Valor Elementary School Project

Case Number: ENV-2022-5866-MND

Project Location: 15526-15544 Plummer Street, Los Angeles, California 91343

Community Plan Area: Mission Hills - Panorama City - North Hills

Council District: 7 – Rodriguez

Project Description: Bright Star Schools (the "Applicant") proposes to redevelop the site located at 15526-15544 Plummer Street ("Project Site" or "Site), which encompasses approximately 2.06 acres (approximately 89,629 square feet [sf]), into an elementary school. The Site consists of two parcels identified by Assessor Parcel Number (APN) 265-601-5007, which is approximately 1.30 acres in size, and APN 265-601-5008, which is approximately 0.76 acre in size. The 1.30-acre parcel is currently undeveloped and covered with grasses, shrubs, and various mature trees, and the 0.76-acre parcel is currently developed with a one-story single-family residence with similar vegetation as the larger parcel. The site contains 56 trees/shrubs (including nine protected native trees/shrubs and 32 non-protected significant trees), and two street trees.

The Valor Elementary School Project ("Proposed Project" or "Project") involves the construction of a one and two-story, 26.5-foot-tall, elementary school building with 28 classrooms (totaling 23,538 sf) for grades transitional kindergarten (TK) through 4; a multi-purpose room (totaling 3,182 sf); administrative spaces (totaling 1,616 sf); corridors, storage spaces, and covered outdoor dining (totaling 6,419 sf); and a surface parking lot with an ingress/egress driveway off Plummer Street. The elementary school building would have a total building area of 34,755 sf and would accommodate a maximum enrollment of 552 students. The Project would also include 30,726 sf of open space and landscaping, including two play areas (totaling 13,060 sf), a kindergarten play area (totaling 1,300 sf). The on-site single-family residence located at 15526 West Plummer Street was built in 1914 and is listed in SurveyLA. Therefore, the residence is recognized by the City as having historic significance. The 1,402-sf residence would remain on the Site as part of the Project but would be adaptively reused for additional administrative space for the school and would include a conference room, counselor office, staff support space, and psychologist office. The existing restroom in the residence would remain. The Project would include a car drop-off and pick-up area and a total of 49 surface-level parking spaces including 17 standard, 21 compact, nine clean air spaces, and two ADA spaces that would be located along the southern and western portions of the Site. The Project would also include 112 short-term and three long-term bicycle parking spaces, for a total of 115 bicycle parking spaces.

Project construction is expected to commence in September 2023. Construction activities would occur on weekdays between 8:00 a.m. and 3:00 p.m. The Project would require excavation of approximately 12,500 cubic yards (cy) of soil material. Of the 12,500 cy of soil, approximately 10,000 cy would be used as fill and redistributed on-site and the remaining 2,500 cy would be exported off the Site. Construction activities would also include tree removal and replacement of existing trees. Of the 56 on-site trees/shrubs, four trees are dead and would be removed along with an additional 41 trees/shrubs, consisting of nine protected native trees/shrubs and 32 non-protected significant trees. As designated by the City's tree removal application permit and consistent with the City's tree protection policies, protected tree/shrub removals would be replaced at a 1:4 ratio by planting 36 trees on-site and non-protected tree removals would be replaced at a 1:1 ratio by planting 32 trees on-site. The removal of the four dead trees do not require replacement. The Project would retain 13 existing trees, including 12 non-protected

significant trees (two of which are street trees) and one protected native tree. Construction is anticipated to end in September 2024, for a total construction period of approximately 12 months.

PREPARED FOR:	**PREPARED BY:**	**APPLICANT:**
The City of Los Angeles Department of City Planning	Rincon Consultants, Inc.	Bright Star Schools

November 2022

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1 INTRODUCTION

An application for the proposed Valor Elementary School Project ("Proposed Project" or "Project") located at 15526-15544 Plummer Street ("Project Site" or "Site) has been submitted by Bright Star Schools (the "Applicant") to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles (Department of City Planning), as the Lead Agency for the Project, has determined that the Project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA), and the preparation of an Initial Study is required.

This Initial Study/Mitigated Negative Declaration (Initial Study/MND) document evaluates potential environmental effects resulting from construction and operation of the Project. This Initial Study/MND has been prepared in accordance with CEQA (Public Resources Code Section 21000 et seq.), and the State *CEQA Guidelines* (Title 14, California Code of Regulations, Section 15000 et seq.) as implemented by the City. This Initial Study/MND is intended as an informational document, which is ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE OF AN INITIAL STUDY

Enacted in 1970, CEQA provides several basic purposes: (1) to inform governmental decision makers and the public about the potential significant environmental effects of Proposed Projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a MND is appropriate. If the Initial Study concludes that neither a Negative Declaration nor MND is appropriate, an Environmental Impact Report is normally required.

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study/MND is organized into four sections as follows:

1. INTRODUCTION

   Describes the purpose and content of the Initial Study/MND and provides an overview of the CEQA process.

2. EXECUTIVE SUMMARY

   Provides Project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.

3. PROJECT DESCRIPTION

   Provides a description of the environmental setting and the Project, including Project characteristics and a list of discretionary actions.

