this category shares general characteristics with the preceding theme (Post-1933 Long Beach Earthquake Schools), it is distinguished by an experimental approach to school design that emerged during the Great Depression. Such schools reflect the most avant-garde ideas of the era and the beginning of modern, functionalist school design.

Stylistically, the proto-modernist school need not be purely “modern” in the sense of lacking any ornamental detailing. The significant changes reflected a philosophy that went a step further than did the schools of the 1920s in designing for function and integrating school buildings with exterior spaces. During the postwar construction boom, many of the same ideas that characterized these experimental schools became the norm.

The notable differences between the two themes relate to scale, site plan, and functional, child-centered design. The proto-modernist school has an explicitly domestic scale, with low ceilings and lack of monumental design or massing. These schools generally exhibit a decentralized campus design, with a strong geometric patterning applied to the site plan. Classroom wings generally consist of one-room-deep rectilinear buildings, lined with adjacent patios and landscaping. Building plans clearly express their function, with (usually) one-story massing, generous expanses of glazing, window sizes and configurations tailored to sun patterns and doors opening directly onto patio areas and courtyards. The preferred typology was the early version of the “finger-plan” school, with rectilinear classroom wings extending from a central axis.

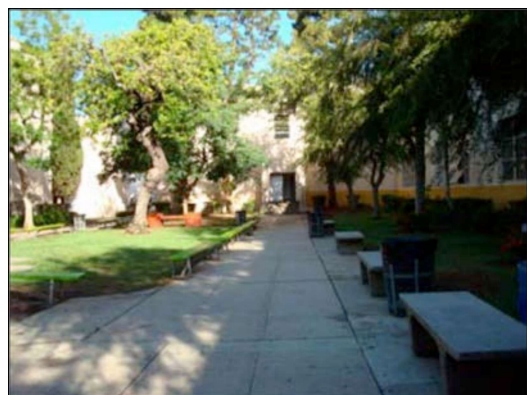


Figure 70. Modernist master Richard Neutra's Emerson Middle School (1937-1940). Source: LAUSD, 2011.

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### Character-Defining Features | Buildings/Structures:

- One-story massing for elementary schools; up to two stories for middle and senior high schools
- Usually reinforced concrete, steel- or wood-frame construction, clad in cement/stucco
- Classrooms are often single- or double-loaded finger-like wings, arranged along a central axis or semicircle
- Classrooms open directly onto patios/play areas through glass doors or movable walls
- Varying elevations might display differentiated window sizes and configurations, in order to tailor interior light to sun patterns and create cross-lit classrooms
- Windows are plentiful and include steel- and wood-framed multilight windows, in double-hung sashes, awning and hopper casements, clerestories, and fixed panes
- Displays an informal, nonmonumental scale and spare ornamental program
- Stylistically modern; might display influence of Late Moderne or PWA Streamline Moderne
- May have been partially or fully funded through WPA, 1935 to 1943; WPA projects may include significant interior artwork such as murals, paintings and sculpture
- May have been designed by a prominent architect of the period



Figure 71. Corona Avenue Elementary School (1935). Source: USC Digital Archive.

### Character-Defining Features | Campus/District:

- A unified, nonmonumental, nonhierarchical site plan
- Displays inventive site plan incorporating buildings, landscaped courtyards, and circulation corridors into a unified campus design
- Swaths of landscaped patios and terraces adjacent to classroom wings; designed outdoor spaces, including patios, courtyards
- Use of outdoor corridors, with simple canopy supports and posts or *pilotis*, form links between classrooms and other buildings

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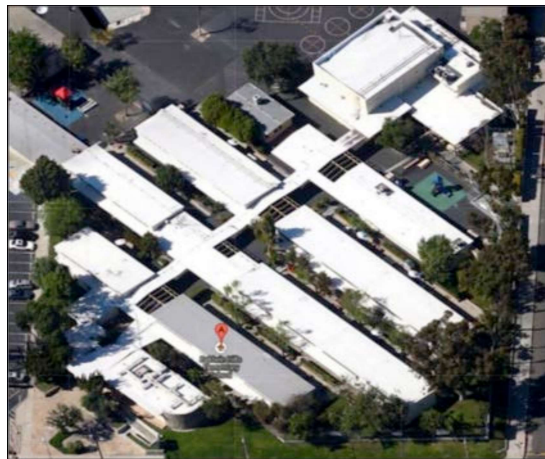
Design Guidelines and Treatment Approaches for Historic Schools



Figure 72. Emerson Junior High (now Middle) School, Richard Neutra, 1937, Los Angeles. This school is extant and located on Selby Avenue near Santa Monica Boulevard in west Los Angeles. Source: Julius Shulman Archives, J. Paul Getty Trust, Getty Research Institute.

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Figures 73. and 74. Condensed finger-plan of Baldwin Hills Elementary School. Axial classroom wings, one-story massing, swaths of landscaping and patios. Source: Getty Research Institute, Shulman Archives (left), Google Maps, 2013 (right).

### Theme: LAUSD | Educating the Baby Boom: The Postwar Modern Functionalist School Plant, 1945-1969

By the 1950s, many of the design ideas considered experimental in the 1930s had matured and become the national standard for schools. Stylistically, schools might include some historicist detailing reflecting popular styles (such as Colonial Revival). But, overall, a unified campus design, building types and plans that accommodated a high degree of indoor-outdoor integration, ample outdoor spaces, and sheltered corridors marked the typology as the mature version of the functionalist school plant. The priority remained the creation of a domestic scale for schools. Campuses displayed a one-story massing for elementary schools, and up to two stories for middle and high schools. Site plans, which often featured a decentralized, pavilion-like layout, lacked the formality and monumentality that characterized earlier eras of school design.

School types expressive of these ideals include the finger-plan (1940s–1950s) and cluster-plan (1950s), and variations on their basic themes. Combinations of these basic forms, which flexed according to available lot size and school enrollment, are also evident.

For LAUSD, the postwar years brought another round of reform as well as unprecedented expansion. Given the postwar classroom shortage, many campuses were constructed quickly, from standardized plans used district-wide, in designs that convey some of these ideas. The most intact and well-designed campuses among these, though, uniquely represent this era of reform and the midcentury modern school.

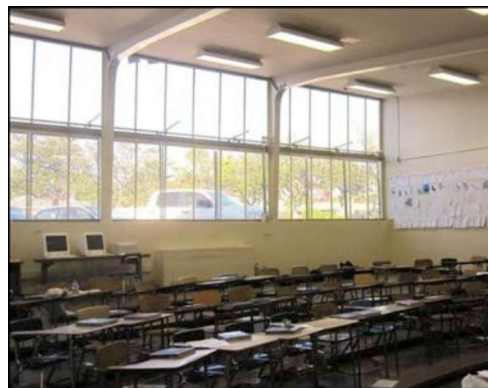


Figure 75. Orville Wright Middle School (1948–1952). Source: LAUSD, 2012.



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Figures 76. and 77. One-story massing and double-loaded axial classrooms, lined by landscaped courtyards, Grover Cleveland Senior High School (1959). Source: LAUSD, 2014.

### Character-Defining Features | Buildings/Structures:

- Building plans and site design clearly express their function; classroom wings often exhibit one-story “finger-like” wings, arranged on an axis
- Easily identifiable indoor-outdoor spaces, connections to classrooms through the incorporation of patios, courtyards, and outdoor canopied corridors
- One-story massing, particularly for elementary schools; up to two to three stories for junior and high schools
- Building types and plans expressive of postwar ideals in school design; these can include (1) finger-plan schools (usually in 1940s through 1950s); (2) cluster-plan schools (beginning in 1950s); and (3) variations and combinations of these typologies clearly expressive of the ideals for informality, indoor-outdoor connections, and zoned planning for the site
- Varying elevations might display differentiated window sizes and configurations, in order to tailor interior light to sun patterns and create cross-lit/cross-ventilated classrooms

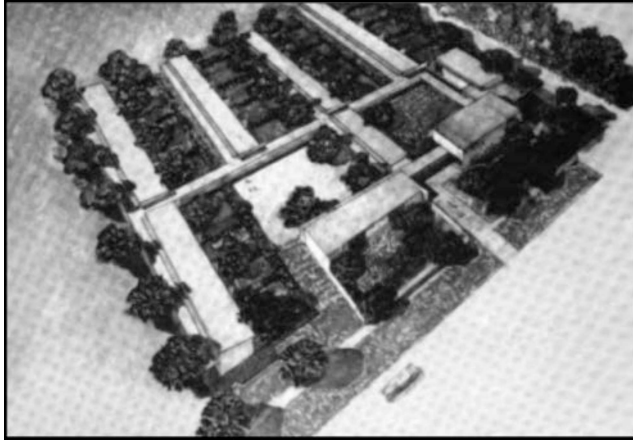
### Character-Defining Features | Campus/District:

- Unified campus design includes most or all of the following attributes: lack of formality and monumentality; low massing (usually one stories for classrooms and up to two stories for auditoriums/multipurpose rooms); strong geometric ordering of buildings and outdoor spaces; decentralized, pavilion-like layout; rational, function-driven site design; buildings extend across the site; buildings are oriented to outdoor spaces (courtyards, patios, outdoor areas), purposeful indoor-outdoor integration
- Automobile traffic/drop-off areas separated from campus; linked to interior via extended canopied corridors; buildings often turn inward, toward green spaces and courtyards, lawns
- Outdoor corridors, sheltered beneath simple canopies, forming links between the buildings of the campus



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Figures 78. and 79. Neutra's conceptual sketch of Kester Avenue Elementary School and the current aerial view. Source: McCoy, Neutra (left) and LAUSD Kester Avenue Elementary School Pre-Planning Survey, 2011 (right).

### Character-Defining Features | Campus/District (continued):

- Classrooms often consist of a series of axial, modular units; an informal, domestic scale for the buildings and campus might be especially evident in elementary schools
- Swaths of patios, terraces, and plantings adjacent to and alternating with buildings
- Generous expanses of windows, including steel- and wood-framed multilight windows, in awning and hopper casements, clerestories, and fixed panes
- Flat roof or broken-plane roof often used for lighting and acoustical issues
- Modular design, with a rhythmic, asymmetrical but balanced composition
- Usually displays a modern design idiom, usually either regional modernist (with use of native materials such as stone, brick, and wood siding and/or framing), International Style modernist, or, by the early 1960s, Late Modern (more expressive and sculptural); may have been designed by a prominent architect of the period
- Often associated with postwar suburbanization/growth near major employment centers (such as San Fernando Valley & southwest Los Angeles)
- Often built in residential neighborhoods on large expanses of land, with swaths of land devoted to landscape design and playing fields (in particular for high school campuses)



Figure 80. Orville Wright Middle School (1948-1952). Source: Getty Research Institute, Julius Shulman Archive.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

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## ARCHITECTURAL STYLES

### *Beaux-Arts Classicism & Neo-Classical Revival*

Early twentieth-century buildings brought a new architectural vocabulary to LAUSD school design. The monumentalism and motifs of Beaux Arts Classicism accommodated a new scale for school building of two and three stories. This scale was demanded by expanding enrollment and a need for increased capacity and rooms differentiated by grade level and curriculum.

Beaux Arts Classicism and Neo-Classical Revival styles were especially favored by designers following the lead of McKim, Mead and White and other prominent national firms. The impressive porticos, with classical orders and colossal columns, advertised the importance placed on public education. Primarily of masonry construction, most of these schools fell victim to the 1933 Long Beach Earthquake. The San Fernando Middle School Auditorium, constructed as part of a 6-year high school in 1916, is one of the few remaining examples of this era.

### *Typical Character-Defining Features:*

- Monumental scale
- Formal, symmetrical design composition
- Smooth stone, masonry, or concrete exteriors (often scored to resemble masonry)
- Elaborated entrance, often featuring portico with columns
- Classical detailing, such as use of gables and entablature, columns, and pilasters
- Multilight grouped windows with wood surrounds



Figure 81. Neo-Classical school design: San Fernando Middle School (1916). Source: Leslie Heumann & Associates and SAIC for LAUSD.



Figure 82. Detail, San Fernando Middle School (1916). Source: Leslie Heumann & Associates and SAIC for LAUSD.

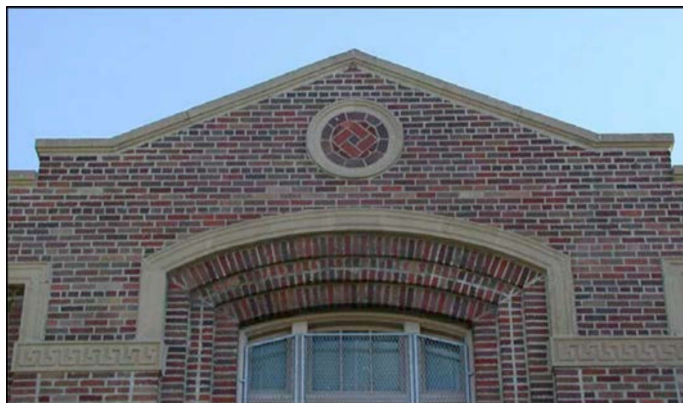
# LOS ANGELES UNIFIED SCHOOL DISTRICT

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### ***Indigenous Revival Styles and the Era of Historic Eclecticism***

As of 2013, a substantial number of LAUSD's historic school buildings were constructed between the early 1920s and World War II. These schools reflect the eclectic menu of revival styles popular at the time for a range of building types. Period-revival styles seen in LAUSD schools include Italian Renaissance Revival, Collegiate Gothic Revival, and Tudor Revival. In addition, for Southern California's emerging architectural profession and academy, this era brought a new emphasis on the region's indigenous architectural traditions and a desire to infuse design with local character. Indigenous revival styles that rose in popularity during this period included, most notably for LAUSD public schools, the Spanish Colonial and Mission Revival. Designers expressed regional character and flavor by relating buildings to the outdoors, with one-story schools easily opened to exterior spaces, and by providing open loggias and arcades for circulation.

Where present, architectural styling and details are generally most clearly expressed in the campus's public buildings, such as the auditorium or administration building, and at primary entrances to buildings or classroom wings.



Figures 83. and 84. Renaissance Revival Style: Joseph Le Conte Middle School, Edgar Cline (1922). Source: LAUSD Le Conte Middle School Pre-Planning Survey, 2012 (left) Leslie Heumann & Associates and SAIC for LAUSD (right).



Figures 85. and 86. Northern Italian Renaissance: Hamilton Senior High School Administration Building, John C. Austin & Frederick C. Ashley, (1931). Source: LAUSD Hamilton Senior High School Pre-Planning Survey, 2010 (left) Leslie Heumann & Associates and SAIC for LAUSD (right).



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### ***Mission Revival and Spanish Colonial Revival***

Beginning with efforts to restore California's missions in the late nineteenth century, Southern Californian architects began looking toward regional history for stylistic cues. The region's climate and Hispanic heritage figured prominently in these new directions. The Mission Revival vocabulary, most popular between 1890 and 1920, drew inspiration from Southwestern missions. Identifying features include curved parapets and red tiled, low-pitched roofs. Arches were used liberally, and wall surfaces commonly displayed smooth stucco. The Spanish Colonial Revival flourished between 1915 and 1940, reaching its apex during the 1920s and 1930s. This movement was catalyzed by architect Bertram Goodhue's 1915 designs for Panama-California Exposition in San Diego.

The Spanish Colonial Revival style became one of the most popular idioms for a range of building types. Architects and builders embraced the style, which was employed for many LAUSD schools. The rise in popularity of the Spanish Colonial Revival style also coincided with the move toward more child-scaled schools, with lower massing and open, expansive campuses. With its emphasis on arcaded corridors and patios, the style fit the school reform movement particularly well.

Spanish Colonial Revival buildings tend to be asymmetrical and sheathed with smooth stucco. Roofs generally consist of gabled, gabled and flat, and (less commonly) hipped roofs, clad in red clay tiles. Arched openings, whether for windows, doors, or gates, are a textbook feature. Secondary materials—including wood, wrought iron, and polychromatic tile—provide decorative accents. Windows are generally wood framed or metal, with molded wood surrounds or lintels.

### ***Typical Character-Defining Features:***

- Stucco-clad walls (usually smooth finish); might have brick or cast stone
- Asymmetrical design; incorporation of exterior patios and courtyards
- Use of towers, turrets, or cupolas
- Low-pitched gabled or hipped roof covered in red clay tiles or flat roof with parapet wall
- Shallow eaves or deeper eaves, lined with exposed carved wood brackets
- Arched openings for windows, doors, and use of arcades
- Secondary materials can include wrought iron, polychromatic tile, and cast stone



Figure 87. Post-earthquake Mission Revival Style: Reseda Elementary School (1936). Source: Leslie Heumann & Associates and SAIC for LAUSD.



Figure 88. Late example of Spanish Colonial Revival: Verdugo Hills High School (1948). Source: Leslie Heumann & Associates and SAIC for LAUSD.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools

### ***Renaissance Revival Style***

In the late nineteenth and early twentieth centuries, the Renaissance Revival style began as a fairly literal translation of sixteenth-century Italian *palazzi* into two- and three-story buildings. The style evolved into one of the most popular of the 1920s, in particular for midrise office buildings. McKim, Mead, and White designed some of the United States' most elegant expressions of the revival during its earlier years.

Renaissance Revival buildings in Southern California are generally sheathed in brick or stucco. Facades are symmetrical or highly regular and divided into bays by the fenestration pattern or by piers, which are often treated as columns with bases and capitals. Variations in surface finishes, fenestration, and level of detail visually distinguish each section, creating a horizontal emphasis that is reinforced by prominent belt courses. A cornice, set above a frieze and/or architrave, traditionally tops a Renaissance Revival building. Windows on top stories are often distinguished from lower stories by different surrounds and configuration.

### ***Typical Character-Defining Features:***

- Rectangular massing
- Brick, stucco, and concrete, with trim of terra cotta or cast stone and bases of granite or masonry
- Horizontal emphasis; differentiated treatment of stories
- Symmetry and regularity
- Brick, stucco, or concrete exterior, often scored to resemble masonry
- Gabled and/or hipped roof, often sheathed in clay tiles
- Linear fenestration pattern
- Belt courses and cornices
- Classical detailing
- Cast stone or terra cotta architectural ornament



Figure 89. El Sereno Middle School, originally Woodrow Wilson High School (1937). Source: Leslie Heumann & Associates and SAIC for LAUSD.



Figure 90. University High School (1924). Source: Leslie Heumann & Associates and SAIC for LAUSD.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools

### ***Gothic Revival / Collegiate Gothic***

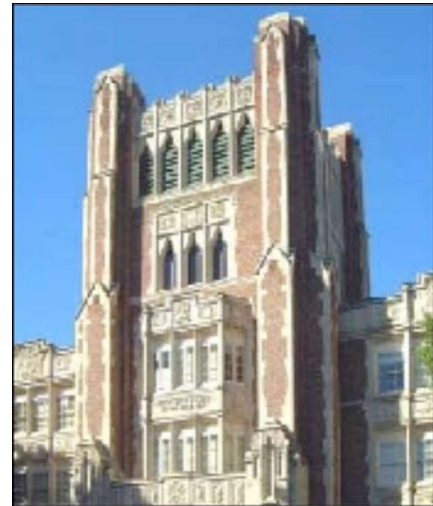
Popularized by writers and art critics such as John Ruskin (1819–1900), the English Gothic Revival movement looked back to and idealized the preindustrial Medieval era as a more pure and moral golden age, for society as well as for architecture. First popularized for religious buildings and for school buildings—the “Collegiate Gothic”—the style began appearing in the Los Angeles area in the late 1800s. Few buildings were constructed locally in this style, and even fewer remain.

Most extant Collegiate Gothic schools in Los Angeles were constructed during the height of the period-revival era. In the 1930s, in school design, the style fell out of favor as more up-to-date architectural idioms began emerging. The 1933 Long Beach earthquake, and then the 1934 Field Act, hastened the need for widespread school repairs and new construction, which accelerated the stylistic shift during this period.

Gothic Revival schools share the same emphasis on verticality that characterizes other applications of the style. The emphasis on the vertical is often expressed through the use of uninterrupted piers or attached ornament, which extend from the ground to the roof. The style also makes liberal use of mullions, towers, spires, and pinnacles. Windows are arranged in vertical channels of glass, sometimes topped with pointed arches. Brick and concrete were the materials of choice, often accented by cast stone.

### ***Typical Character-Defining Features:***

- Concrete or brick exterior
- Emphasis on the vertical axis
- Attenuated windows and openings
- Use of full-length columns or pilasters
- Steeply gabled roof
- Liberal use of cast stone or terra cotta ornament and sculptural detailing
- Stylized openings, with Tudor, pointed, or round arches
- Windows and doorways outlined with archivolts and topped with decorative crowns
- Windows with mullions



*Figure 91. John Marshall High School, George Lindsey, architect (1931). Source: Heumann & Associates and SAIC for LAUSD.*



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools



Figures 92. and 93. Huntington Park High School, Administration Building (1936). Source: Leslie Heumann & Associates and SAIC for LAUSD.

### Art Deco

As architects and designers began exploring alternatives to historic revival styles, one of the earliest modern alternatives was Art Deco. The term grew out of the 1925 exposition in Paris showcasing the “nouveau,” or new directions in design and decorative arts, at the *Le Musée des Arts Decoratifs*.

The idiom is highly decorative but rejects copying or adapting historical revival styles. Instead, ornamentation draws on geometric and foliate patterns and motifs, such as zigzags and chevrons, light, and color. Primarily in use between the 1920s and 1930s, the style was used most often in commercial, industrial, and institutional buildings.

### Typical Character-Defining Features:

- Emphasis on verticality through building massing;
- Applied exterior features and ornament
- Use of stylized, geometric motifs and decorative features, such as zigzags and chevrons
- Generally features smooth stucco- or concrete-clad wall surfaces
- Often features towers or other elements projecting beyond the roofline
- Often features steel-frame casement and fixed windows



Figure 94. PWA Moderne with Art Deco influence: Florence Nightingale Middle School (1937-1939). Source: Heumann & Associates and SAIC for LAUSD.





Figure 95. *Streamline Moderne: Thomas Jefferson High School, Stiles O. Clements (1933). Source: LAUSD.*

### ***Streamline Moderne | Moderne***

The Streamline Moderne became a popular style during the Great Depression and World War II period. Its clean lines and minimalist ornament both celebrated the modern machine-age and signaled the period of austerity triggered by the Great Depression. Compared with its more ornamental predecessor, the Art Deco style, Streamline Moderne is more restrained in its ornamental program and emphasizes the horizontal rather than the vertical. This is achieved through incorporating bands of windows, decorative raised or grooved horizontal lines, flat canopies with banded fascia, and narrow coping at the roofline. Other characteristics include smooth wall surfaces, usually clad in stucco, glass block or porthole windows, and rounded corners. Reference to aerodynamic design is a signature of the style.

Compared with the Streamline Moderne, Moderne (also called Art Moderne) buildings also tend to be horizontal in emphasis but more clean-lined and rectilinear in their massing and detailing. Moderne designs are generally characterized by flat roofs, smooth stucco exteriors, and use of metal casement windows that often meet at the corners of the building.

### ***Typical Character-Defining Features:***

- Horizontal emphasis, massing, and accents, such as moldings and continuous sill courses
- Smooth stucco or concrete exterior finish
- Curvilinear/rounded wall surfaces, corners, and features
- Recessed windows with no surrounds
- Flat or nearly flat roof



Figure 96. *Moderne: Venice High School (1935-1937). Source: Leslie Heumann & Associates and SAIC for LAUSD.*

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools



Figures 97. and 98. Hollenbeck Middle School (1936, left) and Hollywood Union High School (1934/1935, right). Source: Leslie Heumann & Associates and SAIC for LAUSD.

### **PWA Moderne**

Created by the National Industrial Recovery Act, the Public Works Administration (PWA) was founded within a few months of the March 1933 Long Beach Earthquake. Following widespread damage to Los Angeles public schools in the wake of the earthquake, much school reconstruction work was funded by the PWA.

Consequently, a substantial number of Los Angeles public schools either built or remodeled during this time exhibit some degree of PWA Moderne styling. Also referred to as “Stripped Classicism,” the PWA Moderne often incorporates elements of a number of styles, including Classical Revival, Spanish Colonial Revival, Art Deco, and Streamline Moderne.

Compared with the Streamline Moderne, the PWA Moderne was more formal and symmetrical in its overall design, with less emphasis on curvilinear shapes and horizontality. This style is found throughout the United States, particularly for institutional buildings funded through the PWA. Although the PWA program was terminated in 1943, buildings continued to display these stylistic features.

### **Typical Character-Defining Features:**

- Emphasis on the vertical axis
- Symmetrical, formal design composition and massing
- Smooth wall surfaces, generally exhibiting stucco, concrete, and/or polished stone (rarely includes brick exterior elements)
- Usually displays a flat roof
- Piers, often fluted or reeded, separating recessed window channels
- Incorporation of shallow relief panels and interior murals



Figure 99. PWA Moderne meets Spanish Colonial Revival style: Canoga Park High School Auditorium (1939). Source: Leslie Heumann & Associates and SAIC for LAUSD.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools



Figures 100. and 101. Emerson Middle School, Richard Neutra, architect (1937-1940). Source: LAUSD.

### **Early Modernism | International Style (Pre-1945)**

This style coincides with the emergence of modernism in Los Angeles, at a time when the idiom was still experimental and practiced by a small group of architects and designers. Many of these same ideas became the norm in the postwar period, but during the pre-1945 years, the ideas remained very unique and experimental. The City of Los Angeles Office of Historic Resources describes this stylistic theme as follows:

With precedents in Europe dating to the first decades of the twentieth century, Los Angeles was one of the first American centers of the International Style due in large part to the import of ideas by Viennese expatriates Rudolph Schindler and Richard Neutra. Although never catching on as a widely-accepted style for domestic architecture, the International Style was embraced and regionalized by a number of Los Angeles architects and designers who established a formidable local Modernist tradition.

Rudolph Schindler came to Los Angeles from Austria in 1920 to oversee construction on the Barnsdall House (Hollyhock House) for the office of Frank Lloyd Wright. Fellow Austrian Richard Neutra came to Los Angeles at Schindler's urging in 1925. Schindler, Lloyd Wright and Neutra and the architects of the so-called "Second Generation" architects continued to design buildings in Los Angeles in the postwar years; however, by this time the work of these architects and their protégés took on an expression of a more regional modernism (see Mid-Century Modernism).<sup>6</sup>

### **Typical Character-Defining Features:**

- Horizontal emphasis; use of simple, geometric volumes; smooth, unadorned wall surfaces, often sheathed in stucco or concrete
- Flat or nearly flat roof, often with cantilevered eaves
- Use of corner and casement windows, often with steel frames
- Windows generally set flush with the wall plane, with minimal trim or surrounds
- Continuous bands of windows emphasize the horizontal axis

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<sup>6</sup> These descriptions are drawn and adapted from the City of Los Angeles Office of Historic Resources guidelines for evaluating modern resources in Los Angeles. Excerpts in this passage were drawn from: Architectural Resources Group, n.d., "Pre-War Modernism," prepared for the City of Los Angeles Office of Historic Resources.



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools



Figures 102. and 103. On left, Fernangeles Elementary School (1954), Sun Valley. On right, Parmlee Avenue Elementary School (1962), southeastern Los Angeles. Source: LAUSD, 2014.

### **Mid-Century Modernism / Regional Modernism (Post-1945)**

Mid-Century Modernism, or Regional Modernism, represents a middle ground between the formal, machine-age aesthetic of the International Style and a regional idiom reflecting local precedent and identity. In the postwar period through the 1960s, as practiced in Southern California, Mid-Century Modernism took its cues from the region's first-generation modernist architects such as Richard Neutra, Rudolph Schindler, Gregory Ain, Frank Lloyd Wright, and Harwell Hamilton Harris. In the postwar period, second-generation practitioners such as Raphael Soriano, Whitney Smith, and A. Quincy Jones, among many others, established Los Angeles as a center for innovative architectural design and culture.

Mid-Century Modernism is characterized by an honest expression of structure and function, with little applied ornament. Aesthetic effect is achieved through an asymmetrical but balanced, rhythmic design composition, often expressed in modular post-and-beam construction. Whether wood or steel, post-and-beam construction allowed for open floor plans, ease of expansion, and generous expanses of glazing to heighten indoor-outdoor integration. Infill panels of wood or glass are common, with glazing often extending to the gable. Buildings are generally one to two-stories, with an emphasis on simple, geometric forms.

Capped with low-pitched gabled or flat roofs, a Mid-Century Modern building often displays wide eaves and cantilevered canopies, supported on spider-leg or post supports. Sheathing materials vary, with wood, stucco, brick and stone, or steel-framing and glass. Windows are generally flush-mounted, with metal frames. This style was seen in postwar institutional and commercial buildings, as well as residences, from 1945 until circa 1975, when Title 24 restrictions on the use of glass curtailed the expansive glazing that characterizes the style.



Figure 104. Pacoima Middle School, Administrative Building (1955), Wilmington. Source: LAUSD Pacoima Middle School Pre-Planning Survey, 2010.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

Design Guidelines and Treatment Approaches for Historic Schools



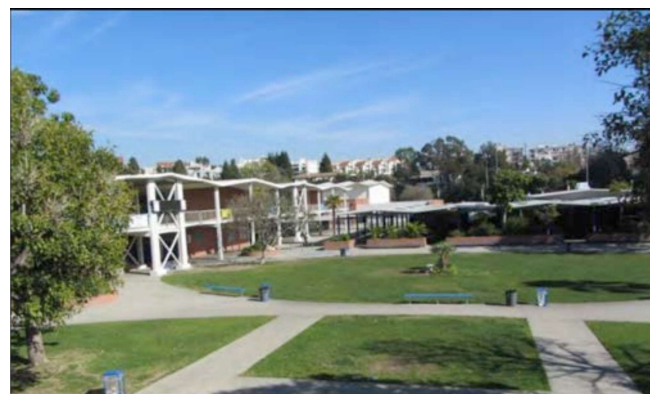
Figures 105. and 106. Dodson Middle High School (1960). Source: LAUSD, 2014.

## **Typical Character-Defining Features:**

- Horizontal design composition and massing; use of modular design; generally one to two stories
- Simple, geometric volumes; exterior materials include stucco, brick, or concrete
- Flat or shed roof, often with wide, cantilevered overhangs
- Aesthetic qualities derive from use of simply treated materials and excellent craftsmanship
- Direct expression of structural systems, often in wood or steel post-and-beam
- Lack of historicizing ornament
- Generous expanses of fenestration, including bands of grouped multilight windows
- Extensive use of sheltered exterior corridors, with flat or slightly sloped roofs supported by posts, piers, or pipe columns

## **Mid-Century Modernism | Expressionistic/Organic Subtype:**

- Combines sculptural forms with basic geometric volumes
- Curved, sweeping wall surfaces
- Expressionistic roof forms, including butterfly, folded plate or barrel vault roof forms



Figures 107. and 108. Orville Wright Middle School (left), Palisades Charter High School (right). Source: LAUSD.

# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools

### VI. Conclusion

This study represents a first step in developing procedures and guidelines that are tailored to LAUSD's need to efficiently design and implement modernization and upgrade projects while also protecting historic resources. The goal is to offer LAUSD a sound approach that is grounded in the *SOI Standards* and best preservation practices. In this way, use of the *LAUSD Design Guidelines and Treatment Approaches for Historic Schools* will help LAUSD staff retain and protect the district's many historically significant schools while also facilitating compliance with CEQA, specifically through application of the *SOI Standards* and the avoidance of significant adverse impacts to historic resources.

However, the *LAUSD Design Guidelines and Treatment Approaches for Historic Schools* is also intended to be a living document. As LAUSD continues implementing districtwide modernization, the design guidelines lend themselves to amendment and expansion as needed, in conjunction with a qualified historic preservation professional. In this way, development of the *LAUSD Design Guidelines and Treatment Approaches for Historic Schools* represents a preliminary—but critically important—first step, in order to equip LAUSD staff with the resources and guidelines they will need as they design projects while also ensuring LAUSD's continuing stewardship of its many historically significant assets.

## VII. National Park Service Technical Assistance: Select References

National Park Service, US Department of the Interior, Technical Preservation Services, Interpreting the Secretary of the Interior's Standards for Rehabilitation (ITS) Series  
Available at: <http://www.nps.gov/tps/standards/applying-rehabilitation/standards-bulletins.htm>.

Titles include:

New Additions (ITS No. 3)  
Exterior Doors (ITS No. 4)  
Exposed Interior Brick (ITS No. 5)  
Interior Finishes (ITS No. 7)  
Interior Alterations (ITS No. 8)  
Porches (ITS No. 9)  
Stair Tower Additions (ITS No. 10)  
School Buildings: Interior Alterations to School Buildings to Accommodate New Uses (ITS No. 11)  
School Buildings: Rehabilitation and Adaptive Reuse of Schools (ITS No. 12)  
Adding New Openings (ITS No. 14)  
Loading Door Openings (ITS No. 16)  
New Additions (ITS No. 18)  
Interior Finishes (ITS No. 19)  
Adding New Openings on Secondary Elevations (ITS No. 21)  
Adding New Entrances to Historic Buildings (ITS No. 22)  
Windows: Selecting New Windows to Replace Non-Historic Windows (ITS No. 23)  
Corridors: Installing New Systems in Historic Corridors (ITS No. 24)  
Interior Finishes: Altering the Character of Historically Finished Interiors (ITS No. 25)  
Entrances and Doors: Entrance Treatments (ITS No. 26)  
Awnings: Adding Awnings to Historic Storefronts and Entrances (ITS No. 27)  
Interior Features: Retaining Distinctive Corridor Features (ITS No. 31)  
Roofing Materials: Slate Roof Treatments (ITS No. 32)  
Secondary Elevations: Alterations to Rear Elevations (ITS No. 33)  
Rooftop Additions (ITS No. 36)  
Alterations without Historical Basis (ITS No. 38)  
Site and Setting: Changes to Historic Sites (ITS No. 39)  
Corridors: Corridors in Historic School Buildings (ITS No. 40)  
Incompatible Alterations to the Setting and Environment of a Historic Property (ITS No. 41)  
Subdividing Significant Historic Interior Spaces (ITS No. 44)  
Modifying Historic Interior Railings to Meet Building Code (ITS No. 46)  
Rooftop Additions on Mid-Size Historic Buildings (ITS No. 47)  
Installing New Systems in Historic Buildings (ITS No. 51)  
Incorporating Solar Panels in a Rehabilitation Project (ITS No. 52)  
Designing New Additions to Provide Accessibility (ITS No. 53)  
Alterations without Historic Basis (ITS No. 56)



# LOS ANGELES UNIFIED SCHOOL DISTRICT

## Design Guidelines and Treatment Approaches for Historic Schools

### National Park Service, US Department of the Interior, Technical Preservation Services, Preservation Briefs

The NPS Preservation Briefs provide guidance on preserving, rehabilitating, and restoring historic buildings. These publications offer extensive guidance for recognizing and addressing common preservation issues and problems prior to beginning work. Available at: <http://www.nps.gov/tps/how-to-preserve/briefs.htm>

Titles include:

Preservation Brief 1, "Assessing Cleaning and Water-Repellent Treatments for Historic Masonry Buildings."

Preservation Brief 2, "Repainting Mortar Joints in Historic Masonry Buildings."

Preservation Brief 3, "Conserving Energy in Historic Buildings."

Preservation Brief 4, "Roofing for Historic Buildings."

Preservation Brief 6, "Dangers of Abrasive Cleaning to Historic Buildings."

Preservation Brief 7, "The Preservation of Historic Glazed Architectural Terra-Cotta."

Preservation Brief 9, "The Repair of Historic Wooden Windows."

Preservation Brief 10, "Exterior Paint Problems on Historic Woodwork."

Preservation Brief 12, "The Preservation of Historic Pigmented Structural Glass (Vitrolite and Carrara Glass)."

Preservation Brief 13, "The Repair and Thermal Upgrading of Historic Steel Windows."

Preservation Brief 15, "Preservation of Historic Concrete: Problems and General Approaches."

Preservation Brief 16, "The Use of Substitute Materials on Historic Building Exteriors."

Preservation Brief 17, "Architectural Character - Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character."

Preservation Brief 18, "Rehabilitating Interiors in Historic Buildings - Identifying Character-Defining Elements."

Preservation Brief 19, "The Repair and Replacement of Historic Wooden Shingle Roofs."

Preservation Brief 21, "Repairing Historic Flat Plaster- Walls and Ceilings."

Preservation Brief 22, "The Preservation and Repair of Historic Stucco."

Preservation Brief 23, "Preserving Historic Ornamental Plaster."

Preservation Brief 24, "Heating, Ventilating, and Cooling Historic Buildings: Problems and Recommended Approaches."

Preservation Brief 28, "Painting Historic Interiors."

Preservation Brief 29, "The Repair, Replacement, and Maintenance of Historic Slate Roofs."

Preservation Brief 30, "The Preservation and Repair of Historic Clay Tile Roofs."

Preservation Brief 31, "Mothballing Historic Buildings."

Preservation Brief 32, "Making Historic Properties Accessible."

Preservation Brief 33, "The Preservation and Repair of Historic Stained and Leaded Glass."

Preservation Brief 34, "Applied Decoration for Historic Interiors: Preserving Historic Composition Ornament."

Preservation Brief 35, "Understanding Old Buildings: The Process of Architectural Investigation."

Preservation Brief 36, "Protecting Cultural Landscapes."

Preservation Brief 37, "Appropriate Methods of Reducing Lead-Paint Hazards in Historic Housing."

Preservation Brief 38, "Removing Graffiti from Historic Masonry."

Preservation Brief 39, "Holding the Line: Controlling Unwanted Moisture in Historic Buildings."

Preservation Brief 40, "Preserving Historic Ceramic Tile Floors."

Preservation Brief 41, "The Seismic Retrofit of Historic Buildings: Keeping Preservation in the Forefront."

Preservation Brief 42, "The Maintenance, Repair and Replacement of Historic Cast Stone."

# **LOS ANGELES UNIFIED SCHOOL DISTRICT**

Design Guidelines and Treatment Approaches for Historic Schools

## **Appendix A**

### **California Historical Building Code**



# **CALIFORNIA** 2013 **HISTORICAL BUILDING** **CODE**

**California Code of Regulations**  
**Title 24, Part 8**

California Building Standards Commission



Effective Date: January 1, 2014  
(For Errata and Supplements, see History Note Appendix)

2013 California Historical Building Code  
California Code of Regulations, Title 24, Part 8

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## PREFACE

This document is the 8th of 12 parts of the official triennial compilation and publication of the adoptions, amendments and repeal of administrative regulations to *California Code of Regulations, Title 24*, also referred to as the *California Building Standards Code*. This part is known as the *California Historical Building Code*.

The *California Building Standards Code* is published in its entirety every three years by order of the California legislature, with supplements published in intervening years. The California legislature delegated authority to various state agencies, boards, commissions and departments to create building regulations to implement the State's statutes. These building regulations, or standards, have the same force of law, and take effect 180 days after their publication unless otherwise stipulated. The *California Building Standards Code* applies to occupancies in the State of California as annotated.

A city, county, or city and county may establish more restrictive building standards reasonably necessary because of local climatic, geological or topographical conditions. Findings of the local condition(s) and the adopted local building standard(s) must be filed with the California Building Standards Commission to become effective and may not be effective sooner than the effective date of this edition of the *California Building Standards Code*. Local building standards that were adopted and applicable to previous editions of the *California Building Standards Code* do not apply to this edition without appropriate adoption and the required filing.

Should you find publication (e.g., typographical) errors or inconsistencies in this code or wish to offer comments toward improving its format, please address your comments to:

California Building Standards Commission  
2525 Natomas Park Drive, Suite 130  
Sacramento, CA 95833-2936  
Phone: (916) 263-0916  
Fax: (916) 263-0959  
Web Page: [www.bsc.ca.gov](http://www.bsc.ca.gov)

## ACKNOWLEDGEMENTS

The 2013 California Building Standards Code (Code) was developed through the outstanding collaborative efforts of the Department of Housing and Community Development, the Division of State Architect, the Office of the State Fire Marshal, the Office of Statewide Health Planning and Development, the California Energy Commission, the California Department of Public Health, the California State Lands Commission, the Board of State and Community Corrections, and the California Building Standards Commission (Commission).

This collaborative effort included the assistance of the Commission's Code Advisory Committees and many other volunteers who worked tirelessly to assist the Commission in the production of this Code.

*Governor Edmund G. Brown Jr.*

*Members of the California Building Standards Commission*

*Secretary Anna Caballero – Chair*

*James Barthman – Vice-Chair*

*Stephen Jensen*

*Rose Conroy*

*Randy Twist*

*Sheila Lee*

*Richard Sawhill*

*Richard Sierra*

*Kent Sasaki*

*Steven Winkel*

*Erick Mikiten*

*Jim McGowan – Executive Director*

*Michael L. Nearman – Deputy Executive Director*

For questions on California state agency amendments, please refer to the contact list on the following page.

## PART 8 CONTAINS ALTERNATIVE REGULATIONS FOR QUALIFIED HISTORICAL BUILDINGS

The *California Historical Building Code* (CHBC) is unique among state regulations. The authoring of the original CHBC required state agencies promulgating regulations for building construction to work in harmony with representatives of other design and construction disciplines. The result was a totally new approach to building codes for historical structures, which maintains currently acceptable life-safety standards.

These regulations are also unique in that they are performance oriented rather than prescriptive. The provisions of the CHBC are to be applied by the enforcing authority of every city, county, city and county, or state agency in permitting repairs, alterations and additions necessary for the preservation, rehabilitation, relocation, related construction, change of use or continued use of a qualified historical building.

The authority for use of the CHBC is vested in Sections 18950 through 18961 of the Health and Safety Code. Section 18954 states, "The building department of every city or county shall apply the provisions of alternative building standards and building regulations adopted by the CHBC Board pursuant to Section 18959.5 in permitting repairs, alterations and additions necessary for the preservation, restoration, rehabilitation, moving or continued use of an historical building or structure. A state agency shall apply the alternative building regulations adopted by the CHBC Board pursuant to Section 18959.5 in

permitting repairs, alterations and additions necessary for the preservation, restoration, rehabilitation, moving or continued use of an historical building or structure."

However, be aware that in order to use the CHBC, the structure under consideration must be qualified by being designated as an historical building or structure. Section 18955 states, "For the purposes of this part, a qualified historical building or structure is any structure or collection of structures, and their associated sites deemed of importance to the history, architecture or culture of an area by an appropriate local or state governmental jurisdiction. This shall include structures on existing or future national, state or local historical registers or official inventories, such as the National Register of Historic Places, State Historical Landmarks, State Points of Historical Interest, and city or county registers or inventories of historical or architecturally significant sites, places, historic districts or landmarks."