4. EVALUATION OF ENVIRONMENTAL IMPACTS

   Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

1.3 CEQA PROCESS

In compliance with the *CEQA Guidelines*, the City of Los Angeles (Department of City Planning), as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. An effort will be made to inform, contact, and solicit input on the Project from the public and various government agencies, including stakeholders and other interested parties.

At the onset of the environmental review process, the City has prepared this Initial Study to determine if the Project may have a significant effect on the environment. This Initial Study determined that the Project would not have a significant effect(s) on the environment, and, therefore, this MND has been prepared.

As set forth in Section 15072 of the *CEQA Guidelines*, the City, as the Lead Agency for the Project, will provide a notice of intent to adopt a MND to the public, responsible agencies, trustee agencies, and the county clerk to allow the public and agencies to review the proposed MND. Pursuant to Section 15105 of the *CEQA Guidelines*, the public review period for a proposed MND shall be a minimum of 20 days (or 30 days when a proposed MND is submitted to the State Clearinghouse for review by state agencies).

2 EXECUTIVE SUMMARY

PROJECT TITLE	**VALOR ELEMENTARY SCHOOL PROJECT**
ENVIRONMENTAL CASE NO.	**ENV-2022-5866-MND**
RELATED CASES	

PROJECT LOCATION	
ADDRESS	15526 – 15544 PLUMMER STREET, LOS ANGELES, CALIFORNIA 91343
COMMUNITY PLAN AREA	MISSION HILLS – PANORAMA CITY – NORTH HILLS
GENERAL PLAN DESIGNATION	LOW RESIDENTIAL
ZONING	RA-1
COUNCIL DISTRICT	7 – RODRIGUEZ

LEAD AGENCY	CITY OF LOS ANGELES
STAFF CONTACT	ESTHER AHN
ADDRESS	200 NORTH SPRING STREET, ROOM 763
PHONE NUMBER	(213) 978-1486
EMAIL	ESTHER.AHN@LACITY.ORG

APPLICANT	BRIGHT STAR SCHOOLS
ADDRESS	600 SOUTH LA FAYETTE PARK PLACE, SUITE 302, LOS ANGELES, CALIFORNIA 90057
PHONE NUMBER	(323) 954-9957

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by the Project. The impacts for each of these environmental factors would be less than significant with mitigation measures included in this MND.

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

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

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).
5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
    a) Earlier Analysis Used. Identify and state where they are available for review.
    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
9) The explanation of each issue should identify:
    a) The significance criteria or threshold, if any, used to evaluate each question; and
    b) The mitigation measure identified, if any, to reduce the impact to less than significance.

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3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Project Site is located at 15526-15544 Plummer Street and encompasses approximately 2.06 acres (approximately 89,629 square feet [sf]) and consists of two parcels identified by Assessor Parcel Number (APN) 265-601-5007, which is approximately 1.30 acres in size, and APN 265-601-5008, which is approximately 0.76 acre in size. The 1.30-acre parcel is currently undeveloped and covered with grasses, shrubs, and various mature trees, and the 0.76-acre parcel is currently developed with a one-story single-family residence with similar vegetation as the larger parcel. The site contains 56 trees/shrubs (including nine protected native trees/shrubs and 32 non-protected significant trees), and two street trees.

The Proposed Project involves the construction of a one and two-story, 26.5-foot-tall elementary school building with 28 classrooms (totaling 23,538 sf) for grades transitional kindergarten (TK) through 4; a multi-purpose room (totaling 3,182 sf); administrative spaces (totaling 1,616 sf); corridors, storage spaces and covered outdoor dining (totaling 6,419 sf); and a surface parking lot with an ingress/egress driveway off Plummer Street. The elementary school building would have a total building area of 34,755 sf and would accommodate a maximum enrollment of 552 students. The Project would serve existing elementary grade students currently enrolled in classes at Panorama Baptist Church located at 8755 Woodman Avenue (approximately two miles southeast) in the neighboring community of Arleta. The existing school is currently renting temporary space (i.e., 16 classrooms) from the Panorama Baptist Church and is at full capacity with an enrollment of 380 students. The Project would provide a new school for these students and would not include demolition of property at Panorama Baptist Church once school services are transferred to the Project Site since the Applicant does not own the church property. The Project would also include 30,726 sf of open space and landscaping, including two play areas (totaling 13,060 sf) and a kindergarten play area (totaling 1,300 sf) at the Project Site.

The on-site single-family residence located at 15526 West Plummer Street was built in 1914 and is listed in SurveyLA. Therefore, the residence is recognized by the City as having historic significance. The residence would remain on the Site as part of the Project but would be converted into additional administrative space for the school and would include a conference room, counselor office, staff support space, and psychologist office. The existing restroom would remain. The Project would include a car drop-off and pick-up area and a total of 49 surface-level parking spaces including 17 standard, 21 compact, nine clean air spaces, and two ADA spaces that would be located along the southern and western portions of the Site. The Project would also include 112 short-term and three long-term bicycle parking spaces, for a total of 115 bicycle parking spaces.

Project construction is expected to commence in September 2023. Construction activities would occur on weekdays between 8:00 a.m. and 3:00 p.m. The Project would require excavation of approximately 12,500 cubic yards (cy) of soil material. Of the 12,500 cy of soil, approximately 10,000 cy would be used as fill and redistributed on-site and the remaining 2,500 cy would be exported off the Site. Construction activities would also include tree removal and replacement of existing trees. Of the 56 on-site trees/shrubs, four trees are dead and would be removed along with an additional 41 trees/shrubs, consisting of nine protected native trees/shrubs and 32 non-protected significant trees. As designated by the City's tree removal application permit and consistent with the City's tree protection policies, protected tree/shrub removals would be replaced at a 1:4 ratio by planting 36 trees on-site and non-protected tree removals would be replaced at a 1:1 ratio by planting 32 trees on-site. The removal of the four dead trees do not require replacement. The Project would retain 13 existing trees, including 12 non-protected

significant trees (two of which are street trees) and one protected native tree. Construction is anticipated to end in September 2024, for a total construction period of approximately 12 months.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located at 15526-15544 Plummer Street, in the Mission Hills - Panorama City - North Hills Community Plan Area in the City of Los Angeles. As shown in Figure 1, Regional Location, the project site is location in the western portion of the Community Plan Area near its center. The Project Site encompasses approximately 2.06 acres (approximately 89,629 sf) and consists of two parcels identified by APN 265-601-5007, which is approximately 1.30 acres in size, and APN 265-601-5008, which is approximately 0.76 acre in size. Figure 2, Project Location, outlines the Project Site in its local context and surrounding uses.