The regulations of the CHBC have the same authority as state law and are to be considered as such. Liability is the same as for prevailing law.

The intent of the CHBC is to save California's architectural heritage by recognizing the unique construction problems inherent in historical buildings and by providing a code to deal with these problems.

## HISTORICAL PREFACE

The background of the *California Historical Building Code* can be traced to December 1973, when the State Department of Parks and Recreation published the California History Plan, Volume I, in which Recommendation No. 11 was proposed by the then California Landmarks Advisory Committee (later to become The State Historical Resources Commission). This proposal expressed a need for a new building code to meet the intent of protecting the public health and safety and also retain “enough flexibility to allow restoration of a Historic feature while still retaining its Historic integrity.” No. 11 of this History Plan supported this need by stating that “. . . restoration . . . is frequently made difficult by unnecessarily rigid interpretation of building . . . codes.”

In March of 1974, the Landmarks Committee by resolution recommended that the Director of the State Department of Parks and Recreation and the State Architect initiate a study to develop this needed code. These two officials accepted this concept and jointly called a statewide meeting in Sacramento on May 14th of that year. Attending were representatives from both the public and private sectors, such as members of the building industry, design professions, local and state building officials, and others interested in this problem.

Out of this open conference, a steering committee was formed to explore in depth the ways and means of implementing the new historical building code concept. This ad hoc committee was chaired by a representative from the California Council, American Institute of Architects and composed of a comprehensive cross section of the professional organizations and government agencies concerned with design and code enforcement.

Meetings began late in 1974 and continued into early 1975. By April of that year, a legislative subcommittee of the ad hoc group drafted a sample bill for the proposed code and requested that it be carried by Senator James R. Mills, President Pro Tem-

pore of the Senate. After further development and refinement, the enacting legislation to create the authority for the code and an advisory board to prepare regulations to implement it (SB 927, Mills) was supported by both the legislature and the public. It was signed by the governor in September 1975, and became effective January 1, 1976.

The members of the advisory board, which were required by law to include local and state building officials, individuals from the building industry and design professions, as well as representatives from city and county governments, were appointed and held their first session in Sacramento, February 24, 1976. This Board's duties included the preparation of code regulations and the review of specific historic building cases, when officially requested by governing bodies.

Several of the Board's members were a part of the original ad hoc steering committee and thus provided a continuity and smooth transition from the inception of the code's philosophy to its pragmatic implementation in these performance-oriented regulations.

The first comprehensive regulations were codified in August and October 1979, after years of careful deliberation. Those regulations allowed all jurisdictions to utilize them at their discretion in replacing or modifying details of prevailing prescriptive codes.

Changes made in law in 1984 and 1991, and to the code, make the application of the *California Historical Building Code* statutes and regulations applicable for all agencies and at the discretion of the owner for local jurisdictions when dealing with qualified historical buildings.

These current performance regulations were adopted by the Board on June 23, 1998, and approved by the California Building Standards Commission on December 12, 2013.





# CALIFORNIA CODE OF REGULATIONS, TITLE 24

## California Agency Information Contact List

### Board of State and Community Corrections

www.csa.ca.gov .....(916) 445-5073  
Local Adult Jail Standards  
Local Juvenile Facility Standards

### California Building Standards Commission

www.bsc.ca.gov .....(916) 263-0916

### California Energy Commission

www.enregy.ca.gov .....**Energy Hotline** (800) 772-3300  
Building Efficiency Standards  
Appliance Efficiency Standards  
Compliance Manual/Forms

### California State Lands Commission

www.slc.ca.gov .....(562) 499-6312  
Marine Oil Terminals

### California State Library

www.library.ca.gov .....(916) 654-0266

### Department of Consumer Affairs:

#### Acupuncture Board

www.acupuncture.ca.gov .....(916) 515-5200  
Office Standards

#### Board of Pharmacy

www.pharmacy.ca.gov .....(916) 574-7900  
Pharmacy Standards

#### Bureau of Barbering and Cosmetology

www.barbercosmo.ca.gov .....(916) 952-5210  
Barber and Beauty Shop,  
and College Standards

#### Bureau of Electronic and Appliance Repair, Home Furnishings and Thermal Insulation

www.bearhfti.ca.gov .....(916) 999-2041  
Insulation Testing Standards

#### Structural Pest Control Board

www.pestboard.ca.gov .....(800) 737-8188  
Structural Standards

#### Veterinary Medical Board

www.vmb.ca.gov .....(916) 263-2610  
Veterinary Hospital Standards

### Department of Food and Agriculture

www.cdffa.ca.gov  
Meat & Poultry Packing Plant Standards (916) 654-0509  
Dairy Standards (916) 654-0773

### Department of Housing and Community Development

www.hcd.ca.gov .....(916) 445-9471  
Residential- Hotels, Motels, Apartments,  
Single-Family Dwellings; and  
Permanent Structures in Mobilehome &  
Special Occupancy Parks  
(916) 445-3338  
Factory-Built Housing, Manufactured Housing &  
Commercial Modular  
Mobilehome- Permits & Inspections  
Northern Region-(916) 255-2501  
Southern Region-(951) 782-4420  
(916) 445-9471  
Employee Housing Standards

### Department of Public Health

www.dph.ca.gov .....(916) 449-5661  
Organized Camps Standards  
Public Swimming Pools Standards

### Department of Water Resources

www.dwr.ca.gov .....(916) 651-9676  
Gray Water Information

### Division of the State Architect

www.dgs.ca.gov/dsa .....(916) 445-8100

#### Access Compliance

#### Structural Safety

Public Schools Standards  
Essential Services Building Standards  
Community College Standards

#### State Historical Building Safety Board

Alternative Building Standards

### Office of Statewide Health Planning and Development

www.oshpd.ca.gov .....(916) 654-3139  
Hospital Standards  
Skilled Nursing Facility Standards &  
Clinic Standards  
Permits (916) 654-3362

### Office of the State Fire Marshal

osfm.fire.ca.gov .....(916) 445-8200  
Code Development and Analysis  
Fire Safety Standards  
Fireplace Standards  
Day Care Centers Standards  
Exit Standards

## HOW TO DETERMINE WHERE CHANGES HAVE BEEN MADE

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|| This symbol indicates that a change has been made.

> This symbol indicates deletion of language.

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## CHAPTER 8-1

# ADMINISTRATION

Note: The *California Historical Building Code*, Part 8 of Title 24, governs for all qualified historical buildings or properties in the State of California.

### SECTION 8-101 TITLE, PURPOSE AND INTENT

**8-101.1 Title.** These regulations shall be known as the *California Historical Building Code* and will be referred to herein as “the CHBC.”

**8-101.2 Purpose.** The purpose of the CHBC is to provide regulations for the preservation, restoration, rehabilitation, relocation or reconstruction of buildings or properties designated as qualified historical buildings or properties (Chapter 8-2). The CHBC is intended to provide solutions for the preservation of qualified historical buildings or properties, to promote sustainability, to provide access for persons with disabilities, to provide a cost-effective approach to preservation, and to provide for the reasonable safety of the occupants or users. The CHBC requires enforcing agencies to accept solutions that are reasonably equivalent to the regular code (as defined in Chapter 8-2) when dealing with qualified historical buildings or properties.

**8-101.3 Intent.** The intent of the CHBC is to facilitate the preservation and continuing use of qualified historical buildings or properties while providing reasonable safety for the building occupants and access for persons with disabilities.

### SECTION 8-102 APPLICATION

**8-102.1 Application.** The CHBC is applicable to all issues regarding code compliance for qualified historical buildings or properties. The CHBC may be used in conjunction with the regular code to provide solutions to facilitate the preservation of qualified historical buildings or properties. The CHBC shall be used by any agency with jurisdiction and whenever compliance with the code is required for qualified historical buildings or properties.

1. The state or local enforcing agency shall apply the provisions of the CHBC in permitting repairs, alterations and additions necessary for the preservation, restoration, reconstruction, rehabilitation, relocation or continued use of a qualified historical building or property when so elected by the private property owner.
2. **State agencies.** All state agencies shall apply the provisions of the CHBC in permitting repairs, alterations and additions necessary for the preservation, restoration, rehabilitation, safety, relocation, reconstruction or continued use of qualified historical buildings or properties.

**8-102.1.1 Additions, alterations and repairs.** It is the intent of the CHBC to allow nonhistorical expansion or addition to a qualified historical building or property, pro-

vided nonhistorical additions shall conform to the requirements of the regular code. See Chapter 8-2.

**8-102.1.2 Relocation.** Relocated qualified historical buildings or properties shall be sited to comply with the regular code or with the solutions listed in the CHBC. Nonhistorical new construction related to relocation shall comply with the regular code. Reconstruction and restoration related to relocation is permitted to comply with the provisions in the CHBC.

**8-102.1.3 Change of occupancy.** For change of use or occupancy, see Chapter 8-3, Use and Occupancy.

**8-102.1.4 Continued use.** Qualified historical buildings or properties may have their existing use or occupancy continued if such use or occupancy conformed to the code or to the standards of construction in effect at the time of construction, and such use or occupancy does not constitute a distinct hazard to life safety as defined in the CHBC.

**8-102.1.5 Unsafe buildings or properties.** When a qualified historical building or property is determined to be unsafe as defined in the regular code, the requirements of the CHBC are applicable to the work necessary to correct the unsafe conditions. Work to remediate the buildings or properties need only address the correction of the unsafe conditions, and it shall not be required to bring the entire qualified historical building or property into compliance with regular code.

**8-102.1.6 Additional work.** Qualified historical buildings or properties shall not be subject to additional work required by the regular code, regulation or ordinance beyond that required to complete the work undertaken. Certain exceptions for accessibility and for distinct hazards exist by mandate and may require specific action, within the parameters of the CHBC.

### SECTION 8-103 ORGANIZATION AND ENFORCEMENT

**8-103.1 Authority.** The state or local enforcing agency, pursuant to authority provided under Section 18954 of the Health and Safety Code, shall administer and enforce the provisions of the CHBC in permitting repairs, alterations and additions necessary for the preservation, restoration, reconstruction, rehabilitation, relocation or continued use of a qualified historical building or property.

**8-103.2 State enforcement.** All state agencies pursuant to authority provided under Section 18954 and Section 18961 of the Health and Safety Code shall administer and enforce the CHBC with respect to qualified historical buildings or properties under their respective jurisdiction.

**8-103.3 Liability.** Prevailing law regarding immunity of building officials is unaffected by the use and enforcement of the CHBC.

## **SECTION 8-104 REVIEW AND APPEALS**

**8-104.1 State Historical Building Safety Board (SHBSB).** In order to provide for interpretation of the provisions of the CHBC and to hear appeals, the SHBSB shall act as an appeal and review body to state and local agencies or any affected party.

**8-104.2 SHBSB review.** When a proposed design, material or method of construction is being considered by the enforcing agency, the agency chief, the building official or the local board of appeals may file a written request for opinion to the SHBSB for its consideration, advice or findings. In considering such request, the SHBSB may seek the advice of other appropriate private or public boards, individuals, or state or local agencies. The SHBSB shall, after considering all of the facts presented, including any recommendation of other appropriate boards, agencies or other parties, determine if, for the purpose intended, the proposal is reasonably equivalent to that allowed by these regulations in proposed design, material or method of construction, and it shall transmit such findings and its decision to the enforcing agency for its application. The Board may recover the costs of such reviews and shall report the decision in printed form, copied to the California Building Standards Commission.

**8-104.2.1 State agencies.** All state agencies with ownership of, or that act on behalf of state agency owners of, qualified historical buildings or properties, shall consult and obtain SHBSB review prior to taking action or making decisions or appeals that affect qualified historical buildings or properties, per Section 18961 of the Health and Safety Code.

**8-104.2.2 Imminent threat.** Where an emergency is declared and a qualified historical building or property is declared an imminent threat to life and safety, the state agency assessing such a threat shall consult with the SHBSB before any demolition is undertaken, per Section 18961 of the Health and Safety Code.

**8-104.3 SHBC appeals.** If any local agency administering and enforcing the CHBC or any person adversely affected by any regulation, rule, omission, interpretation, decision or practice of the agency enforcing the CHBC wishes to appeal the issue for resolution to the SHBSB, either of these parties may appeal directly to the Board. The Board may accept the appeal only if it determines that issues involved are of statewide significance. The Board may recover the costs of such reviews and shall make available copies of decisions in printed form at cost, copied to the California Building Standards Commission.

**8-104.4 Local agency fees.** Local agencies, when actively involved in the appeal, may also charge affected persons reasonable fees not to exceed the cost of obtaining reviews and appeals from the Board.

## **SECTION 8-105 CONSTRUCTION METHODS AND MATERIALS**

**8-105.1 Repairs.** Repairs to any portion of a qualified historical building or property may be made in-kind with historical materials and the use of original or existing historical methods of construction, subject to conditions of the CHBC. (See Chapter 8-8.)

**8-105.2 Solutions to the *California Historical Building Code*.** Solutions provided in the CHBC, or any other acceptable regulation or methodology of design or construction and used in whole or in part, with the regular code, or with any combination of the regular code and the CHBC, shall be allowed. The CHBC does not preclude the use of any proposed alternative or method of design or construction not specifically prescribed or otherwise allowed by these regulations. Any alternative may be submitted for evaluation to the appropriate enforcing agency for review and acceptance. The enforcing agency may request that sufficient evidence or proof be submitted to substantiate any claims that may be made regarding such solutions. Any alternative offered in lieu of that prescribed or allowed in the CHBC shall be reasonably equivalent in quality, strength, effectiveness, durability and safety to that of the CHBC.

## **SECTION 8-106 SHBSB RULINGS**

**8-106.1 General.** Rulings of the SHBSB (i.e., formal appeals, case decisions, code interpretations and administrative resolutions, etc.) that are issues of statewide application are required to be submitted to the California Building Standards Commission in printed form. These rulings may be used to provide guidance for similar cases or issues.



## CHAPTER 8-2

# DEFINITIONS

### SECTION 8-201 DEFINITIONS

For the purpose of the CHBC, certain terms and phrases, words and their derivatives shall be construed as specified in this chapter. Additional definitions and/or terms may appear in the various other chapters relative to terms or phrases primarily applicable thereto. Any reference to “authority having jurisdiction” does not necessarily preclude the appellate process of Section 8-104.3.

**ADDITION.** A nonhistorical extension or increase in floor area or height of a building or property.

**ALTERATION.** A modification to a qualified historical building or property that affects the usability of the building or property, or part thereof. Alterations include, but are not limited to, remodeling, renovation, rehabilitation, reconstruction, historical restoration, changes or rearrangement of the structural parts or elements, and changes or rearrangements in the plan configuration of walls and full-height partitions.

**BUILDING STANDARD.** Any guideline, regulation or code that may be applied to a qualified historical building or property.

**CHARACTER-DEFINING FEATURE.** Those visual aspects and physical elements that comprise the appearance of a historical building or property, and that are significant to its historical, architectural and cultural values, including the overall shape of the historical building or property, its materials, craftsmanship, decorative details, interior spaces and features, as well as the various aspects of its site and environment.

**CULTURAL RESOURCE.** Building, site, property, object or district evaluated as having significance in prehistory or history.

**DISTINCT HAZARD.** Any clear and evident condition that exists as an immediate danger to the safety of the occupants or public right of way. Conditions that do not meet the requirements of current regular codes and ordinances do *not*, of themselves, constitute a distinct hazard. Section 8-104.3, SHBC appeals, remains applicable.

**ENFORCING AGENCY,** Authority Having Jurisdiction, Local Agency with Jurisdiction. An entity with the responsibility for regulating, enforcing, reviewing or otherwise that exerts control of or administration over the process of gaining permits, approvals, decisions, variances, appeals for qualified historical buildings or properties.

**EXIT LADDER DEVICE.** An exit ladder device is a permanently installed, fixed, folding, retractable or hinged ladder intended for use as a means of emergency egress from areas of the second or third stories. Unless approved specifically for a longer length, the ladder shall be limited to 25 feet (7620 mm) in length. Exit ladders are permitted where the area served by the ladder has an occupant load less than 10 persons.

**FIRE HAZARD.** Any condition which increases or may contribute to an increase in the hazard or menace of fire to a greater degree than customarily recognized by the authority having jurisdiction, or any condition or act which could obstruct, delay, hinder or interfere with the operations of firefighting personnel or the egress of occupants in the event of fire. Section 8-104.3, SHBC appeals, remains applicable.

**HISTORICAL FABRIC OR MATERIALS.** Original and later-added historically significant construction materials, architectural finishes or elements in a particular pattern or configuration which form a qualified historical property, as determined by the authority having jurisdiction.

**HISTORICAL SIGNIFICANCE.** Importance for which a property has been evaluated and found to be historical, as determined by the authority having jurisdiction.

**IMMINENT THREAT.** Any condition within or affecting a qualified historical building or property which, in the opinion of the authority having jurisdiction, would qualify a building or property as dangerous to the extent that the life, health, property or safety of the public, its occupants or those performing necessary repair, stabilization or shoring work are in immediate peril due to conditions affecting the building or property. Potential hazards to persons using, or improvements within, the right-of-way may not be construed to be “imminent threats” solely for that reason if the hazard can be mitigated by shoring, stabilization, barricades or temporary fences.

**INTEGRITY.** Authenticity of a building or property’s historical identity, evidenced by the survival of physical characteristics that existed during the property’s historical or prehistorical period of significance.

**LIFE-SAFETY EVALUATION.** An evaluation of the life-safety hazards of a qualified historical building or property based on procedures similar to those contained in NFPA 909, *Standard for the Protection of Cultural Resources, Appendix B, Fire Risk Assessment in Heritage Premises*.

**LIFE SAFETY HAZARD.** See Distinct Hazard.

**PERIOD OF SIGNIFICANCE.** The period of time when a qualified historical building or property was associated with important events, activities or persons, or attained the characteristics for its listing or registration.

**PRESERVATION.** The act or process of applying measures necessary to sustain the existing form, integrity and materials of a qualified historical building or property. Work, including preliminary measures to protect and stabilize the property, generally focuses upon the ongoing maintenance and repair of historic materials and features rather than extensive replacement and new construction. New exterior additions are not within the scope of this treatment; however, the limited and sensitive upgrading of mechanical, electrical and plumbing systems and other code-related work to make properties functional is appropriate within a preservation project.

## DEFINITIONS

**QUALIFIED HISTORICAL BUILDING OR PROPERTY.** As defined in Health and Safety Code Section 18955 as “Qualified Historical Building or Property.” Any building, site, object, place, location, district or collection of structures, and their associated sites, deemed of importance to the history, architecture or culture of an area by an appropriate local, state or federal governmental jurisdiction. This shall include historical buildings or properties on, or determined eligible for, national, state or local historical registers or inventories, such as the National Register of Historic Places, California Register of Historical Resources, State Historical Landmarks, State Points of Historical Interest, and city or county registers, inventories or surveys of historical or architecturally significant sites, places or landmarks.

**RECONSTRUCTION.** The act or process of depicting, by means of new construction, the form, features and detailing of a nonsurviving site, landscape, building, property or object for the purpose of replicating its appearance at a specific period of time.

**REGULAR CODE.** The adopted regulations that govern the design and construction or alteration of nonhistorical buildings and properties within the jurisdiction of the enforcing agency.

**REHABILITATION.** The act or process of making possible a compatible use for qualified historical building or property through repair, alterations and additions while preserving those portions or features which convey its qualified historical, cultural or architectural values.

**RELOCATION.** The act or process of moving any qualified historical building or property or a portion of a qualified historical building or property to a new site, or a different location on the same site.

**REPAIR.** Renewal, reconstruction or renovation of any portion of an existing property, site or building for the purpose of its continued use.

**RESTORATION.** The act or process of accurately depicting the form, features and character of a qualified building or property as it appeared at a particular period of time by the means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period. The limited and sensitive upgrading of mechanical, electrical and plumbing systems and other code-required work to make properties functional is appropriate within a restoration project.

**STRUCTURE.** That which is built or constructed, an edifice or a building of any kind, or any piece of work artificially built up or composed of parts joined together in some definite manner.

**TREATMENT.** An act of work to carry out preservation, restoration, stabilization, rehabilitation or reconstruction.

## CHAPTER 8-3

# USE AND OCCUPANCY

### SECTION 8-301 PURPOSE AND SCOPE

**8-301.1 Purpose.** The purpose of the CHBC is to provide regulations for the determination of occupancy classifications and conditions of use for qualified historical buildings or properties.

**8-301.2 Scope.** Every qualified historical building or property for which a permit or approval has been requested shall be classified prior to permit issuance according to its use or the character of its occupancy in accordance with the regular code and applicable provisions of this chapter.

### SECTION 8-302 GENERAL

**8-302.1 Existing use.** The use or character of occupancy of a qualified historical building or property, or portion thereof, shall be permitted to continue in use regardless of any period of time in which it may have remained unoccupied or in other uses, provided such building or property otherwise conforms to all applicable requirements of the CHBC.

**8-302.2 Change in occupancy.** The use or character of the occupancy of a qualified historical building or property may be changed from or returned to its historical use or character, provided the qualified historical building or property conforms to the requirements applicable to the new use or character of occupancy as set forth in the CHBC. Such change in occupancy shall not mandate conformance with new construction requirements as set forth in regular code.

**8-302.3 Occupancy separations.** Required occupancy separations of more than one hour may be reduced to one-hour fire-resistive construction with all openings protected by not less than three-fourths-hour fire-resistive assemblies of the self-closing or automatic-closing type when the building is provided with an automatic sprinkler system throughout the entire building in accordance with Section 8-410.4. Doors equipped with automatic-closing devices shall be of a type which will function upon activation of a device which responds to products of combustion other than heat.

Required occupancy separations of one hour may be omitted when the building is provided with an automatic sprinkler system throughout.

**8-302.4 Maximum floor area.** Regardless of the use or character of occupancy, the area of a one-story qualified historical building or property may have, but shall not exceed, a floor area of 15,000 square feet (1393.5 m<sup>2</sup>) unless such an increase is otherwise permitted in regular code. Multistory qualified historical buildings (including basements and cellars) shall be in accordance with regular code requirements.

**Exception:** Historical buildings may be unlimited in floor area without fire-resistive area separation walls:

1. When provided with an automatic sprinkler, or
2. Residential occupancies of two stories or less when provided with a complete fire alarm and annunciation system and where the exiting system conforms to regular code.

**8-302.5 Maximum height.** The maximum height and number of stories of a qualified historical building or property shall not be limited because of construction type, provided such height or number of stories does not exceed that of its historical design.

**8-302.5.1 High-rise buildings.** Occupancies B, F-1, F-2 or S in high-rise buildings with floors located more than 75 feet above the lowest floor level having building access may be permitted with only the stories over 75 feet provided with an automatic fire sprinkler system if:

1. The building construction type and the exits conform to regular code, and
2. A complete building fire alarm and annunciation system is installed, and
3. A fire barrier is provided between the sprinklered and nonsprinklered floors.

**8-302.6 Fire-resistive construction.** See Chapter 8-4.

**8-302.7 Light and ventilation.** Existing provisions for light and ventilation which do not, in the opinion of the enforcing agency, constitute a safety hazard may remain. See Section 8-303.6 for residential requirements. See Section 8-503 for Escape or Rescue Windows and Doors.

### SECTION 8-303 RESIDENTIAL OCCUPANCIES

**8-303.1 Purpose.** The purpose of this section is to provide regulations for those buildings designated as qualified historical buildings or properties and classified as occupancies. The CHBC requires enforcing agencies to accept any reasonably equivalent to the regular code when dealing with qualified historical buildings and properties.

**8-303.2 Intent.** The intent of the CHBC is to preserve the integrity of qualified historical buildings and properties while maintaining a reasonable degree of protection of life, health and safety for the occupants.

**8-303.3 Application and scope.** The provisions of this section shall apply to all qualified historical buildings used for human habitation. Those dwelling units intended only for display, or public use with no residential use involved, need not comply with the requirements of this section.

**8-303.4 Fire escapes.** See Chapter 8-5.

**8-303.5 Room dimensions.** Rooms used for sleeping purposes may contain a minimum of 50 square feet (4.6 m<sup>2</sup>) floor area, provided there is maintained an average ceiling height of 7 feet (2134 mm). Other habitable rooms need only be of adequate size to be functional for the purpose intended.

**8-303.6 Light and ventilation.** Windows in habitable rooms shall have an area of 6 percent of the floor area, or 6 square feet (0.56 m<sup>2</sup>), whichever is greater. Windows in sleeping rooms shall be openable (see Section 8-503). Residential occupancies need not be provided with electrical lighting.

**8-303.7 Alteration and repair.** The alteration and repair of qualified historical buildings or properties may permit the replacement, retention and extension of original materials and the continued use of original methods of construction, provided a life-safety hazard is not created or continued. Alterations and repairs shall be consistent with the CHBC.

The amount of alterations and repairs is not limited, provided there is no nonhistorical increase in floor area, volume or size of the building or property.

**8-303.8 Exiting.** See Chapter 8-5.

## CHAPTER 8-4

# FIRE PROTECTION

### SECTION 8-401 PURPOSE, INTENT AND SCOPE

**8-401.1 Purpose.** The purpose of this chapter is to provide for fire protection of qualified historical buildings or properties. The CHBC requires enforcing agencies to accept any reasonably equivalent to the regular code when dealing with qualified historical buildings or properties.

**8-401.2 Intent.** The intent of the CHBC is to preserve the integrity of qualified historical buildings or properties while maintaining a reasonable degree of fire protection based primarily on the life safety of the occupants and firefighting personnel.

**8-401.3 Scope.** This chapter shall apply when required by the provisions of Section 8-102.

### SECTION 8-402 FIRE-RESISTIVE CONSTRUCTION

**8-402.1 Exterior wall construction.** The fire-resistance requirement for existing exterior walls and existing opening protection may be satisfied when an automatic sprinkler system designed for exposure protection is installed per the CHBC. The automatic sprinklers may be installed on the exterior with at least one sprinkler located over each opening required to be protected. Additional sprinklers shall also be distributed along combustible walls under the roof lines that do not meet the fire-resistive requirement due to relationship to property lines as required by regular code. Such sprinkler systems may be connected to the domestic water supply on the supply-main side of the building shut-off valve. A shut-off valve may be installed for the sprinkler system, provided it is locked in an open position.

**8-402.2 One-hour construction.** Upgrading an existing qualified historical building or property to one-hour fire-resistive construction and one-hour fire-resistive corridors shall not be required regardless of construction or occupancy when one of the following is provided:

1. An automatic sprinkler system throughout. See Section 8-410.2 for automatic sprinkler systems.
2. An approved life-safety evaluation.
3. Other alternative measures as approved by the enforcing agency.

**8-402.3 Openings in fire-rated systems.** Historical glazing materials and solid wood unrated doors in interior walls required to have one-hour fire rating may be approved when operable windows and doors are provided with appropriate smoke seals and when the area affected is provided with an automatic sprinkler system. See Section 8-410 for automatic sprinkler systems.

### SECTION 8-403 INTERIOR FINISH MATERIALS

New nonhistorical interior wall and ceiling finish shall conform to the provisions of the regular code. Existing nonconforming materials used for wood lath and plaster walls, see Section 8-404.

**Exception:** When an automatic sprinkler system is provided throughout the building, existing finishes shall be approved.

### SECTION 8-404 WOOD LATH AND PLASTER

Wood lath and plaster walls may be considered in accordance with codes, standards and listings published prior to 1943 whereby a wood stud wall assembly with gypsum or lime plaster on hand split or sawn wooden lath obtains a one-half-hour fire-resistive rating. This rating may be increased for interior walls to as much as one hour by filling the wall with mineral fiber or glass fiber.

### SECTION 8-405 OCCUPANCY SEPARATION

See Chapter 8-3.

### SECTION 8-406 MAXIMUM FLOOR AREA

See Chapter 8-3.

### SECTION 8-407 VERTICAL SHAFTS

Vertical shafts need not be enclosed when such shafts are blocked at every floor level by the installation of not less than 2 full inches (51 mm) of solid wood or equivalent construction installed so as to prevent the initial passage of smoke and flame. Automatic sprinkler systems or other solutions may be considered on a case-by-case basis, in lieu of enclosure of vertical shafts and stairwells.

### SECTION 8-408 ROOF COVERING

Existing or original roofing materials may be repaired or reconstructed subject to the following requirements:

1. The original or historical roofing system shall be detailed or modified as necessary in order to be capable of providing shelter while preserving the historical materials and appearance of the roof.
2. Wooden roof materials may be utilized where fire resistance is required, provided they are treated with

fire-retardant treatments to achieve a Class “B” roof covering rating. Wood roofing in state designated Urban Wildland and High Fire Zones shall be permitted when installed in class “A” assemblies.

3. Jurisdictions that prohibit wood roofing materials for application as roof coverings and roof assemblies shall submit documentation for the adoption. Express Terms, statement of reasons and minutes of the action by the adopting authority Health and Safety Code, Section 18959(f).

#### **SECTION 8-409 FIRE ALARM SYSTEMS**

Every qualified historical building or property shall be provided with fire alarm systems as required for the use or occupancy by the regular code or other approved alternative.

#### **SECTION 8-410 AUTOMATIC SPRINKLER SYSTEMS**

**8-410.1** Every qualified historical building or property which cannot be made to conform to the construction requirements specified in the regular code for the occupancy or use, and which constitutes a distinct fire hazard (for definition of “distinct hazard,” see Chapter 8-2), shall be deemed to be in compliance if provided with an automatic sprinkler system or a life-safety system or other technologies as approved by the enforcing agency. (“Automatic” is defined in the regular code. Sprinkler System is defined in this section.)

**8-410.2** When required by the CHBC, an automatic sprinkler systems is defined by the following standards (for nonhazardous occupancies).

1. Buildings of four stories or less: NFPA 13R, 2002 edition.
2. For floors above the fourth, NFPA 13, 2002, SFM amended edition.
3. Buildings with floors above 75 feet, NFPA 13, 2002 edition.
4. When the building is free standing or with property line separation, two floors and 1500 sf per floor or less, NFPA 13D, 2002 Edition.
5. For exterior wall and opening protection. As required by this section.

**Exception:** When the automatic sprinkler systems are used to reach compliance using this code, in three or more occasions, the system shall be NFPA standard 13D shall be increased to NFPA 13R Standard, or NFPA 13R standard shall be increased to a NFPA 13 standard.

**8-410.3** Automatic sprinkler systems shall not be used to substitute for or act as an alternate to the required number of exits from any facility. (See Chapter 8-5 for exiting requirements.)

**8-410.4** An automatic sprinkler system shall be provided in all detention facilities.

#### **SECTION 8-411 OTHER TECHNOLOGIES**

Fire alarm systems, smoke and heat detection systems, occupant notification and annunciation systems, smoke control systems and fire modeling, times egress analysis and modeling, as well as other engineering methods and technologies may be accepted by the enforcing agency to address areas of non-conformance.

#### **SECTION 8-412 HIGH-RISE BUILDINGS**

Qualified historical buildings having floors for human occupancy located more than 75 feet above the lowest floor level having building access shall conform to the provisions of the regular code for existing high-rise buildings as amended by the CHBC.

## CHAPTER 8-5

# MEANS OF EGRESS

### SECTION 8-501

#### PURPOSE, INTENT AND SCOPE

**8-501.1 Purpose.** The purpose of this chapter is to establish minimum means of egress regulations for qualified historical buildings or properties. The CHBC requires enforcing agencies to accept reasonably equivalent alternatives to the means of egress requirements in the regular code.

**8-501.2 Intent.** The intent of these regulations is to provide an adequate means of egress.

**8-501.3 Scope.** Every qualified historical building or portion thereof shall be provided with exits as required by the CHBC when required by the provisions of Section 8-102.

### SECTION 8-502

#### GENERAL

**8-502.1 General.** The enforcing agency shall grant reasonable exceptions to the specific provisions of applicable egress regulations where such exceptions will not adversely affect life safety.

**8-502.2.** Existing door openings and corridor widths of less than dimensions required by regular code shall be permitted where there is sufficient width and height for the occupants to pass through the opening or traverse the exit.

**8-502.3 Stairs.** Existing stairs having risers and treads or width at variance with the regular code are allowed if determined by the enforcing agency to not constitute a distinct hazard. Handrails with nonconforming grip size or extensions are allowed if determined by the enforcing agency to not constitute a distinct hazard.

**8-502.4 Main entry doors.** The front or main entry doors need not be rehung to swing in the direction of exit travel, provided other means or conditions of exiting, as necessary to serve the total occupant load, are provided.

**8-502.5 Existing fire escapes.** Existing previously approved fire escapes and fire escape ladders shall be acceptable as one of the required means of egress, provided they extend to the ground and are easily negotiated, adequately signed and in good working order. Access shall be by an opening having a minimum width of 29 inches (737mm) when open with a sill no more than 30 inches (762mm) above the adjacent floor, landing or approved step.

**8-502.6 New fire escapes and fire escape ladders.** New fire escapes and fire escape ladders which comply with this section shall be acceptable as one of the required means of egress. New fire escapes and new fire escape ladders shall comply with the following:

1. Access from a corridor shall not be through an intervening room.
2. All openings within 10 feet (3048 mm) shall be protected by three-fourths-hour fire assemblies. When

located within a recess or vestibule, adjacent enclosure walls shall be of not less than one-hour fire-resistive construction.

3. Egress from the building shall be by a clear opening having a minimum dimension of not less than 29 inches (737 mm). Such openings shall be openable from the inside without the use of a key or special knowledge or effort. The sill of an opening giving access shall not be more than 30 inches (737 mm) above the floor, step or landing of the building or balcony.
4. Fire escape stairways and balconies shall support the dead load plus a live load of not less than 100 pounds per square foot (4.79 kN/m<sup>2</sup>) and shall be provided with a top and intermediate handrail on each side. The pitch of the stairway shall not exceed 72 degrees with a minimum width of 18 inches (457 mm). Treads shall not be less than 4 inches (102 mm) in width, and the rise between treads shall not exceed 10 inches (254 mm). All stair and balcony railings shall support a horizontal force of not less than 50 pounds per lineal foot (729.5 N/m<sup>2</sup>) of railing.
5. Balconies shall not be less than 44 inches (1118 mm) in width with no floor opening other than the stairway opening greater than  $\frac{5}{8}$  inch (15.9 mm) in width. Stairway openings in such balconies shall not be less than 22 inches by 44 inches (559 by 1118 mm). The balustrade of each balcony shall not be less than 36 inches (914 mm) high with not more than 9 inches (287 mm) between balusters.
6. Fire escapes shall extend to the roof or provide an approved gooseneck ladder between the top floor landing and the roof when serving buildings four or more stories in height having roofs with less than 4 units vertical in 12 units horizontal (33.3 percent slope). Fire escape ladders shall be designed and connected to the building to withstand a horizontal force of 100 pounds (445 N) placed anywhere on the rung. All ladders shall be at least 15 inches (381 mm) wide, located within 12 inches (305 mm) of the building. Ladder rungs shall be  $\frac{3}{4}$  inch (19.1 mm) in diameter and shall be located 12 inches (305 mm) on center. Openings for roof access ladders through cornices and similar projections shall have minimum dimensions of 30 inches by 33 inches (762 by 838 mm).

The length of fire escapes and exit ladder devices shall be limited to that approved by the building official based on products listed by a recognized testing laboratory.

7. The lowest balcony shall not be more than 18 feet (5486 mm) from the ground. Fire escapes shall extend to the ground or be provided with counterbalanced stairs reaching to the ground.



## **MEANS OF EGRESS**

8. Fire escapes shall not take the place of stairways required by the codes under which the building was constructed.
9. Fire escapes shall be kept clear and unobstructed at all times and maintained in good working order.

### **SECTION 8-503**

#### **ESCAPE OR RESCUE WINDOWS AND DOORS**

Basements in dwelling units and every sleeping room below the fourth floor shall have at least one openable window or door approved for emergency escape which shall open directly into a public street, public way, yard or exit court. Escape or rescue windows or doors shall have a minimum clear area of 3.3 square feet (0.31 m<sup>2</sup>) and a minimum width or height dimension of 18 inches (457 mm) and be operable from the inside to provide a full, clear opening without the use of special tools.

### **SECTION 8-504**

#### **RAILINGS AND GUARDRAILS**

The height of railings and guard railings and the spacing of balusters may continue in their historical height and spacing unless a distinct hazard has been identified or created by a change in use or occupancy.

## CHAPTER 8-6

# ACCESSIBILITY

### SECTION 8-601 PURPOSE, INTENT AND SCOPE

**8-601.1 Purpose.** The purpose of the CHBC is to provide alternative regulations to facilitate access and use by persons with disabilities to and throughout facilities designated as qualified historical buildings or properties. These regulations require enforcing agencies to accept alternatives to regular code when dealing with qualified historical buildings or properties.

**8-601.2 Intent.** The intent of this chapter is to preserve the integrity of qualified historical buildings and properties while providing access to and use by persons with disabilities.

**8-601.3 Scope.** The CHBC shall apply to every qualified historical building or property that is required to provide access to persons with disabilities.

1. Provisions of this chapter do not apply to new construction or reconstruction/replicas of historical buildings.
2. Where provisions of this chapter apply to alteration of qualified historical buildings or properties, alteration is defined in *California Building Code (CBC)*, Chapter 2, Definitions and Abbreviations. 202 – A. Alter or Alteration.

**8-601.4 General application.** The provisions in the CHBC apply to local, state and federal governments (Title II entities); alteration of commercial facilities and places of public accommodation (Title III entities); and barrier removal in commercial facilities and places of public accommodation (Title III entities). Except as noted in this chapter.

### SECTION 8-602 BASIC PROVISIONS

**8-602.1 Regular code.** The regular code for access for people with disabilities (Title 24, Part 2, Vol. 1, Chapter 11B) shall be applied to qualified historical buildings or properties unless strict compliance with the regular code will threaten or destroy the historical significance or character-defining features of the building or property.

**8-602.2 Alternative provisions.** If the historical significance or character-defining features are threatened, alternative provisions for access may be applied pursuant to this chapter, provided the following conditions are met:

1. These provisions shall be applied only on an item-by-item or a case-by-case basis.
2. Documentation is provided, including meeting minutes or letters, stating the reasons for the application of the alternative provisions. Such documentation shall be retained in the permanent file of the enforcing agency.

### SECTION 8-603 ALTERNATIVES

**8-603.1 Alternative minimum standards.** The alternative minimum standards for alterations of qualified historical buildings or facilities are contained in Section 4.1.7(3) of ADA Standards for Accessible Design, as incorporated and set forth in federal regulation 28 C.F.R. Pt. 36.

**8-603.2 Entry.** These alternatives do not allow exceptions for the requirement of level landings in front of doors, except as provided in Section 8-603.4.

1. Access to any entrance used by the general public and no further than 200 feet (60 960 mm) from the primary entrance.
2. Access at any entrance not used by the general public but open and unlocked with directional signs at the primary entrance and as close as possible to, but no further than 200 feet (60 960 mm) from, the primary entrance.
3. The accessible entrance shall have a notification system. Where security is a problem, remote monitoring may be used.

**8-603.3 Doors.** Alternatives listed in order of priority are:

1. Single-leaf door which provides a minimum 30 inches (762 mm) of clear opening.
2. Single-leaf door which provides a minimum 29½ inches (749 mm) clear opening
3. Double door, one leaf of which provides a minimum 29½ inches (749 mm) clear opening.
4. Double doors operable with a power-assist device to provide a minimum 29½ inches (749 mm) clear opening when both doors are in the open position.

**8-603.4 Power-assisted doors.** Power-assisted door or doors may be considered an equivalent alternative to level landings, strikeside clearance and door-opening forces required by the regular code.

**8-603.5 Toilet rooms.** In lieu of separate-gender toilet facilities as required in the regular code, an accessible unisex toilet facility may be designated.

**8-603.6 Exterior and interior ramps and lifts.** Alternatives listed in order of priority are:

1. A lift or a ramp of greater than standard slope but no greater than 1:10, for horizontal distances not to exceed 5 feet (1525 mm). Signs shall be posted at upper and lower levels to indicate steepness of the slope.
2. Access by ramps of 1:6 slope for horizontal distance not to exceed 13 inches (330 mm). Signs shall be posted at upper and lower levels to indicate steepness of the slope.

## **SECTION 8-604 EQUIVALENT FACILITATION**

Use of other designs and technologies, or deviation from particular technical and scoping requirements, are permitted if the application of the alternative provisions contained in Section 8-603 would threaten or destroy the historical significance or character-defining features of the historical building or property.

1. Such alternatives shall be applied only on an item-by-item or a case-by-case basis.
2. Access provided by experiences, services, functions, materials and resources through methods including, but not limited to, maps, plans, videos, virtual reality and related equipment, at accessible levels. The alternative design and/or technologies used will provide substantially equivalent or greater accessibility to, and usability of, the facility.
3. The official charged with the enforcement of the standards shall document the reasons for the application of the design and/or technologies and their effect on the historical significance or character-defining features. Such documentation shall be in accordance with Section 8-602.2, Item 2, and shall include the opinion and comments of state or local accessibility officials, and the opinion and comments of representative local groups of people with disabilities. Such documentation shall be retained in the permanent file of the enforcing agency. Copies of the required documentation should be available at the facility upon request.

**Note:** For commercial facilities and places of public accommodation (Title III entities).

Equivalent facilitation for an element of a building or property when applied as a waiver of an ADA accessibility requirement will not be entitled to the Federal Department of Justice certification of this code as rebuttable evidence of compliance for that element.

## CHAPTER 8-7

# STRUCTURAL REGULATIONS

### SECTION 8-701 PURPOSE, INTENT AND SCOPE

**8-701.1 Purpose.** The purpose of the CHBC is to provide alternative regulations to the regular code for the structural safety of buildings designated as qualified historical buildings or properties. The CHBC requires enforcing agencies to accept any reasonably equivalent alternatives to the regular code when dealing with qualified historical buildings or properties.

**8-701.2 Intent.** The intent of this chapter is to encourage the preservation of qualified historical buildings or structures while providing standards for a minimum level of building performance with the objective of preventing partial or total structural collapse such that the overall risk of life-threatening injury as a result of structural collapse is low.

**8-701.3 Application.** The alternative structural regulations provided by Section 8-705 are to be applied in conjunction with the regular code whenever a structural upgrade or reconstruction is undertaken for qualified historical buildings or properties.

### SECTION 8-702 GENERAL

**8-702.1** The CHBC shall not be construed to allow the enforcing agency to approve or permit a lower level of safety of structural design and construction than that which is reasonably equivalent to the regular code provisions in occupancies which are critical to the safety and welfare of the public at large, including, but not limited to, public and private schools, hospitals, municipal police and fire stations and essential services facilities.

**8-702.2** Nothing in these regulations shall prevent voluntary and partial seismic upgrades when it is demonstrated that such upgrades will improve life safety and when a full upgrade would not otherwise be required.

### SECTION 8-703 STRUCTURAL SURVEY

**8-703.1 Scope.** When a structure or portion of a structure is to be evaluated for structural capacity under the CHBC, it shall be surveyed for structural conditions by an architect or engineer knowledgeable in historical structures. The survey shall evaluate deterioration or signs of distress. The survey shall determine the details of the structural framing and the system for resistance of gravity and lateral loads. Details, reinforcement and anchorage of structural systems and veneers shall be determined and documented where these members are relied on for seismic lateral resistance.

**8-703.2** The results of the survey shall be utilized for evaluating the structural capacity and for designing modifications to the structural system to reach compliance with this code.

**8-703.3 Historical records.** Past historical records of the structure or similar structures may be used in the evaluation, including the effects of subsequent alterations.

### SECTION 8-704 NONHISTORICAL ADDITIONS AND NONHISTORICAL ALTERATIONS

**8-704.1** New nonhistorical additions and nonhistorical alterations which are structurally separated from an existing historical building or structure shall comply with regular code requirements.

**8-704.2** New nonhistorical additions which impose vertical or lateral loads on an existing structure shall not be permitted unless the affected part of the supporting structure is evaluated and strengthened, if necessary, to meet regular code requirements.

**Note:** For use of archaic materials, see Chapter 8-8.

### SECTION 8-705 STRUCTURAL REGULATIONS

**8-705.1 Gravity loads.** The capacity of the structure to resist gravity loads shall be evaluated and the structure strengthened as necessary. The evaluation shall include all parts of the load path. Where no distress is evident, and a complete load path is present, the structure may be assumed adequate by having withstood the test of time if anticipated dead and live loads will not exceed those historically present.

**8-705.2 Wind and seismic loads.** The ability of the structure to resist wind and seismic loads shall be evaluated. Wind loads shall be considered when appropriate, but need not exceed 75% of the wind loads prescribed by the regular code. The evaluation shall be based on the requirements of Section 8-706.

**8.705.2.1** Any unsafe conditions in the lateral-load-resisting system shall be corrected, or alternative resistance shall be provided. When strengthening is required, additional resistance shall be provided to meet the minimum requirements of the CHBC. The strengthening measures shall be selected with the intent of meeting the performance objectives set forth in Section 8-701.2. The evaluation of structural members and structural systems for seismic loads shall consider the inelastic performance of structural members and their ability to maintain load-carrying capacity during the seismic loadings prescribed by the regular code.

**8.705.2.2** The architect or engineer shall consider additional measures with minimal loss of, and impact to, historical materials which will reduce damage and needed repairs in future earthquakes to better preserve the historical structure in perpetuity. These additional measures shall be presented to the owner for consideration as part of the rehabilitation or restoration.

## SECTION 8-706 LATERAL LOAD REGULATIONS

**8-706.1 Seismic forces.** Strength-level seismic forces used to evaluate the structure for resistance to seismic loads shall be based on the *R*-values tabulated in the regular code for similar lateral-force-resisting systems including consideration of the structural detailing of the members where such *R*-values exist. Where such *R*-values do not exist, an appropriate *R*-value shall be rationally assigned considering the structural detailing of the members.

### Exceptions:

1. The forces need not exceed 0.75 times the seismic forces prescribed by the regular code requirements.
2. For Occupancy Category I, II or III structures, near-fault increases in ground motion (maximum considered earthquake ground motion of 0.2 second spectral response greater than 150 percent at 5 percent damping) need not be considered when the fundamental period of the building is 0.5 seconds in the direction under consideration.
3. For Occupancy Category I or II structures, the seismic base shear need not exceed 0.30W.
4. For Occupancy Category III or IV structures, the seismic base shear need not exceed 0.40W.

**8-706.1.1** When a building is to be strengthened with the addition of a new lateral force resisting system, the *R* value of the new system can be used when the new lateral force resisting system resists at least 75 percent of the building's base shear regardless of its relative rigidity.

**8-706.1.2** Unreinforced masonry bearing wall buildings shall comply with the *California Existing Building Code* (CEBC), Appendix Chapter A1, 2010 Edition, and as modified by the CHBC. Alternative standards may be used on a case-by-case basis when approved by the authority having jurisdiction. It shall be permitted to exceed the strength limitation of 100 psi in Section A108.2 of the CEBC when test data and building configuration supports higher values subject to the approval of the authority having jurisdiction.

**8-706.1.3** All deviations from the detailing provisions of the lateral-force-resisting systems shall be evaluated for stability and the ability to maintain load-carrying capacity at the expected inelastic deformations.

**8-706.2 Existing building performance.** The seismic resistance may be based upon the ultimate capacity of the structure to perform, giving due consideration to ductility and reserve strength of the lateral-force-resisting system and materials while maintaining a reasonable factor of safety. Broad judgment may be exercised regarding the strength and performance of materials not recognized by regular code requirements. (See Chapter 8-8, Archaic Materials and Methods of Construction.)

**8-706.2.1** All structural materials or members that do not comply with detailing and proportioning requirements of the regular code shall be evaluated for potential seismic performance and the consequence of non-compliance. All members that would be reasonably expected to fail and lead to collapse or life threatening injury when subjected to seismic demands shall be judged unacceptable, and appropriate structural strengthening shall be developed.

**8-706.3 Load path.** A complete and continuous load path, including connections, from every part or portion of the structure to the ground shall be provided for the required forces. It shall be verified that the structure is adequately tied together to perform as a unit when subjected to earthquake forces.

**8-706.4 Parapets.** Parapets and exterior decoration shall be investigated for conformance with regular code requirements for anchorage and ability to resist prescribed seismic forces.

An exception to regular code requirements shall be permitted for those parapets and decorations which are judged not to be a hazard to life safety.

**8-706.5 Nonstructural features.** Nonstructural features of historical structure, such as exterior veneer, cornices and decorations, which might fall and create a life-safety hazard in an earthquake, shall be evaluated. Their ability to resist seismic forces shall be verified, or the feature shall be strengthened with improved anchorage when appropriate.

**8-706.5.1** Partitions and ceilings of corridors and stairways serving an occupant load of 30 or more shall be investigated to determine their ability to remain in place when the building is subjected to earthquake forces.

## CHAPTER 8-8

# ARCHAIC MATERIALS AND METHODS OF CONSTRUCTION

### SECTION 8-801 PURPOSE, INTENT AND SCOPE

**8-801.1 Purpose.** The purpose of the CHBC is to provide regulations for the use of historical methods and materials of construction that are at variance with regular code requirements or are not otherwise codified, in buildings or structures designated as qualified historical buildings or properties. The CHBC require enforcing agencies to accept any reasonably equivalent alternatives to the regular code when dealing with qualified historical buildings or properties.

**8-801.2 Intent.** It is the intent of the CHBC to provide for the use of historical methods and materials of construction that are at variance with specific code requirements or are not otherwise codified.

**8-801.3 Scope.** Any construction type or material that is, or was, part of the historical fabric of a structure is covered by this chapter. Archaic materials and methods of construction present in a historical structure may remain or be reinstalled or be installed with new materials of the same class to match existing conditions.

### SECTION 8-802 GENERAL ENGINEERING APPROACHES

Strength values for archaic materials shall be assigned based upon similar conventional codified materials, or on tests as hereinafter indicated. The archaic materials and methods of construction shall be thoroughly investigated for their details of construction in accordance with Section 8-703. Testing shall be performed when applicable to evaluate existing conditions. The architect or structural engineer in responsible charge of the project shall assign allowable stresses or strength levels to archaic materials. Such assigned strength values shall not be greater than those provided for in the following sections without adequate testing, and shall be subject to the concurrence of the enforcing agency.

### SECTION 8-803 NONSTRUCTURAL ARCHAIC MATERIALS

Where nonstructural historical materials exist in uses which do not meet the requirements of the regular code, their continued use is allowed by this code, provided that any public health and life-safety hazards are mitigated subject to the concurrence of the enforcing agency.

### SECTION 8-804 ALLOWABLE CONDITIONS FOR SPECIFIC MATERIALS

Archaic materials which exist and are to remain in qualified historical buildings or structures shall be evaluated for their condition and for loads required by this code. The structural

survey required in Section 8-703 of the CHBC shall document existing conditions, reinforcement, anchorage, deterioration and other factors pertinent to establishing allowable stresses, strength levels and adequacy of the archaic materials. The remaining portion of this chapter provides additional specific requirements for commonly encountered archaic materials.

### SECTION 8-805 MASONRY

For adobe, see Section 8-806.

**8-805.1 Existing solid masonry.** Existing solid masonry walls of any type, except adobe, may be allowed, without testing, a maximum ultimate strength of nine pounds per square inch (62.1 kPa) in shear where there is a qualifying statement by the architect or engineer that an inspection has been made, that mortar joints are filled and that both brick and mortar are reasonably good. The shear stress above applies to unreinforced masonry, except adobe, where the maximum ratio of unsupported height or length to thickness does not exceed 13, and where minimum quality mortar is used or exists. Wall height or length is measured to supporting or resisting elements that are at least twice as stiff as the tributary wall. Stiffness is based on the gross section. Shear stress may be increased by the addition of 10 percent of the axial direct stress due to the weight of the wall directly above. Higher-quality mortar may provide a greater shear value and shall be tested in accordance with Appendix A, Chapter A1 of the *California Existing Building Code* (CEBC) 2010 edition, and as modified by the CHBC.

#### 8-805.2 Stone masonry.

**8-805.2.1 Solid-backed stone masonry.** Stone masonry solidly backed with brick masonry shall be treated as solid brick masonry as described in Section 8-805.1 and in the 2009 IEBC, provided representative testing and inspection verifies solid collar joints between stone and brick and that a reasonable number of stones lap with the brick wythes as headers or that steel anchors are present. Solid stone masonry where the wythes of stone effectively overlap to provide the equivalent header courses may also be treated as solid brick masonry.

**8-805.2.2 Independent wythe stone masonry.** Stone masonry with independent face wythes may be treated as solid brick masonry as described in Section 8-805.1 and the CEBC, provided representative testing and inspection verify that the core is essentially solid in the masonry wall and that steel ties are epoxied in drilled holes between outer stone wythes at floors, roof and not to exceed 4 feet (1219 mm) on center in each direction, between floors and roof. A reinforcing element shall exist or be provided at or near the top of all stone masonry walls.

**8-805.2.3 Testing of stone masonry.** Testing of stone masonry shall be similar to the 2010 CEBC requirements

for brick masonry, except that representative stones which are not interlocked shall be pulled outward from the wall and shear area appropriately calculated after the test.

**8-805.3 Reconstructed walls.** Totally reconstructed walls utilizing original brick or masonry, constructed similar to original, shall be constructed in accordance with the regular code. Repairs or infills may be constructed in a similar manner to the original walls without conforming to the regular code.

## SECTION 8-806 ADOBE

**8-806.1 General.** Unburned clay masonry may be constructed, reconstructed, stabilized or rehabilitated subject to this chapter. Alternative approaches which provide an equivalent or greater level of safety may be used, subject to the concurrence of the enforcing agency.

**8-806.2 Moisture protection.** Provisions shall be in-place to protect adobe structures from deterioration due to moisture penetration. Adobe shall be maintained in reasonably good condition. Particular attention shall be given to moisture content of adobe walls. Unmaintained walls or ruins shall be evaluated for safety based on their condition and stability. Additional protection measures may be appropriate subject to the concurrence of the enforcing agency.

**8-806.3 Height to thickness ratio.** Unreinforced new or existing adobe walls shall meet these criteria need not be evaluated for out of plane failure. Where existing dimensions do not meet these conditions, additional strengthening measures, such as a bond beam, may be appropriate. Existing sod or rammed earth walls shall be considered similar to the extent these provisions apply.

1. One-story adobe load-bearing walls shall not exceed a height-to-thickness ratio of 6.
2. Two-story adobe buildings or structures' height-to-thickness wall ratio shall not exceed 6 at the ground floor and 5 at the second floor, and shall be measured at floor-to-floor height when the second floor and attic ceiling/roof are connected to the wall as described below.

**8-806.4 Nonload-bearing adobe.** Nonload-bearing adobe partitions and gable end walls shall be evaluated for stability and anchored against out-of-plane failure if necessary.

**8-806.5 Bond beam.** Where provided, a bond beam or equivalent structural element shall be located at the top of all adobe walls, and at the second floor for two-story buildings or structures. The size and configuration of the structural element shall be sufficient to provide an effective brace for the wall, to tie the building together and to connect the wall to the floor or roof.

**8-806.6 Repair or reconstruction.** Repair or reconstruction of wall area may utilize unstabilized brick or adobe masonry designed to be compatible with the constituents of the existing adobe materials.

**8-806.7 Shear values.** Existing adobe may be allowed a maximum strength level of twelve pounds per square inch (82.7 kPa) for shear.

**8-806.8 Mortar.** Mortar may be of the same soil composition as that used in the existing wall, or in new walls as necessary to be compatible with the adobe brick.

## SECTION 8-807 WOOD

**8-807.1 Existing wood diaphragms or walls.** Existing wood diaphragms or walls of straight or diagonal sheathing shall be assigned shear resistance values appropriate with the fasteners and materials functioning in conjunction with the sheathing. The structural survey shall determine fastener details and spacings and verify a load path through floor construction. Shear values of Tables 8-8-A and 8-8-B.

**8-807.2 Wood lath and plaster.** Wood lath and plaster walls and ceilings may be utilized using the shear values referenced in Section 8-807.1.

**8-807.3 Existing wood framing.** Existing wood framing members may be assigned allowable stresses consistent with codes in effect at the time of construction. Existing or new replacement wood framing may be of archaic types originally used if properly researched, such as balloon and single wall. Wood joints such as dovetail and mortise and tenon types may be used structurally, provided they are well made. Lumber selected for use and type need not bear grade marks, and greater or lesser species such as low-level pine and fir, boxwood and indigenous hardwoods and other variations may be used for specific conditions where they were or would have been used.

Wood fasteners such as square or cut nails may be used with a maximum increase of 50 percent over wire nails for shear.

## SECTION 8-808 CONCRETE

**8-808.1 Materials.** Natural cement concrete, unreinforced rubble concrete and similar materials may be utilized wherever that material is used historically. Concrete of low strength and with less reinforcement than required by the regular code may remain in place. The architect or engineer shall assign appropriate values of strength based on testing of samples of the materials. Bond and development lengths shall be determined based on historical information or tests.

**8-808.2 Detailing.** The architect or engineer shall carefully evaluate all detailing provisions of the regular code which are not met and shall consider the implications of these variations on the ultimate performance of the structure, giving due consideration to ductility and reserve strength.

## SECTION 8-809 STEEL AND IRON

The hand-built, untested use of wrought or black iron, the use of cast iron or grey iron, and the myriad of joining methods that are not specifically allowed by code may be used wherever applicable and wherever they have proven their worth under the considerable span of years involved with most qualified historical buildings or structures. Uplift capacity should be evaluated



and strengthened where necessary. Fixed conditions or midheight lateral loads on cast iron columns that could cause failure should be taken into account. Existing structural wrought, forged steel or grey iron may be assigned the maximum working stress prevalent at the time of original construction.

### SECTION 8-810 HOLLOW CLAY TILE

The historical performance of hollow clay tile in past earthquakes shall be carefully considered in evaluating walls of hollow clay tile construction. Hollow clay tile bearing walls shall be evaluated and strengthened as appropriate for lateral loads and their ability to maintain support of gravity loads. Suitable protective measures shall be provided to prevent blockage of exit stairways, stairway enclosures, exit ways and public ways as a result of an earthquake.

### SECTION 8-811 VENEERS

**8-811.1 Terra cotta and stone.** Terra cotta, cast stone and natural stone veneers shall be investigated for the presence of suit-

able anchorage. Steel anchors shall be investigated for deterioration or corrosion. New or supplemental anchorage shall be provided as appropriate.

**8-811.2 Anchorage.** Brick veneer with mechanical anchorage at spacings greater than required by the regular code may remain, provided the anchorages have not corroded. Nail strength in withdrawal in wood sheathing may be utilized to its capacity in accordance with code values.

### SECTION 8-812 GLASS AND GLAZING

**8-812.1 Glazing subject to human impact.** Historical glazing material located in areas subject to human impact may be approved subject to the concurrence of the enforcing agency when alternative protective measures are provided. These measures may include, but not be limited to, additional glazing panels, protective film, protective guards or systems, and devices or signs which would provide adequate public safety.

**8-812.2 Glazing in fire-rated systems.** See Section 8-402.3.

**TABLE 8-8A  
STRENGTH VALUES FOR EXISTING MATERIALS**

EXISTING MATERIALS OR CONFIGURATIONS OF MATERIALS <sup>1</sup>	STRENGTH LEVEL CAPACITY x14.594 for N/m
1. Horizontal diaphragms <sup>2</sup>	
1.1 Roofs with straight sheathing and roofing applied directly to the sheathing	300 lbs per foot for seismic shear
1.2 Roofs with diagonal sheathing and roofing applied directly to the sheathing	750 lbs per foot for seismic shear
1.3 Floors with straight tongue-and-groove sheathing	300 lbs per foot for seismic shear
1.4 Floors with straight sheathing and finished wood flooring with board edges offset or perpendicular	1,500 lbs per foot for seismic shear
1.5 Floors with diagonal sheathing and finished	1,800 lbs per foot for seismic shear
2. Crosswalls <sup>2,3</sup>	
2.1 Plaster on wood or metal lath	Per side: 600 lbs per foot for seismic shear
2.2 Plaster on gypsum lath	550 lbs per foot for seismic shear
2.3 Gypsum wallboard, unblocked edges	200 lbs per foot for seismic shear
2.4 Gypsum wallboard, blocked edges	400 lbs per foot for seismic shear
3. Existing footings, wood framing, structural steel and reinforcing steel	
3.1 Plain concrete footings	$f'_c = 1,500$ psi (10.34 MPa) unless otherwise shown by tests <sup>3</sup>
3.2 Douglas fir wood	Allowable stress same as D.F. No. 1 <sup>3</sup>
3.3 Reinforcing steel	$f_t = 40,000$ lbs per square inch (124.1 N/mm <sup>2</sup> ) maximum
3.4 Structural steel	$f_t = 33,000$ lbs per square inch (137.9 N/mm <sup>2</sup> ) maximum

<sup>1</sup>Material must be sound and in good condition.

<sup>2</sup>Shear values of these materials may be combined, except the total combined value shall not exceed 900 pounds per foot (13,140 N/m).

<sup>3</sup>Stresses given may be increased for combinations of loads as specified in the regular code.

**TABLE 8-8B**  
**STRENGTH VALUES OF NEW MATERIALS USED IN CONNECTION WITH EXISTING CONSTRUCTION**

NEW MATERIALS OR CONFIGURATIONS OF MATERIALS	STRENGTH LEVEL CAPACITY <sup>1</sup>
<p>1. Horizontal diaphragms<sup>2</sup></p> <p>1.1 <sup>15</sup>/<sub>32</sub> inch minimum plywood sheathing fastened directly over existing straight sheathing with edges of plywood located on center of individual sheathing boards and fastened with minimum #8x 1<sup>1</sup>/<sub>4</sub> inch wood screws or nails with helical threads 0.13 inch min. diameter and 1<sup>1</sup>/<sub>4</sub> inch min. length at 4 inch centers all panel edges and 12 inch centers each way in field.</p> <p>1.2 Same plywood and attachments as 1.1 fastened directly over existing diagonal sheathing.</p> <p>1.3 <sup>3</sup>/<sub>8</sub> inch plywood sheathing fastened directly over existing straight or diagonal sheathing with ends and edges on centers of individual sheathing boards and fastened with #6 wood screws or nails with helical threads 0.13 inch minimum diameter and 1<sup>1</sup>/<sub>4</sub> inch min. length at 6 inch centers tall panel edges and 12 inch centers each way in field.</p>	<p>1,500 lbs per foot</p> <p>1,800 lbs per foot</p> <p>900 lbs per foot</p>
<p>2. Shear walls:</p> <p>Plywood sheathing applied directly over wood studs. No value shall be given to plywood applied over existing plaster or wood sheathing</p>	<p>100 percent of the value specified in the regular code for shear walls</p>
<p>3. Crosswalls: (special procedure only)</p> <p>3.1 Plywood sheathing applied directly over wood studs. No value shall be given to plywood applied over existing plaster or wood sheathing</p> <p>3.2 Drywall or plaster applied directly over wood studs</p> <p>3.3 Drywall or plaster applied to sheathing over existing wood studs</p>	<p>133 percent of the value specified in the regular code for shear walls</p> <p>100 percent of the values in the regular code</p> <p>50 percent of the values specified in the regular code</p>
<p>4. Tension bolts</p> <p>a. Bolts extending entirely through unreinforced masonry walls secured with bearing plates on far side of a three-wythe-minimum wall with at least 30 square inches (19 350 mm<sup>2</sup>) of area<sup>4,5</sup></p> <p>b. All thread rod extending to the exterior face of the wall installed in adhesive<sup>9</sup></p>	<p>5,400 lbs (24,010 N) per bolt<sup>6</sup></p> <p>2,700 lbs (12,009 N) per bolt for two-wythe walls<sup>6</sup></p> <p>3,600 lbs (16,014 N) per bolt</p>
<p>5. Shear bolts</p> <p>Bolts embedded a minimum of 8 inches (203 mm) into unreinforced masonry walls and centered in a 2<sup>1</sup>/<sub>2</sub>-inch-diameter (63.5 mm) hole filled with dry-pack or nonshrink grout. Through bolts with first 8 inches (203 mm) as noted above and embedded all thread rod as noted in Item 4.b<sup>5,7,9</sup></p>	<p><sup>1</sup>/<sub>2</sub> inch (12.7 mm) diameter = 1050 lbs (4671 N)<sup>6</sup></p> <p><sup>5</sup>/<sub>8</sub> inch (15.9 mm) diameter = 1500 lbs (6672 N)<sup>6</sup></p> <p><sup>3</sup>/<sub>4</sub> inch (19 mm) diameter = 2250 lbs (10,008 N)<sup>6</sup></p>
<p>6. Infilled walls</p> <p>Reinforced masonry infilled openings in existing unreinforced masonry walls. Provide keys or dowels to match reinforcing.</p>	<p>Same as values specified for unreinforced masonry walls</p>
<p>7. Reinforced masonry</p> <p>Masonry piers and walls reinforced per the regular code</p>	<p>Same as values specified in the regular code<sup>8</sup></p>
<p>8. Reinforced concrete</p> <p>Concrete footings, walls and piers reinforced as specified in the regular code and designed for tributary loads</p>	<p>Same values as specified in the regular code<sup>8</sup></p>

<sup>1</sup>Values are for strength level loads as defined in regular code standards.

<sup>2</sup>Values may be adjusted for other fasteners when approved by the enforcing authority.

<sup>3</sup>In addition to existing sheathing value.

<sup>4</sup>Bolts to be <sup>1</sup>/<sub>2</sub>-inch (12.7 mm) minimum diameter.

<sup>5</sup>Other bolt sizes, values and installation methods may be used provided a testing program is conducted in accordance with regular code standards. Bolt spacing shall not exceed 6 feet. (1830 mm) on center and shall not be less than 12 inches (305 mm) on center

<sup>6</sup>Other masonry based on tests or other substantiated data.

<sup>7</sup>Embedded bolts to be tested as specified in regular code standards.

<sup>8</sup>Stresses given may be increased for combinations of loads as specified in the regular code.

<sup>9</sup>Adhesives shall be approved by the enforcing agency and installed in accordance with the manufacturer's recommendations. All drilling dust shall be removed from drilled holes prior to installation.

## CHAPTER 8-9

# MECHANICAL, PLUMBING AND ELECTRICAL REQUIREMENTS

### SECTION 8-901 PURPOSE, INTENT AND SCOPE

**8-901.1 Purpose.** The purpose of the CHBC is to provide regulations for the mechanical, plumbing and electrical systems of buildings designated as qualified historical buildings or properties. The CHBC requires enforcing agencies to accept any reasonable equivalent solutions to the regular code when dealing with qualified historical buildings or properties.

**8-901.2 Intent.** The intent of the CHBC is to preserve the integrity of qualified historical buildings or properties while providing a reasonable level of protection from fire, health and life-safety hazards (hereinafter referred to as safety hazards) for the building occupants.

**8-901.3 Scope.** The CHBC shall be applied in conjunction with the regular code whenever compliance with the regular code is required for qualified historical buildings or properties.

**8-901.4 Safety hazard.** No person shall permit any safety hazard to exist on premises under their control, or fail to take immediate action to abate such hazard. Existing systems which constitute a safety hazard when operational may remain in place, provided they are completely and permanently rendered inoperative. Safety hazards created by inoperative systems shall not be permitted to exist. Requirements of the regular code concerning general regulations shall be complied with, except that the enforcing agency shall accept solutions which do not cause a safety hazard.

**8-901.5 Energy conservation.** Qualified historical buildings or properties covered by this part are exempted from compliance with energy conservation standards. When new nonhistorical lighting and space conditioning system components, devices, appliances and equipment are installed, they shall comply with the requirements of Title 24, Part 6, *The California Energy Code*, except where the historical significance or character-defining features are threatened.

### SECTION 8-902 MECHANICAL

**8-902.1 General.** Mechanical systems shall comply with the regular code unless otherwise modified by this chapter.

**8-902.1.1** The provisions of the CHBC shall apply to the acceptance, location, installation, alteration, repair, relocation, replacement or addition of any heating, ventilating, air conditioning, domestic incinerators, kilns or miscellaneous heat-producing appliances or equipment within or attached to a historical building.

**8-902.1.2** Existing systems which do not, in the opinion of the enforcing agency, constitute a safety hazard may remain in use.

**8-902.1.3** The enforcing agency may approve any alternative to the CHBC which would achieve equivalent life safety.

**8-902.2 Heating facilities.** All dwelling-type occupancies covered under this chapter shall be provided with heating facilities. Wood-burning or pellet stoves or fireplaces may be acceptable as heating facilities.

**8-902.3 Fuel oil piping and tanks.** Fuel oil piping and tanks shall comply with regular code requirements except that the enforcing agency may waive such requirements where the lack of compliance does not create a safety or environmental hazard.

**8-902.4 Heat-producing and cooling equipment.** Heat-producing and cooling equipment shall comply with the regular code requirements governing equipment safety, except that the enforcing agency may accept alternatives which do not create a safety hazard.

#### 8-902.5 Combustion air.

**8-902.5.1** All fuel-burning appliances and equipment shall be provided a sufficient supply of air for proper fuel combustion, ventilation and draft hood dilution.

**8-902.5.2** The enforcing agency may require operational tests for combustion air systems which do not comply with applicable requirements of the regular code.

#### 8-902.6 Venting of appliances.

**8-902.6.1** Every appliance required to be vented shall be connected to an approved venting system. Venting systems shall develop a positive flow adequate to convey all combustion products to the outside atmosphere.

**8-902.6.2** Masonry chimneys in structurally sound condition may remain in use for all fuel-burning appliances, provided the flue is evaluated and documentation provided that the masonry and grout are in good condition. Terra cotta chimneys and Type C metallic vents installed in concealed spaces shall not remain in use unless otherwise mitigated and approved on a case-by-case basis.

**8-902.6.3** The enforcing agency may require operational tests for venting systems which do not comply with applicable requirements of the regular code.

#### 8-902.7 Ducts.

**8-902.7.1** New ducts shall be constructed and installed in accordance with applicable requirements of the regular code.

**8-902.7.2** Existing duct systems which do not comply with applicable requirements of the regular code and do not, in the opinion of the enforcing agency, constitute a safety or health hazard may remain in use.

#### 8-902.8 Ventilating systems.

**8-902.8.1** Ventilating systems shall be installed so that no safety hazard is created.

**8-902.8.2** Grease hoods and grease hood exhaust systems shall be furnished and installed in accordance with applicable requirements of the regular code. Existing systems which are altered shall comply with the regular code.

#### **8-902.9 Miscellaneous equipment requirements.**

**8-902.9.1** The following appliances and equipment shall be installed so that no safety hazard is created: warm air furnaces, space heating equipment, vented decorative appliances, floor furnaces, vented wall furnaces, unit heaters, room heaters, absorption units, refrigeration equipment, duct furnaces, infrared radiant heaters, domestic incinerators, miscellaneous heat-producing appliances and water heaters.

**8-902.9.2** Storage-type water heaters shall be equipped with a temperature- and pressure-relief valve in accordance with applicable requirements of the regular code.

### **SECTION 8-903 PLUMBING**

**8-903.1 General.** Plumbing systems shall comply with the regular code unless otherwise noted.

**8-903.1.1** The provisions of the CHBC shall apply to the acceptance, location, installation, alteration, repair, relocation, replacement or addition of any plumbing system or equipment within or attached to a historical building.

**8-903.1.2** Existing systems which do not, in the opinion of the enforcing agency, constitute a safety hazard may remain in use.

**8-903.1.3** The enforcing agency may approve any alternative to these regulations which achieves reasonably equivalent life safety.

#### **8-903.2 Residential occupancies.**

**8-903.2.1** Where toilet facilities are provided, alternative sewage disposal methods may be acceptable if approved by the local health department. In hotels, where private facilities are not provided, water closets at the ratio of one for each 15 rooms may be acceptable.

**8-903.2.2** Toilet facilities are not required to be on the same floor or in the same building as sleeping rooms. Water-flush toilets may be located in a building immediately adjacent to the sleeping rooms. When alternative sewage disposal methods are utilized, they shall be located a minimum distance from the sleeping rooms or other locations as approved by the local health department.

**8-903.2.3** Kitchen sinks shall be provided in all kitchens. The sink and countertop may be of any smooth nonabsorbent finish which can be maintained in a sanitary condition.

**8-903.2.4** Hand washing facilities shall be provided for each dwelling unit and each hotel guest room. A basin and pitcher may be acceptable as adequate hand washing facilities.

**8-903.2.5** Hot or cold running water is not required for each plumbing fixture, provided a sufficient amount of water is supplied to permit the fixture's normal operation.

**8-903.2.6** Bathtubs and lavatories with filler spouts less than 1 inch (25.4 mm) above the fixture rim may remain in use, provided there is an acceptable overflow below the rim.

**8-903.2.7** Original or salvage water closets, urinals and flushometer valves shall be permitted in qualified historical buildings or properties. Historically accurate reproduction, nonlow-consumption water closets, urinals and flushometer valves shall be permitted except where historically accurate fixtures that comply with the regular code are available.

**8-903.3 Materials.** New nonhistorical materials shall comply with the regular code requirements. The enforcing agency shall accept alternative materials which do not create a safety hazard where their use is necessary to maintain the historical integrity of the building.

**8-903.4 Drainage and vent systems.** Plumbing fixtures shall be connected to an adequate drainage and vent system. The enforcing agency may require operational tests for drainage and vent systems which do not comply with applicable requirements of the regular code. Vent terminations may be installed in any location which, in the opinion of the enforcing agency, does not create a safety hazard.

**8-903.5 Indirect and special wastes.** Indirect and special waste systems shall be installed so that no safety hazard is created. Chemical or industrial liquid wastes which may detrimentally affect the sanitary sewer system shall be pretreated to render them safe prior to discharge.

**8-903.6 Traps and interceptors.** Traps and interceptors shall comply with the regular code requirements except that the enforcing agency shall accept solutions which do not increase the safety hazard. Properly maintained "S" and drum traps may remain in use.

#### **8-903.7 Joints and connections.**

**8-903.7.1** Joints and connections in new plumbing systems shall comply with applicable requirements of the regular code.

**8-903.7.2** Joints and connections in existing or restored systems may be of any type that does not create a safety hazard.

**8-903.8 Water distribution.** Plumbing fixtures shall be connected to an adequate water distribution system. The enforcing agency may require operational tests for water distribution systems which do not comply with applicable requirements of regular code. Prohibited (unlawful) connections and cross connections shall not be permitted.

**8-903.9 Building sewers and private sewage disposal systems.** New building sewers and new private sewage disposal systems shall comply with applicable requirements of the regular code.

**8-903.10 Fuel-gas piping.** Fuel-gas piping shall comply with the regular code requirements except that the enforcing agency shall accept solutions which do not increase the safety hazard.

## SECTION 8-904 ELECTRICAL

**8-904.1 General.** Electrical systems shall comply with the regular code unless otherwise permitted by this code, or approved by the authority having jurisdiction.

**8-904.1.1** The provisions of the CHBC shall apply to the acceptance, location, installation, alteration, repair, relocation, replacement or addition of any electrical system or portion thereof, the premise wiring, or equipment fixed in place as related to restoration within or attached to a qualified historical building or property.

**8-904.1.2** Existing systems, wiring methods and electrical equipment which do not, in the opinion of the enforcing agency, constitute a safety hazard may remain in use.

**8-904.1.3** The enforcing agency may approve any alternative to the CHBC which achieves equivalent safety.

**8-904.1.4** Archaic methods that do not appear in present codes may remain and may be extended if, in the opinion of the enforcing agency, they constitute a safe installation.

### 8-904.2 Wiring methods.

**8-904.2.1** Where existing branch circuits do not include an equipment grounding conductor and, in the opinion of the enforcing agency, it is impracticable to connect an equipment grounding conductor to the grounding electrode system, receptacle convenience outlets may remain the nongrounding type.

**8-904.2.2** Ground fault circuit interrupter (GFCI) protected receptacles shall be installed where replacements are made at receptacle outlets that are required to be so protected by the regular code in effect at the time of replacement. Metallic face plates shall either be grounded to the grounded metal outlet box or be grounded to the grounding-type device when used with devices supplied by branch circuits without equipment grounding conductors.

**8-904.2.3** Grounding-type receptacles shall not be used without a grounding means in an existing receptacle outlet unless GFCI protected. Existing nongrounding receptacles shall be permitted to be replaced with nongrounding or grounding-type receptacles where supplied through a ground fault circuit interrupter.

**8-904.2.4** Extensions of existing branch circuits without equipment-grounding conductors shall be permitted to supply grounding-type devices only when the equipment grounding conductor of the new extension is grounded to any accessible point on the grounding electrode system.

**8-904.2.5** Receptacle outlet spacing and other related distance requirements shall be waived or modified if determined to be impracticable by the enforcing agency.

**8-904.2.6** For the replacement of lighting fixtures on an existing nongrounded lighting outlet, or when extending an existing nongrounding lighting outlet, the following shall apply:

1. The exposed conductive parts of lighting fixtures shall be connected to any acceptable point on the grounding electrode system, or

2. The lighting fixtures shall be made of insulating material and shall have no exposed conductive parts.

**Exception:** Lighting fixtures mounted on electrically nonconductive ceilings or walls where located not less than either 8 feet (2438 mm) vertically or 5 feet (1524 mm) horizontally from grounded surfaces.

**8-904.2.7** Lighting load calculations for services and feeders may be based on actual loads as installed in lieu of the "watts per square foot" method.

**8-904.2.8** Determination of existing loads may be based on maximum demand recordings in lieu of calculations, provided all of the following are met:

1. Recordings are provided by the serving agency.
2. The maximum demand data is available for a one-year period.

**Exception:** If maximum demand data for a one-year period is not available, the maximum demand data shall be permitted to be based on the actual amperes continuously recorded over a minimum 30-day period by a recording ammeter connected to the highest loaded phase of the feeder or service. The recording should reflect the maximum demand when the building or space is occupied and include the measured or calculated load at the peak time of the year, including the larger of the heating or cooling equipment load.

3. There has been no change in occupancy or character of load during the previous 12 months.
4. The anticipated load will not change, or the existing demand load at 125 percent plus the new load does not exceed the ampacity of the feeder or rating of the service.



## CHAPTER 8-10

# QUALIFIED HISTORICAL DISTRICTS, SITES AND OPEN SPACES

### SECTION 8-1001 PURPOSE AND SCOPE

**8-1001.1 Purpose.** The purpose of this chapter is to provide regulations for the preservation, rehabilitation, restoration and reconstruction of associated historical features of qualified historical buildings, properties or districts (as defined in Chapter 8-2), and for which Chapters 8-3 through 8-9 of the CHBC may not apply.

**8-1001.2 Scope.** This chapter applies to the associated historical features of qualified historical buildings or properties such as historical districts that are beyond the buildings themselves which include, but are not limited to, natural features and designed site and landscape plans with natural and man-made landscape elements that support their function and aesthetics. This may include, but will not be limited to:

1. Site plan layout configurations and relationships (pedestrian, equestrian and vehicular site circulation, topographical grades and drainage, and use areas).
2. Landscape elements (plant materials, site structures other than the qualified historical building, bridges and their associated structures, lighting, water features, art ornamentation, and pedestrian, equestrian and vehicular surfaces).
3. Functional elements (utility placement, erosion control and environmental mitigation measures).

### SECTION 8-1002 APPLICATION

**8-1002.1** The CHBC shall apply to all sites and districts and their features associated with qualified historical buildings or qualified historical districts as outlined in 8-1001.2 Scope.

**8-1002.2** Where the application of regular code may impact the associated features of qualified historical properties beyond their footprints, by work performed secondarily, those impacts shall also be covered by the CHBC.

**8-1002.3** This chapter shall be applied for all issues regarding code compliance or other standard or regulation as they affect the purpose of this chapter.

**8-1002.4** The application of any code or building standard shall not unduly restrict the use of a qualified historical building or property that is otherwise permitted pursuant to Chapter 8-3 and the intent of the *State Historical Building Code*, Section 18956.

### SECTION 8-1003 SITE RELATIONS

The relationship between a building or property and its site, or the associated features of a district (including qualified historical landscape), site, objects and their features are critical components that may be one of the criteria for these buildings and properties to be qualified under the CHBC. The CHBC recognizes the importance of these relationships. This chapter shall be used to provide context sensitive solutions for treatment of qualified historical buildings, properties, district or their associated historical features, or when work to be performed secondarily impacts the associated historical features of a qualified historical building or property.





# APPENDIX A

## CHAPTER 8-1

When modification must be made to qualified historical buildings and properties, the CHBC is intended to work in conjunction with the United States Secretary of Interior Standards for the Treatment of Historic Properties with Guidelines for Pre-

serving, Rehabilitating, Restoring and Reconstructing Historic Buildings and the Secretary of Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes.

## CHAPTER 8-6

TABLE 1—PROVISION APPLICABILITY

	Title II Public Entities	Title III Private Entities	Title III Barrier Removal
<p><b>SECTION 8-601 PURPOSE, INTENT, SCOPE</b></p> <p><b>8-601.1 Purpose.</b> The purpose of the CHBC is to provide alternative regulations to facilitate access and use by persons with disabilities to and throughout facilities designated as qualified historical buildings or properties. These regulations require enforcing agencies to accept alternatives to regular code when dealing with qualified historical buildings or properties.</p> <p><b>8-601.2 Intent.</b> The intent of this chapter is to preserve the integrity of qualified historical buildings and properties while providing access to and use by people with disabilities.</p> <p><b>8-601.3 Scope.</b> The CHBC shall apply to every qualified historical building or property that is required to provide access to people with disabilities.</p> <ol style="list-style-type: none"> <li>1. Provisions of this chapter do not apply to new construction or reconstruction/replicas of historical buildings.</li> <li>2. Where provisions of this chapter apply to alteration of qualified historical buildings or properties, alteration is defined in <i>California Building Code (CBC)</i>, Chapter 2, Definitions and Abbreviations. 202 – A. Alter or Alteration.</li> </ol> <p><b>8-601.4 General application.</b> The provisions in the CHBC apply to local, state and federal governments (Title II entities); alteration of commercial facilities and places of public accommodation (Title III entities); and barrier removal in commercial facilities and places of public accommodation (Title III entities). Except as noted in this chapter.</p>	Applies	Applies	Applies
<p><b>SECTION 8-602 — BASIC PROVISIONS</b></p> <p><b>8-602.1 Regular code.</b> The regular code for access for people with disabilities (Title 24, Part 2, Vol.1, Chapter 11B) shall be applied to qualified historical buildings or properties unless strict compliance with the regular code will threaten or destroy the historical significance or character-defining features of the building or property.</p> <p><b>8-602.2 Alternative provisions.</b> If the historical significance or character-defining features are threatened, alternative provisions for access may be applied pursuant to this chapter, provided the following conditions are met:</p> <ol style="list-style-type: none"> <li>1. These provisions shall be applied only on an item-by-item or case-by-case basis.</li> <li>2. Documentation is provided, including meeting minutes or letters, stating the reasons for the application of the alternative provisions. Such documentation shall be retained in the permanent file of the enforcing agency.</li> </ol>	Applies	Applies	Applies

(continued)

TABLE 1—PROVISION APPLICABILITY—continued

	Title II Public Entities	Title III Private Entities	Title III Barrier Removal
<b>SECTION 8-603 — ALTERNATIVES</b>			
<b>8-603.1 Alternative minimum standards.</b> The alternative minimum standards for alterations of qualified historical buildings or facilities are contained in Section 4.1.7(3) of ADA Standards for Accessible Design, as incorporated and set forth in federal regulation 28 C.F.R. Pt. 36.	Applies	Applies	Applies
<b>8-603.2 Entry.</b> These alternatives do not allow exceptions for the requirement of level landings in front of doors, except as provided in Section 8-603.4. <ol style="list-style-type: none"> <li>1. Access to any entrance used by the general public and no further than 200 feet (60 960 mm) from the primary entrance.</li> <li>2. Access at any entrance not used by general public but open and unlocked with directional signs at the primary entrance and as close as possible to, but no further than 200 feet (60 960 mm) from, the primary entrance.</li> <li>3. The accessible entrance shall have a notification system. Where security is a problem, remote monitoring may be used.</li> </ol>	Applies	Applies	Applies
<b>8-603.3 Doors.</b> Alternatives listed in order of priority are: <ol style="list-style-type: none"> <li>1. Single-leaf door which provides a minimum 30 inches (762 mm) of clear opening.</li> <li>2. Single-leaf door which provides a minimum 29½ inches (749 mm) clear opening.</li> <li>3. Double door, one leaf of which provides a minimum 29½ inches (749 mm) clear opening.</li> <li>4. Double doors operable with a power-assist device to provide a minimum 29½ inches (749 mm) clear opening when both doors are in the open position.</li> </ol> <b>Exception:</b> Alternatives in this section do not apply to alteration of commercial facilities and places of public accommodation (Title III entities).	Does not apply	Does not apply	Applies
<b>8-603.4 Power-assisted doors.</b> Power-assisted door or doors may be considered an equivalent alternative to level landings, strikeside clearance and door-opening forces required by regular code.	Applies	Applies	Applies
<b>8-603.5 Toilet rooms.</b> In lieu of separate-gender toilet facilities as required in the regular code, an accessible unisex toilet may be designated.	Applies	Applies	Applies
<b>8-603.6 Exterior and interior ramps and lifts.</b> Alternatives listed in order of priority are: <ol style="list-style-type: none"> <li>1. A lift or a ramp of greater than standard slope but no greater than 1:10, for horizontal distances not to exceed 5 feet (1525 mm). Signs shall be posted at upper and lower levels to indicate steepness of the slope.</li> <li>2. Access by ramps of 1:6 slope for horizontal distance not to exceed 13 inches (330 mm). Signs shall be posted at upper and lower levels to indicate steepness of the slope.</li> </ol>	Applies	Applies	Applies

(continued)

TABLE 1—PROVISION APPLICABILITY—continued

	Title II Public Entities	Title III Private Entities	Title III Barrier Removal
<p><b>SECTION 8-604 — EQUIVALENT FACILITATION</b></p> <p>Use of other designs and technologies, or deviation from particular technical and scoping requirements, are permitted if the application of the alternative provisions contained in Section 8-603 would threaten or destroy the historical significance or character-defining features of the qualified historical building or property.</p> <ol style="list-style-type: none"> <li>1. Such alternatives shall be applied only on an item-by-item or case-by-case basis.</li> <li>2. Access provided by experiences, services, functions, materials and resources through methods including, but not limited to, maps, plans, videos, virtual reality and related equipment, at accessible levels. The alternative design and/or technologies used will provide substantially equivalent or greater accessibility to, and usability of, the facility.</li> <li>3. The official charged with the enforcement of the standards shall document the reasons for the application of the design and/or technologies and their effect on the historical significance or character-defining features. Such documentation shall be in accordance with Section 8-602.2, Item 2, and shall include the opinion and comments of state or local accessibility officials, and the opinion and comments of representative local groups of people with disabilities. Such documentation shall be retained in the permanent file of the enforcing agency. Copies of the required documentation should be available at the facility upon request.</li> </ol> <p><b>Note:</b> For commercial facilities and places of public accommodation (Title III entities).</p> <p>Equivalent facilitation for an element of a building or property when applied as a waiver of an ADA accessibility requirement will not be entitled to the Federal Department of Justice certification of this code as rebuttable evidence of compliance for that element.</p>	Applies	<p><b>Waivers</b></p> <p>If a builder applies for a waiver of an ADA accessibility requirement for an element of a building, he or she will not be entitled to certification's rebuttable evidence of compliance for that element. This limitation on the certification determination should be noted in any publication of Chapter 8-6 if certification is granted.</p>	Applies

**Notes:** The regular code for Chapter 8-6 is contained in Title 24, Part 2, Vol.1, Chapter 11, which contain standards for new construction. Provisions of this chapter may be used in conjunction with all other provisions of the regular code and ADA regulations.