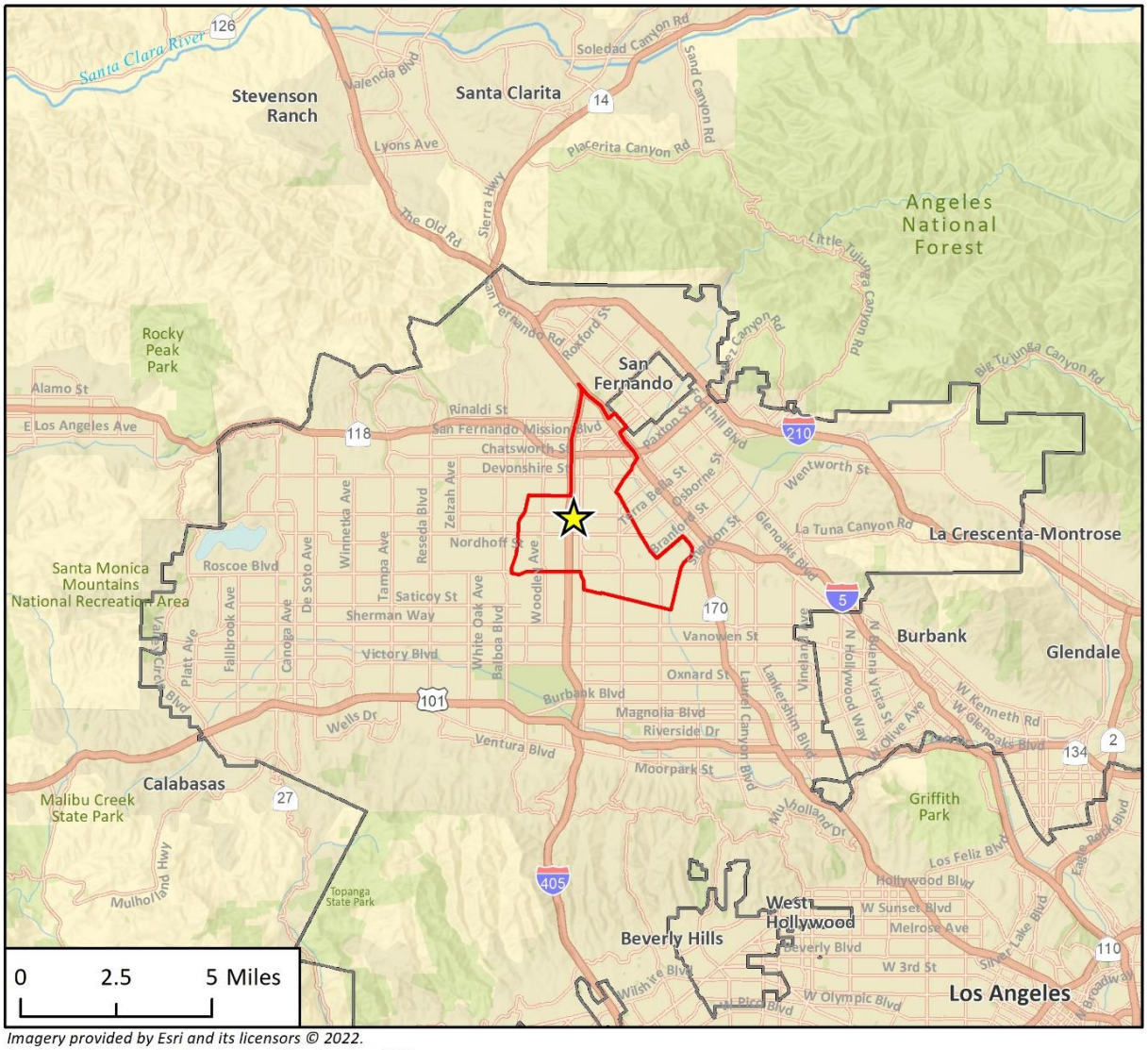
3.2.2 Existing Conditions

The 1.30-acre parcel is currently undeveloped and covered with grasses, shrubs, and various mature trees, and the 0.76-acre parcel is currently developed with a one-story single-family residence with similar vegetation as the larger parcel. The entire Project Site is relatively flat, with the local topography sloping downwards to the south. The elevation of the Site is approximately 869 feet above mean sea level. Of the two parcels that comprise the Site, the eastern parcel (15526 Plummer Street) is developed with a one-story, single-family Craftsman style residence constructed in 1914 and two contemporary sheds. The residence is listed in SurveyLA. Therefore, the residence is recognized by the City as having historic significance. Several partial orchard rows are also located at the rear (south) of this parcel. The western parcel (15544 Plummer Street) is undeveloped and covered with grasses, shrubs, and various mature trees. Each of the parcels is enclosed with various fences and a curbed sidewalk lies beyond the fences to the north, separating the parcels from Plummer Street, a paved four-lane arterial roadway. Figure 3, Views of the Project Site, includes photos of the existing conditions at the Project Site.

3.2.3 Surrounding Land Uses

The Project Site is in an urbanized area. Land uses surrounding the Project Site include Plummer Street to the north, with single-family residences beyond; single- and multi-family residences to the east, with an apartment building for senior citizens (Plummer Village) and commercial uses beyond; single- and multi-family residences to the south, with Vincennes Street beyond; and single-family residences to the west, with Orion Avenue beyond. The Project Site is also located approximately 440 feet east of Interstate 405 (I-405). Figure 2, Project Location, shows the site in the local vicinity.

Figure 1 Regional Location



Imagery provided by Esri and its licensors © 2022.
Additional data provided by the City of Los Angeles, 2021.

Project Location

City of Los Angeles

Mission Hills – Panorama City – North Hills Plan Area

N

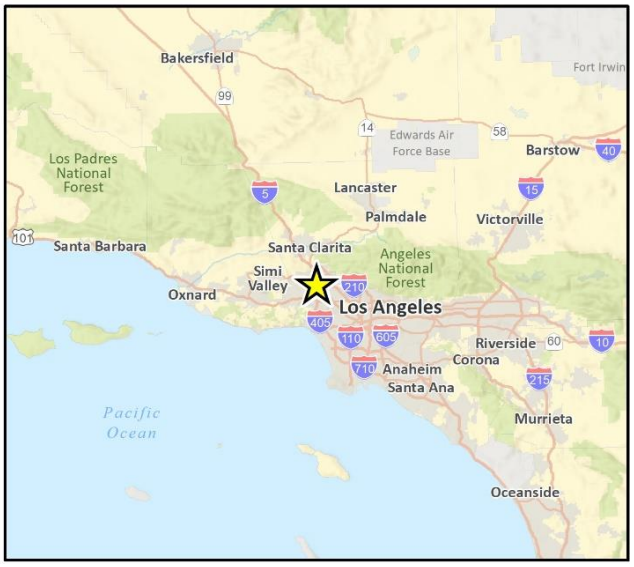


Fig 1 Regional Location

Figure 2 Project Location

Imagery provided by Microsoft Bing and its licensors © 2022.

Fig3 Adjacent Land Use

Figure 3 Views of the Project Site

Photograph 1. Overview of Site from Plummer Street looking south.

Photograph 2. On-site looking east towards the existing single-family residence.

Photograph 3. Along Plummer Street looking southeast toward the Site.

Photograph 4. On-site looking east toward the western parcel of the Site.

Photograph 5. Southern portion of Site.

Photograph 6. Exisitng shed structure on the eastern parcel of the Project Site.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Proposed Project involves the construction of a one and two-story, 26.5-foot-tall elementary school building with 28 classrooms (totaling 23,538 sf) for grades TK through 4; a multi-purpose room (totaling 3,182 sf); administrative spaces (totaling 1,616 sf); corridors, storage spaces and covered outdoor dining (totaling 6,419 sf); and a surface parking lot with an ingress/egress driveway off Plummer Street on an approximately 2.06-acre Project Site. The proposed elementary school would have a total building area of 34,755 sf and would accommodate a maximum enrollment of 552 students. The first floor of the elementary school building would include four TK classrooms, four kindergarten classrooms, four 1st grade classrooms, four 2nd grade classrooms, and one specialty classroom, ranging from 732 sf to 928 sf, as well as an administrative space, registrar/records space, health office, and restrooms. The second floor of the building would include four 3rd grade classrooms, four 4th grade classrooms, and three specialty classrooms, ranging from 734 sf to 928 sf, as well as an administrative space, director office, assistant principal office, inclusion specialist space, occupational therapy and speech space, and restrooms. The Project would serve existing elementary grade students currently enrolled in classes at Panorama Baptist Church located at 8755 Woodman Avenue (approximately two miles southeast) in the neighboring community of Arleta. The existing school is currently renting temporary space (i.e., 16 classrooms) from the Panorama Baptist Church and is at full capacity with an enrollment of 380 students. The Project would provide a new school for these students and would not include demolition of property at Panorama Baptist Church once school services are transferred to the Project Site since the Applicant does not own the church property.