**HISTORY NOTE APPENDIX**  
***CALIFORNIA HISTORICAL BUILDING CODE***  
**(Title 24, Part 8, California Code of Regulations)**

For prior history, see History Note Appendix to the *California Historical Building Code*, 2010 Triennial Edition, effective January 1, 2011.

1. Editorial correction to Chapter 8-8, Section 8-812, Tables 8-8A and 8-8B. Include missing tables in 2007 annual code adoption supplement.

2. SHBSB 01/10 – Repeal and amend Chapters 8-7 and 8-8 of the 2010 *California Historical Building Code*, CCR, Title 24, Part 8 regulated by the State Historical Building Safety Board, effective on July 1, 2012.

3. Repeal the 2010 *California Historical Building Code*, CCR, Title 24, Part 8 and adopt the 2013 *California Historical Building Code*, CCR, Title 24, Part 8 approved by the Building Standards Commission on December 12, 2012. Published on July 1, 2013 and effective on January 1, 2014.





## B-3 Historic Resource Exemptions 2005

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**LOS ANGELES UNIFIED SCHOOL DISTRICT  
NEW SCHOOL CONSTRUCTION PROGRAM**

**PROGRAM ENVIRONMENTAL IMPACT REPORT  
EXEMPTIONS**

CHATTEL ARCHITECTURE, PLANNING & PRESERVATION, INC.

SEPTEMBER 2005

**LOS ANGELES UNIFIED SCHOOL DISTRICT NEW SCHOOL CONSTRUCTION PROGRAM  
PROGRAM ENVIRONMENTAL IMPACT REPORT EXEMPTIONS**

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## INTRODUCTION

Starting in 1994, scores of Los Angeles Unified School District- (LAUSD-) owned properties have been evaluated for historic significance and as a result, a number have been found to be, or to contain, historical resources. As a result, of the more than 700 school campuses and buildings in the LAUSD system, 410 such properties have been evaluated for historic significance.<sup>1</sup> The 410 surveyed properties were at least 45 years of age at the time of the evaluation (built before 1955). An additional list of 22 post World War II-era campuses was most recently recommended for future re-evaluation but such an evaluation has not been undertaken to date. Of the 400+ evaluated pre-1955 properties, 123 were found to appear eligible for listing in the California Register of Historical Resources (California Register), that is, they qualify as “historical resources” as defined in the California Environmental Quality Act (CEQA). The two resulting lists of resources and additional list of post World War II properties are contained at the end of this document.

This document was prepared to provide LAUSD with a guide to tasks for alteration of historical resources that would be generally exempt from CEQA review. It is intended to create

an exemption for projects involving the maintenance, rehabilitation, restoration, [or] preservation... of historical resources, provided that the activity meets published federal standards for the treatment of historic properties. These federal standards describe means of preserving, rehabilitating, restoring, and reconstructing historic buildings without adversely affecting their historic significance. Use of this exemption, like all categorical exemptions, is limited by the factors described in CEQA Guidelines §15300.2 and is not to be used where the activity would cause a substantial adverse change in the significance of a historical resource.<sup>2</sup>

To ensure that proposed work does not cause substantial adverse change in the significance of a historical resource, nearly all alterations, modifications, additions or repairs to LAUSD-owned properties that are considered historical resources under CEQA should be evaluated for conformance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings (Secretary's Standards)*<sup>3</sup> by a consultant who meets the Secretary of the Interior's Professional Qualifications Standards in 36 CFR Part 61, in either architectural history or historic architecture (hereinafter “qualified architectural historian”).<sup>4</sup> However, given the number of historical resources owned by LAUSD and the constant cycle of maintenance and repair that must be accomplished, it has been determined that there are a range of tasks that may be undertaken on historical resources without review by a qualified architectural historian.

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<sup>1</sup> Three surveys to evaluate the historic significance of these properties have been conducted. The surveys are: Federal Emergency Management Agency (FEMA, 1994) and “Phase I” (Phase 1 Getty, 2001-2002), both under a Planning Grant from Preserve LA Initiative, through J. Paul Getty Trust, and “Phase 2 Final Database” by Leslie Heumann and Associates, Aspen Environmental Group (Phase 2 Getty, 2004).

<sup>2</sup> CEQA Title 14. *California Code of Regulations*, Chapter 3. Guidelines for Implementation of the California Environmental Quality Act, Article 19. Categorical Exemptions <[http://ceres.ca.gov/topic/env\\_law/ceqa/guidelines/art19.html](http://ceres.ca.gov/topic/env_law/ceqa/guidelines/art19.html)>

<sup>3</sup> Kay D. Weeks and Anne E. Grimmer *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings* (Washington, D.C.: National Park Service, 1995) <<http://www.cr.nps.gov/hps/tps/secstan1.htm>>.

Hereinafter *Secretary's Standards*.

<sup>4</sup> As described in *LAUSD New School Construction Program EIR*, Appendix E.2 LAUSD Cultural Assessment Procedures (March 2004).

## DEFINITIONS

Key terms used and programs referenced in this document are defined below.

### California Register of Historical Resources

The *California Register of Historical Resources* (California Register) was established to serve as an authoritative guide to the state's significant historical and archaeological resources (*California Public Resources Code, PRC §5024.1*). State law provides that in order for a property to be considered eligible for listing in the California Register, it must be found by the State Historical Resources Commission to be significant under any of the following four criteria; if the resource:

- 1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- 2) Is associated with the lives of persons important in our past.
- 3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual or possesses high artistic values.
- 4) Has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one of the four above criteria, properties eligible for the California Register must also retain sufficient integrity to convey their historic significance. California Register regulations contained in Title 14, Division 3, Chapter 11.5, §4852 (c), provide, "It is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register." The California Office of Historic Preservation (OHP) has consistently interpreted this to mean that a property eligible for listing in the California Register must retain "substantial" integrity.

The California Register also includes properties which: have been formally *determined eligible for listing in*, or are *listed in* the National Register of Historic Places (National Register); are registered State Historical Landmark Number 770, and all consecutively numbered landmarks after Number 770; points of historical interest, which have been reviewed and recommended to the State Historical Resources Commission for listing; and city and county-designated landmarks or districts (if criteria for designation are determined by OHP to be consistent with California Register criteria (*PRC §5024.1(d)*). *PRC §5024.1* states:

- (g) A resource identified as significant in an historical resource survey may be listed in the California Register if the survey meets all of the following criteria:
  - (1) The survey has been or will be included in the State Historical Resources Inventory.
  - (2) The survey and the survey documentation were prepared in accordance with [OHP]... procedures and requirements.
  - (3) The resource is evaluated and determined by the office to have a significance rating of category 1 to 5 on DPR [California Department of Parks and Recreation] form 523.
  - (4) If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources which have become eligible or ineligible due to changed circumstances or further

documentation and those which have been demolished or altered in a manner that substantially diminishes the significance of the resource.

### **CEQA Categorical Exemption**

The *CEQA Categorical Exemption* is described in the CEQA Guidelines §15331 as:

projects limited to maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of historical resources in a manner consistent with *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings* (Secretary's Standards).

### **Character-Defining Features**

Character-defining features are defined by the National Park Service as "all those visual aspects and physical features that comprise the appearance of ...historic building(s)." "Character-defining elements include the overall shape of the building, its materials, craftsmanship, decorative details, interior spaces and features, as well as the various aspects of its site and environment."<sup>5</sup> It is necessary to define these materials, features and spaces that collectively make a property significant before planning or initiating alterations.

### **Historical Resources**

A *historical resource* is defined in CEQA as

a resource listed in, or determined eligible for listing in, the California Register of Historical Resources. Historical resources included in a local register of historical resources..., or deemed significant pursuant to criteria set forth in subdivision (g) of §5024.1, are presumed to be historically or culturally significant for purposes of this section, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant (*PRC* §21084.1).

### **In Kind**

Replacement of a feature *in kind* means to substitute it with a new feature that matches the existing exactly in material, finish, appearance, profile, thickness, dimensions, shape and form. Replacement is not appropriate unless the feature is deteriorated beyond repair (e.g. more than 50 percent unusable). Unless the feature to be replaced is utilitarian (such as standard hardware, like brass screws) or not visible (as in hidden inside a wall), dated photographs of the feature to be replaced must be taken before replacement has been undertaken to document its condition; and after the work has been completed, to document that the new feature is an appropriate replacement. These dated photographs must be maintained in the property's permanent administrative or facilities records for review. Refer to definition for *replacement*.

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<sup>5</sup> National Park Service (Lee H. Nelson, FAIA) Preservation Brief 17 "Architectural Character Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character" (Washington, DC: National Park Service, Technical Preservation Series) np <<http://www.cr.nps.gov/hps/tps/briefs/brief17.htm>>

## Preservation

*Preservation* is one of the four treatment approaches to making appropriate alterations to historic properties. The others are *rehabilitation*, *restoration*, and *reconstruction* (described below). *Preservation* “places a high premium on the retention of all historic fabric through conservation, maintenance and repair. It reflects a building's continuum over time, through successive occupancies, and the respectful changes and alterations that are made.”<sup>6</sup> “Both *preservation* and *rehabilitation* standards focus attention on “preservation of those materials, features, finishes, spaces, and spatial relationships that, together, give a property its historic character.” While *preservation* as a treatment can accommodate “limited and sensitive” code-required changes, its philosophy does not extend to include alterations as are often necessary to accommodate the changing needs of LAUSD. For this reason, *preservation* will not normally be the appropriate treatment for LAUSD-owned historical resources.

## Qualified Architectural Historian

A *qualified architectural historian* investigates and evaluates architectural resources in connection with proposed school alteration (including modifications, additions and repair) projects and new school construction. A *qualified architectural historian* must meet the minimum requirements of the Secretary of the Interior's Professional Qualifications Standards (36 *Code of Federal Regulations (CFR)* Part 61, Appendix A), in architectural history or historic architecture.

## Reconstruction

One of the four basic approaches to historic preservation, *reconstruction* is used

When a contemporary depiction is required to understand and interpret a property's historic value (including the re-creation of missing components in a historic district or site); when no other property with the same associative value has survived; and when sufficient historical documentation exists to ensure an accurate reproduction. Prior to undertaking work, a documentation plan for Reconstruction should be developed.<sup>7</sup>

The *Secretary of the Interior's Standards for Reconstruction and Guidelines for Reconstructing Historic Buildings* are used to guide work when it is appropriate to recreate a no longer extant building or important feature (such as a fountain) of a property using entirely new material. Reconstruction is generally only used when the building or feature no longer exists. The objective for *reconstruction* is to have the building or feature appear “as it did at a particular--and most significant--time in its history,” much like restoration. It includes strict requirements for documentation both before and after such work is undertaken. This treatment is rarely appropriate and for LAUSD can only be undertaken using and following the recommendations of a consulting qualified architectural historian. After a reconstruction project of this type is completed, it is imperative that it be identified as a new example of a non-surviving building or feature.

## Rehabilitation

*Rehabilitation* is the treatment among the four historic preservation approaches that will generally be the most appropriate for LAUSD projects related to historic properties. It is used “when repair and replacement of deteriorated features are necessary; when alterations or additions to the property are

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<sup>6</sup> *Secretary's Standards* np.

<sup>7</sup> *Secretary's Standards* 169.



planned for a new or continued use; and when its depiction at a particular period of time is not appropriate...”<sup>8</sup> Basic components of *rehabilitation* include identification, retention and preservation of historic materials and features, while protecting, maintaining and repairing those materials and features. *Rehabilitation* can allow replacement of materials and features when repair cannot be achieved and also accommodates replacement of missing historic features, based either on prior evidence or with contemporary, compatible, differentiated new features. It can allow new additions on non-character defining elevations and the most latitude for modifications based on energy efficiency, accessibility considerations, and fire and life safety codes.

Of all the treatments, *rehabilitation* allows the most change in the historical resource, while protecting and maintaining building materials and character-defining features. More leniency is allowed to replace “deteriorated, damaged, or missing features using either traditional or substitute materials.” It is the only approach that grants the possibility to continue a property’s functional use by allowing thoughtful additions and alterations.

The standards for rehabilitation are as follows:

#### **Standards for Rehabilitation**

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

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<sup>8</sup> Secretary’s Standards 61.

## Repair

According to the *Secretary of the Interior's Standards and Guidelines for Rehabilitating Historic Buildings*, *repair* is recommended when the “physical condition of character-defining materials and features warrants additional work.” The guidance for *repair* is as follows:

Rehabilitation guidance for the repair of historic materials such as masonry, wood, and architectural metals... begins with the *least degree of intervention* possible such as patching, piecing-in, splicing, consolidating, or otherwise reinforcing or upgrading... according to recognized preservation methods. Repairing also includes the *limited replacement in kind*--or with compatible substitute material-- of extensively deteriorated or missing parts of features when there are surviving prototypes (for example, brackets, dentils, steps, plaster, or portions of slate or tile roofing). Although using the same kind of material is always the preferred option, *substitute material... [can be] acceptable if the form and design as well as the substitute material itself convey the visual appearance of the remaining parts of the feature and finish* [emphasis added].<sup>9</sup>

Thus repair of a surviving feature is always more appropriate than its replacement, which must be justified.

## Restoration

*Restoration* as an approach is “the act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period.” *Restoration* is appropriate

*When the property's design, architectural, or historical significance during a particular period of time outweighs the potential loss of extant materials, features, spaces, and finishes that characterize other historical periods; when there is substantial physical and documentary evidence for the work; and when contemporary alterations and additions are not planned, restoration may be considered as a treatment. Prior to undertaking work, a particular period of time, i.e., the restoration period, should be selected and justified, and a documentation plan for Restoration developed* [emphasis added].<sup>10</sup>

Part of the goal of restoration is to make a building appear as it did at a specific point in time. Although it can allow for limited and sensitive changes to mechanical, electrical and plumbing systems for code compliance, restoration will not generally be the appropriate treatment for LAUSD-owned properties.

## Replacement

In some cases, features or materials will be deteriorated beyond a point where repair would be possible. In general, at least 50 percent of the feature or material must be so deteriorated that it is beyond repair, in order to justify its *replacement*. Refer to definition for *in kind*. In cases where *replacement* is necessary, specific guidance provided in the *Secretary of the Interior's Standards and Guidelines for Rehabilitating Historic Buildings* is as follows:

If the essential form and detailing are still evident so that the physical evidence can be used to re-establish the feature as an integral part of the rehabilitation, then its replacement is appropriate.

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<sup>9</sup> *Secretary's Standards* 63, 64.

<sup>10</sup> *Secretary's Standards* 121.

Like the guidance for repair, the preferred option is always replacement of the entire feature in kind, that is, with the same material. Because this approach may not always be technically or economically feasible, provisions are made to consider the use of a compatible substitute material. It should be noted that, while the...guidelines recommend the replacement of an entire character-defining feature that is extensively deteriorated, they never recommend removal and replacement with new material of a feature that--although damaged or deteriorated--could reasonably be repaired and thus preserved.<sup>11</sup>

*Replacement* is only warranted where the feature cannot be repaired, not if repair is difficult or time-consuming. Every effort at repair should be exhausted before the decision is made to replace a feature. As described in Activities Exempt for Review, replacements without review and approval of a qualified architectural historian will only be acceptable when the feature can be replaced as original. If the original material is archaic and cannot be obtained, a qualified architectural historian must be consulted. When replacement is undertaken, the new feature must match the existing one in every way possible - it is almost never acceptable to use the closest stock or off-the-shelf item. Unless the feature to be replaced is utilitarian (such as standard hardware, like brass screws) or not visible (as in hidden inside a wall), dated photographs of the feature to be replaced must be taken before replacement to document its condition, and after work is completed to document that the new feature is an appropriate replacement. These dated photographs must be maintained in the property's permanent, on-site administrative or facilities records for review. Refer to definition for *in kind*.

### Substantial Adverse Change

"*Substantial adverse change* in the significance of an historical resource means the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (PRC §15064.5 (b)(1)). Substantial adverse change is the test for impacts to historical resources under CEQA. PRC §15064.5 (b)(2) describes *material impairment* taking place when a project:

- (a) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register... or
- (b) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register... or its identification in an historical resources survey... unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- (c) Demolishes or materially alters those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register... as determined by a lead agency for the purposes of CEQA.

If a proposed alteration, modification, addition or repair to a property that meets the definition of an historical resource were expected to cause *substantial adverse change* in the historical resource, environmental clearance for the project would require mitigation measures to reduce impacts. No such alterations should be undertaken without consulting and following the recommendations of a qualified architectural historian and completing environmental clearance prior to undertaking the project.

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<sup>11</sup> Secretary's Standards 64.

***The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings (Secretary's Standards)***

The *Secretary's Standards* were developed to guide work undertaken on historic buildings with the intention of assisting the long-term preservation of a property's significance through the preservation of historic materials and features. The *Secretary's Standards* contain guidelines for the four different treatment approaches: *preservation, rehabilitation, restoration* and *reconstruction*. These guidelines are widely used by federal, state, and local government officials to review projects proposed for historic properties.

CEQA provides that the effects of projects found to be "consistent with" the *Secretary's Standards* "shall generally be considered mitigated below a level of significance and thus *not significant*" under *PRC* §15126.4(b)(1) (emphasis added). Further, CEQA provides an exemption for projects "limited to... rehabilitation... in a manner consistent with" the *Secretary's Standards* under regulations in *PRC* §15331.

The following pages contain an overall listing of alteration activities for historical resources that can be accomplished without review by a qualified architectural historian (unless noted). While this list is intended to be as complete as possible, it may not cover all potential issues related to alteration, including maintenance, rehabilitation, restoration, or preservation of historical resources and may be updated as necessary.

Unless there is a question or some level of uncertainty whether or not a task should be done or how it can be properly accomplished without causing harm, this provides guidance on basic alterations, including maintenance, rehabilitation, restoration, or preservation of historical resources that can be undertaken without oversight of a qualified architectural historian.

## ACTIVITIES EXEMPT FROM REVIEW

For identified historical resources, the following list describes limited tasks that are generally exempt from review by a qualified architectural historian. If there is any question whether the task is appropriate for the historical resource, a qualified architectural historian should be consulted, their recommendations followed, and a record retained in the facility's permanent files. Likewise, if the correct course of action cannot be readily identified, a qualified architectural historian must be consulted before commencing any such work. Care must be taken to ensure that tasks are undertaken in precisely the manner described below. Clear, dated documentation photographs must be taken of repaired, replaced or altered areas or features, both before and after the task has been executed, and these photographs must be retained in permanent on-site facilities or administration records. Exceptions to these exempted activities are also noted.

Copies of this complete guidance shall be distributed to and retained by all Facilities, Construction and related staff as well as administration and maintenance at each LAUSD-owned identified historical resource properties (and all subsequently identified historical resources), on a continual basis. A more detailed plan for distribution of this document may be set forth in the future as an amendment, if necessary. Additional guidance on nearly every task described below is described in the section immediately following, Preservation Briefs, and in the guidance contained in those briefs.

The list and description of exempt activities is as follows:

### Interior

1. Repair of floors, when work is accomplished in kind, to precisely match existing materials and form. Any sources of damage, such as moisture or damage from another object, must be identified and remedied prior to undertaking repairs, to ensure against future harm.

Refer to Preservation Briefs 6 "Dangers of Abrasive Cleaning to Historic Buildings," 17 "Architectural Character - Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character," 18 "Rehabilitating Interiors in Historic Buildings - Identifying Character-Defining Elements," 35 "Understanding Old Buildings: The Process of Architectural Investigation," 39 "Holding the Line: Controlling Unwanted Moisture in Historic Buildings" and 40 "Preserving Historic Ceramic Tile Floors."

2. Floor refinishing shall be accomplished to exactly match existing finish, so long as the refinishing product is water-based and is removable using gentlest means possible. Stone, brick and tile floors shall NOT be sealed or stained.

Refer to Preservation Briefs 15 "Preservation of Historic Concrete: Problems and General Approaches," 18 "Rehabilitating Interiors in Historic Buildings - Identifying Character-Defining Elements," 28 "Painting Historic Interiors," 35 "Understanding Old Buildings: The Process of Architectural Investigation," 40 "Preserving Historic Ceramic Tile Floors" and 42 "The Maintenance, Repair and Replacement of Historic Cast Stone."

3. Repair of interior walls, including plaster and drywall, to exactly match existing; this can include repair of interior cracks up to one-inch wide. Any material used to repair such cracks shall match the color and finish of the existing materials. The repairs must be restricted to the damaged area and care must be taken to avoid damage to adjacent materials. This exemption does NOT apply to walls that have decorative plaster trim or other finishes that contribute to the architectural significance of the property.

Refer to Preservation Briefs 17 "Architectural Character - Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character," 18 "Rehabilitating Interiors in Historic Buildings - Identifying Character-Defining Elements," 21 "Repairing Historic Flat Plaster - Walls and Ceilings," 22 "The Preservation and Repair of Historic Stucco," 23 "Preserving Historic Ornamental Plaster," 28 "Painting Historic Interiors" and 34 "Applied Decoration for Historic Interiors: Preserving Historic Composition Ornament."

4. Removal of loose and flaking paint, only if it can be accomplished using the least invasive techniques possible: those are limited to light sanding, preferably by hand (light sanding does NOT allow overall exposure of bare wood or other materials) and hand scraping. Paint removal or destructive surface preparation treatments including low-, medium- and high-pressure water blasting, sandblasting or chemical cleaning shall NOT be used. Painted surfaces shall be repainted to match the pre-existing finish, while any interior or exterior surfaces that do not show evidence of previous paint application shall remain unpainted. Decorative paint and plaster treatments, including murals, shall NOT be retouched, overpainted, plastered, drywalled, or paneled over.

Refer to Preservation Briefs 6 "Dangers of Abrasive Cleaning to Historic Buildings," 18 "Rehabilitating Interiors in Historic Buildings - Identifying Character-Defining Elements," 23 "Preserving Historic Ornamental Plaster," 28 "Painting Historic Interiors," 34 "Applied Decoration for Historic Interiors: Preserving Historic Composition Ornament," 35 "Understanding Old Buildings: The Process of Architectural Investigation" and 37 "Appropriate Methods of Reducing Lead-Paint Hazards in Historic Housing."

5. Repair of interior stairs when work is accomplished in kind to exactly match existing materials, in profile, thickness, dimensions, shape, form and finishes.

Refer to Preservation Briefs 17 "Architectural Character - Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character," 18 "Rehabilitating Interiors in Historic Buildings - Identifying Character-Defining Elements," 28 "Painting Historic Interiors" and 35 "Understanding Old Buildings: The Process of Architectural Investigation."

6. Repair or replacement of suspended ceiling tiles when work is done in kind to exactly match existing in profile, thickness, dimensions, shape, form and finishes.

Refer to Preservation Briefs 17 "Architectural Character - Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character," 18 "Rehabilitating Interiors in Historic Buildings - Identifying Character-Defining Elements" and 35 "Understanding Old Buildings: The Process of Architectural Investigation."

7. Installation of grab bars and minor interior modifications for ADA accessibility. Such installations shall NOT use fasteners drilled into any part of tile, stone, brick or other masonry; such penetrations are only allowable in grout or mortar. Any such penetrations shall be carefully repaired immediately after modification is removed, using same strength, color, and finish of grout or mortar.

Portland cement shall NOT be used for such patching or repairs under any circumstances. Any grout or mortar repair material must be the same strength or weaker than the original material and must match the original in appearance, color, texture (sanded versus non-sanded) and tooling or striking method.

Refer to Preservation Briefs 7 "The Preservation of Historic Glazed Architectural Terra-Cotta" and 32 "Making Historic Properties Accessible."

8. Repair or replacement of free-standing furniture and equipment. Alteration of built-in cabinetry, furniture, or bookshelves (casework) shall NOT be included in this exemption unless it is limited to in kind repair. Such work shall be undertaken in the sequence identified in the *Secretary's Standards*: patching, piecing-in, splicing, consolidating, or otherwise reinforcing. The least invasive approach shall be used. Any of these approaches must match existing material as closely as possible (in profile, thickness, dimensions, shape and form) and painted or refinished to match existing. Previously unpainted casework shall not be painted and painted casework shall not be stripped of paint without consultation and approval by a qualified architectural historian.

Refer to Preservation Briefs 17 "Architectural Character - Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character," 18 "Rehabilitating Interiors in Historic Buildings - Identifying Character-Defining Elements," 28 "Painting Historic Interiors" and 35 "Understanding Old Buildings: The Process of Architectural Investigation."

### Mechanical, Electrical and Plumbing

9. No window- or wall-mounted air conditioners, heating or air filtration devices shall be installed.  
Refer to Preservation Brief 24 "Heating, Ventilating, and Cooling Historic Buildings: Problems and Recommended Approaches."
10. Replacement or installation of insulation, provided that decorative interior plaster, woodwork or exterior siding is not altered by this work item. Use of urea formaldehyde foam insulation or any other thermal insulation that contains water in its chemical composition and is installed within wall cavities shall NOT be included in this exemption.

Refer to Preservation Brief 3 "Conserving Energy in Historic Buildings."

11. Installation of mechanical equipment within exterior perimeter walls and beneath the roof of a building such that it does not affect the exterior appearance of the building or require installation of new duct work in the interior. Such installations shall NOT use fasteners drilled into any part of tile, stone, brick or other masonry; such penetrations are only allowable in grout or mortar. Any such penetrations shall be carefully repaired immediately after modification is removed, using same strength, color, and finish of grout or mortar.

Refer to Preservation Briefs 3 "Conserving Energy in Historic Buildings" and 24 "Heating, Ventilating, and Cooling Historic Buildings: Problems and Recommended Approaches."

12. Repair or replacement of minor electrical work within building, limited to upgrading or replacement of wiring and utilitarian components (e.g. junction boxes, conduit, panels, sub panels, utilitarian sockets), with the exception of fixtures and decorative or archaic switches that shall be repaired wherever possible. If such repair or replacement necessitates opening walls, the walls shall be closed, repaired, and re-painted in kind to match existing finishes. Boxes shall be flush mounted (inset) in walls and recessed with appropriate front plate. Surface-mounted conduit will be acceptable in applications of less than 20 lineal feet per run, and only when affixed to easily repairable surfaces (e.g. plaster, grout, non-decorative painting, simple woodwork or paneling) and painted to match existing wall finish. Such installations shall NOT use fasteners drilled into any part of tile, stone, brick or other masonry; such penetrations are only allowable in grout or mortar. Any such penetrations shall be carefully repaired immediately after modification is removed, using same strength, color, and finish of grout or mortar.



Refer to Preservation Briefs 17 "Architectural Character - Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character," 18 "Rehabilitating Interiors in Historic Buildings - Identifying Character-Defining Elements," 21 "Repairing Historic Flat Plaster - Walls and Ceilings," 22 "The Preservation and Repair of Historic Stucco," 23 "Preserving Historic Ornamental Plaster" and 28 "Painting Historic Interiors."

13. Replacement or installation of fire or smoke detectors. Care should be taken to avoid damage or alteration of surrounding finishes or materials when installing these features. This exemption does NOT apply where installation of these items would result in damage to surrounding finishes or features. Such installations shall NOT use fasteners drilled into any part of tile, stone, brick or other masonry; such penetrations are only allowable in grout or mortar. Any such penetrations shall be carefully repaired immediately after modification is removed, using same strength, color, and finish of grout or mortar.

Refer to Preservation Brief 24 "Heating, Ventilating, and Cooling Historic Buildings: Problems and Recommended Approaches."

14. Minor plumbing work within buildings, limited to upgrading or in kind replacement of pipes and other utilitarian components, with the exception of historic or archaic fixtures that shall be repaired when possible. Plumbing fixtures such as sinks and toilets shall NOT be replaced unless the fixture cannot be repaired (more than 50 percent unusable, refer to definition of *replacement*), and then shall be replaced in kind.

Refer to Preservation Briefs 7 "The Preservation of Historic Glazed Architectural Terra-Cotta," 17 "Architectural Character - Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character," 18 "Rehabilitating Interiors in Historic Buildings - Identifying Character-Defining Elements" and 35 "Understanding Old Buildings: The Process of Architectural Investigation."

### Exterior

15. Repair, or partial replacement of existing porch components, including cornices, exterior siding, doors, balustrades, stairs, or other trim, only if the existing feature cannot be repaired. The repair or replacement must be accomplished in kind to exactly match existing material (in profile, dimensions, shape, thickness and form) and painted, where applicable, to match existing finish. Such work must be undertaken in the sequence identified in the *Secretary's Standards*: patching, piecing-in, splicing, consolidating, otherwise reinforcing or upgrading. The least invasive approach shall be used.

Refer to Preservation Briefs 1 "Assessing Cleaning and Water-Repellent Treatments for Historic Masonry Buildings," 6 "Dangers of Abrasive Cleaning to Historic Buildings," 7 "The Preservation of Historic Glazed Architectural Terra-Cotta," 10 "Exterior Paint Problems on Historic Woodwork," 16 "The Use of Substitute Materials on Historic Building Exteriors," 17 "Architectural Character - Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character," 35 "Understanding Old Buildings: The Process of Architectural Investigation" and 38 "Removing Graffiti from Historic Masonry."

### Doors and Windows

16. Repair of interior or exterior doors, frames and thresholds when such work is undertaken in the sequence identified in the *Secretary's Standards*: patching, piecing-in, splicing, consolidating, or otherwise reinforcing. The least invasive approach shall be used. Any of these approaches shall

match existing material as closely as possible (in profile, thickness, dimensions, shape and form) and painted or refinished, consistent with pre-existing finishes.

Refer to Preservation Briefs 17 "Architectural Character - Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character," 18 "Rehabilitating Interiors in Historic Buildings - Identifying Character-Defining Elements," 28 "Painting Historic Interiors" and 35 "Understanding Old Buildings: The Process of Architectural Investigation."

17. Replacement of damaged security devices or installation of new security devices consistent with original or pre-existing finishes including cameras, dead bolts, door locks, window latches, door peepholes or intrusion detection devices. Such installations shall NOT use fasteners drilled into any part of tile, stone, brick or other masonry; such penetrations are only allowable in grout or mortar. Any such penetrations shall be carefully repaired immediately after modification is removed, using same strength, color, and finish of grout or mortar.

Refer to Preservation Briefs 17 "Architectural Character - Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character," 18 "Rehabilitating Interiors in Historic Buildings - Identifying Character-Defining Elements," 28 "Painting Historic Interiors" and 35 "Understanding Old Buildings: The Process of Architectural Investigation."

18. Caulking and weather-stripping shall be accomplished with compatibly colored materials.

Refer to Preservation Brief 3 "Conserving Energy in Historic Buildings."

19. Replacement of clear window panes in kind, so long as the broken glass and replacement glass are clear and un-tinted; and replacement glass does not alter the existing window material, form or appearance. The glass shall be glazed in a manner appropriate for the window (e.g. finished using properly smoothed glaziers' putty, painted wood stops, etc.), and to match glazing methods in other panes of glass in same window. Replacement of existing archaic, textured, decorative, or tinted glass is NOT included in this exemption.

Refer to Preservation Briefs 9 "The Repair of Historic Wooden Windows," 11 "Rehabilitating Historic Storefronts," 12 "The Preservation of Historic Pigmented Structural Glass (Vitrolite and Carrara Glass)," 13 "The Repair and Thermal Upgrading of Historic Steel Windows," 17 "Architectural Character - Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character," 18 "Rehabilitating Interiors in Historic Buildings - Identifying Character-Defining Elements," 28 "Painting Historic Interiors" and 35 "Understanding Old Buildings: The Process of Architectural Investigation."

20. Repair of window sash, frames and sills when such work is undertaken in the sequence identified in the *Secretary's Standards*; patching, piecing-in, splicing, consolidating, or otherwise reinforcing. The least invasive approach shall be used. Any of these approaches must match existing material as closely as possible (in profile, thickness, dimensions, shape and form) and be painted or finished to match existing finish. Replacement of any of these features shall NOT be exempted.

Refer to Preservation Briefs 9 "The Repair of Historic Wooden Windows," 10 "Exterior Paint Problems on Historic Woodwork," 12 "The Preservation of Historic Pigmented Structural Glass (Vitrolite and Carrara Glass)," 13 "The Repair and Thermal Upgrading of Historic Steel Windows" and 33 "The Preservation and Repair of Historic Stained and Leaded Glass."

## Roofs and Related Features

21. Repair of roofing, gutters and downspouts shall be accomplished in kind to exactly match existing materials (in profile, dimensions, including thickness, shape and form) and painted or refinished to match existing finish. Cement asbestos shingles may be replaced with asphalt-based shingles and untreated wood shingles may be replaced with fire-resistant wood shingles. Replacement of broken, individual terra cotta tiles must match existing as closely as possible in color, finish, type, shape, thickness and form, dimensions, pattern and attachment method. New roof finish material shall not be applied over existing roof material (e.g. shingles, tiles). Replacement of roofing materials in large part (more than 25 percent) or in total is NOT included in this exemption.

Refer to Preservation Briefs 4 "Roofing for Historic Buildings," 17 "Architectural Character - Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character," 19 "The Repair and Replacement of Historic Wooden Shingle Roofs," 29 "The Repair, Replacement, and Maintenance of Historic Slate Roofs," 30 "The Preservation and Repair of Historic Clay Tile Roofs" and 39 "Holding the Line: Controlling Unwanted Moisture in Historic Buildings."

## Seismic Repair and Upgrade

22. Anchoring of masonry walls to floor and roof systems, so long as anchors are embedded and concealed from exterior view, such as Hilti-type (or equal) systems.

Refer to Preservation Briefs 5 "The Preservation of Historic Adobe Buildings" and 41 "The Seismic Retrofit of Historic Buildings: Keeping Preservation in the Forefront."

23. Grout injection of unreinforced masonry (URM) walls is limited to application of City of Los Angeles document #P/BC 2002-056 (formerly RGA #1-91), "Crack Repair of Unreinforced Masonry Walls with Grout Injection."<sup>12</sup> Mortar shall be removed as necessary for repairs using hand tools only. No epoxy shall be used in URM applications.

Refer to Preservation Briefs 2 "Repointing Mortar Joints in Historic Masonry Buildings" and 41 "The Seismic Retrofit of Historic Buildings: Keeping Preservation in the Forefront."

24. Repair of parapets, chimneys and cornices shall be accomplished to exactly match existing features in all material and visual aspects. Portland cement shall NOT be used for such patching or repairs under any circumstances. Bracing and reinforcing of chimneys and fireplaces is exempted, if bracing and reinforcing are either concealed from exterior view or removable in the future.

Refer to Preservation Briefs 2 "Repointing Mortar Joints in Historic Masonry Buildings," 4 "Roofing for Historic Buildings" and 41 "The Seismic Retrofit of Historic Buildings: Keeping Preservation in the Forefront."

25. Brick or masonry repointing shall include removal of deteriorated mortar using only hand tools, and new mortar shall match existing in color, texture and style of finish (striking). New mortar shall not be stronger than original and Portland cement shall NOT be used for such patching or repairs under any circumstances.

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<sup>12</sup> City of Los Angeles Department of Building & Safety, "Crack Repair of Unreinforced Masonry Walls with Grout Injection." document #P/BC 2002-056, formerly RGA #1-91, effective 2/11/91, revised 3/10/00  
<<http://www.ladbs.org/faq/info%20bulletins/building%20code/IB-P-BC%202002-056%20Crack%20Repair%20of%20URM.pdf>>

Refer to Preservation Briefs 1 "Assessing Cleaning and Water-Repellent Treatments for Historic Masonry Buildings," 2 "Repointing Mortar Joints in Historic Masonry Buildings," 3 "Conserving Energy in Historic Buildings," 6 "Dangers of Abrasive Cleaning to Historic Buildings" and 38 "Removing Graffiti from Historic Masonry."

26. Stabilization of structural foundations and addition of foundation bolts, so long as work is not visible from interior finished rooms or any part of building exterior.

Refer to Preservation Briefs 17 "Architectural Character - Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character," 35 "Understanding Old Buildings: The Process of Architectural Investigation" and 41 "The Seismic Retrofit of Historic Buildings: Keeping Preservation in the Forefront."

27. Temporary bracing or shoring, as part of emergency stabilization. Any such bracing or shoring shall not use fasteners or other penetrations drilled into any part of stone, brick, tile or other masonry; such penetrations are only allowable in mortar or wood. Any such penetrations shall be carefully repaired immediately after modification is removed, using same strength, color, and finish of grout, mortar or wood. Portland cement shall NOT be used for such patching or repairs under any circumstances.

Refer to Preservation Briefs 17 "Architectural Character - Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character," 35 "Understanding Old Buildings: The Process of Architectural Investigation" and 41 "The Seismic Retrofit of Historic Buildings: Keeping Preservation in the Forefront."

28. Installation of seismic upgrades, provided such upgrades are not visible on the exterior or on interior in publicly accessible spaces, including offices. These seismic upgrades shall be limited to: cross bracing on pier and post foundations, metal fasteners, collar ties, gussets, tie downs, strapping and anchoring of mechanical, electrical or plumbing equipment, installation of plywood diaphragms beneath first floor joists, above top floor ceiling rafters and on roofs, and addition of seismic automatic gas shut-off valves. Any such bracing or shoring shall not use fasteners or other penetrations drilled into any part of stone, brick, tile or other masonry; such penetrations are only allowable in mortar or wood. Any such penetrations shall be carefully repaired immediately after modification is removed, using same strength, color, and finish of grout, mortar or wood.

Refer to Preservation Briefs 17 "Architectural Character - Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character," 35 "Understanding Old Buildings: The Process of Architectural Investigation" and 41 "The Seismic Retrofit of Historic Buildings: Keeping Preservation in the Forefront."

#### Other Exterior Work

29. Repair or replacement of signs or awnings (including frame or armature) when work is done in kind to exactly match existing materials, form, method and location of attachment. Any such attachments shall not use fasteners or other penetrations drilled into any part of stone, brick, tile or other masonry; such penetrations are only allowable in mortar or wood. Any such penetrations shall be carefully repaired immediately after modification is removed, using same strength, color, and finish of grout, mortar or wood.

Refer to Preservation Briefs 25 "The Preservation of Historic Signs" and 44 "The Use of Awnings on Historic Buildings: Repair, Replacement and New Design."

## Landscaping

30. Replacement in kind of landscaping plant material, retaining existing grade level.

Refer to Preservation Brief 36 "Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes."

31. Repair or replacement of utilitarian landscape components, such as sprinkler piping. This does not include archaic, decorative or other potential character-defining features, such as fountains or paved walkways.

Refer to Preservation Brief 36 "Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes."

32. Repair of fencing and freestanding exterior walls when work is accomplished in kind to exactly match existing materials and form.

Refer to Preservation Brief 36 "Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes."

33. Installation of temporary (no more than 365 days in duration), reversible barriers such as chain link fences and polyethylene sheeting or tarps. Attachments for these barriers shall not use fasteners or other penetrations drilled into any part of stone, brick, tile or other masonry; such penetrations are only allowable in mortar or wood. Any such penetrations shall be carefully repaired immediately after modification is removed, using same strength, color, and finish of grout, mortar or wood.

Refer to Preservation Briefs 31 "Mothballing Historic Buildings" and 41 "The Seismic Retrofit of Historic Buildings: Keeping Preservation in the Forefront."

34. Repair of roadways, driveways and walkways when such work is accomplished in kind to exactly match existing material, finish and form.

Refer to Preservation Briefs 1 "Assessing Cleaning and Water-Repellent Treatments for Historic Masonry Buildings," 2 "Repointing Mortar Joints in Historic Masonry Buildings," 6 "Dangers of Abrasive Cleaning to Historic Buildings," 7 "The Preservation of Historic Glazed Architectural Terra-Cotta," 15 "Preservation of Historic Concrete: Problems and General Approaches," 16 "The Use of Substitute Materials on Historic Building Exteriors," 17 "Architectural Character - Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character," 32 "Making Historic Properties Accessible," 36 "Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes," 38 "Removing Graffiti from Historic Masonry" and 42 "The Maintenance, Repair and Replacement of Historic Cast Stone."

35. Repair or replacement of running track surfaces, within existing curbs. This exception does NOT include alterations to existing curb, steps or any features or surfaces other than that of the track. New track surfaces shall be installed at the same grade in all portions of the track as existing and match in finish and form.

Refer to Preservation Briefs 15 "Preservation of Historic Concrete: Problems and General Approaches" and 16 "The Use of Substitute Materials on Historic Building Exteriors."

## HISTORICAL RESOURCES OWNED BY LAUSD

The three described surveys of properties owned by LAUSD (constructed before 1955), identified the following 123 schools as historical resources (having one or more buildings that meet the criteria for listing in the California Register):

School Name	Date(s)	Survey
2 <sup>nd</sup> Street Elementary School	1922-1978	FEMA
10 <sup>th</sup> Street Elementary School	1922-1983	Phase 1/Getty
17 <sup>th</sup> Street Elementary School <sup>13</sup>	1926	FEMA
24 <sup>th</sup> Street Elementary School	1926-1971	other
49 <sup>th</sup> Street Elementary School	1923-1968	Phase 1/Getty
52 <sup>nd</sup> Street Elementary School	1922-1969	Phase 1/Getty
66 <sup>th</sup> Street Elementary School	1927-1965	Phase 1/Getty
109 <sup>th</sup> Street Elementary School	1940	other
Adams Middle School	1927-1964	Phase 1/Getty
Aldama Elementary School	1923-1927	Phase 1/Getty
Alta Loma Elementary School	1935-1972	Phase 1/Getty
Angeles Mesa Elementary School	1917-1968	other
Apperson Street Elementary School	1949-1957	Phase 2
Arlington Heights Elementary School	1937-1968	FEMA
Baldwin Hills Elementary School	1949-1973	Phase 1/Getty
Bandini Branch Adult Education Center	unknown	FEMA
Bandini Street Elementary School	1923-1977	FEMA
Barton Hill Elementary School	1923-1965	Phase 1/Getty
Bell High School	1925-1989	Phase 1/Getty
Belvedere Elementary School	1922-1962	FEMA
Berendo Middle School	1937-1992	Phase 1/Getty
Broadway Elementary School	1936-1963	Phase 1/Getty
Bryson Avenue Elementary School	1925-1977	Phase 1/Getty
Buchanan Street Elementary School	1937-1996	FEMA
Burroughs Middle School	1923-1978	Phase 1/Getty
Canoga Park Elementary School	1935-1969	FEMA
Canoga Park High School	1930-1977	Phase 1/Getty
Carpenter Avenue School	1938-1968	FEMA
Carson Street School	1927-1966	Phase 1/Getty
Cienega Elementary School	1924-1969	other
Corona Avenue Elementary School	1935-1968	Phase 1/Getty
Dorris Place Elementary School	1928-1970	Phase 1/Getty
Dorsey High School	1937-1961	Phase 1/Getty
Eagle Rock Elementary School	1917-1919	Phase 1/Getty
El Sereno Middle School	1937-1968	Phase 1/Getty

<sup>13</sup> Now used as Senior High School Division Office.

School Name	Date(s)	Survey
Emerson Middle School	1937-1957	Phase 2
Eshelman Avenue Elementary School	1925-1969	FEMA
Euclid Avenue Elementary School	1923-1970	Phase 1/Getty
Fairfax High School	1942-1968	Phase 1/Getty
Fremont High School	1924-1976	Phase 1/Getty
Fries Avenue Elementary School	1924-1977	Phase 1/Getty
Garvanza Elementary School	1922-1966	FEMA
Glassell Park Elementary School	1924-1952	Phase 1/Getty
Gompers Middle School	1937-1962	FEMA
Graham Elementary School	1925-1975	Phase 1/Getty
Grant Elementary School	1922-1990	FEMA
Gulf Avenue Elementary School	1926-1969	FEMA
Hamasaki Middle School	1927-1962	Phase 1/Getty
Hamilton High School	1931-1949	FEMA
Hancock Park Elementary School	1937-1958	FEMA
Hobart Boulevard Elementary School	1937-1968	Phase 1/Getty
Hollenbeck Middle School	1923-1976	FEMA
Hollywood High School	1910-1977	other; Phase 1/Getty
Humphreys Avenue Elementary School	1923-1969	Phase 1/Getty
Huntington Park High School	1923-1991	Phase 1/Getty
Irving Middle School	1937-1990	Phase 1/Getty
Jefferson High School	1936-1970	other; Phase 1/Getty
Jordan High School	1927-1970	Phase 1/Getty
Kester Avenue Elementary School	1951-1957	Phase 1/Getty
King Elementary School	1936-1972	Phase 2
Los Angeles Center for Enriched Studies	1937-1961	FEMA
Lankershim Elementary School	1912-1982	Phase 1/Getty
Le Conte Middle School	1922-1977	FEMA
Leland Street Elementary School	1924-1977	Phase 1/Getty
Lincoln High School	1937-1980	FEMA
Lokrantz Special Education Center	1960-1975	Phase 1/Getty
Lomita Fundamental Magnet	1937-1968	Phase 1/Getty
Los Feliz Elementary School	1937	FEMA
Mann Middle School	1926-1977	Phase 1/Getty
Manual Arts High School	1935-1989	other; Phase 1/Getty
Mar Vista Elementary School	1949-1957	Phase 2
Marshall High School	1931-1992	FEMA
Miramonte Elementary School	1936-1969	FEMA
Morningside Elementary School	1915-1995	FEMA
Muir Middle School	1922-1971	other
Nightingale Middle School	1937-1969	Phase 1/Getty
North Hollywood High School	1927	FEMA
Norwood Street Elementary School	1939-1969	Phase 2
Old Canyon School	1894	Phase 1/Getty
Old Farmdale School	1894	Phase 1/Getty
Old Vernon School (Heritage School)	1876	Phase 1/Getty



<b>School Name</b>	<b>Date(s)</b>	<b>Survey</b>
Pacific Palisades Elementary School	1931-1960	other; Phase 1/Getty
Pacoima Elementary School	1916-1969	Phase 1/Getty
Palms Middle School	1949-1960	Phase 2
Perez Special Education Center	1926-1981	Phase 1/Getty
Point Fermin Elementary School	1921-1925	Phase 1/Getty
Reed Middle School	1939-1958	Phase 1/Getty
Reseda Elementary School	1936-1955	FEMA
Ritter Elementary School	1932-1968	FEMA
Rowan Avenue Elementary School	1916-1963	Phase 1/Getty
Salvin Special Education	1937-1974	Phase 2
San Fernando Middle School	1916-1975	FEMA
San Gabriel Avenue Elementary School	1924-1937	Phase 1/Getty
San Pedro Adult School	1926	FEMA
San Pedro High School	1936-1971	FEMA
San Pedro Street School	1927-1991	Phase 1/Getty
Santa Monica Elementary School	1937-1993	FEMA
Solano Avenue Elementary School	1924	Phase 1/Getty
Soto Street Elementary School	1937	FEMA
South Gate High School	1930-1988	Phase 1/Getty
South Gate Middle School	1941-1966	FEMA
South Park Elementary School	1936-1966	Phase 1/Getty
State Street Children's Center	1931	Phase 1/Getty
State Street Elementary School	1924-1937	Phase 1/Getty
Sterry Children's Center	1914	Phase 1/Getty
Sun Valley Middle School	1944-1954	Phase 2
University High School	1924-1978	FEMA
Utah Street School	1937-1970	Phase 1/Getty
Van Ness Elementary School	1923	FEMA
Van Nuys High School	1933-1976	Phase 1/Getty
Van Nuys Middle School	1948-1958	Phase 2
Venice High School	1935-1969	Phase 1/Getty
Verdugo Hills High School	1937-1970	Phase 1/Getty
Vernon City Elementary School	1929-1942	Phase 1/Getty
Victoria Avenue Elementary School	1929-1976	Phase 2
Vine Street Elementary School	1922-1995	FEMA
Virgil Middle School	1924-1978	Phase 1/Getty
Virginia Road Elementary School	1924-1977	Phase 1/Getty
Warner Avenue Elementary School	1949-1977	Phase 2
West Vernon Avenue Elementary School	1937-1976	Phase 1/Getty
Wilton Place Elementary School	1922-1996	FEMA
Wright Middle School	1948-1951	Phase 1/Getty
Yorkdale Elementary School	1923-1966	Phase 1/Getty

## POST-WORLD WAR II ERA PROPERTIES RECOMMENDED FOR RE-EVALUATION

As part of the Phase 2 evaluation, the following properties were recommended for future re-evaluation for historic significance:

School Name	Date(s)
153 <sup>rd</sup> Street Elementary School	1957-1958
156 <sup>th</sup> Street Elementary School	1953
186 <sup>th</sup> Street Elementary School	1955-1962
Amestoy Elementary School	1949-1957
Avalon Gardens Elementary School	1952
Castle Heights Elementary School	1951-1961
Century Park Elementary School	1948-1959
Chandler Elementary School	1949-1956
Colfax Avenue Elementary School	1950-1956
Cowan Avenue Elementary School	1953-1958
Dixie Canyon Avenue Elementary School	1949-1961
Encino Elementary School	1947-1961
Fernangeles Elementary School	1948-1954
Fullbright Avenue Elementary School	1954
Haskell Elementary School	1953-1965
Hawaiian Avenue Elementary School	1948-1966
Pacoima Middle School	1955
Sherman Oaks Center for Enriched Studies	1950-1956
Stagg Street Elementary School	1954-1958
Vintage Street Fundamental Magnet School	1953
Webster Middle School	1954-1958
Wilmington Middle School	1951-1962

## PRESERVATION BRIEFS

Preservation Briefs listed below in numerical order provide additional, detailed information that can be used as a guide for preserving, rehabilitating and restoring specific features, such as windows, masonry walls and roofs of historic buildings. Prepared pursuant to the National Historic Preservation Act of 1966, as amended, the Secretary of the Interior developed and made available "information concerning historic properties. Technical Preservation Services, Heritage Preservation Services Division, National Park Service prepare[d] standards, guidelines, and other educational materials on responsible historic preservation treatments to a broad public."<sup>14</sup> Since 1975, these have been prepared by National Park Service staff as part of Technical Preservation Services, and are updated and amended as necessary. Written and illustrated guidance is provided in each brief on how to deal with these features in conformance with the Secretary's Standards. Rather than to exclude certain briefs that may not apply to LAUSD-owned properties, all are cited regardless of the applicability of focus.

Individual Preservation Briefs are available for a small fee from the US Government Printing Office (GPO, telephone number 866-512-1800) using the stock number from the GPO Online Bookstore (<http://bookstore.gpo.gov>). A complete set of single-sided, faxable prints out of each Preservation Brief shall be maintained at LAUSD Facilities department for dissemination and use by personnel without web access. Each Preservation Brief is listed below (by number), followed by the appropriate web link.

At the main Preservation Brief website (<http://www.cr.nps.gov/hps/tps/briefs/presbhom.htm>), the content of these briefs can be searched by item (e.g. windows - historic wooden and - historic steel).

### Preservation Briefs

- 1 "Assessing Cleaning and Water-Repellent Treatments for Historic Masonry Buildings"  
<http://www.cr.nps.gov/hps/tps/briefs/brief01.htm>
- 2 "Repointing Mortar Joints in Historic Masonry Buildings"  
<http://www.cr.nps.gov/hps/tps/briefs/brief02.htm>
- 3 "Conserving Energy in Historic Buildings" <http://www.cr.nps.gov/hps/tps/briefs/brief03.htm>
- 4 "Roofing for Historic Buildings" <http://www.cr.nps.gov/hps/tps/briefs/brief04.htm>
- 5 "The Preservation of Historic Adobe Buildings" <http://www.cr.nps.gov/hps/tps/briefs/brief05.htm>
- 6 "Dangers of Abrasive Cleaning to Historic Buildings" <http://www.cr.nps.gov/hps/tps/briefs/brief06.htm>
- 7 "The Preservation of Historic Glazed Architectural Terra-Cotta"  
<http://www.cr.nps.gov/hps/tps/briefs/brief07.htm>
- 8 "Aluminum and Vinyl Siding on Historic Buildings: The Appropriateness of Substitute Materials for Resurfacing Historic Wood Frame Buildings" <http://www.cr.nps.gov/hps/tps/briefs/brief08.htm>
- 9 "The Repair of Historic Wooden Windows" <http://www.cr.nps.gov/hps/tps/briefs/brief09.htm>
- 10 "Exterior Paint Problems on Historic Woodwork" <http://www.cr.nps.gov/hps/tps/briefs/brief10.htm>
- 11 "Rehabilitating Historic Storefronts" <http://www.cr.nps.gov/hps/tps/briefs/brief11.htm>
- 12 "The Preservation of Historic Pigmented Structural Glass (Vitrolite and Carrara Glass)"  
<http://www.cr.nps.gov/hps/tps/briefs/brief12.htm>

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<sup>14</sup> National Park Service "Technical Preservation Services for Historic Buildings"  
<<http://www.cr.nps.gov/hps/tps/briefs/credits.htm>>

- 13 "The Repair and Thermal Upgrading of Historic Steel Windows"  
<http://www.cr.nps.gov/hps/tps/briefs/brief13.htm>
- 14 "New Exterior Additions to Historic Buildings: Preservation Concerns"  
<http://www.cr.nps.gov/hps/tps/briefs/brief14.htm>
- 15 "Preservation of Historic Concrete: Problems and General Approaches"  
<http://www.cr.nps.gov/hps/tps/briefs/brief15.htm>
- 16 "The Use of Substitute Materials on Historic Building Exteriors"  
<http://www.cr.nps.gov/hps/tps/briefs/brief16.htm>
- 17 "Architectural Character - Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character" <http://www.cr.nps.gov/hps/tps/briefs/brief17.htm>
- 18 "Rehabilitating Interiors in Historic Buildings - Identifying Character-Defining Elements"  
<http://www.cr.nps.gov/hps/tps/briefs/brief18.htm>
- 19 "The Repair and Replacement of Historic Wooden Shingle Roofs"  
<http://www.cr.nps.gov/hps/tps/briefs/brief19.htm>
- 20 "The Preservation of Historic Barns" <http://www.cr.nps.gov/hps/tps/briefs/brief20.htm>
- 21 "Repairing Historic Flat Plaster - Walls and Ceilings" <http://www.cr.nps.gov/hps/tps/briefs/brief21.htm>
- 22 "The Preservation and Repair of Historic Stucco" <http://www.cr.nps.gov/hps/tps/briefs/brief22.htm>
- 23 "Preserving Historic Ornamental Plaster" <http://www.cr.nps.gov/hps/tps/briefs/brief23.htm>
- 24 "Heating, Ventilating, and Cooling Historic Buildings: Problems and Recommended Approaches"  
<http://www.cr.nps.gov/hps/tps/briefs/brief24.htm>
- 25 "The Preservation of Historic Signs" <http://www.cr.nps.gov/hps/tps/briefs/brief25.htm>
- 26 "The Preservation and Repair of Historic Log Buildings"  
<http://www.cr.nps.gov/hps/tps/briefs/brief26.htm>
- 27 "The Maintenance and Repair of Architectural Cast Iron"  
<http://www.cr.nps.gov/hps/tps/briefs/brief27.htm>
- 28 "Painting Historic Interiors" <http://www.cr.nps.gov/hps/tps/briefs/brief28.htm>
- 29 "The Repair, Replacement, and Maintenance of Historic Slate Roofs"  
<http://www.cr.nps.gov/hps/tps/briefs/brief29.htm>
- 30 "The Preservation and Repair of Historic Clay Tile Roofs"  
<http://www.cr.nps.gov/hps/tps/briefs/brief30.htm>
- 31 "Mothballing Historic Buildings" <http://www.cr.nps.gov/hps/tps/briefs/brief31.htm>
- 32 "Making Historic Properties Accessible" <http://www.cr.nps.gov/hps/tps/briefs/brief32.htm>
- 33 "The Preservation and Repair of Historic Stained and Leaded Glass"  
<http://www.cr.nps.gov/hps/tps/briefs/brief33.htm>
- 34 "Applied Decoration for Historic Interiors: Preserving Historic Composition Ornament"  
<http://www.cr.nps.gov/hps/tps/briefs/brief34.htm>
- 35 "Understanding Old Buildings: The Process of Architectural Investigation"  
<http://www.cr.nps.gov/hps/tps/briefs/brief35.htm>

- 36 "Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes"  
<http://www.cr.nps.gov/hps/tps/briefs/brief36.htm>
- 37 "Appropriate Methods of Reducing Lead-Paint Hazards in Historic Housing"  
<http://www.cr.nps.gov/hps/tps/briefs/brief37.htm>
- 38 "Removing Graffiti from Historic Masonry" <http://www.cr.nps.gov/hps/tps/briefs/brief38.htm>
- 39 "Holding the Line: Controlling Unwanted Moisture in Historic Buildings"  
<http://www.cr.nps.gov/hps/tps/briefs/brief39.htm>
- 40 "Preserving Historic Ceramic Tile Floors" <http://www.cr.nps.gov/hps/tps/briefs/brief40.htm>
- 41 "The Seismic Retrofit of Historic Buildings: Keeping Preservation in the Forefront"  
<http://www.cr.nps.gov/hps/tps/briefs/brief41.htm>
- 42 "The Maintenance, Repair and Replacement of Historic Cast Stone"  
<http://www.cr.nps.gov/hps/tps/briefs/brief42.htm>
- 43 "The Preparation and Use of Historic Structure Reports"  
<http://www.cr.nps.gov/hps/tps/briefs/brief43.htm>
- 44 "The Use of Awnings on Historic Buildings: Repair, Replacement and New Design"  
<http://www.cr.nps.gov/hps/tps/briefs/brief44.htm>

## B-4 Historic Resources Survey Report

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LAUSD Historic Resources Inventory, updated April 2023\*

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
2	CR	Intensive (DPR)	001st Street	ES	2820 E 1st St, Los Angeles 90033	13267	1922-1978
2	NR; CR (Listed)	Reconnaissance	002nd Street	ES	1942 E 2nd St, Los Angeles 90033	13326	1923-1969
1	Ineligible	Reconnaissance	003rd Street	ES	201 S June St, Los Angeles, CA 90004	13399	
2	NR; CR	Intensive (DPR)	004th Street	ES	420 S Amalia Ave, Los Angeles 90022	13482	1938-1969
1	LAHCM	Intensive (HRER)	006th Avenue	ES	3109 Sixth Ave, Los Angeles 90018	13425	1922-1969
7	Ineligible	Reconnaissance (Memo)	007th Street	ES	1570 7th St, San Pedro	13550	1963-1987
2	CR; LAHCM	Reconnaissance (DPR)	010th Street	ES	1000 Grattan St, Los Angeles 90015	13265	1922-1983
7	NR; CR; LAHCM	Reconnaissance	015th Street	ES	1527 S Mesa St, San Pedro 90731	13337	1923-1961, <a href="#">1929</a> , <a href="#">1935</a>
2	NR; CR (Listed)	Reconnaissance	017th Street	ES	644 W 17th St, Los Angeles 90015	13282	1926

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**LAUSD Historic Resources Inventory, updated April 2023\***

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
2	Ineligible	Intensive (DPR)	020th Street	ES	1353 20th St, Los Angeles 90011	13333	1969-1998
1	NR; CR (Listed)	Reconnnaissance (memo - EEC)	024th Street	ES	2055 W 24th St, Los Angeles 90018	13335	1926-1971
2	Ineligible	Intensive (DPR)	028th Street	ES	2807 Stanford Ave, Los Angeles 90011	13325	1927-1968
1	Ineligible	Intensive (HRER)	032nd Street	ES	822 W 32nd Way, Los 90007	13299	
1	NR; CR	Intensive (DPR)	042nd Street II	ES	4231 Fourth Ave, Los Angeles 90008	13487	1926-1977
7	NR; CR; LAHCM	Intensive (HRER)	049th Street	ES	750 E 49th St, Los Angeles 90011	13348	1923-1969
1	NR; CR	Reconnnaissance (DPR)	052nd Street II	ES	816 W 51st St, Los Angeles 90037	13307	1922-1969; <a href="#">1925</a>
1	LAHCM	Intensive (DPR)	054th Street	ES	5501 S Eileen Ave, Los Angeles 90043	13548	1927-1949
1	Ineligible	Intensive (DPR)	059th Street	ES	5939 Second Ave, Los Angeles 90043	13400	1924-1977

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LAUSD Historic Resources Inventory, updated April 2023\*

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
1	Ineligible	Intensive (DPR)	061st Street	ES	6020 S Figueroa St, Los Angeles 90003	13370	1936-1969
7	NR; CR	Reconnaissance (DPR)	066th Street	ES	6600 S San Pedro St, Los Angeles 9003	13339	1927-1965
7	Ineligible	Intensive (DPR)	068th Street	ES	612 W 68th St, Los Angeles 90044	13318	1936-1963
1	Ineligible	Reconnaissance	074th Street	ES	2112 74th St, Los Angeles 90047	13549	1967
7	Ineligible	Reconnaissance	075th Street	ES	142 W 75th St, Los Angeles 90003	13470	1923-1969
7	CR; LAHCM	Intensive (HRER)	092nd Street	ES	9211 Grape St, Los Angeles 90002	13511	1940-1976; <a href="#">1931</a>
7	Ineligible	Reconnaissance (Memo)	093rd Street	ES	330 E 93rd Way, Los Angeles 90003	13814	1962
1	Ineligible	Intensive (DPR)	095th Street Preparatory School	ES	1109 W 96th St, Los Angeles 90044	13349	1922-1977
7	Ineligible	Reconnaissance	096th Street	ES	1471 E 96th St, Los Angeles 90002	13496	1950-1976

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**LAUSD Historic Resources Inventory, updated April 2023\***

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
4	Ineligible	Reconnaissance	098th Street II (closed) Bright Star Secondary Academy	ES	5431 W 98th St, Los Angeles 90045	13547	1951-1955
7	Ineligible	Reconnaissance	099th Street	ES	9900 S Wadsworth Ave, Los Angeles 90002	13508	1926-1971
7	NR; CR	Intensive (DPR)	107th Street	ES	147 107th St, Los Angeles 90003	13857	1957
7	NR; CR; LAHCM	Reconnaissance	109th Street	ES	10915 McKinley Ave, Los Angeles 90059	13672	1939-1976
7	Ineligible	Intensive (DPR)	112th Street	ES	1265 112th St, Los Angeles 90059	13838	1960
7	Ineligible	Reconnaissance	116th Street	ES	11610 Stanford Ave, Los Angeles 90059	13723	1953-1957
7	Ineligible	Reconnaissance	118th Street	ES	144 E 118th St, Los Angeles 90061	13321	1923-1968
7	Ineligible		122nd Street	ES	405 E 122nd Way, Los Angeles 90061	13868	1963-1963
1	Ineligible	Reconnaissance	135th Street	ES	801 W 135th St, Gardena 90247	13607	1949-1957

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**LAUSD Historic Resources Inventory, updated April 2023\***

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
7	Ineligible	Reconnaissance	153rd Street	ES	1605 W 153rd St, Gardena 90247	13812	1957-1958
7	CR	Intensive (DPR)	156th Street	ES	2100 W 156th St, Gardena 90249	13673	1953
7	Ineligible	Reconnaissance	186th Street	ES	1581 W 186th St, Gardena 90248	13303	1955-1962
7	Ineligible		232nd Place	ES	23240 Archibald Way, Carson 90745	13709	1957-1968
2	CR; LAHCM	Reconnaissance	Adams, John	MS	151 W 30th St, Los Angeles 90007	13366	1927-1964
3	Ineligible		Admin - 21213 Vanowen		21213 Vanowen St, Canoga Park 91303	13519	
2	Needs Evaluation		Admin (14th St/San Julian)		711-715 14th St, Los Angeles	13334	1923
1	Ineligible		Admin Ofc - M&O Area S1		6620 11th Ave, Los Angeles 90043	15042	1937
3	Ineligible		Aggeler	CDS	21050 Plummer St, Chatsworth 91311	13644	1951

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**LAUSD Historic Resources Inventory, updated April 2023\***

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
2	CR; LAHCM	Intensive (HRER)	Albion Street	ES	322 S Avenue 18 , Los Angeles 90031	13296	1922-1969
5	NR; CR; LAHCM	Intensive (DPR)	Aldama	ES	632 N Cromwell , 90042	13401	1923-1927
2	Ineligible	Reconnaissance	Alexandria Avenue	ES	4304 Rosewood Ave, Los Angeles 90004	16686	1923-1991
5	Ineligible	Intensive (DPR)	Allesandro	ES	2210 Riverside Dr, Los Angeles 90039	13367	1954-1977
1	NR; CR	Reconnaissance (DPR)	Alta Loma	ES	1745 Vineyard Ave, Los Angeles 90019	13402	1935-1972
7	Ineligible		Ambler Avenue	ES	319 E Sherman Way, Carson 90746	13833	1966
7	Ineligible	Reconnaissance	Amestoy	ES	1048 W 149th St, Gardena 90247	13426	1949-1957
6	Ineligible	Reconnaissance	Anatola Avenue	ES	7364 Anatola Ave, Van Nuys 91406	13609	1951-1955
3	NR; CR	Intensive (DPR)	Andasol	ES	10126 Encino Ave, Northridge	13839	1959

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**LAUSD Historic Resources Inventory, updated April 2023\***

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
1	NR; CR (Listed)	Reconnaissance	Angeles Mesa	ES	2611 W 52nd St, Los Angeles 90043	13427	1917-1968
2	Ineligible	Intensive (DPR)	Ann	ES	126 Bloom St, Los Angeles 90012	13426	1957
7	Ineligible		Annalee Avenue	ES	19410 S Annalee Way, Los Angeles 90746	13760	1966-1967
5	Ineligible	Reconnaissance	Annandale	ES	6125 Poppy Peak Dr, Los Angeles 90042	13371	1954-1965
6	NR; CR; LAHCM	Reconnaissance	Apperson Street	ES	10233 Woodward Ave, Sunland 91040	13608	1949-1957
5	CR	Reconnaissance	Aragon Avenue	ES	1118 Aragon Ave, Los Angeles 90065	13372	1925-1969
1	NR; CR (Listed)	Reconnaissance	Arlington Heights	ES	1717 Seventh Ave, Los Angeles 90019	15202	1937-1968
6	Ineligible	Reconnaissance (DPR)	Arminta Street	ES	11530 Strathern St, North Hollywood 91605	13710	1953
5	Ineligible	Intensive (Memo)	Arroyo Seco Museum Science Magnet	ES/MS	4805 Sycamore Way, Los Angeles 90042	13900	1975

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Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
5	Ineligible	Reconnaissance	Ascot Avenue	ES	1447 E 45th St, Los Angeles 90011	13276	1925-1977
5	Ineligible		Atwater	ES	3271 Silver Lake Way, Los Angeles 90039	13457	1976
1	Ineligible	Intensive (DPR)	Audubon	MS	4120 11th Ave, Los Angeles 90008	13564	1953-1974
7	Ineligible	Reconnaissance	Avalon	ES	13940 S San Pedro St, Los Angeles 90061	13618	1948-1955
3	Needs Evaluation		Balboa Blvd. Magnet	ES	17020 Labrador St, Northridge	13840	1960
1	NR; CR	Reconnaissance (DPR)	Baldwin Hills	ES	5421 Obama Blvd, Los Angeles 90016	13595	1949-1973
4	Ineligible	Reconnaissance	Bancroft, Hubert Howe	MS	929 N Las Palmas Ave, Los Angeles 90038	13565	1929-1978
7	NR; CR (Listed)	Reconnaissance	Bandini Street	ES	425 N Bandini St, San Pedro 90731	13458	1923-1977; <a href="#">1935</a>
7	Ineligible		Banneker	SS	14024 S San Pedro Way, Los Angeles 90061	15142	1972-1978

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Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
7	Ineligible	Reconnaissance	Banning, Phineas	SH	1527 Lakme Ave, Wilmington 90744	13368	1937-1978
1	Ineligible	Reconnaissance	Barrett, Charles W.	ES	419 W 98th St, Los Angeles 90003	13449	1923-1969
7	NR; CR	Reconnaissance (DPR/Memo)	Barton Hill	ES	423 N Pacific Ave, San Pedro 90731	13340	1923-1965; <a href="#">1933</a>
3	Ineligible	Intensive (DPR)	Bassett	ES	15756 Bassett St, Lake Balboa 91406	13813	
6	Ineligible	Reconnaissance	Beachy Avenue	ES	9757 Beachy Ave, Pacoima 91331	13666	1954-1960
3	Ineligible		Beckford	ES	19130 Tulsa St, Northridge	13836	
4	Ineligible	Reconnaissance	Beethoven Street	ES	3711 Beethoven St, Los Angeles 90066	15206	1949-1959
4	Ineligible	Reconnaissance	Beethoven Street Children's Center	CC	12939 Lucille Ave, Los Angeles 90066	15206	1944
5	CR; LAHCM	Reconnaissance (DPR)	Bell	SH	4328 Bell Ave, Bell 90201	13488	1925-1989

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**LAUSD Historic Resources Inventory, updated April 2023\***

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
5	Ineligible		Bellevue Avenue	CC	610 N Micheltorena St, Los Angeles 90026	13841	
2	NR; CR	Intensive (DPR)	Belmont	SH	1574 W 2nd St, Los Angeles 90026	14201	1923-1994
2	NR; CR (Listed)	Reconnaissance	Belvedere I	ES	3724 E 1st St, Los Angeles 90063	13373	1922-1962
2	Ineligible	Reconnaissance	Belvedere II	MS	312 N Record Ave, Los Angeles 90063	13466	1924-1985
2	NR; CR	Intensive (DPR)	Berendo	MS	1157 S Berendo St, Los Angeles 90006	13274	1937-1992
2	Ineligible	Reconnaissance	Berkeley Avenue (Preschool)	CC	1814 Berkeley Ave, Los Angeles 90026	13596	1944
6	Ineligible	Reconnaissance	Bertrand Avenue	ES	7021 Bertrand Ave, Reseda 91335	13610	1951-1957
7	Ineligible	Reconnaissance	Bethune, Mary McLeod	MS	155 W 69th St, Los Angeles 90063	13514	1927-1969
3	CR		Birmingham II	SH	17000 Haynes St, Van Nuys 91406	13667	1944-1976

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LAUSD Historic Resources Inventory, updated April 2023\*

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
3	Ineligible		Blythe	ES	18730 Blythe St, Reseda 91335	13758	1957
7	Ineligible		Bonita	ES	21929 Bonita Way, Carson 90745	13796	1958-1958
4	Ineligible	Reconnaissance	Braddock Drive	ES	4711 Inglewood Blvd, Culver City 90230	13536	1949-1955
1	Ineligible	Reconnaissance	Bradley	MS	3875 Dublin Ave, Los Angeles 90008	13516	
6	CR		Brainard	ES	11407 Brainard Ave, Lakeview Terrace (Los Angeles)	13834	1966
2	CR	Reconnaissance	Breed Street	ES	2226 E 3rd St, Los Angeles 90033	13281	1937-1990
4	NR; CR; LAHCM	Reconnaissance	Brentwood Science Magnet	ES	740 Gretna Green Wy, Los Angeles 90049	13394	1929-1977; <a href="#">1935</a>
2	CR	Reconnaissance	Bridge Street	ES	605 N Boyle Ave, Los Angeles 90033	13297	1922-1924
1	Ineligible		Bright	ES	1771 W 36th Way, Los Angeles 90018	13306	

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**LAUSD Historic Resources Inventory, updated April 2023\***

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
7	Ineligible	Reconnaissance	Broad Avenue	ES	24815 Broad Ave, Wilmington 90744	13774	
7	Ineligible		Broadacres	ES	19424 S Broadacres Way, Carson 90746	13837	1967-1967
6	Ineligible	Intensive (HRER)	Broadous, Hillery T	ES	12561 Filmore Way, Pacoima 91331	13768	
4	CR; LAHCM	Reconnaissance (DPR)	Broadway	ES	1015 Lincoln Blvd, Venice 90291	13533	1936-1963
4	Ineligible	Reconnaissance	Brockton Avenue	ES	1309 Armacost Ave, Los Angeles 90025	13432	1922-1967
2	Ineligible		Brooklyn Avenue	ES	4620 Cesar Chavez Way, Los Angeles 90022	13471	1960-1975
5	CR; LAHCM	Reconnaissance	Bryson Avenue	ES	4470 Missouri Ave, South Gate 90280	13558	1925-1977
5	NR; CR (Listed)	Reconnaissance	Buchanan Street	ES	5024 Buchanan St, Los Angeles 90042	13350	1937-1996
1	Ineligible	Reconnaissance	Budlong Avenue	ES	5940 S Budlong Ave, Los Angeles 90044	15162	1937-1969

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**LAUSD Historic Resources Inventory, updated April 2023\***

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
3	Ineligible	Reconnaissance	Burbank Boulevard	ES	12215 Albers St, North Hollywood 91607	13678	1954, <a href="#">1955</a>
5	LAHCM	Reconnaissance	Burbank, Luther	MS	6460 N Figueroa St, Los Angeles 90042	13551	1927-1977
1	NR; CR	Reconnaissance (DPR)	Burroughs, John	MS	600 S McCadden Pl, Los Angeles 90005	13448	1923-1978
6	Ineligible	Intensive (DPR)	Burton Street	ES	8111 Calhoun St, Panorama City 91402	13540	1950-1958
5	NR; CR; LAHCM	Reconnaissance	Bushnell Way	ES	5507 Bushnell Way, Los Angeles 90042	13375	1935-1974
7	NR; CR; LAHCM	Reconnaissance	Cabrillo Avenue	ES	732 S Cabrillo Ave, San Pedro 90731	13552	1927-1972
2	Ineligible	Reconnaissance	Cahuenga	ES	220 S Hobart Blvd, Los Angeles 90004	13341	1937-1996
4	Ineligible		Calabash	ES	23055 Eugene Way, Woodland Hills	13743	1959
3	CR		Calahan Community Charter		18722 Knapp St, Northridge	13747	

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**LAUSD Historic Resources Inventory, updated April 2023\***

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
4	Ineligible	Reconnaissance	Calvert Street	ES	19850 Delano St, Woodland Hills 91367	13731	1953-1954
6	NR; CR	Intensive (DPR)	Camellia Avenue	ES	7451 Camellia Ave, North Hollywood 91605	13587	1945-1955
1	NR; CR	Intensive (DPR)	Canfield Avenue	ES	9233 Airdrome St, Los Angeles 90035	13556	1949-1976
3	NR; CR (Listed)		Canoga Park I	ES	7438 Topanga Canyon Blvd, Canoga Park 91303	13416	1935-1969
3	NR; CR (Listed)	Intensive (HRER/DPR)	Canoga Park II	SH	6850 Topanga Canyon Blvd, Canoga Park 91303	13415	1930-1977
6	Ineligible	Reconnaissance	Cantara Street	ES	17950 Cantara St, Reseda 91355	13732	1952-1961
6	Ineligible	Reconnaissance	Canterbury Avenue	ES	13670 Montague St, Arleta 91331	13541	1955-1957
4	NR; CR; LAHCM	Intensive (Memo)	Canyon (SM)	ES	421 Entrada Dr, Santa Monica 90402	13346	1894-1955

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LAUSD Historic Resources Inventory, updated April 2023\*

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
3	Ineligible	Intensive (DPR)	Capistrano Avenue	ES	8118 Capistrano Ave, West Hills	13759	1957-58
7	Ineligible		Carnegie	MS	21820 Bonita Way, Carson 90745	13761	1965
7	Ineligible		Caroldale Learning Community	ES	22424 Caroldale Way, Carson 90745	13843	1960-1969
3	NR; CR; LAHCM		Carpenter Avenue; <i>Carpenter Community Charter School</i>	ES	3909 Cromwell Ave, 91604	13518	1938-1969
7	Ineligible		Carson	SH	22328 S Main Way, Carson 90745	13869	1962-1969
1	CR; LAHCM	Reconnaissance (DPR)	Carson Street	ES	161 E Carson St, Carson 90745	13435	1927-1966
1	CR; LAHCM	Intensive (DPR)	Carthay Center	ES	6351 W Olympic Blvd, Los Angeles 90048	13461	1926-1949
5	NR; CR; LAHCM	Intensive (DPR)	Carver, George Washington	MS	4410 McKinley Ave, Los Angeles 90011	13409	1923-1960; 1934
2	Needs Evaluation	Reconnaissance	Castelar	ES	840 Yale St, Los Angeles 90012	13283	1923-1976

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1	CR	Intensive (DPR)	Castle Heights	ES	9755 Cattaraugus Ave, Los Angeles 90034	13680	1951-1961
3	Ineligible		Castlebay	ES	19010 Castlebay Ln, Northridge	13892	
7	Ineligible	Reconnaissance	Catskill Avenue	ES	23536 Catskill Ave, Carson 90745	13662	1948-1963
1	Ineligible	Reconnaissance	Century Park	ES	10935 S Spinning Ave, Inglewood 90303	13675	1948-1959
3	Needs Evaluation		Chandler	ES	14030 Weddington St, Van Nuys 91401	13619	1949-1956
5	Ineligible	Reconnaissance	Chapman	ES	1947 Marine Ave, Gardena 90249	13460	1948-1977
1	Ineligible		Charnock Road	ES	11133 Charnock Way, Los Angeles	13676	
6	Ineligible		Chase Street	EEC	8635 Colbath Ave, Panorama City 91402	16744	
6	Ineligible	Reconnaissance	Chase Street	ES	14041 Chase St, Van Nuys 91402	13620	1949-1955

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Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
3	NR; CR	Intensive (DPR)	Chatsworth	SH	10027 Lurline Ave, Chatsworth 91311	13870	1963
3	CR	Intensive (DPR)	Chatsworth Park	ES	22005 Devonshire St, Chatsworth 91311	13389	1935-1959
4	NR; CR; LAHCM	Reconnaissance	Cheremoya Avenue	ES	6017 Franklin Ave, Los Angeles 90028	13410	1922
4	Needs Evaluation		CHIME Institute's Schwarzenegger Community School	ES	19722 W Collier Way, Tarzana	13844	1960
1	NR; CR (Listed)	Intensive (DPR)	Cienega	ES	2611 Orange Way, Los Angeles 90016	13429	1924-1969
1	Ineligible		Cimarron	ES	11559 Cimarron Way, Los Angeles 90044	13660	1953-1957
5	Ineligible	Reconnaissance	City Terrace	ES	4350 City Terrace Dr, Los Angeles 90063	13490	1948-1959
1	Needs Evaluation		Clay (Animo Phillis Wheatley Charter MS)	MS	12226 S Western Ave, Los Angeles 90047	13752	1958
3	NR; CR	Intensive (DPR)	Cleveland, Grover	SH	8140 Vanalden Ave, Reseda 91335	13753	1959-1960

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5	Ineligible		Clifford	ES	2150 Duane Way, Los Angeles	13309	
3	Ineligible		Clover Avenue	ES	11020 Clover Ave, Los Angeles 90034	11020	1954
1	Ineligible		Cochran	MS	4066 W Johnnie Cochran Way, Los Angeles	13574	1936
4	Ineligible		Coeur d'Alene	ES	810 COEUR D'ALENE Way, Los Angeles 90019	13578	1956-1957
6	Ineligible	Intensive (DPR)	Cohasset Street	ES	15810 Saticoy St, Van Nuys 91406	13542	1954-1957
3	Ineligible	Reconnaissance	Coldwater Canyon Avenue	ES	6850 Coldwater Canyon Ave, North Hollywood 91605	13663	1948-1954
3	CR	Intensive (DPR)	Colfax Avenue	ES	11724 Addison St, North Hollywood 91607	13681	1950-1955
1	Ineligible	Reconnaissance	Coliseum Street	ES	4400 Coliseum St, Los Angeles 90016	13593	1954
3	Needs Evaluation	Intensive (DPR)	Columbus	MS	22250 Elkwood St, Canoga Park	13754	

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2	Ineligible	Reconnaissance	Commonwealth Avenue	ES	215 S Commonwealth Ave, Los Angeles 90004	13392	1937-1991
4	Needs Evaluation		Community Magnet Charter		11301 Bellagio Way, Los Angeles 90049	13687	1941
7	Ineligible	Reconnaissance	Compton Avenue	ES	1515 E 104th St, Los Angeles 90002	13498	1949-1967
5	NR; CR	Reconnaissance (DPR)	Corona Avenue	ES	3825 Bell Ave, Bell 90201	13453	1935-1968
4	Ineligible	Reconnaissance	Cowan Avenue	ES	7615 Cowan Ave, Los Angeles 90045	13622	1953-1958
1	Ineligible		Crenshaw	SH	5010 11th Way, Los Angeles 90043	13766	1968-1968
1	Needs Evaluation	Reconnaissance	Crescent Heights Boulevard	ES	1661 S Crescent Heights Blvd, Los Angeles 90035	13454	1941-1976
7	Ineligible	Reconnaissance	Crestwood Street	ES	1946 W Crestwood St, San Pedro 90732	13733	1953-1961
7	Ineligible		Curtiss	MS	1254 E Helmick Way, Carson 90746	13775	1969-1969

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**LAUSD Historic Resources Inventory, updated April 2023\***

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
5	Ineligible		Dahlia Heights	ES	5063 Floristan Way, Los Angeles	13308	1962-1966
7	Ineligible	Reconnaissance	Dana, Richard Henry	MS	1501 Cabrillo Ave, San Pedro 90731	15063	1928-1962
3	Ineligible	Intensive (DPR)	Danube Avenue	ES	11220 Danube Ave, Granada Hills	13845	
3	Needs Evaluation		Darby	ES	10818 Darby Ave, Northridge	13797	
5	Needs Evaluation		Dayton Heights	ES	607 N Westmoreland Ave, Los Angeles 90004	13352	1924-1977
4	NR; CR; LAHCM		de Portola, Gaspar	MS	18720 Linnet St, Tarzana	13785	1960
3	Ineligible		Dearborn	ES	9240 Wish Way, Northridge	13762	
7	Ineligible	Reconnaissance	Del Amo	ES	21228 Water St, Carson 90745	13623	1950-1968
5	Ineligible		Delevan Drive	ES	4168 W Avenue 42 , Los Angeles 90065	13455	1954-1974

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**LAUSD Historic Resources Inventory, updated April 2023\***