The on-site single-family residence located at 15526 West Plummer Street was built in 1914 and is listed in SurveyLA. Therefore, the residence is recognized by the City as having historic significance. The residence would remain on the site as part of the Project but would be converted into additional administrative space for the school and would include a conference room, counselor office, staff support space, and psychologist office. The existing restroom would remain.

Table 1, Project Summary, provides details of the proposed building components, Figure 4, Project Site Plan, depicts the configuration of all project components on the Project Site, Figure 5 through Figure 8, Project Elevations, depict the building elevations from multiple perspectives, Figure 9, Project Cross-Sections, illustrates the proposed building layout of the different classrooms, and Figure 10, Planting Plan, depicts the landscaping plans for the Project.

3.3.2 Open Space and Landscaping

The Project would provide 30,726 sf of open space and landscaping, including a kindergarten play area (totaling 1,300 sf) and two play areas (totaling 13,060 sf). According to Project plans, there are 56 existing trees/shrubs on the Project Site and two street trees. Of the 56 on-site trees/shrubs, four trees are dead and would be removed along with an additional 41 trees/shrubs, consisting of nine protected native trees/shrubs and 32 non-protected significant trees. As designated by the City's tree removal application permit and consistent with the City's tree protection policies, protected tree/shrub removals would be replaced at a 1:4 ratio by planting 36 trees on-site. Non-protected tree removals would be replaced at a 1:1 ratio by planting 32 trees on-site. The removal of the four dead trees do not require replacement. The Project would retain 13 existing trees, including 12 non-protected significant trees (two of which are street trees) and one protected native tree. Landscaping would occur around the entire Project Site boundary and within islands in the surface parking lot. The project would include capture and reuse cisterns; however, details for the size of the cisterns are not yet available at this stage of project design.

3.3.3 Access, Circulation, and Parking

The Project would include construction of one new ingress/egress driveway off Plummer Street, providing access to the surface parking and car drop-off and pick-up area at the southern and western portion of the Site. Per Los Angeles Municipal Code (LAMC) Section 12.21.A.4.f, the Project would be required to provide one parking space per classroom, for a total of 28 parking spaces. The Project would provide 49 surface-level parking spaces including 17 standard, 21 compact, nine clean air spaces, and two ADA spaces. Of the nine clean air spaces, six spaces would include infrastructure for electric vehicle (EV) charging, one space would be EV van accessible with EV charging, and two spaces would be designated for clean air/vanpool/EV vehicles. The Project would also include 112 short-term and three long-term bicycle parking spaces, for a total of 115 bicycle parking spaces.

3.3.4 Anticipated Construction Schedule

Project construction is expected to commence in September 2023. Construction activities would occur on weekdays between 8:00 a.m. and 3:00 p.m. Construction is anticipated to end in September 2024, for a total construction period of approximately 12 months.

Construction would include site preparation, grading, building construction, asphalt paving, and architectural coating. The Project would require excavation of approximately 12,500 cy of soil material. Of the 12,500 cy of soil, approximately 10,000 cy would be used as fill and redistributed on-site and the remaining 2,500 cy would be exported off the Site.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. This Initial Study/MND analyzes the impacts associated with the Project and provides environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits, and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Pursuant to LAMC Section 16.05, Site Plan Review
- Pursuant to LAMC Section 653, Conditional Use Permit to allow a school use in the RA-1 Zone District
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