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
5	Ineligible	Reconnaissance	Delevan Science Center	ES	4300 Yosemite Way, Los Angeles 90065		1912-1930
2	Ineligible	Reconnaissance	Dena, Christopher	ES	1314 Dacotah St, Los Angeles 90023	13277	1926-1969
7	Ineligible	Intensive (DPR)	Denker Avenue	ES	1620 W 162nd St, Gardena 90247	13638	1935-1963
3	Needs Evaluation		Devonshire	ES	10045 N Jumilla Ave, Chatsworth 91311	13801	1962
3	Ineligible	Reconnaissance	Dixie Canyon Avenue	ES	4220 Dixie Canyon Ave, Sherman Oaks 91423	13677	1949-1961
6	CR	Intensive (DPR)	Dodson, Rudecinda Sepulveda	MS	28014 Montereyina Dr, Rancho Palos Verdes 90275	13846	1960
7	Ineligible	Reconnaissance	Dolores Street	ES	22526 Dolores St, Carson 90745	13711	1954
7	Ineligible	Reconnaissance	Dominguez	ES	21250 Santa Fe Ave, Long Beach 90810	13310	1926-1961
5	NR; CR	Reconnaissance (DPR)	Dorris Place	ES	2225 Dorris Pl, Los Angeles 90031	13510	1928-1970; <a href="#">1925</a>

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**LAUSD Historic Resources Inventory, updated April 2023\***

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1	NR; CR (Listed)	Intensive (DPR)	Dorsey, Susan Miller	SH	3537 Farmdale Ave, Los Angeles 90016	13643	1937-1961
2	Needs Evaluation		Downtown Business Magnet	HS	1081 W Temple St, Los Angeles 90012	13269	1961
7	NR	Intensive (HRER)	Drew Jr., Charles R.	MS	8511 Compton Ave, Los Angeles	13871	1960-1963
6	Ineligible	Intensive (DPR)	Dyer Street	ES	14500 Dyer St, Sylmar 91342	13712	1953-1954
5	CR	Reconnaissance (DPR)	Eagle Rock I	ES	2057 Fair Park Ave, Los Angeles 90041	13499	1917-1919
5	Ineligible	Reconnaissance	Eagle Rock II	SH	1750 Yosemite Dr, Los Angeles 90041	13553	1927-1976
2	Ineligible	Intensive (DPR)	Eastman Avenue	ES	4112 E Olympic Blvd, Los Angeles 90023	13520	1923-1977
7	Ineligible	Reconnaissance	Edison, Thomas A.	MS	6500 Hooper Ave, Los Angeles 90001	13555	1926-1963
1	Ineligible		Education Career Center - West		3721 W Washington Blvd, Los Angeles 90018	15204	1936

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3	Needs Evaluation		El Camino Real CAS	HS	5440 Valley Circle Blvd, Woodland Hills 91367	13776	1966
6	CR	Intensive (DPR)	El Dorado	ES	12749 El Dorado Ave, Sylmar 91342	13792	1961
3	Needs Evaluation		El Oro	ES	12230 El Oro Way, Granada Hills	13802	
5	Needs Evaluation		El Sereno	ES	3838 Rosemead Ave, Los Angeles 90032	13387	1915
2	NR; CR	Reconnaissance (DPR)	El Sereno II	MS	2839 N Eastern Ave, Los Angeles 90032	13412	1937-1968
5	Ineligible	Reconnaissance	Elizabeth Street	ES	4811 Elizabeth St, Cudahy 90201	13480	1932-1993
5	CR	Reconnaissance	Elysian Heights	ES	1562 Baxter St, Los Angeles 90026	13411	1917-1972
3	Ineligible	Reconnaissance	Emelita Street	ES	17931 Hatteras St, Encino 91316	13713	1954
4	Needs Evaluation		Emerson Learning Center	AS	8810 Emerson Ave, Los Angeles 90045	13714	1953

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Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
4	NR; CR (Listed)	Reconnaissance	Emerson, Ralph Waldo	MS	1650 Selby Ave, Los Angeles 90024	13641	1937-1957
3	Ineligible	Intensive (DPR)	Enadia Way	ES	22944 Enadia Way, West Hills	13656	
4	Ineligible	Reconnaissance	Encino	ES	16941 Addison St, Encino 91316	13500	1947-1961
3	Ineligible	Reconnaissance	Erwin Street	ES	13400 Erwin St, Van Nuys 91401	13624	1949-1957
7	NR; CR (Listed)	Reconnaissance	Eshelman Avenue	ES	25902 Eshelman Ave, Lomita 90717	13501	1925-1969
2	CR; LAHCM	Reconnaissance	Euclid Avenue	ES	806 Euclid Ave, Los Angeles 90023	13319	1923-1970
2	CR	Reconnaissance	Evans, E. Manfred	AS	717 N Figueroa St, Los Angeles 90012	13288	1914-1981
2	Ineligible	Reconnaissance	Evergreen Avenue	ES	2730 Ganahl St, Los Angeles 90033	13569	1937-1972
6	CR	Reconnaissance	Fair Avenue	ES	6501 Fair Ave, North Hollywood 91606	13600	1949-1955

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6	Ineligible	Reconnaissance	Fair Avenue	EEC	11300 Kittridge St, North Hollywood 91606	16765	
4	Needs Evaluation	Reconnaissance	Fairburn Avenue	ES	1403 Fairburn Ave, Los Angeles 90024	13445	1950-1976
4	NR; CR; LAHCM	Intensive (HRER)	Fairfax	SH	7850 Melrose Ave, Los Angeles 90046	13473	1942-1968
2	Ineligible	Reconnaissance	Farmdale	ES	2660 Ruth Swiggett Dr, Los Angeles 90032	15166	1949-1966
6	Ineligible		Fenton Avenue School	ES	11828 Gain St, Lakeview Terrace (Los Angeles) 91342	13767	1955
6	CR	Intensive (DPR)	Fernangeles	ES	12001 Art St, Sun Valley 91352	13594	1948-1954
1	Ineligible	Reconnaissance	Figueroa Street	ES	510 W 111th St, Los Angeles 90044	13502	1925-1978
5	Ineligible	Reconnaissance	Fishburn Avenue	ES	5701 Fishburn Ave, Maywood 90270	13532	1923-1970
7	Ineligible	Reconnaissance	Fleming, Alexander	MS	25425 Walnut St, Lomita 90717	13657	1925-1990

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LAUSD Historic Resources Inventory, updated April 2023\*

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5	Ineligible		Fletcher Drive	ES	3350 Fletcher Way, Los Angeles 90065	13472	1927
7	Ineligible	Reconnaissance	Florence Avenue	ES	7211 Bell Ave, Los Angeles 90001	13397	1935-1977
7	Ineligible	Reconnaissance	Flournoy	ES	1630 E 111th St, Los Angeles 90059	13509	1925
5	Ineligible	Intensive (DPR)	Ford Boulevard	ES	1112 S Ford Blvd, Los Angeles 90022	13503	1924-1968
1	CR	Intensive (HRER)	Foshay, James A.; <a href="#">Foshay, James, Instructional Academy</a>	LC	3751 S Harvard Blvd, Los Angeles 90018	13474	1924-1968; <a href="#">1935</a>
6	Ineligible	Intensive (HRE Memo)	Francis, John H., Polytechnic	SH	12431 Roscoe Way, Sun Valley 91352	13734	1957-1957
5	CR		Franklin Avenue	ES	1910 N Commonwealth Ave, Los Angeles 90027	13446	1926
5	Needs Evaluation	Reconnaissance (DPR/Memo)	Franklin, Benjamin	SH	820 N Ave 54, Los Angeles, CA 90042	13405	1916-1991
7	NR; CR	Reconnaissance (DPR)	Fremont, John C.	SH	7676 S San Pedro St, Los Angeles 90003	13475	1924-1976; <a href="#">1923</a>

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2	Ineligible	Reconnaissance	Friedman, Abram, Occupational Center	AS	1646 S Olive St, Los Angeles 90015	13462	1926-1977
7	NR; CR; LAHCM	Reconnaissance	Fries Avenue	ES	1301 Fries Ave, Wilmington 90744	13463	1924-1977; <a href="#">1935</a>
3	NR; CR	Intensive (DPR)	Frost, Robert	MS	12314 Bradford Pl, Grenada Hills 91344	13777	1969
4	Ineligible	Reconnaissance	Fullbright Avenue	ES	6940 Fullbright Ave, Canoga Park 91306	13661	1954-1954
6	Ineligible	Reconnaissance	Fulton, Robert	MS	7477 Kester Ave, Van Nuys 91405	13543	1951-1956
5	Needs Evaluation	Reconnaissance	Gage, Henry T.	MS	2880 E Gage Ave, Huntington Park 90255	13598	1929-1992
6	Ineligible		Garden Grove Avenue	ES	18141 Valerio St, Reseda 91335	13715	1953
7	NR		Gardena	SH	1301 W 182nd St, Gardena 90248	13735	1955-1968
7	Ineligible	Reconnaissance	Gardena	ES	647 W Gardena Blvd, Gardena 90247	13320	1949-1965

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4	Needs Evaluation	Reconnaissance	Gardner Street	ES	7450 Hawthorn Ave, Los Angeles 90046	13354	1921-1977
2	NR; CR	Intensive (HRER)	Garfield, James A.	SH	5101 E 6th St, Los Angeles 90022	13512	1925-1983
5	NR; CR (Listed)	Intensive (DPR)	Garvanza	ES	317 N Avenue 62 , Los Angeles 90042	15329	1922-1966
2	Ineligible	Intensive (DPR)	Gates	ES	3333 Manitou Ave, Los Angeles 90031	13291	1890
3	NR; CR	Intensive (DPR)	Gault Street	ES	17000 Gault St, Van Nuys 91406	13682	1951-1957
3	Needs Evaluation		Germain	ES	20730 Germain St, Chatsworth	13872	
5	NR (Listed)	Reconnaissance (DPR)	Glassell Park	ES	2211 W Avenue 30 , Los Angeles 90065	13384	1924-1952
6	CR	Intensive (DPR)	Gledhill	ES	16030 Gledhill St, North Hills	13746	1957-2006
2	Ineligible		Glen Alta	ES	3410 Sierra St, Los Angeles 90031	13292	1890

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5	Ineligible		Glenfeliz	ES	3955 Glenfeliz Blvd, Los Angeles 90039	13526	1960
6	Ineligible	Reconnaissance	Glenwood	ES	8001 Ledge Ave, Sun Valley 91352	13590	1946-1955
7	NR; CR (Listed)	Reconnaissance	Gompers, Samuel Intermediate	MS	234 E 112th St, Los Angeles, CA 90061	13581	1937-1962
7	Ineligible	Intensive (HRER/DPR)	Graham	ES	8407 S Fir Ave, Los Angeles 90001	13476	1925-1975
3	Needs Evaluation	Reconnaissance	Granada	ES	17170 Tribune St, Granada Hills 91344	13561	1954
3	NR; CR	Intensive (DPR)	Granada Hills	SH	10535 Zelzah Ave, Granada Hills 91344	13769	1960
4	Ineligible	Reconnaissance	Grand View Boulevard	ES	3951 Grand View Blvd, Los Angeles 90066	13716	1953
5	NR; CR (Listed)	Intensive (DPR)	Grant	ES	1530 N Wilton Pl, Los Angeles 90028	13355	1922-1990
3	Needs Evaluation		Grant, Ulysses S.	SH	13000 Oxnard Way, Valley Glen 91401	13674	1958-1964

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7	Ineligible	Reconnaissance	Grape Street	ES	1940 111th St, Los Angeles 90059	13495	1925
6	Ineligible	Reconnaissance (Memo)	Gridley	ES	1907 8th St, San Fernando 91340	13748	1958
2	Ineligible	Reconnaissance	Griffin Avenue	ES	2025 Griffin Ave, Los Angeles 90031	13284	1923-1977
2	Ineligible	Reconnaissance	Griffith, David Wark	MS	4765 E 4th St, Los Angeles 90022	13646	1939-1977
7	CR; LAHCM		Griffith-Joyner, Florence	ES	1963 103rd St, Los Angeles 90002	13497	1963-1970
7	NR; CR (Listed)	Reconnaissance	Gulf Avenue	ES	828 W L St, Wilmington 90744	13464	1926-1969
6	Ineligible	Reconnaissance	Haddon Avenue	ES	10115 Haddon Ave, Pacoima 91331	13527	1946-1967
3	NR; CR; LAHCM		Hale, George Ellery	MS	23830 Califa St, Woodland Hills	13873	1961
7	Ineligible	Reconnaissance	Halldale Avenue	ES	21514 Halldale Ave, Torrance 90501	13601	1948-1955

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2	CR	Intensive (HRER/DPR)	Hamasaki, Morris K. School	ES	4865 E First St, Los Angeles 90022	13577	1927-1962
1	NR; CR (Listed)	Intensive (HRER)	Hamilton, Alexander	SH	2955 S Robertson Blvd, Los Angeles 90034	13570	1931-1974
3	Ineligible		Hamlin	ES	22627 Hamlin Way, West Hills	13725	1958-1962
1	NR; CR (Listed)	Reconnaissance	Hancock Park	ES	408 S Fairfax Ave, Los Angeles 90036	13582	1937-1958
7	Ineligible		Harbor City	ES	1508 W 254th St, Harbor City 90710	13406	1916-1976
7	Ineligible		Harbor Occupational Center		740 N Pacific Ave, San Pedro 90731	13779	1960
6	Ineligible		Harding	ES	13060 Harding Way, Sylmar 91342	13819	1962
2	Ineligible		Harrison	ES	3529 City Terrace Dr, Los Angeles 90063	13528	1962
3	Ineligible	Intensive (DPR)	Hart Street	ES	21040 Hart St, Canoga Park 91303	13749	1957

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1	NR; CR		Harte, Bret Prep. Inter.; <i>Harte, Bret Jr., 780 W. 92nd St.</i>	MS	9301 S Hoover St, Los Angeles 90044	13612	1929-1977
3	Ineligible	Intensive (Memo)	Haskell Avenue	ES	15850 Tulsa St, Granada Hills 91344	13736	1953-1965
7	Needs Evaluation	Reconnaissance	Hawaiian Avenue	ES	540 N Hawaiian Ave, Wilmington 90744	13648	1948-1966; <i>1955</i>
3	Ineligible	Intensive (DPR)	Haynes Street	ES	6624 Lockhurst Dr, West Hills 91307	13793	1961
6	Ineligible	Reconnaissance	Hazeltine Avenue	ES	7150 Hazeltine Ave, Van Nuys 91405	13529	1948-1960
5	Ineligible	Reconnaissance	Heliotrope Avenue	ES	5911 Woodlawn Ave, Maywood 90270	13530	1924-1977
3	NR; CR	Intensive (DPR)	Henry, Patrick	MS	17340 San Jose St, Granada Hills 91344	13658	1957-1959
6	Ineligible		Herrick	ES	13350 Herrick Ave, Sylmar 91342	13726	1959
4	Ineligible	Reconnaissance	Hesby Oaks	ES	15530 Hesby St, Encino 91436	13717	1953-1958

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1	Ineligible	Reconnaissance	Hillcrest Drive	ES	4041 Hillcrest Dr, Los Angeles 90008	13621	1949-1962
2	Ineligible	Intensive (DPR)	Hillside	ES	120 E Avenue 35 , Los Angeles 90031	13293	1937-1982
2	CR; LAHCM	Reconnaissance	Hobart Boulevard	ES	980 S Hobart Blvd, Los Angeles 90006	13331	1937-1968
2	NR; CR (Listed)	Reconnaissance	Hollenbeck	MS	2510 E 6th St, Los Angeles 90023	13408	1923-1976
4	NR (Listed)	Intensive (DPR/Memo)	Hollywood	SH	1521 N Highland Ave, Los Angeles 90028	13356	1910-1977
3	NR; CR; LAHCM		Holmes	MS	9351 Paso Robles Way, Northridge	13835	1966
5	NR; CR; LAHCM	Reconnaissance	Holmes Avenue	ES	5108 Holmes Ave, Los Angeles 90058	13315	1923-1969; <a href="#">1922</a>
5	Ineligible	Reconnaissance	Hooper Avenue	ES	1225 E 52nd St, Los Angeles 90011	13316	1937-1976
2	Ineligible	Reconnaissance	Hoover Street	ES	2726 Francis Ave, Los Angeles 90005	13298	1937-1982

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6	Ineligible	Reconnaissance	Hubbard Street	ES	13325 Hubbard St, Sylmar 91342	13718	1953-1965
3	Ineligible		Hughes	MS	5607 Capistrano Way, Woodland Hills	13763	
2	Ineligible	Intensive (HRER/DPR)	Humphreys Avenue	ES	500 S Humphreys Ave, Los Angeles 90022	13437	1923-1969
2	Ineligible	Intensive (DPR)	Huntington Drive	ES	4435 Huntington Dr N, Los Angeles, CA 90032	13312	1963-2006
5	NR; CR	Reconnaissance (DPR)	Huntington Park	SH	6020 Miles Ave, Huntington Park 90255	13597	1923-1991
1	NR; CR	Reconnaissance (Memo)	Hyde Park Blvd. (YES Academy)	ES	3140 Hyde Park Blvd, Los Angeles 90043	13465	1937-1970
3	Needs Evaluation		Independence	SH	6501 Balboa Blvd, Lake Balboa 91406	15186	1944
5	NR; CR; LAHCM	Intensive (HRER)	Irving, Washington	MS	3010 Estara Ave, Los Angeles 90065	13583	1937-1990
5	NR; CR; LAHCM	Reconnaissance	Ivanhoe	ES	2828 Herkimer St, Los Angeles 90039	13357	1941

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5	NR; CR (Listed)	Reconnaissance (DPR)	Jefferson, Thomas	SH	1319 E 41st St, Los Angeles, CA 90011	13447	1936-1970
7	Ineligible	Reconnaissance	Johnston	CDS	2210 Taper Ave, San Pedro 90731	13854	1961
7	NR; CR (Listed)	Intensive (HRER)	Jordan, David Starr	SH	2265 E 103rd St, Los Angeles 90002	13494	1927-1970
3	CR		Justice Street	ES	23350 Justice St, West Hills	13727	1959
3	CR; LAHCM	Intensive (HRER)	Kennedy	SH	11254 Gothic Ave, Granada Hills	13263	1971
4	CR		Kenter Canyon	ES	645 N Kenter Ave, Los Angeles 90049	13626	1955
4	Ineligible	Reconnaissance	Kentwood	ES	8401 Emerson Ave, Los Angeles 90045	13589	1947-1958
3	CR; LAHCM	Reconnaissance (DPR)	Kester Avenue	ES	5353 Kester Ave, Van Nuys 91411	13683	1951-1957
1	NR; CR; LAHCM	Reconnaissance	King Jr., Martin Luther	ES	3989 S Hobart Blvd, Los Angeles 90062	13423	1936-1972

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5	Needs Evaluation	Reconnaissance	King, Thomas Starr	MS	4201 Fountain Ave, Los Angeles 90029	13531	1926-1967
3	Ineligible	Intensive (HRER)	Kittridge	ES	13619 Kittridge Way, Van Nuys 91411	13696	1956-1957
3	Needs Evaluation		Knollwood	ES	11822 Gerald Ave, Granada Hills	13770	
1	Ineligible	Reconnaissance	La Salle Avenue	ES	8715 La Salle Ave, Los Angeles 90047	13507	1949-1968
1	NR; CR (Listed)	Intensive (Memo)	LACES Magnet/Pasteur, Louis	Mag	5931 W 18th St, Los Angeles 90035	13554	1937-1961
4	NR; CR; LAHCM		Lanai	ES	4241 Lanai Rd, Encino	13703	1958
5	Ineligible	Reconnaissance	Lane, Robert Hill	ES	1500 Cesar Chavez Ave, Monterey Park 91754	13629	1949-1955
6	Ineligible	Reconnaissance	Langdon Avenue	ES	8817 Langdon Ave, Sepulveda 91343	13413	1948-1969
3	NR; CR; LAHCM	Reconnaissance (DPR)	Lankershim I	ES	5250 Bakman Ave, North Hollywood 91601	13358	1912-1982

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6	Ineligible	Reconnaissance (Memo)	Lassen	ES	15017 Superior Way, North Hills	13803	
2	Needs Evaluation		Latona	ES	4312 Berenice Ave, Los Angeles	13374	1937
4	Ineligible		Lawrence	MS	10100 Variel Way, Chatsworth 91311	13695	
4	NR; CR (Listed)	Intensive (DPR)	Le Conte, Joseph	MS	1316 N Bronson Ave, Los Angeles 90028	13438	1922-1977
7	NR	Intensive (DPR)	Leapwood	ES	19302 Leapwood Ave, Carson 90746	13817	1962
3	Needs Evaluation		Leichman, Diane	HS	19034 Gault St, Reseda 91335		1971
7	NR; CR; LAHCM	Reconnaissance (DPR)	Leland Street	ES	2120 Leland St, San Pedro 90731	13439	1924-1977; 1935
3	Ineligible	Reconnaissance	Lemay Street	ES	17520 Vanowen St, Van Nuys 91406	13684	1951-1959
5	Ineligible	Reconnaissance	Liberty Boulevard	ES	2728 Liberty Blvd, South Gate 90280	13599	1924-1977

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**LAUSD Historic Resources Inventory, updated April 2023\***

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
6	Ineligible		Liggett	ES	9373 Moonbeam Way, Panorama City 91402	13804	1961
5	Ineligible	Reconnaissance	Lillian Street	ES	5909 Lillian St, Los Angeles 90001	13468	1923-1992
3	Ineligible	Intensive (DPR)	Limerick	ES	8530 Limerick Ave, Canoga Park 91306	13697	1953
2	NR; CR (Listed)	Intensive (HRER)	Lincoln, Abraham II	SH	3501 N Broadway , Los Angeles 90031	13280	1937-1980
7	Ineligible	Intensive (DPR)	Locke, Elaine LeRoy	SH	327 E 111th Way, Los Angeles 90061	13889	c 1967
3	Ineligible	Intensive (DPR)	Lockhurst	ES	6170 Lockhurst Dr, Woodland Hills	13794	
5	CR	Intensive (DPR)	Lockwood Avenue	ES	4345 Lockwood Ave, Los Angeles 90029	13311	1924-1996
5	Ineligible	Reconnaissance	Logan Street	ES	1711 W Montana St, Los Angeles 90026	13266	1922-1992
3	CR; LAHCM	Reconnaissance (DPR)	Lokrantz, Sven Special Ed Ctr	SS	19451 Wyandotte St, Reseda 91335	13795	1960-1975

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5	Ineligible	Reconnaissance	Loma Vista Avenue	ES	3629 E 58th St, Maywood 90270	13586	1936-1987
7	CR; LAHCM	Reconnaissance (DPR)	Lomita Fundamental Magnet	ES	2211 W 247th St, Lomita 90717	13313	1937-1968
3	Ineligible		London, Jack	CDS	12924 Oxnard St, Van Nuys 91401	15441	1958
2	CR	Intensive (DPR)	Lorena Street	ES	1015 S Lorena St, Los Angeles 90023	13351	1923-1936
5	Ineligible	Reconnaissance	Loreto Street	ES	3408 Arroyo Seco Ave, Los Angeles 90065	13301	1938-1968
6	Ineligible	Reconnaissance	Lorne Street	ES	17440 Lorne St, Northridge 91325	13669	1952-1955
1	Ineligible		Los Angeles	SH	4650 W Olympic Blvd, Los Angeles, CA 90019	13361	
5	NR; CR (Listed)	Reconnaissance	Los Feliz	ES	1740 N New Hampshire Ave, Los Angeles 90027	13344	1937
6	Needs Evaluation	Reconnaissance	Lowman, Charles Leroy Special Education Center	SS	12827 Saticoy St, North Hollywood 91605	13544	1949-1972

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4	Ineligible	Reconnaissance	Loyola Village	ES	8821 Villanova Ave, Los Angeles 90045	13602	1953-1954
3	Ineligible	Reconnaissance	Lull Special Education (Academy for Enriched Science)	ES	17551 Miranda St, Encino 91316	13615	1950-1957
6	Ineligible	Reconnaissance (Memo)	Maclay	MS	12540 Pierce Way, Pacoima	13771	1960
3	NR; CR; LAHCM	Intensive (DPR)	Madison, James	MS	13000 Hart St, North Hollywood 91605	13627	1955-1957; <a href="#">1968</a>
2	Ineligible		Magnolia	ES	1626 S Orchard Ave, Los Angeles 90006	13302	1964
7	Ineligible	Reconnaissance	Main Street	ES	129 E 53rd St, Los Angeles 90011	13272	1922-1968
2	Needs Evaluation	Reconnaissance	Malabar Street	ES	3200 E Malabar St, Los Angeles 90063	13314	1922-1959
1	Ineligible	Reconnaissance	Manchester Avenue	ES	661 W 87th St, Los Angeles 90044	13305	1926-1969
1	Ineligible	Reconnaissance	Manhattan Place	ES	1850 W 96th St, Los Angeles 90047	13685	1951-1969

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1	NR; CR; LAHCM	Reconnaissance (DPR)	Mann, Horace	MS	7001 S Cromwell Pl, 90047	13534	1926-1977
1	NR; CR (Listed)	Reconnaissance (DPR)	Manual Arts	SH	4131 S Vermont Ave, Los Angeles 90037	13345	1935-1989
4	NR; CR	Intensive (DPR)	Mar Vista	ES	3330 Granville Ave, Los Angeles 90066	13603	1949-1957; <a href="#">1947</a>
2	Ineligible		Marianna	ES	4215 E Gleason Way, Los Angeles 90063	13479	1958-1964
4	NR; CR	Intensive (HRER)	Marina del Rey	MS	12500 Braddock Dr, Marina del Rey	13782	
7	CR	Intensive (DPR)	Markham	MS	1650 104th St, Los Angeles 90002	13699	1957
1	NR; CR; LAHCM		Marlton	ES	4000 Santa Tomas Dr, Los Angeles 90008	13860	1967
4	Needs Evaluation	Reconnaissance	Marquez	ES	16821 Marquez Ave, Pacific Palisades 90272	13628	1954
5	NR; CR (Listed)		Marshall, John	SH	3939 Tracy St, Los Angeles 90027	13628	1931-1992

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1	Ineligible		Marvin Avenue	ES	2411 Marvin Ave, Los Angeles 90016	13573	1955-1970
7	Ineligible	Reconnaissance	Maxine Waters Occ Ctr		10925 S Central Ave, Los Angeles 90059	13938	1965
3	Needs Evaluation		Mayall	ES	16701 Mayall St, North Hills	13938	
5	Ineligible		Mayberry	ES	2414 Mayberry Way, Los Angeles	13484	
4	Ineligible		McBride, JJ	SS	3960 Centinela Way, Los Angeles	15205	1966-1975
7	Ineligible	Intensive (HRER)	McKinley Avenue II	ES	7812 McKinley Ave, Los Angeles 90001	13506	1925-1968
4	Needs Evaluation	Reconnaissance	Melrose Avenue	ES	731 N Detroit St, Los Angeles 90046	13521	1926-1966
3	Ineligible	Intensive (DPR)	Melvin Avenue	ES	7700 Melvin Ave, Reseda 91335	13719	1954-1960
1	NR; CR	Reconnaissance	Menlo Avenue	ES	4156 Menlo Ave, Los Angeles 90037	13386	1936-1978; 1935

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2	Ineligible	Reconnaissance	Metropolitan II	SH	727 S Wilson St, Los Angeles 90021	13285	1920-1923
7	NR; CR; LAHCM	Reconnaissance	Meyler	ES	1123 W 223rd St, Torrance 90502	13730	1955-1968
5	CR	Intensive (DPR)	Micheltorena	ES	1511 Micheltorena St, Los Angeles 90026	13329	1926-1960
1	Needs Evaluation		Mid City Magnet	ES	3150 W Adams Blvd, Los Angeles	13911	1945
1	Ineligible		Mid City's Prescott	SES	3100 W Adams Blvd, Los Angeles 90018		
5	Ineligible	Reconnaissance	Middleton Street	ES	6537 Malabar St, Huntington Park 90255	13649	1926-1982
5	Ineligible	Reconnaissance	Miles Avenue	ES	6720 Miles Ave, Huntington Park 90255	13650	1936-1983
1	Ineligible		Miller	ES	830 W 77th Way, Los Angeles 90044	13780	1970
3	Needs Evaluation		Millikan/ Lousi Armstrong	MS	5041 Sunnyslope Way, Sherman Oaks	13728	

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7	NR; CR (Listed)	Reconnaissance	Miramonte	ES	1400 E 68th St, Los Angeles 90001	13323	1936-1969
3	Ineligible	Reconnaissance	Monlux, John B.	ES	6051 Bellaire Ave, N. Hollywood 91606	13591	1945-1955
6	Ineligible		Monroe, James	SH	9229 N Haskell Way, North Hills 91343	13704	1957-1957
6	Ineligible	Reconnaissance	Montague Street	ES	13000 Montague St, Arleta 91331	13739	1953
5	Needs Evaluation		Monte Vista	EEC/ES	5423 Monte Vista St, Los Angeles 90042	13270	1957
6	NR; CR (Listed)	Reconnaissance	Morningside	ES	576 N Maclay Ave, San Fernando 91340	13414	1915-1995
6	NR; CR; LAHCM	Intensive (DPR)	Mount Gleason	MS	10965 Mount Gleason Ave, Sunland	13744	1957-1959
1	Ineligible	Reconnaissance	Mount Vernon (Johnnie Cochran MS)	MS	4066 W Johnnie Cochran Vista, Los Angeles 90019	13574	1936-1978
5	Needs Evaluation		Mount Washington	ES	3981 San Rafael Ave, Los Angeles 90065	13324	1955

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6	Ineligible		Mountain View	ES	6410 Olcott Way, Tujunga	13706	
1	CR; LAHCM	Reconnaissance	Muir, John	MS	5929 S Vermont Ave, Los Angeles 90044	13436	1922-1971
3	Ineligible	Intensive (DPR)	Mulholland	MS	17120 Vanowen St, Lake Balboa 91406	151184	1963
2	Ineligible	Reconnaissance	Multnomah Street	ES	2101 N Indiana Ave, Los Angeles 90032	13631	1949
2	Ineligible	Reconnaissance	Murchison Street	ES	1501 Murchison St, Los Angeles 90033	13522	1925-1965
2	Ineligible	Reconnaissance	Murchison Street Children's Center	CC	1537 Murchison St, Los Angeles 90033	16665	1948
3	Ineligible		Napa	ES	19010 Napa Way, Northridge	13701	
7	CR	Intensive (DPR)	Narbonne	SH	24300 Western Ave, Harbor City 90710	13407	1956
4	Ineligible	Reconnaissance	Nestle Avenue	ES	5060 Nestle Ave, Tarzana 91356	13614	1951-1958

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3	NR; CR; LAHCM		Nevada	ES	22120 Chase St, West Hills	13783	1960
5	Ineligible	Reconnaissance	Nevin Avenue	ES	1569 E 32nd St, Los Angeles 90011	13390	1921-1979
6	Ineligible		Newcastle	ES	6520 Newcastle Way, Reseda 91335	13720	1953
5	NR; CR; LAHCM	Reconnaissance (DPR)	Nightingale, Florence	MS	3311 N Figueroa St, Los Angeles 90065	13584	1937-1969
5	Ineligible	Reconnaissance	Nimitz, Chester William	MS	6021 Carmelita Ave, Huntington Park 90255	13637	1929-1969
3	NR; CR		Nobel	MS	9950 Tampa Ave, Northridge, 91324	13805	
6	Ineligible	Intensive (DPR)	Noble Avenue	ES	8329 Noble Ave, Sepulveda 91343	13632	1949-1957
1	Ineligible		Normandie	ES	4505 S Raymond Way, Los Angeles 90037	13300	1907
7	Ineligible	Reconnaissance	Normont	ES	1001 W 253rd St, Harbor City 90710	13652	1949-1968

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3	NR; CR (Listed)	Reconnaissance	North Hollywood III	SH	5231 Colfax Ave, North Hollywood 91601	13557	1926-
6	Ineligible		North Valley Occ Ctr		11450 Sharp Ave, Mission Hills 91345	13888	1970
3	Needs Evaluation	Reconnaissance	Northridge II	MS	17960 Chase St, Northridge 91325	13740	1954-1957
2	CR; LAHCM	Reconnaissance	Norwood Street	ES	2020 Oak St, Los Angeles 90007	13271	1939-1969
4	NR; CR	Intensive (Memo)	Old Canyon School	N/A	421 Entrada Dr, Santa Monica 90402	13346	1894
2	NR; CR	Reconnaissance (DPR)	Old Farmdale School (on campus of El Sereno Middle School; formerly Wilson HS)	N/A	2839 N Eastern Ave, Los Angeles 90032	13412	1894
5	NR; CR	Reconnaissance (DPR)	Old Vernon Avenue School	N/A	2360 E Vernon Ave, Los Angeles	13563	1876
6	CR		Olive Vista	MS	14600 Tyler St, Sylmar 91342	13707	1958-1968
6	Ineligible	Intensive (HRER)	O'Melveny	ES	728 Woodworth St, San Fernando 91340	13396	1949-1966

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4	Needs Evaluation		Open Charter/Osage Avenue	ES	5540 W 77th St, Los Angeles 90045	13633	1949-1972
6	NR; CR	Intensive (DPR)	Osceola	ES	14940 Osceola St, Sylmar 91342	13751	1957-58
1	Ineligible	Reconnaissance	Overland Avenue	ES	10650 Ashby Ave, Los Angeles 90064	13486	1938-1955
6	Ineligible	Reconnaissance	Oxnard Street	ES	10912 Oxnard St, North Hollywood 91606	13636	1948-1969
5	Ineligible	Reconnaissance	Pacific Boulevard Special Education Center	SS	5714 Pacific Blvd, Huntington Park 90255	13936	1918-1976
4	NR; CR; LAHCM	Reconnaissance (DPR)	Pacific Palisades	ES	800 Cromwell , 90272	13443	1931-1960
6	CR; LAHCM	Reconnaissance (DPR)	Pacoima I	ES	11016 Norris Ave, Pacoima 91331	13417	1916-1969
6	CR	Intensive (DPR)	Pacoima II	MS	9919; 9921 Laurel Canyon Blvd, Pacoima 91331	13750	1955; <a href="#">1953</a> ; <a href="#">1957</a>
4	NR	Intensive (DPR)	Palisades Charter	SH	15777 Bowdoin St, Pacific Palisades 90272	13742	1961

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1	Ineligible	Reconnaissance	Palms I	ES	3520 Motor Ave, Los Angeles, CA 90034	13418	1923-1937; <a href="#">1935</a>
1	NR; CR; LAHCM	Reconnaissance	Palms II	MS	10860 Woodbine St, Los Angeles 90034	13668	1949-1960
5	Ineligible		Park Avenue	ES	8020 Park Way, Cudahy 90210	13861	1968-1968
6	Ineligible	Reconnaissance	Park Western Place	ES	1214 Park Western Pl, San Pedro 90732	13588	1944-1962
7	CR	Intensive (DPR)	Parmelee	ES	1338 76th Pl, Los Angeles 90001	13815	1962-1965
3	Needs Evaluation		Parthenia	ES	16825 Napa St, North Hills	13702	
4	Ineligible	Intensive (HRER)	Paseo del Rey	ES	7751 Paseo del Rey Way, Playa del Rey	13784	1959-1960
3	Needs Evaluation		Pearl Journalism and Communications Magnet	SH	6649 Balboa Blvd, Lake Balboa	15701	1944
7	Ineligible	Reconnaissance	Peary, Robert E.	MS	1415 Gardena Blvd, Gardena 90247	13625	1932-1960

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2	CR; LAHCM	Intensive (HRER)	Perez, Alfonso B. Special Education Center	SS	4540 Michigan Ave, Los Angeles 90022	13489	1926-1981
4	Ineligible		Phoenix	HS	12971 Zanja St, Los Angeles 90066	15062	1971
6	Ineligible	Reconnaissance	Pinewood Avenue	ES	10111 Silverton Ave, Tujunga 91042	13613	1937-1969
1	Ineligible		Pio Pico	MS	1512 S Arlington Ave, Los Angeles	13903	1989 (2 bldgs from 1950s)
6	NR; CR; LAHCM	Reconnaissance	Plainview Avenue	ES	10819 Plainview Ave, 91042	13580	1953-1968
2	Ineligible	Reconnaissance	Plasencia, Betty	ES	1321 Cortez St, Los Angeles 90026	13287	1927-1983
3	CR; LAHCM		Platt Ranch	ES	5345 Wilhelmina Ave, Woodland Hills 91364	13818	
4	Needs Evaluation	Reconnaissance	Playa del Rey	ES	12221 Juniette St, Culver City 90230	13559	1955
6	Ineligible	Intensive (DPR)	Plummer	ES	9340 Noble Ave, North Hills 91343	13878	1952-1955

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7	NR; CR; LAHCM	Reconnaissance (DPR)	Point Fermin	ES	3333 S Kerckhoff Ave, San Pedro 90731	13376	1921-1925 (1917; 1936)
6	Needs Evaluation		Polytechnic	SH	12431 Roscoe Blvd, Sun Valley, CA 91352	13734	
3	NR; CR	Intensive (DPR)	Pomelo	ES	7633 March Ave, West Hills	13764	
3	NR; CR; LAHCM		Porter	MS	15960 Kingsbury St, Granada Hills	13807	
7	Ineligible	Intensive (HRER)	President	ES	1465 W 243rd St, Harbor City, CA 90710	13765	
1	Ineligible		Purche	ES	13210 Purche Way, Gardena 90249	13655	1957-1957
1	Ineligible		Queen Anne	ES	1212 Queen Anne Pl, Los Angeles	13567	1992-2005
5	CR	Intensive (DPR)	Ramona I	ES	1133 N Mariposa Ave, Los Angeles 90029	13353	1924-1991
2	Ineligible	Reconnaissance	Ramona II	SH	231 S Alma Ave, Los Angeles 90063	13422	2012

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6	Ineligible		Ranchito Avenue	ES	7940 Ranchito Way, Panorama City 91402	13721	1953; 1939?
1	Needs Evaluation	Reconnaissance	Raymond Avenue	MS	7511 Raymond Ave, Los Angeles 90044	13469	1922-1967
3	NR; CR; LAHCM	Reconnaissance (DPR)	Reed, Walter	MS	4525 Irvine Ave, No Hollywood 91602	13647	1939-1958
3	NR; CR (Listed)	Reconnaissance	Reseda I	ES	7265 Amigo Ave, Reseda 91335	13398	1936-1955
6	Ineligible	Intensive (HRER)	Reseda II	SH	18230 Kittridge St, Reseda 91335	13664	1955-1969
4	NR; CR; LAHCM		Revere, Paul	MS	1450 Allenford Ave, Los Angeles 90049	13665	1955-1956
4	Ineligible	Reconnaissance	Richland Avenue	ES	11562 Richland Ave, Los Angeles 90064	13576	1946-1961
4	Ineligible	Reconnaissance	Richland Avenue Preschool	CC	2623 Coolidge Ave, Los Angeles 90064	13576	1944
3	CR	Reconnaissance	Rio Vista	ES	4243 (4267) Cromwell Ave, 91602	13441	1938-1976

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7	NR; CR (Listed)	Reconnaissance	Ritter	ES	11108 Watts Way, Los Angeles 90059	13562	I
3	Ineligible	Reconnaissance	Riverside Drive	ES	13061 Riverside Dr, Sherman Oaks 91423	13645	1947-1955
5	Ineligible		Rockdale	ES	1303 Yosemite Dr, Los Angeles 90041	13379	1929
2	NR; CR; LAHCM	Reconnaissance	Roosevelt, Theodore II	SH	456 S Mathews St, Los Angeles 90033	13523	1922-1990
6	NR; CR	Intensive (DPR)	Roscoe	ES	10765 Strathern St, Sun Valley 91352	13362	1930-1966
4	Needs Evaluation		Roscomare Road	ES	2425 Roscomare Way, Los Angeles 90077	13799	1957
2	Ineligible	Intensive (DPR)	Rosemont	ES	421 N Rosemont Ave, Los Angeles 90026	13289	1922-1977
4	Ineligible	Reconnaissance	Rosewood Avenue	ES	503 N Croft Ave, Los Angeles 90048	13579	1926
2	NR; CR	Reconnaissance (DPR)	Rowan Avenue	ES	600 S Rowan Ave, Los Angeles 90023	13381	1916-1963

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7	Ineligible	Intensive (DPR)	Russell	ES	1263 E Firestone Blvd, Los Angeles 90001	15401	1926-1962
2	CR; LAHCM	Reconnaissance	Salvin, Sophia T. Special Education Center	SS	1925 Budlong Ave, Los Angeles 90007	13275	1937-1974
6	NR; CR	Intensive (DPR)	San Fernando I	ES	1130 Mott St, San Fernando 91340	13419	1923-1968
6	NR; CR (Listed)	Reconnaissance	San Fernando II	MS	130 N Brand Blvd, San Fernando 91340	13420	1916-1975
6	NR; CR	Reconnaissance	San Fernando III	SH	11133 O'Melveny Ave, San Fernando 91340	13670	1951-1957
5	CR; LAHCM	Reconnaissance (DPR)	San Gabriel Avenue	ES	8628 San Gabriel Ave, South Gate 90280	13651	1924-1937
6	Ineligible		San Jose	ES	14928 Clymer St, Mission Hills 91345	13691	1954-55
5	Needs Evaluation		San Pascual	ES	815 San Pascual Ave, Los Angeles 90042	13440	1924
7	NR; CR (Listed)	Reconnaissance	San Pedro I	SH	1001 W 15th St, San Pedro 90731	13377	1936-1971; 1926

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7	NR; CR (Listed)	Reconnaissance	San Pedro II	AS	950 W Santa Cruz St, San Pedro 90731	13434	1926
7	CR; LAHCM	Reconnaissance	San Pedro Street	ES	1635 S San Pedro St, Los Angeles 90015	13279	1927-1997
2	NR; CR (Listed)	Reconnaissance	Santa Monica Boulevard (Currently Community Charter School)	ES	1022 N Van Ness Ave, Los Angeles 90038	13347	1937-1993
6	Needs Evaluation		Saticoy	ES	7850 Ethel Way, North Hollywood 91605	13363	1956 (primarily)
1	CR	Intensive (DPR)	Saturn Street	ES	5360 Saturn St, Los Angeles 90019	13525	1953-1965
7	Ineligible		Sellery	SS	15804 S Budlong Way, Gardena 90247	13855	1961-1963
4	Ineligible	Reconnaissance	Selma Avenue	ES	6611 Selma Ave, Los Angeles 90028	13360	1918-1993
6	NR;CR	Intensive (DPR)	Sepulveda, Francisco	MS	15330 Plummer Way, North Hills 91343	13786	1956 - 1960
4	Ineligible		Serrania	ES	5014 Serrania Way, Woodland Hills	13800	