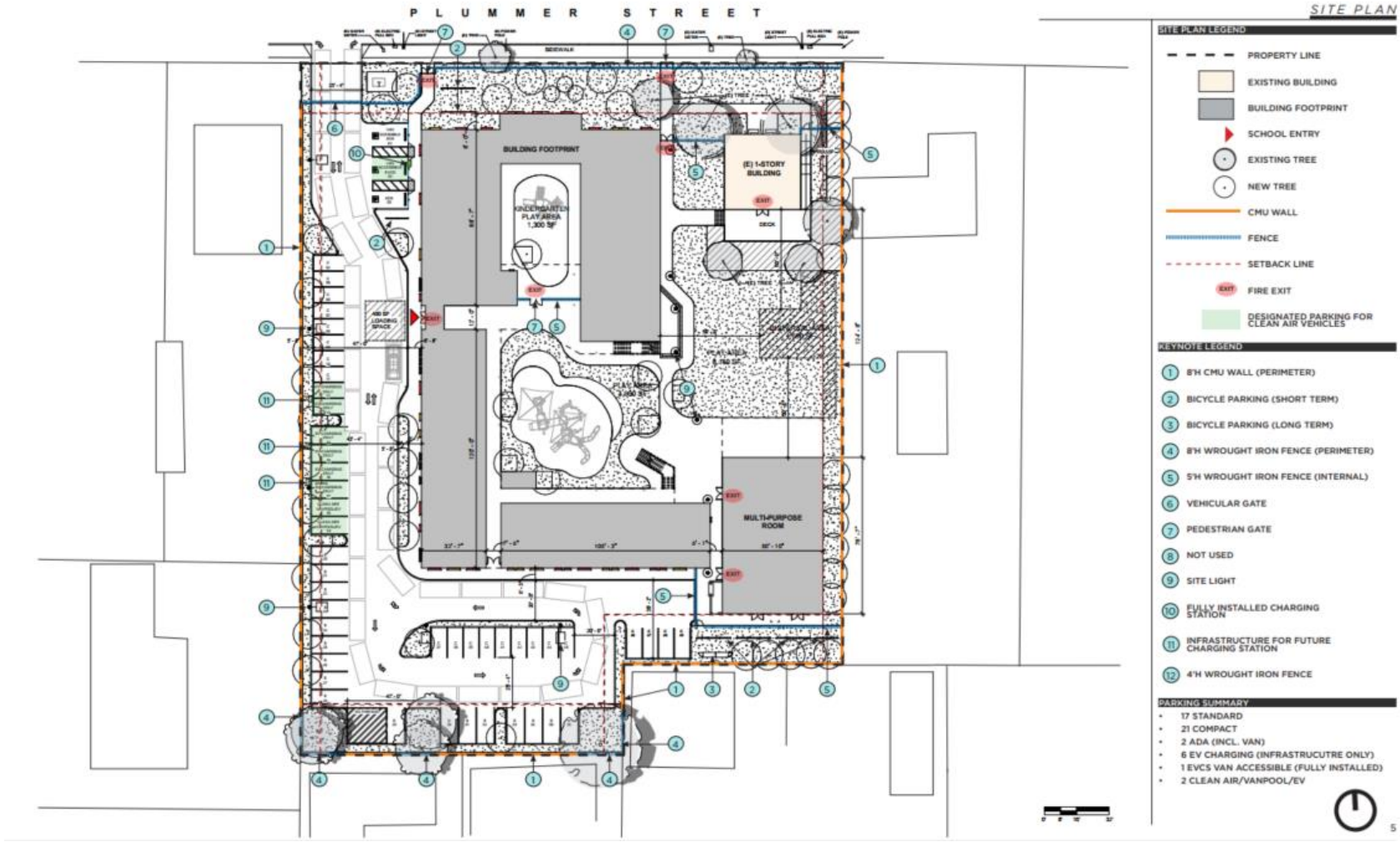
Table 1 Project Summary

Proposed Building Area (square feet)	
Multipurpose Room	3,182
Administrative Space	1,616
Administrative Space in Existing Residence	1,402
Classrooms	23,538
Corridors, Storage Spaces, and Covered Outdoor Dining	6,419
Total	**34,755**
Parking Provided (stalls)	
Standard	17
Compact	21*
ADA (Including Van)	2
Clean Air	9**
Total	**49**
Bicycle Parking (spaces)	
Short-Term	112
Long-Term	3
Total	**115**
Public Open Space/Landscaping (square feet)	
Kindergarten Play Area	1,300
Play Areas	13,060
Landscaping	16,366
Total	**30,726**
Setbacks (feet)	
Front Yard	25
East Side Yard	10
West Side Yard	10
Rear Yard	25
Overview	
Gross Site Area	89,629 sf (2.06 acres)
Max School Enrollment	552 students
Max Height	26 feet, 6 inches

*40 percent max of required parking. Required parking is 28 spaces.
** 6electric vehicle charging stations, 1electrical vehicle van accessible, and 2clean air/vanpool/electrical vehicle.

Source: Berliner Architects 2022

Figure 4 Project Site Plan

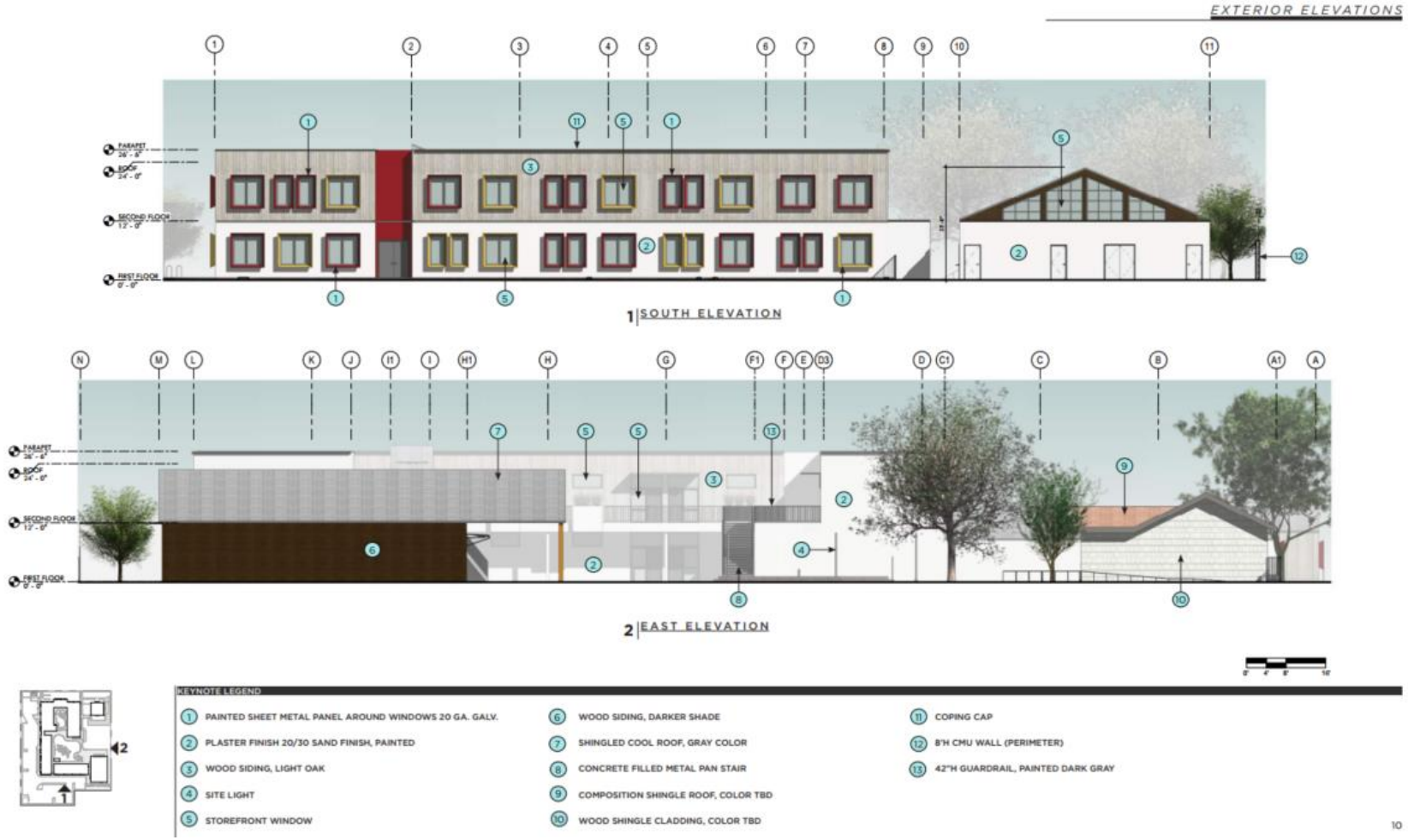


Source: Berliner Architects, 2022

Figure 5 Project Elevations – North and West

Source: Berliner Architects, 2022

Figure 6 Project Elevations – South and East

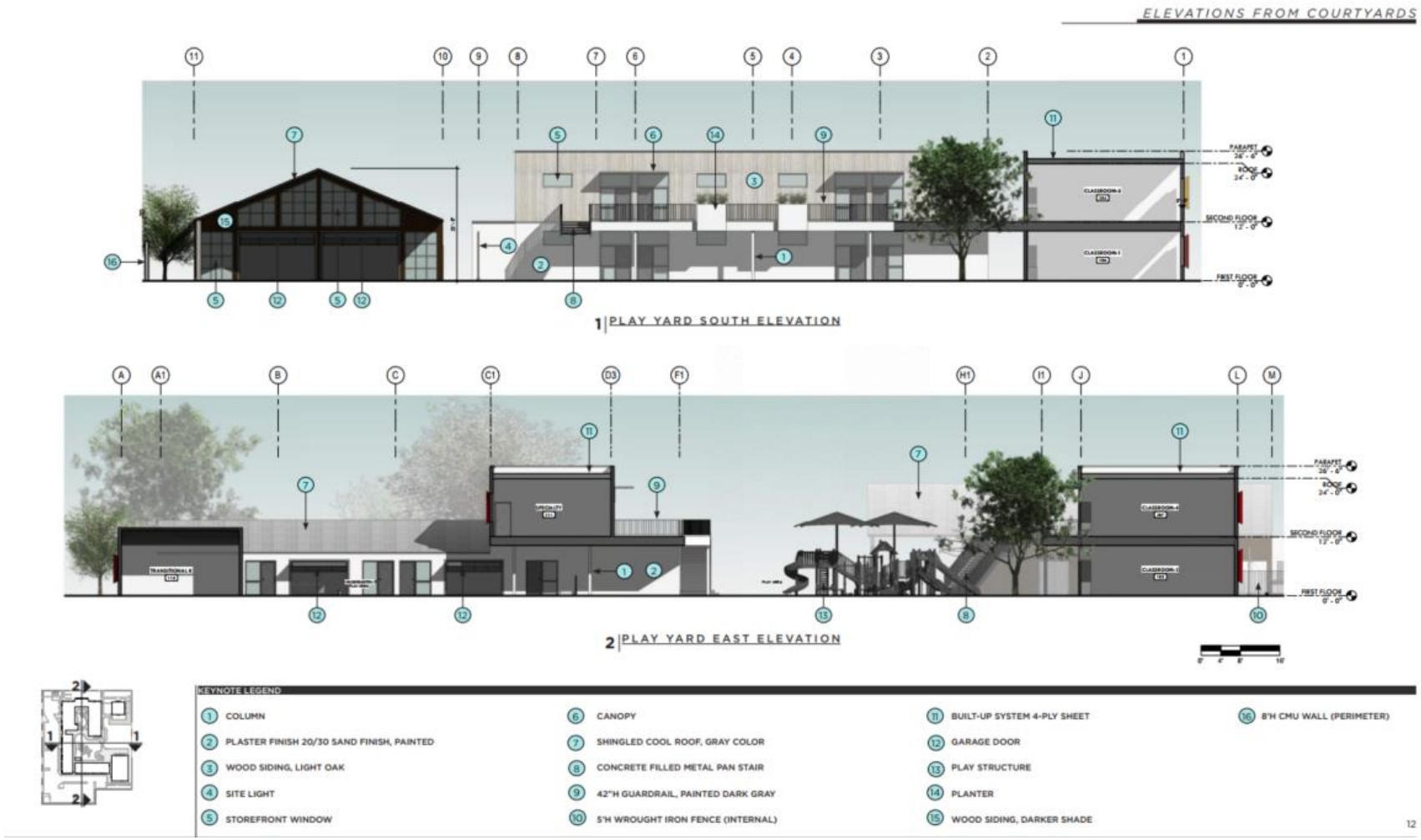


Source: Berliner Architects, 2022

Figure 7 Project Elevations – North and West Play Yard

Source: Berliner Architects, 2022

Figure 8 Project Elevations – South and East Play Yard



Source: Berliner Architects, 2022

Figure 9 Project Cross-Sections

Source: Berliner Architects, 2022

Figure 10 Planting Plan

Source: Berliner Architects, 2022

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4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

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

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

Less Than Significant Impact. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance); and focal views (visual access to a particular object, scene, or feature of interest). The Project is located in an established urban area in which existing views are defined primarily by Plummer Street to the north, with single-family residences beyond; single- and multi-family residences to the east, with a senior apartment building beyond; single- and multi-family residences to the south, with Vincennes Street beyond; and single-family residences to the west, with Orion Avenue beyond. Due to the relatively level topography and extent of development within the immediate area, there are no scenic views or vantage points that afford scenic views. Furthermore, as shown in Figure 3, there are no significant natural features on the Project Site or other valued views within the Project area that would be defined as a scenic vista. Therefore, impacts to scenic vistas would be less than significant.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

Less Than Significant Impact. There are two officially designated State scenic highways in Los Angeles County. This includes State Route 2 (SR-2; Angeles Crest Highway) approximately 11.8 miles south of the Project Site and a portion of State Route 27 (SR-27; Topanga Canyon Highway) approximately 9.9 miles southwest of the Project Site (California Department of Transportation