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6	Ineligible		Sharp	ES	13800 Pierce St, Arleta 91331	13809	1959
1	Ineligible	Intensive (HRER)	Shenandoah Street	ES	2450 Shenandoah St, Los Angeles 90034	13491	1940-1977
2	Needs Evaluation	Reconnaissance	Sheridan Street	ES	416 N Cromwell St, 90033	13290	1921-1971
3	Ineligible	Reconnaissance	Sherman Oaks	ES	14755 Greenleaf St, Sherman Oaks 91403	13517	1948-1976
3	CR	Reconnaissance	Sherman Oaks CES/Sequoia	MS	18605 Erwin St, Reseda 91335	13692	1950-1956
3	Ineligible	Reconnaissance	Shirley Avenue	ES	19452 Hart St, Reseda 91335	13671	1954
4	Ineligible	Intensive (HRER)	Short Avenue	ES	12814 Maxella Ave, Los Angeles 90066	13679	1947-1961
2	Ineligible		Sierra Park	ES	3170 Budau Way, Los Angeles	13391	1965-1977
5	Ineligible		Sierra Vista	ES	4342 Alpha Way, Los Angeles	13380	1953-1964

\*To be updated on an ongoing basis. Findings may be revised. Just because a school is not on this list does not mean it is not historic. Many schools still require evaluations. Consult with OEHS if a project is on a campus that is 45+ years of age

**LAUSD Historic Resources Inventory, updated April 2023\***

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
2	CR; LAHCM	Reconnaissance (DPR)	Solano Avenue	ES	615 Solano Ave, Los Angeles 90012	13343	1924
2	NR; CR (Listed)	Reconnaissance	Soto Street	ES	1020 S Soto St, Los Angeles 90023	13424	1937
2	Ineligible	Reconnaissance	Soto Street Children's Center	CC	2616 E 7th St, Los Angeles 90023	13424	1944
5	NR; CR (Listed)		South Gate I	MS	4100 Firestone Blvd, South Gate 90280	13261	1941-1966
5	NR; CR	Reconnaissance	South Gate II	SH	3351 Firestone Blvd, South Gate 90280	13262	1930-1988
7	CR; LAHCM	Reconnaissance	South Park	ES	8510 Towne Ave, Los Angeles 90003	13304	1936-1966
7	Ineligible		South Shores Performing Arts Magnet	Mag	2060 W 35th Way, San Pedro	13808	1958
6	Ineligible	Reconnaissance	Stagg Street	ES	7839 Amestoy Ave, Van Nuys 91406	13722	1954-1958
5	Ineligible	Reconnaissance	Stanford Avenue	ES	2833 Illinois Ave, South Gate 90280	13478	1941-1976

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**LAUSD Historic Resources Inventory, updated April 2023\***

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
5	CR; LAHCM		State Street	ES	3211 Santa Ana St, South Gate 90280	13639	1924-1937
5	CR; LAHCM		State Street Children's Center	CC	3210 Broadway , Huntington Park 90255	16704	1931
4	Ineligible	Reconnaissance	Sterry, Nora	ES	1730 S Corinth Ave, Los Angeles 90025	13431	1940-1977 (1914)
4	CR	Reconnaissance	Sterry, Nora Children's Center	CC	1747 Sawtelle Blvd, Los Angeles 90025	13431	1914
2	Ineligible	Reconnaissance	Stevenson, Robert Louis	MS	725 S Indiana St, Los Angeles 90023	13450	1937-1974
6	Ineligible	Intensive (DPR)	Stonehurst Avenue	ES	9851 Stonehurst Ave, Sun Valley 91352	13653	1955-1958
4	Needs Evaluation		Stoner	ES	11735 Braddock Dr, Culver City 90230	13772	1957
6	Ineligible	Reconnaissance	Strathern Street	ES	7939 St. Clair Ave, North Hollywood 91605	13654	1948-1957
6	CR	Intensive (DPR)	Sun Valley	MS	7330 Bakman Ave, Sun Valley 91352	13546	1944-1954

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**LAUSD Historic Resources Inventory, updated April 2023\***

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
6	Ineligible		Sun Valley	HS	9171 Telfair Way, Sun Valley 91352	13842	1957
6	Ineligible	Reconnaissance	Sunland	ES	8350 Hillrose St, Sunland 91040	13451	1949-1980
3	NR; CR	Intensive (DPR)	Sunny Brae Avenue	ES	20620 Arminta St, Canoga Park 91306	13737	1953-1960
2	Ineligible	Reconnaissance	Sunrise	ES	2821 E 7th St, Los Angeles 90023	13395	1937-1978
3	Needs Evaluation		Superior	ES	9756 Oso Ave, Chatsworth	13810	1958-59
4	Ineligible	Reconnaissance	Sutter, John A.	MS	7330 Winnetka Ave, Canoga Park 91306	13537	1948-1955
6	NR; CR	Intensive (DPR)	Sylmar	ES	13291 Phillippi Ave, Sylmar 91342	13604	1948-1949
6	NR; CR; LAHCM	Intensive (HRER)	Sylmar	HS	13050 Borden Ave, Sylmar	13856	1959-1960
6	Ineligible	Intensive (DPR)	Sylvan Park	ES	6238 Noble Ave, Van Nuys 91411	13477	1948-1976

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LAUSD Historic Resources Inventory, updated April 2023\*

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
4	NR; CR; LAHCM	Intensive (HRER)	Taft, William Howard	SH	5461 Winnetka Ave, Woodland Hills 91364	13787	1960
7	Ineligible	Intensive (HRER)	Taper	ES	1824 Taper Ave, San Pedro 90731	13539	
4	Ineligible		Tarzana	ES	5726 Topeka Way, Tarzana	13585	1956-1975
6	Ineligible	Reconnaissance	Telfair Avenue	ES	10975 Telfair Ave, Pacoima 91331	13616	1950-1957
5	Needs Evaluation		Toland Way	ES	4545 Toland Way, Los Angeles 90041	13566	1925
4	Needs Evaluation	Reconnaissance	Toluca Lake	ES	4840 Cahuenga Blvd, North Hollywood 91601	13634	1942-1955; <a href="#">1961</a>
4	NR	Intensive (DPR)	Topanga Charter	ES	22075 Topanga School Rd, Topanga 90290	13816	1953-1955
3	Needs Evaluation		Topeka Drive	ES	9815 Topeka Dr, Northridge	13821	
7	Ineligible		Towne Avenue	ES	18924 Towne Way, Carson 90746	13755	1958-1958

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**LAUSD Historic Resources Inventory, updated April 2023\***

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
2	Ineligible	Reconnaissance	Trinity Street	ES	3736 Trinty St, Los Angeles 90011	13332	1939-1968
3	Ineligible	Reconnaissance	Tulsa Street	ES	10900 Hayvenhurst Ave, Granada Hills 91344	13693	1951-1955
4	CR		Twain, Mark	MS	2224 Walgrove Ave, Los Angeles 90066	13630	1949, 1951, 1954
2	Ineligible	Reconnaissance	Union Avenue	ES	150 S Burlington Ave, Los Angeles 90057	13294	1949-1985
4	NR; CR (Listed)	Reconnaissance	University II	SH	11800 W Texas Ave, Los Angeles 90025	13444	1924-1978
2	CR	Reconnaissance	Utah Street	ES	255 N Clarence St, Los Angeles 90033	13328	1937-1970
6	Ineligible	Reconnaissance	Valerio Street	ES	15035 Valerio St, Van Nuys 91405	15143	1949-1956
3	Ineligible		Valley Alternative School	ES	6701 Balboa Blvd, Granada Hills	15185	
4	Ineligible	Reconnaissance	Valley View	ES	6921 Woodrow Wilson Dr, Los Angeles 90068	13428	1953

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**LAUSD Historic Resources Inventory, updated April 2023\***

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
7	Ineligible		Van Deene	ES	826 W Javelin Way, Torrance 90502	13788	1960-1965
3	Ineligible		Van Gogh	ES	17160 Van Gogh St, Granada Hills	13862	1997
4	NR; CR (Listed)	Reconnaissance	Van Ness	ES	501 N Van Ness Ave, Los Angeles 90004	13393	1923
6	NR; CR; LAHCM	Intensive (HRER)	Van Nuys I	ES	6464 Sylmar Ave, Van Nuys 91401	13403	1922-1980
3	CR; LAHCM		Van Nuys II	MS	5435 Vesper Ave, Van Nuys 91411	13605	1948-1958
6	NR; CR	Reconnaissance (DPR)	Van Nuys III	SH	6535 Cedros Ave, Van Nuys 91411	13404	1933-1976
3	Ineligible		Vanalden Avenue	ES	19019 Delano St, Reseda 91335	13724	1955
6	Ineligible	Intensive (DPR)	Vaughn	LC	13330 Vaughn St, San Fernando	13756	1958-66
6	Ineligible		Vena	ES	9377 Vena Way, Arleta 91331	13773	1956

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**LAUSD Historic Resources Inventory, updated April 2023\***

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
4	NR; CR	Reconnaissance (DPR)	Venice	SH	13000 Venice Blvd, Los Angeles 90066	13513	1935-1969
4	Ineligible		Venice Skills Center		611 5th Ave, Venice 90291	13452	1969
6	NR; CR	Intensive (DPR)	Verdugo Hills	SH	10625 Plainview Ave, Tujunga 91042	13642	1937-1970
1	Ineligible		Vermont Avenue	ES	1435 W Cromwell St, 90007	13273	1937-1974
5	CR; LAHCM	Reconnaissance (DPR)	Vernon City	ES	2360 E Vernon Ave, Los Angeles 90058	13563	1929-1942
5	CR; LAHCM		Victoria Avenue	ES	3320 Missouri Ave, South Gate 90280	13493	1929-1976
6	Ineligible	Intensive (DPR)	Victory Boulevard	ES	6315 Radford Ave, North Hollywood 91606	13442	1947-1975
4	NR; CR (Listed)		Vine Street	ES	955 N Vine St, Los Angeles 90038	13342	1922-1995
6	Ineligible		Vinedale	ES	10150 La Tuna Canyon Rd, Sun Valley 91352	13430	1927-1955

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**LAUSD Historic Resources Inventory, updated April 2023\***

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
3	Needs Evaluation		Vintage Street Fundamental Magnet	ES	15848 Stare St, North Hills 91343	13694	1953-1955
2	NR; CR		Virgil II	MS	152 N Vermont Ave, Los Angeles 90004	13382	1924-1978
1	NR; CR	Reconnaissance (DPR)	Virginia Road	ES	2925 Virginia Rd, Los Angeles 90016	13504	1924-1977
5	Needs Evaluation		Wadsworth Avenue	ES	981 E 41st St, Los Angeles 90011	13383	1922-1965
4	Ineligible		Walgrove Avenue	ES	1630 Walgrove Ave, Los Angeles 90066	13729	1953-1958
4	CR; LAHCM		Warner Avenue	ES	615 Holmby Ave, Los Angeles 90024	13481	1949-1977
1	CR	Intensive (DPR)	Washington Prep, George	SH	10860 S Denker Ave, Los Angeles 90047	13560	1927-1968
4	CR	Intensive (DPR)	Webster, Daniel	MS	11330 Graham Pl, Los Angeles 90064	13741	1954-1958
1	Ineligible		Weemes, Lenicia B.	ES	1260 W 36th Pl, Los Angeles 90007	13322	1924-1969

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**LAUSD Historic Resources Inventory, updated April 2023\***

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
7	Ineligible	Reconnaissance	Weigand	ES	10401 Weigand Ave, Los Angeles 90002	13611	1929, 1957, 1966
3	Ineligible	Intensive (DPR)	Welby Way	ES	23456 Welby Way, West Hills 91307	13789	1957-61
1	Ineligible		West Athens	ES	1110 W 119th St, Los Angeles 90044	13317	1923-1983
4	Ineligible	Intensive (DPR)	West Hollywood	ES	970 N Hammond St, West Hollywood 90069	13364	1923
4	Needs Evaluation		West Valley	SS	6649 Balboa Blvd, Van Nuys 91406	15701	1944
4	Ineligible		West Valley Occ Ctr	AOC	6200 Winnetka Ave, Woodland Hills, CA 91367	13659	
7	CR; LAHCM	Intensive (HRER)	West Vernon Avenue	ES	4312 S Grand Ave, Los Angeles 90037	13330	1937-1976
4	Needs Evaluation		Westchester	SH	7400 W Manchester Ave, Los Angeles, CA 90045	13606	1954 - 1955
1	Ineligible		Western Avenue	ES	1724 W 53rd St, Los Angeles 90062	13338	1935-1977

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**LAUSD Historic Resources Inventory, updated April 2023\***

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
4	Ineligible		Westminster	ES	1010 Abbot Kinney Way, Venice 90291	13483	1942
4	Needs Evaluation		Westport Heights	ES	6011 W 79th St, Los Angeles 90045	13592	1938-1958
4	Ineligible		Westside Leadership Magnet		104 Anchorage Way, Marina Del Rey 90292	13575	1966
4	Ineligible		Westwood	ES	2050 Selby Way, Los Angeles 90025	13505	1958
7	NR; CR; LAHCM		White Point	ES	1410 Silvius Ave, San Pedro 90731	13617	1951-1968
7	Ineligible		White, Stephen M.	MS	22102 S Figueroa Way, Carson 90745	13708	1956-1956
1	Ineligible		Widney, Jospeh Pomeroy	SH	2302 S Grammercy Way, Los Angeles	15163	1967-1968
4	Ineligible		Wilbur	ES	5213 Crebs Way, Tarzana	13811	1959
7	Ineligible		Willenberg, Ernest P. Special Education Center	SS	308 Weymouth Ave, San Pedro 90732	13545	1950-1976

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**LAUSD Historic Resources Inventory, updated April 2023\***

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
7	Ineligible		Wilmington II	MS	1700 Gulf Ave, Wilmington 90744	13538	1951-1962
7	NR; CR	Intensive (DPR)	Wilmington Park	ES	1140 Mahar Ave, Wilmington 90744	13378	1925-1989
1	Ineligible		Wilshire Crest	ES	5241 W Olympic Blvd, Los Angeles 90036	13524	1924-1976
1	Ineligible	Intensive (HRER)	Wilson, Woodrow	SH	4500 Multnomah Way, Los Angeles 90032	13778	1970-1970
2	CR; LAHCM		Wilton Place	ES	745 S Wilton Pl, Los Angeles 90005	13433	1922-1996
1	Ineligible	Intensive (DPR)	Windsor Hills Math/Science Magnet	ES	5215 Overdale Dr, Los Angeles 90043	13757	1954
3	Ineligible	Intenisve (DPR)	Winnetka	ES	8240 Winnetka Ave, Canoga Park	13515	
4	Ineligible		Wonderland	ES	8510 Wonderland Way, Los Angeles	13485	
1	Ineligible	Intenisive (DPR)	Woodcrest	ES	1151 W 109th St, Los Angeles 90044	13369	1926-1975

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LAUSD Historic Resources Inventory, updated April 2023\*

Board District	Eligibility	Survey Type (Report Type)	Campus Name	School Type	Address	Site ID	Construction Dates
3	Ineligible	Intenitive (DPR)	Woodlake Avenue	ES	23231 Hatteras St, Woodland Hills 91364	13686	1953
4	CR		Woodland Hills	ES	22201 San Miguel St, 91364	13492	1948-1959
4	CR		Woodland Hills Academy	MS	20800 Burbank Blvd, Woodland Hills 91364	13806	1948 - 1952
5	CR		Woodlawn Avenue	ES	6314 Woodlawn Ave, Bell 90201	13572	1922-1977
4	NR; CR	Reconnaissance (DPR)	Wright, Orville	MS	6550 W 80th St, Los Angeles 90045	13738	1948-1951; 1948 - 1952
5	CR; LAHCM		Yorkdale	ES	5687 Meridian St, Los Angeles 90042	13385	1923-1966

Eligible		207
Ineligible		311
Eval Needed		34
Re-Eval Needed		55

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## Appendix C. Student Population Forecast

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	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
TK-5	272,197	264,550	252,464	236,281	233,433	227,433	226,988	228,732	227,694	224,987	219,727	212,977	207,912	199,417	195,195
6-8	129,587	128,304	124,196	117,811	114,243	112,049	108,270	103,671	98,688	94,941	94,527	95,520	95,156	93,944	92,663
9-12	167,161	166,090	167,797	165,494	161,986	158,520	157,237	155,477	152,557	149,235	144,938	139,226	134,665	134,099	134,125
Ungraded	29,799	29,017	26,938	23,094	23,075	25,647	25,364	25,126	24,665	24,162	23,648	23,058	22,543	22,014	21,732
Total	598,744	587,961	571,395	542,680	532,737	523,649	517,859	513,005	503,605	493,325	482,840	470,781	460,276	449,475	443,716

## Appendix D. CEQA Procedures 2003

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**LOS ANGELES UNIFIED SCHOOL DISTRICT**  
**PROCEDURES FOR IMPLEMENTING**  
**THE CALIFORNIA ENVIRONMENTAL QUALITY ACT**

**April, 2003**

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## **Section One. Introduction**

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

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

## **Section Two. Incorporation of the State CEQA Guidelines by Reference**

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

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

## **Section Three. Responsibilities for Implementing CEQA**

### **3.01 Administrative Executives, Directors and Managers**

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

- schools, such as primary centers, elementary and secondary schools, multilevel schools, magnet schools, special education schools, schools for the disabled, continuation high schools and community adult schools;
- various centers, including children centers, infant centers, magnet centers, opportunity centers, newcomer centers, regional occupational centers, business and industry schools and skills centers;
- administrative offices in a number of different locations;
- school bus garages;
- food manufacturing sites; and
- warehouses.

Depending on the circumstances, activities relating to the acquisition, construction, leasing and operation of these facilities may result in either a direct physical change in the

environment or a reasonably foreseeable indirect physical change in the environment, and are thus potentially subject to CEQA. In addition, certain planning and funding activities for particular activities may be subject to CEQA. Most of the District's activities that are potentially subject to CEQA are undertaken by the Facilities Services Division.

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

- (a) consider, at the earliest feasible time, whether proposed activities to be carried out under his or her direction may result in either direct physical changes in the environment or reasonably foreseeable indirect physical changes in the environment;
- (b) provide written notification to the CEQA Officer of any activities that may result in direct or reasonably foreseeable indirect physical changes in the environment before taking any steps to implement those proposed activities, except for routine types of activities at existing facilities that the CEQA Officer has previously determined are exempt from CEQA;
- (c) obtain one of the following written determinations from the CEQA Officer before taking any steps to implement a proposed activity that may result in direct or reasonably foreseeable indirect physical changes in the environment:
  - (i) a determination that the proposed activity is not a Project;
  - (ii) a determination that the proposed activity is a Project but is exempt from CEQA; or
  - (iii) a determination that the proposed activity is a non-exempt Project and the CEQA process has been completed;
- (d) consult with the CEQA Officer during preparation of any CEQA documents relating to activities under his or her direction;
- (e) ensure that Mitigation Monitoring or Reporting Programs are adequately and fully implemented for District Projects, where adopted EIRs and Mitigated Negative Declarations assign responsibility for monitoring and/or reporting to personnel working under his or her direction;
- (f) provide information and assistance to the CEQA Officer as the CEQA Officer may request in connection with facilities and the District's compliance with CEQA; and
- (g) consult with the CEQA Officer in connection with external projects carried out or approved by other agencies that may impact the health or safety of District students and staff, or the physical environment, at District facilities within his or her area of responsibility.

Without limiting the requirements of subsection (b) above, Administrative Executives, Directors and Managers shall notify the CEQA Officer before acquiring real property for any District facilities or for any other purpose. Without limiting the requirements of subsection (c) above, Administrative Executives, Directors and Managers shall obtain from the CEQA Officer one of the determinations identified in subsection (c) before acquiring real property for any District facilities or for any other purpose.

### **3.02 The CEQA Officer**

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

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

- (a) upon written notification from Administrative Executives, Directors or Managers of proposed activities, conduct preliminary review of the activities to determine whether they are subject to CEQA, as described in State CEQA Guidelines Section 15060(c);
- (b) determine whether proposed activities subject to CEQA are exempt from CEQA under statutory exemptions and/or Categorical Exemptions;
- (c) determine whether District activities subject to CEQA are exempt where it can be said with certainty that there is no possibility of a Significant Effect on the Environment;
- (d) determine the appropriate timing of CEQA review;
- (e) prepare Initial Studies, either in-house or by contract with outside consulting firms;
- (f) consult with and obtain comments from other agencies, including Responsible Agencies, with regard to environmental Effects;
- (g) determine whether Projects' Significant Effects will be mitigated to a level of insignificance in Mitigated Negative Declarations;
- (h) determine whether Projects may have a Significant Effect on the Environment and therefore require preparation of an EIR;

- (i) prepare draft and final Negative Declarations, Mitigated Negative Declarations and EIRs, either in-house or by contract with outside consulting firms;
- (j) circulate and file environmental documents with appropriate agencies as required by law, including Negative Declarations, Mitigated Negative Declarations and EIRs;
- (k) assure adequate opportunity for public review and comment on Negative Declarations, Mitigated Negative Declarations and EIRs;
- (l) evaluate and respond to comments on environmental documents as required by law;
- (m) determine whether a Negative Declaration, Mitigated Negative Declaration or EIR is adequate and meets applicable CEQA requirements;
- (n) prepare Mitigation Monitoring or Reporting Programs pursuant to State CEQA Guidelines Section 15097 for Mitigated Negative Declarations and EIRs as required by law, either in-house or by contract with outside consulting firms;
- (o) designate employees of the Office of Environmental Health & Safety, and/or District staff from other administrative offices or other representatives, to oversee the District's implementation of mitigation measures set forth in Mitigated Negative Declarations and EIRs pursuant to adopted mitigation monitoring or reporting programs;
- (p) file notices as may be required by law or otherwise deemed desirable, such as Notices of Exemption, Notices of Preparation, Notices of Availability and Notices of Determination;
- (q) assure that all activities under CEQA are completed within the time frames required by law;
- (r) for schoolsite acquisition and construction Projects subject to Education Code Section 17213.1, coordinate the CEQA process with the Department of Toxic Substances Control Preliminary Environmental Assessment process as may be required by Section 17213.1(a)(6);
- (s) upon notification of proposed external Projects within one-fourth of a mile of an existing District school which might impose a health or safety hazard to persons attending or employed at the school as described in State CEQA Guidelines Section 15186(b), consult with the Lead Agency regarding the potential impact on the school;
- (t) establish a review commission as necessary or desirable to identify and resolve general and specific issues as may arise relating to CEQA review of the District's activities;
- (u) review and comment upon, as appropriate, external planning documents circulated to the District under CEQA for Projects proposed to be approved or carried out by other agencies that may impose impacts on schools; and

- (v) perform such other tasks as are necessary or desirable in fulfilling the District's CEQA responsibilities, other than those delegated to Administrative Executives, Managers and Directors above or reserved to Advisory Bodies or the Board of Education below.

### **3.03 Advisory Bodies**

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

### **3.04 The Board of Education**

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

- (a) review and certify final EIRs and approve Negative Declarations and Mitigated Negative Declarations prior to approving Projects;
- (b) make the written EIR findings required by State CEQA Guidelines Sections 15091 and 15093 relating to, inter alia, mitigation measures, alternatives and statements of overriding considerations, as applicable; and
- (c) make the written finding required by CEQA Guidelines Section 15186(c)(3) relating to existing facilities within one-fourth of a mile of proposed schoolsites which might reasonably be anticipated to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste.

These tasks shall not be delegated to District staff.

## **Section Four. List of Projects Found to Be Categorically Exempt**

Pursuant to Sections 15022(a)(1)(C) and 15061 of the State CEQA Guidelines, this section sets forth a list of specific types of Projects often handled by the District that have been found to be categorically exempt from CEQA in particular cases. Citations in parentheses are references to the State CEQA Guidelines. Under the State CEQA Guidelines, the District may only rely on Categorical Exemptions as long as none of the exceptions set forth in State CEQA Guidelines Section 15300.2 apply.

- (a) Operations at Existing Facilities (§ 15301). The District has performed a wide variety of operational, maintenance, repair and alteration activities at existing facilities that the District has found to be categorically exempt from CEQA, because the activities involved no or negligible expansion of use. The District has found to be exempt, for example, the following activities in specific circumstances: minor interior and exterior alterations,



restoration of damaged structures and equipment to meet current standards, small additions to existing structures, addition of new copy on existing on and off premise signs, maintenance of existing landscaping, and demolition of small structures including accessory structures such as fences.

- (b) Replacement and Reconstruction (§15302). The District has replaced and reconstructed existing structures and facilities where a new structure was located on the same site as a replaced structure, and the new structure had substantially the same purpose and capacity as the replace structure. The District has applied this exemption, for example, to the replacement of a portable classroom with another portable classroom of substantially the same purpose and capacity.
- (c) New Construction or Conversion of Small Structures (§15303). The District has constructed new small structures and converted other small structures, not involving use of significant amounts of hazardous substances, and found these projects to be exempt from CEQA. Under this category, for example, the District has constructed small warehouses, multipurpose rooms and gyms.
- (d) Minor Alterations to Land (§15304). The District has implemented various minor alterations to land and determined them to be exempt from CEQA, such as new landscaping, filling of earth into previously excavated land with compatible material, minor trenching and backfilling where the surface was restored and construction of athletic fields.
- (e) Inspections (§15309). The District has conducted inspection activities at existing and proposed facilities, and has determined that these inspections are exempt from CEQA.
- (f) Accessory Structures (§15311). The District has constructed minor structures accessory to existing facilities, such as small parking lots and restroom facilities, and determined that these activities are exempt from CEQA.
- (g) Surplus Government Property Sales (§15312). The District has disposed of surplus property and determined that such disposal is exempt from CEQA in particular cases.
- (h) Minor Additions to Schools (§15314). The District has constructed a wide variety of minor additions to existing schools, including but not limited to installation of portable classrooms and expansion of playgrounds. The District has determined that such projects are exempt from CEQA where the addition does not increase the original student capacity by more than 25% or ten classrooms, whichever is less.

State CEQA Guidelines: California Resources Agency, "Guidelines for Implementation of the California Environmental Quality Act of 1970", Title 14, California Code of Regulations, Section 15000 et seq.

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

District: The Los Angeles Unified School District.

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

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

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

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

Categorical Exemption  
Effects  
Environment  
Environmental Impact Report, or "EIR"  
Initial Study  
Lead Agency  
Mitigated Negative Declaration  
Mitigation  
Negative Declaration  
Notice of Determination  
Notice of Exemption  
Notice of Preparation  
Project  
Responsible Agency  
Significant Effect on the Environment

## Appendix E. LAUSD Standard Conditions of Approval

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Los Angeles Unified School District

# **Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects**

Updated: 2023

## **Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects**

The Los Angeles Unified School District (LAUSD) Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects (Standard Conditions; SCs) are uniformly applied development standards. The SCs were compiled from established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs, as well as typically applied mitigation measures. The SCs are divided into the LAUSD California Environmental Quality Act (CEQA) environmental topics (Appendix G of the CEQA Guidelines plus Pedestrian Safety). For each SC, compliance is triggered by factors such as the project type, existing conditions, and type of environmental impact. Compliance with every condition is not required.

The SCs have been updated since the original Board-adopted Standard Conditions of Approval in 2015. This 2018 update incorporates new and revised laws, regulations, guidelines, and Los Angeles Unified School District's standard policies, practices, and specifications.

Additionally, the LAUSD School Design Guidelines and Design Standards referenced in the SCs are routinely updated. If the Design Guidelines and Design Standards conflict with the current SCs, the Design Guidelines and Design Standards shall be followed.

In instances where the District is the Lead Agency but not the project proponent or implementing party (e.g., non-profit, charter school, etc.), the project proponent or implementing party will act as the District's agency (or designee) to implement the applicable SCs.

Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects

Reference #	Topic	Trigger for Compliance	Project Implementation Phase	Standard Conditions	Original Source	Responsible Implementing Party (LAUSD or its Designee)
<b>AESTHETICS</b>						
SC-AE-1	Degradation of neighborhood character	Demolition of historic building or construction of a new building, the majority of which can be viewed from public right-of-way	During project design (Planning)	<p>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.</p> <p><b>School Design Guide<sup>1</sup></b>  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.</p>	School Design Guide. Los Angeles Unified School District (as amended).	Design Team, Asset Management (AM), Architectural and Engineering Services (AE Services)
SC-AE-2	Degradation of neighborhood character	Provide a surface for graffiti and/or opportunity for the accumulation of rubbish and debris along new walls adjacent to public right-of-way	During project design, construction, and operation (Planning, Construction, Post-Construction)	<p>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.</p> <p><b>School Design Guide</b>  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.</p>	School Design Guide. Los Angeles Unified School District (as amended).	Design Team, AM, AE Services, Project Execution (PEX), Maintenance & Operations (M&O)
SC-AE-3	Degradation of neighborhood character and viewshed obstruction	Increase density, height, bulk, or decrease setback compared to the surrounding development	During project design (Planning)	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.	2004 New Construction Program EIR Mitigation Measure AE-1.1, adopted by the Board of Education in June 2004 as part of the 2004 Program EIR and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.	Office of Environmental Health and Safety (OEHS), Design Team, AM, AE Services
SC-AE-4	Outdoor electronic message display signs	Install a new or change an existing school marquee	During project design and installation (Planning, Construction)	<p>LAUSD shall review all designs to ensure that the installation of a school marquee complies with Marquee Signs Bulletin BUL 5004.1.</p> <p><b>Marquee Signs Bulletin BUL-5004.1</b>  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.</p>	School marquees (outdoor sign with electronic message display). BUL-5004.1 adopted May 25, 2010 (as amended).	Design Team, Construction Contractor

<sup>1</sup> 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.

Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects

Reference #	Topic	Trigger for Compliance	Project Implementation Phase	Standard Conditions	Original Source	Responsible Implementing Party (LAUSD or its Designee)
SC-AE-5	Light and glare	Increase light and/or glare	Prior to building occupation, first stadium event, or first use of lights (Planning, Construction)	LAUSD shall review all designs and test new lights following installation to ensure that adverse light trespass and glare impacts are avoided. <b>School Design Guide</b> 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.	School Design Guide. Los Angeles Unified School District (as amended).	Design Team, AM, AE, PEX, Construction Contractor
SC-AE-6	Light and glare	Generate additional light and/or glare	Prior to building occupation, first stadium event, or first use of lights (Planning, Construction)	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: <ul style="list-style-type: none"><li>Limit the amount of light that can be used.</li><li>Minimize glare by controlling the amount of light that tends to create glare.</li><li>Minimize sky glow by controlling the amount of uplight.</li><li>Minimize the amount of off-site impacts or light trespass.</li></ul>	Based on The Collaborative for High Performance Schools. High Performance Schools Best Practices Manual, Volume III— Criteria. Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2014 CHPS Scorecard with 2017 SS12.0, and SS12.1: Light Pollution and Unnecessary Lighting. Includes additional language from International Dark-Sky Association (IDA; as amended).	Design Team
<b>AIR QUALITY</b>						
SC-AQ-1	Air Toxics Health Risk	New classrooms or outdoor play areas: <ul style="list-style-type: none"><li>Within 0.25-mile of mobile and stationary emission sources</li><li>On the LAUSD priority list of schools most at risk from air pollution</li><li>Near an OEHS-identified high-risk facility</li></ul>	During project design (Planning)	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 ‘ <b>Air Toxics Health Risk Assessment (HRA)</b> ’. 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.	REF-5314.2, Procedures for Environmental Review of Proposed Projects, June 12, 2017 (as amended).  REF-5892.0, Environmental Hazards in Proximity to Schools, October 8, 2012 (as amended).	OEHS



## Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects

Reference #	Topic	Trigger for Compliance	Project Implementation Phase	Standard Conditions	Original Source	Responsible Implementing Party (LAUSD or its Designee)
				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 Emissions	Diesel-powered construction equipment	During construction (Construction)	Construction Contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.	LAUSD Best Management Practices, adopted by the Board of Education in June 2004 as part of the 2004 Program EIR and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.	Construction Contractor, PEX
SC-AQ-3	Construction Emissions	Ground-disturbing activity, such as grading, site preparation, and/or removal action for soil contamination	During construction (Construction)	<p>Construction Contractor shall:</p> <ul style="list-style-type: none"> <li>• Maintain speeds of 15 miles per hour (mph) or less with all vehicles.</li> <li>• Load impacted soil directly into transportation trucks to minimize soil handling.</li> <li>• Water/mist soil as it is being excavated and loaded onto the transportation trucks.</li> <li>• Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site.</li> <li>• Minimize soil drop height into haul trucks or stockpiles during dumping.</li> <li>• During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks.</li> <li>• Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed.</li> <li>• Place stockpiled soil on polyethylene sheeting and cover with similar material.</li> <li>• Place stockpiled soil in areas shielded from prevailing winds.</li> </ul>	LAUSD Best Management Practices, adopted by the Board of Education in June 2004 as part of the 2004 Program EIR and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.	Construction Contractor, PEX
SC-AQ-4	Construction Emissions	Use of large, heavy or noisy equipment for construction	During construction (Construction)	<p>LAUSD shall analyze air quality impacts:</p> <p>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.</p> <p>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.</p> <p><u>Exhaust Emissions</u></p> <ul style="list-style-type: none"> <li>• Schedule construction activities that affect traffic flow to off-peak hours (e.g., between 10:00 AM and 3:00 PM).</li> <li>• Consolidate truck deliveries and limit the number of haul trips per day.</li> </ul>	2004 New Construction Program EIR Mitigation Measure AQ-2.1, adopted by the Board of Education in June 2004 and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.	OEHS, PEX, Construction Contractor

Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects

Reference #	Topic	Trigger for Compliance	Project Implementation Phase	Standard Conditions	Original Source	Responsible Implementing Party (LAUSD or its Designee)
				<ul style="list-style-type: none"><li>Route construction trucks off congested streets, as permitted by local jurisdiction haul routes.</li><li>Employ high pressure fuel injection systems or engine timing retardation.</li><li>Use ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment.</li><li>Use construction equipment rated by the United States Environmental Protection Agency as having at least Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower.</li><li>Restrict non-essential diesel engine idle time, to not more than five consecutive minutes.</li><li>Use electrical power rather than internal combustion engine power generators.</li><li>Use electric or alternatively fueled equipment, as feasible.</li><li>Use construction equipment with the minimum practical engine size.</li><li>Use low-emission on-road construction fleet vehicles.</li><li>Ensure construction equipment is properly serviced and maintained to the manufacturer's standards.</li></ul> <p><u>Fugitive Dust</u></p> <ul style="list-style-type: none"><li>Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for 10 days or more).</li><li>Replace ground cover in disturbed areas as quickly as possible.</li><li>Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).</li><li>Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip.</li><li>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.</li><li>Pave all unimproved construction access roads for at least 100 feet from the main road to the project site.</li><li>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.</li><li>Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph).</li><li>Water disturbed areas of the active construction and unpaved road surfaces at least three times daily, except during periods of rainfall.</li></ul>		

Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects

Reference #	Topic	Trigger for Compliance	Project Implementation Phase	Standard Conditions	Original Source	Responsible Implementing Party (LAUSD or its Designee)
				<ul style="list-style-type: none"> <li>Limit traffic speeds on unpaved roads to 15 mph or less.</li> <li>Prohibit fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD.</li> <li>Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.</li> <li>Limit the amount of daily soil and/or demolition debris loaded and hauled per day.</li> </ul> <p><u>General Construction</u></p> <ul style="list-style-type: none"> <li>Use ultra-low VOC or zero-VOC surface coatings.</li> <li>Phase construction activities to minimize maximum daily emissions.</li> <li>Configure construction parking to minimize traffic interference.</li> <li>Provide temporary traffic control during construction activities to improve traffic flow (e.g., flag person).</li> <li>Prepare and implement a trip reduction plan for construction employees.</li> <li>Implement a shuttle service to and from retail services and food establishments during lunch hours.</li> <li>Increase distance between emission sources to reduce near-field emission impacts.</li> </ul>		
<b>BIOLOGICAL RESOURCES</b>						
SC-BIO-1	Sensitive Species and Habitat	New construction in or potential impacts to adjacent to native habitat or waterways	Agency coordination prior to the start of construction; monitoring during construction (Planning, Construction)	<p>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:</p> <ul style="list-style-type: none"> <li>United States Fish and Wildlife Service (USFWS)</li> <li>National Marine Fisheries Services (NMFS)</li> <li>California Department of Fish and Wildlife (CDFW)</li> <li>California Native Plant Society (CNPS)</li> <li>County and/or city planning or environmental offices for sensitive species, habitat, and/or heritage trees that may not exist on published databases.</li> <li>California Natural Diversity Data Base (CNDDB) California Native Plant Society (CNPS) Rare Plant Inventory</li> <li>Local Audubon Society</li> </ul>	2004 New Construction Program EIR Mitigation Measures B-1.1 and B-1.2, adopted by the Board of Education in June 2004 and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.	OEHS

Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects

Reference #	Topic	Trigger for Compliance	Project Implementation Phase	Standard Conditions	Original Source	Responsible Implementing Party (LAUSD or its Designee)
				<ul style="list-style-type: none"><li>Los Angeles County Department of Regional Planning for information on Significant Ecological Areas</li><li>California Digital Conservation Atlas for District-wide location of reserves, plan areas, and land trusts that may overlap with project sites.</li></ul> <p><u>Biological Resources Report</u></p> <p>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.</p> <ul style="list-style-type: none"><li>Information on regional setting that is critical to the assessment of rare or unique resources.</li><li>A thorough, recent floristic-based assessment of special status plants 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.</li><li>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.</li><li>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.</li></ul>		

Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects

Reference #	Topic	Trigger for Compliance	Project Implementation Phase	Standard Conditions	Original Source	Responsible Implementing Party (LAUSD or its Designee)
				<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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: <ul style="list-style-type: none"> <li>Location of the mitigation site.</li> <li>Plant species to be used, container sizes, and seeding rates.</li> <li>Schematic depicting the mitigation area.</li> <li>Planting schedule.</li> <li>Irrigation method.</li> <li>Measures to control exotic vegetation.</li> <li>Specific success criteria.</li> <li>Detailed monitoring program.</li> <li>Contingency measures should the success criteria not be met.</li> <li>Identification of the party responsible for meeting the success criteria and providing for conservation of the site in perpetuity.</li> </ul> </li> </ul> <p>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.</p>		

Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects

Reference #	Topic	Trigger for Compliance	Project Implementation Phase	Standard Conditions	Original Source	Responsible Implementing Party (LAUSD or its Designee)
SC-BIO-2	Light Impacts to Sensitive Species	New outdoor lighting	During lighting design, installation, and prior to first use of lights (Planning, Construction)	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.	2004 New Construction Program EIR Mitigation Measure B-1.3, adopted by the Board of Education in June 2004 and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.	Design Team, AM, AE Services, PEX, M&O
SC-BIO-3	Bird and Bat Nesting Sites	Construction activities within native habitat; that has the potential to disturb birds or bats; or construction / demolition / removal of trees /vegetation during nesting season (February 1 through August 31; as early as January 1 for some raptors)	Prior to construction demolition, or vegetation removal (Construction)	<p>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<sup>2</sup>) should occur outside of nesting season to avoid take of birds, bats, or their eggs.<sup>3</sup></p> <p>Bird Surveys - Construction Demolition or Vegetation Removal in or adjacent to Native Habitat</p> <ul style="list-style-type: none"><li>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).</li><li>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 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.</li><li>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.</li><li>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</li></ul>	2004 New Construction Program EIR Mitigation Measure B-1.4, adopted by the Board of Education in June 2004 and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.	PEX

<sup>2</sup> Substrate is the surface on which a plant or animal lives.

<sup>3</sup> 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.

Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects

Reference #	Topic	Trigger for Compliance	Project Implementation Phase	Standard Conditions	Original Source	Responsible Implementing Party (LAUSD or its Designee)
				<p>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.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul> <p>Bird Surveys - Construction, Demolition, or Vegetation Removal at Existing Campuses</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager.</li> <li>• 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.</li> </ul> <p>Bat Surveys</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Bat surveys must be conducted by a qualified bat Surveyor or Biologist (Surveyor/Biologist). The Surveyor/Biologist shall use the appropriate</li> </ul>		



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				<p>combination of structure inspection, sampling, exit counts, and acoustic monitors to survey an area that may be affected by the project.</p> <ul style="list-style-type: none"><li>• If bats are found, the Surveyor/Biologist shall identify the species and evaluate the colony to determine potential impacts.</li><li>• Mitigation measures shall be determined on a project-specific basis and may include:<ul style="list-style-type: none"><li>○ Avoidance</li><li>○ Humane exclusion prior to demolition<ul style="list-style-type: none"><li>▪ Bats should not be evicted from roost sites during the reproductive period (May-September), or during winter hibernating periods to avoid direct mortality</li><li>▪ Bats should be flushed from trees prior to felling or trimming.</li></ul></li><li>○ Off-site habitat improvements shall be conducted in coordination with the California Department of Fish and Wildlife.</li></ul></li></ul>		
SC-BIO-4	Protected Trees	Removal of protected trees or woodland habitat	Planning and construction (Planning, Construction)	<p>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:</p> <p><b>New Construction in Native Habitat</b></p> <p>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:</p> <ul style="list-style-type: none"><li>• <b>Translocation of rare plants is prohibited in most instances.</b> 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.</li><li>• <b>Permanent conservation of habitat.</b> 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.</li><li>• <b>Off-site acquisition of woodland habitat.</b> 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.</li></ul>	<p>2004 New Construction Program EIR Mitigation Measure B-3.1, adopted by the Board of Education in June 2004 and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.</p> <p>LAUSD Office of Environmental Health &amp; Safety Tree Trimming and Removal Policy.</p>	Design Team, PEX

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Reference #	Topic	Trigger for Compliance	Project Implementation Phase	Standard Conditions	Original Source	Responsible Implementing Party (LAUSD or its Designee)
				<ul style="list-style-type: none"> <li><b>Creation of woodlands.</b> 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.               <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> </ul> </li> </ul> <p>LAUSD shall request CDFW review and comment on any translocation plans, habitat preservation, habitat creation and/or restoration plans.</p> <p><b>Removal of Protected Trees on Existing Campuses</b> 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.</p>		
SC-BIO-5	Wetlands, Riparian Habitat, and other Sensitive Natural Community	Remove native vegetation or alter surface drainage near native habitat communities (e.g., wetlands, riparian habitat, and other sensitive natural communities)	During project design; agency coordination prior to construction; monitoring during and after construction (Planning, Construction)	<p>LAUSD shall comply with CDFW recommendations:</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>A jurisdictional delineation of creeks and their associated riparian habitats shall be conducted pursuant to the USFWS wetland definition.</li> <li>Implementation of recommended measures shall compensate for affected mature riparian corridors and loss of function and value of wildlife corridors.</li> </ul>	<p>2004 New Construction Program EIR Mitigation Measures B-1.1 and B-1.2, adopted by the Board of Education in June 2004 and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.</p> <p>Recommendations as listed in CDFW SUP Draft EIR comment letter dated August 4, 2014.</p>	OEHS

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CULTURAL RESOURCES						
SC-CUL-1	Historic Architect	Direct or indirect effect on historical resources (i.e., buildings, structures, historic districts, and contributing site plan and landscaping features that are either designated or eligible for local, state, or federal landmark listing)	During project design, pre-construction and construction (Planning, Construction)	<p><b>Historic Architect</b></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Role of the Historic Architect</p> <p>The tasks of the Historic Architect on the Design Team shall include, but are not limited to:</p> <ul style="list-style-type: none"><li>• 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.</li><li>• 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.</li><li>• 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.</li></ul>	<p>Los Angeles Unified School District Design Guidelines (as amended).</p> <p>2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.</p> <p>LAUSD Design Guidelines and Treatment Approaches for Historic Schools. January 2015 (as amended).</p>	Design Team, Historic Architect

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Reference #	Topic	Trigger for Compliance	Project Implementation Phase	Standard Conditions	Original Source	Responsible Implementing Party (LAUSD or its Designee)
				<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>The Design Team and Historic Architect shall be responsible for incorporating LAUSD's recommended updates and revisions during the design development and review process.</li> </ul>		
SC-CUL-2	Design Guidelines and Treatment Approaches	Direct or indirect effect on historical resources	During project design, design development, pre-construction and construction (Planning, Construction)	<p>LAUSD shall follow the guidelines outlined in these documents to the maximum extent practicable when planning and implementing projects and adjacent new construction involving historical resources.</p> <p>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.</p> <p>General guidelines include:</p> <ul style="list-style-type: none"> <li>Retain and preserve the character of historic resources.</li> <li>Repair rather than remove, replace, or destroy character-defining features; if replacement is necessary, replace in-kind to match materials, dimensions, and appearance.</li> <li>Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity.</li> </ul>	<p>School Design Guide. Los Angeles Unified School District (as amended).</p> <p>Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools. January 2015 (as amended).</p> <p>Specification 01 3591, Historic Treatment Procedures. April 18, 2017 (as amended).</p>	Design Team, Historic Architect

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				<ul style="list-style-type: none"><li>Where practical, conceal reinforcement required for structural stability or the installation of life safety or mechanical systems.</li><li>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.</li></ul>		
SC-CUL-3	Temporary Protection Plan	Demolition near or potential damage to historic resources	Prior to demolition or major alteration (Planning, Pre-Construction, Construction)	<p>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:</p> <ul style="list-style-type: none"><li>Notation of the historic resource on construction plans.</li><li>Pre-construction survey to document the existing physical condition of the historic resource.</li><li>Procedures and timing for the placement and removal of temporary protection features, around the historic resource.</li><li>Monitoring of the installation and removal of temporary protection features by the Historic Architect, or designee.</li><li>Post-construction survey to document the condition of the historic resource after Project completion.</li><li>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.</li></ul>		Historic Architect, Design Team
SC-CUL-4	Documentation of Historic Resources	Demolition or potential damage to any historic resources	Prior to demolition or major alteration (Planning, Construction)	<p>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).</p> <p>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:</p> <ul style="list-style-type: none"><li><b>Photographs:</b> 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,</li></ul>	2004 New Construction Program EIR Mitigation Measure C-1.5, adopted by the Board of Education in June 2004 and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.	Design Team

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				<p>elevations/exterior, 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.</p> <ul style="list-style-type: none"> <li>• <b>Descriptive and Historic Narrative:</b> 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.</li> <li>• <b>Historic Documentation Package Submittal:</b> 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.</li> </ul>		
SC-CUL-5	Salvage and Reuse of Historical Resources	Demolition of historic resource	Prior to demolition or alteration (Construction)	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.	Specification 01 3591, Historic Treatment Procedures. September 26, 2017 (as amended).	Design Team, OEHS, M&O, Construction Contractor
SC-CUL-6	Archaeological Resource	Project area is deemed highly sensitive for archaeological resources or Phase I Archaeological Site Investigation shows a strong possibility that unique archeological resources are buried on the site	Prior to and during ground-disturbing activities (Construction)	<p>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.</p> <p>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.</p>	Specification 01 3592, Mitigation Procedures for Archeological Findings. April 18, 2017 (as amended).	Design Team, AM, PEX, AE Services
SC-CUL-7	Archaeological Resources	(1) Historic or unique archaeological resources are discovered, or (2) when unique	During ground-disturbing activities (Construction)	<p>The Construction Contractor shall halt construction activities within a 30 foot radius of the find and shall notify the LAUSD.</p> <ul style="list-style-type: none"> <li>• LAUSD shall retain an archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The</li> </ul>	2004 New Construction Program EIR Mitigation Measure C-1.7, adopted by the Board of Education in June 2004 and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.	Design Team, AM, PEX, AE Services

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		archaeological resources have been identified on a site, but LAUSD does not implement a Phase III Data Recovery / Mitigation Program		<p>archaeologist must have knowledge of both prehistoric and historical archaeology.</p> <ul style="list-style-type: none"><li>• The archaeologist shall have the authority to halt any project-related construction activities that could impact potentially significant resources.</li><li>• 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.</li><li>• 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.</li><li>• 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.</li><li>• Archaeological reports shall be submitted to the South Central Coastal Information Center at the California State University, Fullerton.</li><li>• The Archaeological Monitoring Plan shall include:<ul style="list-style-type: none"><li>○ Extent and duration of the monitoring based on the grading plans</li><li>○ At what soil depths monitoring of earthmoving activities shall be required</li><li>○ Location of areas to be monitored</li><li>○ Types of artifacts anticipated</li><li>○ 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</li><li>○ Procedures for maintenance of monitoring logs, recovery, analysis, treatment, and curation of significant resources</li><li>○ 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.</li><li>○ Accommodation and procedures for Native American monitors, if required.</li><li>○ Procedures for discovery of Native American cultural resources.</li></ul></li></ul>	Specification 01 3592, Mitigation Procedures for Archeological Findings. April 18, 2017 (as amended).	



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				<ul style="list-style-type: none"> <li>The construction manager shall adhere to the stipulations of the Archaeological Monitoring Plan.</li> </ul>		
SC-CUL-8	Archaeological Resource Training	Project construction requires archaeological monitoring	Prior to the start grading, excavation, or other ground-disturbing activities (Construction)	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.		OEHS, Design Team, AM, AE Services, PEX
SC-CUL-9	Archaeological Resources Recovery / Mitigation Program	Archaeological resources are discovered and it is determined not to avoid them by abandoning the site or redesigning the project	During ground-disturbing activities (Construction)	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.	2004 New Construction Program EIR Mitigation Measure C-1.9, adopted by the Board of Education in June 2004 and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.	Design Team, AM, AE Services, PEX
SC-CUL-10	Native American Resources	Evidence of Native American resources is uncovered	During ground-disturbing activities (Construction)	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.		Design Team, AM, AE Services, PEX
SC-CUL-11	Paleontological Resources	Project area is identified as sensitive for paleontological resources	During ground-disturbing activities (Construction)	<p>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.</p> <p>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.</p> <ul style="list-style-type: none"> <li>Ground-disturbing activities shall not continue until the discovery has been assessed by the Paleontologist.</li> <li>The paleontologist shall have the authority to halt construction activities to allow a reasonable amount of time to identify potential resources.</li> <li>Significant resources found shall be curated as determined necessary by the Paleontologist.</li> </ul>	2004 New Construction Program EIR Mitigation Measure C-1.10, adopted by the Board of Education in June 2004 and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.	Design Team, AM, AE Services, PEX
<b>GEOLOGY AND SOILS</b>						
SC-GEO-1	Seismic Hazards	Requires grading, excavation, or other ground-disturbing activities	During project design, and project construction (Planning, Construction)	LAUSD shall prepare a Geohazard Assessment for the construction of any new school or applicable school addition.	REF-5314.2, Procedures for Environmental Review of Proposed Projects, June 12, 2017 (as amended). 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.	Design Team, AM, AE Services

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GREENHOUSE GAS EMISSIONS						
SC-GHG-1	Water Use and Efficiency	Requires work on water pumps, valves, piping, and/or tanks	During operation (Post-Construction)	During operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.	LAUSD Best Management Practices, adopted by the Board of Education in June 2004 as part of the 2004 Program EIR and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.  The Collaborative for High Performance Schools. Score Card updated 2014 with 2017 Amendments. Prerequisite WE 1.0 Minimum Reduction in Indoor Potable Water Use, and WE 1.1 Indoor Water Use, and LAUSD School Design Guide (as amended).	M&O
SC-GHG-2	Water Use and Efficiency	Requires work on landscape irrigation system	Prior to full operation of irrigation system (Post-Construction)	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.	LAUSD Best Management Practices, adopted by the Board of Education in June 2004 as part of the 2004 Program EIR and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.  The Collaborative for High Performance Schools. Score Card updated 2014 with 2017 Amendments. Prerequisite WE 3.0 and WE 3.1 Irrigation & Exterior Water Budget / Use Reduction (as amended).	M&O
SC-GHG-3	Water Use and Efficiency	Requires work on landscape irrigation system	Prior to full operation of irrigation system (Post-Construction)	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.	LAUSD Best Management Practices, adopted by the Board of Education in June 2004 as part of the 2004 Program EIR and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.  The Collaborative for High Performance Schools. Score Card updated 2014 with 2017 Amendments. Prerequisite WE 3.0 and WE 3.1 Irrigation & Exterior Water Budget / Use Reduction (as amended).	M&O
SC-GHG-4	Water Use and Efficiency	Requires work on landscape and/or irrigation system	Prior to full operation of irrigation system (Construction)	LAUSD shall develop a water budget for landscape (both non-recreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources.	The Collaborative for High Performance Schools. High Performance Schools Best Practices Manual, Volume III— Criteria. Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2014 CHPS Scorecard with 2017 Amendments. Prerequisite. Construction Waste Management. WE 3.0, WE 3.1, and LAUSD School Design Guide (as amended).	M&O

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SC-GHG-5	Energy Efficiency	Building construction	Prior to occupancy (Planning, Construction)	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.	The Collaborative for High Performance Schools. High Performance Schools Best Practices Manual, Volume III— Criteria. Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2014 CHPS Scorecard with 2017 Amendments. Prerequisite. Energy Efficiency. EE1.0 and LAUSD School Design Guide (as amended).	Design Team, AM, PEX, M&O
SC-USS-1	Construction Waste Management	Generate demolition debris and/or construction waste	Prior to and during construction (Construction)	Implementation of SC-USS-1.	<p>School Design Guide. Los Angeles Unified School District (as amended).</p> <p>Specification 01 7419, Construction &amp; Demolition Waste Management; October 1, 2011;</p> <p>LAUSD Best Management Practices, adopted by the Board of Education in June 2004 as part of the 2004 Program EIR and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015;</p> <p>Guide Specifications 2004.Section 01 7419, Construction &amp; Demolition Waste Management. October 1, 2011;</p> <p>The Collaborative for High Performance Schools. High Performance Schools Best Practices Manual, Volume III— Criteria. Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2014 CHPS Scorecard with 2017 Amendments. Prerequisite. Construction Site Waste Management - WM 2.0 and MW 2.1.1.</p> <p>All as amended.</p>	PEX, Construction Contractor
<b>HAZARDS AND HAZARDOUS MATERIALS</b>						
SC-HAZ-1	Electro-magnetic fields	Placement of new classrooms or outdoor play areas within 500 feet of existing high voltage power lines or cell towers	During project design (Planning)	<p>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.</p> <p><b>Criteria for School Siting in Proximity to High Voltage Power Lines or Cell Towers</b></p> <p>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</p>	<p>California Code of Regulations (CCR), Title 5, Section 14010.</p> <p>REF-5314.2, Procedures for Environmental Review of Proposed Projects, June 12, 2017 (as amended).</p> <p>Board of Education resolutions:</p> <ul style="list-style-type: none"> <li>Effects of Non-Ionizing Radiation-2000</li> </ul>	OEHS, AM, AE Services

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				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.	<ul style="list-style-type: none"><li>Wireless Telecommunication Installations-2009</li><li>T-Mobile- Cell Tower Notification and Condemnation-2009California Code of Regulations, Title 5, Section 14010(c).</li></ul>	
SC-HAZ-2	Pipeline Hazards	Placement of new classrooms or outdoor play areas within 1,500 feet of hazardous pipelines	During project design (Planning)	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.  <b>Pipeline Safety Hazard Analysis</b> 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.	California Code of Regulations (CCR), Title 5, Section 14010.  REF-5314.2, Procedures for Environmental Review of Proposed Projects, June 12, 2017 (as amended).  2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.  California Code of Regulations, Title 5, Section 14010(h).	OEHS, AM, AE Services
SC-HAZ-3	Rail Hazards	Placement of new classrooms or outdoor play areas within 1,500 feet of a railroad track easement	During project design (Planning)	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.  <b>Rail Safety Study Protocol</b> 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.	REF-5314.2, Procedures for Environmental Review of Proposed Projects, June 12, 2017.  2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.  California Code of Regulations, Title 5, Section 14010(d).  All as amended.	OEHS, AM, AE Services
SC-HAZ-4	Impacted Soil	Soil excavation, building remodel, and/or building demolition	During construction (Pre-Construction, Construction)	The Construction Contractor shall comply with the following OEHS Site Assessment practices and requirements (as applicable): <ul style="list-style-type: none"><li>District Specification Section 01 4524, Environmental Import / Export Materials Testing.</li><li>Removal Action Workplan or Remedial Activities Workplan.</li><li>California Air Resources Board Rule 1466.</li><li>Guidelines and Procedures to Address Polychlorinated Biphenyls (PCBs) in Building Materials - particularly applicable to buildings that were constructed or remodeled between 1959 and 1979.</li><li>Lead and asbestos abatement requirements identified by the Facilities Environmental Technical Unit (FETU) in the Phase I / Phase II, or abatement plan(s).</li></ul>	Code of Federal Regulations [CFR] Title 40, Part 763.  Specification 01 4524, Environmental Import/Export Materials Testing; August 29, 2018.  Specification 02 8213, Asbestos Abatement and Asbestos Related Disturbance; September 22, 2014.  Title 29 CFR, Title 8, California Code of Regulations.  LAUSD OEHS, Guidelines and Procedures to Address Polychlorinated Biphenyls (PCBs) in Building Materials, Office of Environmental Health and Safety, October 2016.	OEHS, PEX

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					Specification 02 8400, Polychlorinated Biphenyl (PCB); June 22, 2017. All as amended.	
SC-AQ-1	Air Toxics Health Risk	New classrooms or outdoor play areas: <ul style="list-style-type: none"> <li>- Within 0.25 mile of mobile and stationary emission sources</li> <li>- On the LAUSD priority list of schools most at risk from air pollution</li> <li>- Near an OEHS-identified high-risk facility.</li> <li>- Placement of new classrooms or outdoor play areas within 0.25 mile of emission sources</li> </ul>	During project design (Planning)	Implementation of SC-AQ-1.	REF-5314.2, Procedures for Environmental Review of Proposed Projects, June 12, 2017 (as amended). 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015. California Code of Regulations, Title 5, Section 14010.	OEHS, AM, AE Services
<b>HYDROLOGY and WATER QUALITY</b>						
SC-HWQ-1	Stormwater Requirements	Land disturbance	During construction (Construction)	LAUSD shall design and construct the project to meet or exceed the current and applicable stormwater guidelines.  <b>Stormwater Technical Manual</b> 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.	Stormwater Technical Manual. Prepared for LAUSD by Geosyntec Consultants. October 2009 (as amended).  The Collaborative for High Performance Schools. High Performance Schools Best Practices Manual, Volume III— Criteria. Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2014 CHPS Scorecard with 2017 Amendments. Sites – SS 4.0 Construction Sites Runoff Control/ Sedimentation, SS 5.0 Grading and Paving, SS 5.1Post Construction Storm Water Management, and LAUSD School Design Guide (as amended).	Design Team, AM, AE Services, PEX
SC-HWQ-2	Stormwater Requirements	Land disturbance	During construction (Construction)	LAUSD shall implement the applicable stormwater requirements during construction activities.	OEHS Compliance Checklist for Storm Water Requirements at Construction Sites (as amended).	Design Team, AM, AE Services, PEX

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Reference #	Topic	Trigger for Compliance	Project Implementation Phase	Standard Conditions	Original Source	Responsible Implementing Party (LAUSD or its Designee)
				<b>Compliance Checklist for Storm Water Requirements at Construction Sites</b> 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.	The Collaborative for High Performance Schools. High Performance Schools Best Practices Manual, Volume III— Criteria. Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2014 CHPS Scorecard with 2017 Amendments. Sites – SS 4.0 Construction Sites Runoff Control/ Sedimentation, SS 5.0 Grading and Paving, SS 5.1Post Construction Storm Water Management, and LAUSD School Design Guide (as amended).	
SC-HWQ-3	Miscellaneous Requirements	Ongoing maintenance and repair	During construction and operation (Construction, Post-Construction)	LAUSD shall implement the following programs and procedures, as applicable: <ul style="list-style-type: none"><li>Environmental Training Curriculum – a qualified environmental Monitor shall provide a worker’s environmental awareness program that is prepared by LAUSD for the project.</li><li>Hazardous Waste Management Program (Environmental Compliance/Hazardous Waste).</li><li>Medical Waste Management Program.</li><li>Environmental Compliance Inspections.</li><li>Safe School Inspection Program.</li><li>Integrated Pest Management Program.</li><li>Fats Oil and Grease Management Program.</li><li>Solid Waste Management Program.</li><li>Other related programs overseen by OEHS.</li></ul>	Various LAUSD programs and procedures including:  Environmental Training Curriculum; Hazardous Waste Management Program; Medical Waste Management Program; Environmental Compliance Inspections; Safe School Inspections; Integrated Pest Management Program; Fats Oil and Grease Management Program; Solid Waste Management Program;  All as amended.	OEHS, PEX, M&O
SC-HWQ-4	Flood Hazards	Site acquisition /acquisition of property and/or placement of new building within a flood zone	During project design (Planning)	LAUSD shall analyze potential flood hazards for new projects. The analysis for new projects shall include evaluation of all possible flood hazards as determined by: (1) review of FEMA flood maps; (2) review of flood information provided by local City or County floodplain managers; (3) review of California Department of Water Resources dam safety information; and (4) local drainage analysis by a civil engineer. The flood hazard determination shall include consideration of tsunamis and debris flow. New projects should be located outside of these hazard areas, if practical.  Where placing the project outside the floodplain is impractical, the school or project structure shall be protected from flooding by containment and control of flood flows (e.g., elevating lowest floors at least one foot above the expected 100-year flood level).	2004 New Construction Program EIR Mitigation Measure HWQ-5.1 and HWQ-5.2, adopted by the Board of Education in June 2004 and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.	OEHS, AM, AE Services
SC-HWQ-5	Tsunami Hazards	Place new classrooms or outdoor play areas within 0.62 mile (1 kilometer) of the coast, and less than	Prior to classroom occupation (Operation)	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.	2004 New Construction Program EIR Mitigation Measure HWQ-5.3, adopted by the Board of Education in June 2004 and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.	OEHS, AM, AE Services

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		100 feet above mean sea level				
SC-HWQ-6	Debris Flow	Place new classrooms or outdoor play areas in areas subject to potentially damaging debris flow	During project design (Planning)	<p>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:</p> <ul style="list-style-type: none"> <li>• Adequate building setbacks from natural slopes.</li> <li>• Construction of debris control facilities in upstream areas.</li> <li>• Monitoring and maintaining potential debris flow areas and basins.</li> </ul> <p>In addition, potential loss shall be minimized by establishing an evacuation plan, and elevated awareness and early warning of pending events.</p>	2004 New Construction Program EIR Mitigation Measure HWQ-5.4, adopted by the Board of Education in June 2004 and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.	OEHS, AM, AE Services
<b>NOISE</b>						
SC-N-1	Exterior Campus Noise	On-campus exterior noise levels would be greater than 67 dBA $L_{eq}$	During project design (Planning)	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 $L_{eq}$ . <sup>4</sup>	2004 New Construction Program EIR Mitigation Measure N-1.1, adopted by the Board of Education in June 2004 and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.	OEHS, Design Team, AM, AE Services
SC-N-2	Interior Classroom Noise	Interior classroom noise levels would be greater than 45 dBA $L_{eq}$	During project design (Planning)	<p>LAUSD shall analyze the acoustical environment of the site (such as traffic) and the characteristics of planned building components (such as Heating, Ventilation, and Air Conditioning [HVAC]), and designs shall achieve interior classroom noise levels of less than 45 dBA <math>L_{eq}</math> with a target of 40 dBA <math>L_{eq}</math> (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.</p> <ul style="list-style-type: none"> <li>• New construction should achieve classroom acoustical quality consistent with the current School Design Guide and CHPS (California High Performance Schools) standard of 45 dBA <math>L_{eq}</math>.</li> <li>• 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 <math>L_{eq}</math></li> <li>• Modernization of existing facilities and/or HVAC replacement projects should improve the sound performance of the HVAC system over the existing system.</li> <li>• The District's purchase of new units should give preference to HVAC manufacturers that sell the lowest noise level units at the lowest cost.</li> </ul>	<p>2004 New Construction Program EIR Mitigation Measure N-1.2, adopted by the Board of Education in June 2004, the 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015, and the most current version of the School Design Guidelines.</p> <p>The Collaborative for High Performance Schools. High Performance Schools Best Practices Manual, Volume III— Criteria. Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2014 CHPS Scorecard with 2017 Amendments. EQ – 14.0 Acoustical Performance.</p> <p>All as amended.</p>	OEHS, Design Team, AM, AE Services

<sup>4</sup> L10 value represents the noise level that is exceeded 10% of the time or 6 minutes in an hour.



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				<ul style="list-style-type: none"><li>Existing HVAC units operating in excess of 45 dBA <math>L_{eq}</math> inside classrooms should be modified.</li></ul>		
SC-N-3	Operational Noise	Operational noise levels from new source exceeds local noise standards, policies, or ordinances at adjacent noise-sensitive land uses	During project design and construction (Planning, Construction)	<p>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.</p> <p>Operational noise attenuation measures include, but are not limited to:</p> <ul style="list-style-type: none"><li>Buffer zones;</li><li>Berms;</li><li>Sound barriers;</li><li>Buildings;</li><li>Masonry walls;</li><li>Enclosed bleacher foot wells; and/or</li><li>Other site-specific project design features.</li></ul>	2004 New Construction Program EIR Mitigation Measure N-2.2, adopted by the Board of Education in June 2004 and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.	Design Team, AM, AE Services, PEX
SC-N-4	Construction Noise and Vibration (Annoyance)	Construction on an existing school campus	Prior to and during construction (Construction)	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.	2004 New Construction Program EIR Mitigation Measure N-3.1, adopted by the Board of Education in June 2004 and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.	Design Team, AM, PEX
SC-N-5	Vibration (Structural Damage)	Rock blasting	During construction (Construction)	LAUSD shall require the Construction Contractor to minimize blasting for all demolition and construction activities, where feasible.	2004 New Construction Program EIR Mitigation Measure N-5.1, adopted by the Board of Education in June 2004 and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.	PEX, Inspection
SC-N-6	Vibration (Structural Damage)	Pile driving or heavy vibration activities	During construction (Construction)	For projects where pile driving activities are required within 150 feet of a structure, a detailed vibration assessment shall be provided by an acoustical engineer to analyze potential impacts related to vibration to nearby structures and to determine feasible mitigation measures to eliminate potential risk of architectural damage.		PEX, Inspection
SC-N-7	Vibration (Structural Damage)	Vibration intensive activities are planned within 25 feet of a historic building or structure	Prior to and during construction (Construction)	<p>LAUSD shall meet with the Construction Contractor to discuss alternative methods of demolition and construction for activities within 25 feet of a historic building to reduce vibration impacts. During the preconstruction meeting, the Construction Contractor shall identify demolition methods not involving vibration-intensive construction equipment or activities. For example: sawing into sections that can be loaded onto trucks results in lower vibration levels than demolition by hydraulic hammers.</p> <ul style="list-style-type: none"><li>Prior to construction activities, the Construction Contractor shall inspect and report on the current foundation and structural condition of the historic building.</li></ul>		PEX, Inspection

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				<ul style="list-style-type: none"> <li>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.</li> <li>The Construction Contractor shall avoid use of vibratory rollers and packers adjacent to the building.</li> <li>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.</li> </ul> <p>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.</p>		
SC-N-8	Construction Noise	Use of large, heavy or noisy construction equipment within 500 feet of a non-LAUSD sensitive receptor	During construction (Construction)	<p>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.</p> <p>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:</p> <p><u>Source Controls</u></p> <ul style="list-style-type: none"> <li>Time Constraints – prohibiting work during sensitive nighttime hours.</li> <li>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).</li> <li>Equipment Restrictions – restricting the type of equipment used.</li> <li>Substitute Methods – using quieter methods and/or equipment.</li> <li>Exhaust Mufflers – ensuring equipment has quality mufflers installed.</li> <li>Lubrication &amp; Maintenance – well maintained equipment is quieter.</li> <li>Reduced Power Operation – use only necessary size and power.</li> <li>Limit Equipment On-Site – only have necessary equipment on-site.</li> <li>Noise Compliance Monitoring – technician on site to ensure compliance.</li> <li>Quieter Backup Alarms – manually-adjustable or ambient sensitive types.</li> </ul> <p><u>Path Controls</u></p> <ul style="list-style-type: none"> <li>Noise Barriers – semi-permanent or portable wooden or concrete barriers.</li> </ul>	LAUSD Best Management Practices, adopted by the Board of Education in June 2004 as part of the 2004 Program EIR and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.	OEHS, PEX, Inspection, Design Team

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				<ul style="list-style-type: none"><li>Noise Curtains – flexible intervening curtain systems hung from supports.</li><li>Enclosures – encasing localized and stationary noise sources.</li><li>Increased Distance – perform noisy activities farther away from receptors, including operation of portable equipment, storage and maintenance of equipment.</li></ul> <u>Receptor Controls</u> <ul style="list-style-type: none"><li>Window Treatments – reinforcing the building’s noise reduction ability.</li><li>Community Participation – open dialog to involve affected residents.</li><li>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.</li></ul>		
SC-N-9	Construction Noise	Use of large, heavy or noisy construction equipment on an operating LAUSD campus	During construction (Construction)	<p>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.<sup>5</sup> Noise control measures may include, but are not limited to:</p> <u>Path Controls</u> <ul style="list-style-type: none"><li>Noise Attenuation Barriers<sup>6</sup> – 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.</li></ul> <u>Source Controls</u> <ul style="list-style-type: none"><li>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).</li><li>Substitute Methods – using quieter methods and/or equipment.</li><li>Exhaust Mufflers – ensuring equipment has quality mufflers installed.</li><li>Lubrication &amp; Maintenance – well maintained equipment is quieter.</li><li>Reduced Power Operation – use only necessary size and power.</li></ul>		OEHS, PEX, Construction Contractor

<sup>5</sup> 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.

<sup>6</sup> 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).

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				<ul style="list-style-type: none"> <li>Limit Equipment On-Site – only have necessary equipment on-site.</li> <li>Quieter Backup Alarms – manually-adjustable or ambient sensitive types.</li> </ul> <p>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:</p> <p><u>Receptor Controls</u></p> <ul style="list-style-type: none"> <li>Temporary Window Treatments – temporarily reinforcing the building's noise reduction ability.</li> </ul> <p>Temporary Relocation – in extreme otherwise unmitigable cases, students shall be moved to temporary classrooms / facilities away from the construction activity.</p>		
<b>PEDESTRIAN SAFETY</b>						
SC-PED-1	Pedestrian Safety Analysis	Increase student capacity by more than 25% or 10 classrooms	During project design (Planning)	<p>LAUSD shall participate in the Safe Routes to School (SR2S) program.</p> <p><b>Caltrans SR2S program.</b></p> <p>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.</p>	<p>OEHS pedestrian safety evaluation.</p> <p>REF- 4492.1, School Traffic Study, July 23, 2012 (as amended).</p>	OEHS, Design Team, AM, AE Services
SC-PED-2	Pedestrian Safety Analysis	New campus, new pedestrian/vehicular right-of-ways, or an increase in student capacity by more than 25% or 10 classrooms	During project design (Planning)	<p>LAUSD shall implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program.</p> <p><b>OEHS Traffic and Pedestrian Safety Program</b></p> <p>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.</p>	<p>REF-5314.2, Procedures for Environmental Review of Proposed Projects, June 12, 2017 (as amended).</p> <p>2015 School Upgrade Program EIR, certified by the Board of Education in November 2015 (as amended).</p>	OEHS, Design Team, AM, AE Services
SC-PED-3	Pedestrian Safety Analysis	New campus, new pedestrian/vehicular right-of-ways, or an increase in student	During project design (Planning)	<p>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:</p>	REF-5314.2, Procedures for Environmental Review of Proposed Projects, June 12, 2017 (as amended).	OEHS, Design Team, AM, AE Services

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		capacity by more than 25% or 10 classrooms		<ul style="list-style-type: none"><li>Clearly designate passenger loading areas with the use of signage, painted curbs, etc.</li><li>Install new walkway and/or sidewalk segments where none exist.</li><li>Substandard walkway/sidewalk segments shall be improved to a minimum of eight feet wide.</li><li>Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades.</li></ul>	2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.	
SC-PED-4	Pedestrian Safety Analysis	New campus, new pedestrian/vehicular right-of-ways, or an increase in student capacity by more than 25% or 10 classrooms	During project design (Planning)	<p>LAUSD shall design the project to comply with the traffic and pedestrian guidelines in the School Traffic Safety Reference Guide.</p> <p><b>School Traffic Safety Reference Guide REF- 4492.1.</b> 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.</p>	LAUSD Traffic Safety Reference Guide. REF-4492.1. July 23, 2012 (as amended).	OEHS, Design Team, AM, AE Services
SC-PED-5	Safe Access to School	Construct bus loading area, student drop-off/pick-up area, and/or parking	During project design (Planning)	<p>LAUSD shall design new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide.</p> <p><b>School Design Guide.</b> The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.</p>	School Design Guide. Los Angeles Unified School District (as amended).	Design Team, OEHS, AM, AE Services
SC-T-3	Traffic Analysis	Increase student capacity by more than 25% or 10 classrooms and/or generate additional traffic or shifts traffic patterns	Prior to project approval (Planning, Pre-Construction)	Implementation of SC-T-3.		OEHS, Design Team, AM, AE Services
SC-T-4	Construction Traffic	Large construction equipment required to use public roadways	Prior to construction (Construction)	Implementation of SC-T-4.		PEX, Construction Contractor

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Reference #	Topic	Trigger for Compliance	Project Implementation Phase	Standard Conditions	Original Source	Responsible Implementing Party (LAUSD or its Designee)
<b>POPULATION AND HOUSING</b>						
SC-PH-1	Property Displacement	Residential or business property acquisition	Prior to construction (Pre-Construction)	<b>Relocation Assistance Advisory Program</b> LAUSD shall conform to all residential and business displacement guidelines presented in the LAUSD's Relocation Assistance Advisory Program, which complies with all items identified in the California State Relocation Assistance and Real Property Acquisition Guidelines (California Code of Regulations Title 25, Division 1, Chapter 6).	LAUSD's Relocation Assistance Advisory Program.	Real Estate, Asset Management
<b>PUBLIC SERVICES</b>						
SC-PS-1	Emergency Protection Services	New building, new school, change in campus traffic circulation	Prior to construction (Planning, Construction)	If necessary, LAUSD shall: <ol style="list-style-type: none"> <li>1. Have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval.</li> <li>2. Provide a full site plan for the local review, including all buildings, both existing and proposed; fences; drive gates; retaining walls; and other construction affecting emergency vehicle access, with unobstructed fire lanes for access indicated.</li> </ol>	LAUSD Best Management Practices, adopted by the Board of Education in June 2004 as part of the 2004 Program EIR and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.	OEHS, Design Team, AM, AE Services
SC-PS-2	Emergency Preparedness & Response	New building, new school, change in campus traffic circulation	During school operation (Operation)	LAUSD shall implement emergency preparedness and response procedures in all schools as required in LAUSD References, Bulletins, Safety Notes, and Emergency Preparedness Plans.	REF-5803.2 - Emergency Drills and Procedures, August 26, 2013. SAF-30 - Emergency Response Protocol for LASUD Existing Facilities, March 2, 2007. Emergency Operations Plan, updated April 2010. BUL-6084.0 - Use of School Facilities in an Emergency or Disaster Situation, June 11, 2013. REF-5511.2 - Safe School Plans Update for 2013-2014, August 15, 2013. BUL-5433.1 - District Emergency Response and Preparedness, March 8, 2013. REF-5451.1 - School Site Emergency/Disaster Supplies, April 12, 2013. REF-5451.2 - School Site Emergency/Disaster Supplies, August 15, 2016. REF 5741.0 - Emergency Response - Communications and Response Actions, April 23, 2012. Other LAUSD Emergency Preparedness Plans (as amended): <ul style="list-style-type: none"> <li>• Earthquakes</li> <li>• Bio-Terrorism</li> </ul>	OEHS, Risk Management, M&O, School Administration

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Reference #	Topic	Trigger for Compliance	Project Implementation Phase	Standard Conditions	Original Source	Responsible Implementing Party (LAUSD or its Designee)
					<ul style="list-style-type: none"><li>Heavy Rain and Flooding</li><li>Disturbances/ Demonstrations</li><li>School Safety</li><li>West Nile Virus Precautions</li><li>Procedures for Reentry and Cleanup of Fire-Damaged Building</li><li>Disposal Procedures for Hazardous Waste and Universal Waste</li></ul>	
TRANSPORTATION AND CIRCULATION						
SC-T-1	Traffic Analysis	Increase student capacity by more than 25% or 10 classrooms and additional traffic	During project design (Planning)	<p>LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process.</p> <p><b>Traffic and Pedestrian Safety Requirements for New Schools</b></p> <p>Requirements identify performance requirements for the selection and design of school sites to minimize potential pedestrian safety risks:</p> <ul style="list-style-type: none"><li>Site Selection</li><li>Bus and Passenger Loading Areas</li><li>Vehicle Access</li><li>Pedestrian Routes to School</li></ul> <p>Requirements also state school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.</p>	<p>REF-4492.1, School Traffic Study, July 23, 2012 (as amended).</p> <p>2015 School Upgrade Program EIR, certified by the Board of Education in November 2015 (as amended).</p>	OEHS, AM, Design Team
SC-T-2	Vehicular Access and Parking	Construction of parking, and/or vehicular or pedestrian access	During project design (Planning)	<p>LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process.</p> <p><b>School Design Guide</b></p> <p>Vehicular access and parking shall comply with the Vehicular Access and Parking guidelines of the School Design Guide. The Design Guide contains the following regulations related to traffic:</p> <ul style="list-style-type: none"><li>Parking Space Requirements</li><li>General Parking Guidelines</li><li>Vehicular Access and Pedestrian Safety</li><li>Parking Structure Security</li></ul>	School Design Guide (as amended).	AM, Design Team
SC-T-3	Traffic Analysis	Increase student capacity by more than 25% or 10 classrooms and/or generates	Prior to project approval (Planning, Pre-Construction)	<p>LAUSD shall coordinate with the local City or County jurisdiction and agree on the following:</p> <ul style="list-style-type: none"><li>Compliance with the local jurisdiction’s design guidelines for access, parking, and circulation in the vicinity of the project.</li></ul>		OEHS, Design Team, AM, AE Services



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		additional traffic or shifts traffic patterns		<ul style="list-style-type: none"> <li>• Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds.</li> <li>• Implementation of SR2S, traffic control and pedestrian safety devices.</li> <li>• Fair share contribution and/or other mitigation measures for potential traffic impacts.</li> <li>• Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events.</li> <li>• Traffic study will use the latest version of Institute of Transportation Engineer's (ITE) Trip Generation manual (or comparable guidelines) to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility and the specific school type (e.g., Magnet, Charter, etc.), unless otherwise required by local jurisdiction.</li> <li>• Loading zones will be analyzed to determine the adequacy as pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.</li> </ul>		
SC-T-4	Construction Traffic	Large construction equipment required to use public roadways	Prior to construction (Construction)	LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.		PEX, Construction Contractor
SC-T-5	Vehicle Miles Traveled	Large-scale new construction (10,000 square feet or more) on new property or existing campus	During project design (Planning)	Prior to project approval of large-scale new construction (10,000 square feet or more) on new property or existing campus, LAUSD shall prepare a VMT assessment that documents the project trip generation, whether the project is expected to serve the immediate community or a broader area, and the expected net effect on VMT for the region. If necessary, the VMT assessment shall identify transportation demand management (TDM) measures to reduce VMT impacts.		OEHS, Design Team, AM, AE Services
<b>TRIBAL CULTURAL RESOURCES</b>						
SC-TCR-1	Native American Resource	Evidence of Native American resources is uncovered	During ground-disturbing activities (Construction)	All work shall stop within a 30 foot radius of the discovery. Work shall not continue until the discovery has been 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.		OEHS, Design Team, PEX

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Reference #	Topic	Trigger for Compliance	Project Implementation Phase	Standard Conditions	Original Source	Responsible Implementing Party (LAUSD or its Designee)
SC-TCR-2	Native American Resource	Evidence of Native American resources is uncovered	During grading, excavation, or other ground-disturbing activities (Construction)	<p>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:</p> <ul style="list-style-type: none"><li>At least one year of experience providing Native American monitoring support during similar construction activities.</li><li>Be designated by the Tribe as capable of providing Native American monitoring support.</li><li>Have a combination of education and experience with Tribal cultural resources.</li></ul> <p>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).</p> <p>Subsequently, the Monitor shall remain on-site for the duration of the ground-disturbing activities to ensure the protection of any other potential resources.</p> <p>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.</p>	Specification 01 3592, Mitigation and Monitoring Procedures for Archaeological and Historical Findings; April 18, 2017 (as amended).	OEHS, PEX
UTILITIES AND SERVICE SYSTEMS						
SC-USS-1	Construction Waste Management	Generate demolition debris and/or construction waste	Prior to start and during construction (Construction)	<p>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:</p> <p><b>School Design Guide.</b> Establishes a minimum non-hazardous construction and demolition (C&amp;D) debris recycling requirements of 75% by weight. Construction and demolition waste shall be recycled to the maximum extent feasible.</p> <p><b>Construction &amp; Demolition Waste Management.</b> 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&amp;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&amp;D waste generated by weight.</p>	<p>School Design Guide. Los Angeles Unified School District (as amended).</p> <p>Specification 01 7419, Construction &amp; Demolition Waste Management; October 1, 2011.</p> <p>LAUSD Best Management Practices, adopted by the Board of Education in June 2004 as part of the 2004 Program EIR and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.</p> <p>Guide Specifications 2004.Section 01 7419, Construction &amp; Demolition Waste Management. October 1, 2011.</p> <p>The Collaborative for High Performance Schools. High Performance Schools Best Practices Manual, Volume III— Criteria. Version 1.0, November 1, 2001. Adopted by the Board of Education on</p>	PEX, Construction Contractor

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					October 28, 2003. Updated 2014 CHPS Scorecard with 2017 Amendments. Prerequisite. Construction Site Waste Management - WM 2.0 and MW 2.1.1.  All as amended.	
SC-USS-2	Water Supply	Excavation near water lines	During construction (Construction)	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.	LAUSD Best Management Practices, adopted by the Board of Education in June 2004 as part of the 2004 Program EIR and 2015 School Upgrade Program EIR, certified by the Board of Education in November 2015.	Design Team, AM, AE Services, PEX, M&O
SC-USS-3	Solid Waste (operation)	New school or new school construction on existing campus	During operation (Planning, Operation)	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.	The Collaborative for High Performance Schools. High Performance Schools Best Practices Manual, Volume III— Criteria. Version 1.0, November 1, 2001. Adopted by the Board of Education on October 28, 2003. Updated 2014 CHPS Scorecard with 2017 Amendments. Materials and Waste Management, Prerequisite. Storage and Collection of Recyclables. MW 1.0 (as amended).	AE, Sustainability Unit, M&O
<b>Wildfire</b>						
SC-WF-1	Wildland Fire Risk Reduction	Schools within WUI zones	Construction and Operation	<p><b>Reduction of Wildfire Hazards.</b> Projects located within a Fire Hazard Severity Zone shall comply with local brush clearance requirements. Specific brush clearance activities include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>Maintain Defensible Space. Maintain around and adjacent to any building or structure defensible space by removing and clearing away, for a distance of not less than 100 feet on each side thereof or to the property line, whichever is nearer, all flammable vegetation or other combustible growth. This does not apply to ornamental shrubbery or similar plants that are used as groundcover that do not readily support ignition of fire, and if they do not form a means of rapidly transmitting fire from the growth to any building or structure. A greater distance may be required by state law, local ordinance, rule, or regulation.</li> <li>Remove that portion of any tree that extends within 10 feet of the outlet of any chimney or stovepipe. Trees shall be permitted within the defensible space provided that the horizontal distance between the crowns of adjacent trees is not less than 10 feet. Tree crowns extending to within 10 feet of any structure shall be pruned to maintain a minimum horizontal clearance of 10 feet. Tree crowns within the defensible space shall be pruned to remove limbs located less than 6 feet above the ground surface.</li> <li>Deadwood and litter shall be regularly removed from trees. Maintain any tree adjacent to or overhanging any building free of dead or dying wood.</li> </ul>	California Government Code 51182	LAUSD

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				<ul style="list-style-type: none"><li>Maintain the roof of any structure free of leaves, needles, or other dead vegetative growth.</li><li>Provide and maintain at all times a screen over the outlet of every chimney or stovepipe that is attached to any fireplace, stove, or other device that burns any solid or liquid fuel. The screen shall be constructed of nonflammable material with openings of not more than ½ inch in size.</li></ul>		
SC-WF-2	Fuel Modification	Construction within FHSZs	Prior to construction	<b>Preparation of Fuel Modification Plan for Projects in Fire Hazard Severity Zones.</b> Fuel modification plans shall be prepared for development projects within areas designated as a Fire Hazard Severity Zone within the State Responsibility Areas or Very High Fire Hazard Severity Zone within the Local Responsibility Areas, as described in Title 32, Fire Code. The fuel modification plans are subject to approval by the local authority having jurisdiction and identify specific zones within a property that require to fuel modification. A fuel modification zone is an area of land where combustible native or ornamental vegetation has been modified and/or partially or totally replaced with drought-tolerant, low-fuel-volume plants.	Los Angeles County General Plan Safety Element. Accessed May, 2023: <a href="https://planning.lacounty.gov/wp-content/uploads/2022/11/12.1_gp_final-general-plan-ch12_updated_2022.pdf">https://planning.lacounty.gov/wp-content/uploads/2022/11/12.1_gp_final-general-plan-ch12_updated_2022.pdf</a>	LAUSD