[Caltrans] 2019). As identified in the Mobility Element of the City of Los Angeles General Plan, the nearest designated scenic highways include Tampa and Wentworth Street, located approximately 4.9 miles northwest and 5.7 miles east of the Project Site, respectively (City of Los Angeles 2016a). Therefore, at these distances, the Site is not near a scenic highway.

The Project Site is relatively level and does not contain any unique geologic features. Although the Project would remove four dead and 41 alive on-site trees, consisting of nine protected native trees/shrubs and 32 non-protected significant trees (not counting the dead trees), the Project would replace all removed protected native trees or shrubs on a 1:4 ratio and all removed non-protected significant trees on a 1:1 ratio. The Project would retain two street trees and 11 existing trees on the Site, including one protected native tree. Section IV, Biological Resources, includes a detailed discussion of tree retention and removal activities associated with the Project in compliance with the City's tree protection policies. Furthermore, although the Project includes a historic single-family residence on-site, the building would remain on the Site as part of the Project but would be adaptively reused for additional administrative space for the school and would include a conference room, counselor office, staff support space, and psychologist office. As discussed in Section V, *Cultural Resources*, all character-defining features associated with the historic building would be preserved under the Project. Because there are no impacts to scenic resources on or near the Site, and the Site is not within a scenic highways, the Project would not substantially damage scenic resources in a scenic highway, impacts would be less than significant.

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

Less Than Significant. The Project Site is in an urban area. Land uses surrounding the site include single family and multi-family residences connected by an established roadway network. The Site is also 440 feet east of I-405, which is visible from the Site. The Site itself consists of grasses, shrubs, various mature trees, and a one-story historic single-family residence.

The Proposed Project involves the construction of a one and two-story, 26.5-foot-tall elementary school building with 28 classrooms (totaling 23,538 sf) for grades TK through 4; a multi-purpose room (totaling 3,182 sf); administrative spaces (totaling 1,616 sf); corridors, storage spaces, and covered outdoor dining (totaling 6,419 sf); and a surface parking lot with an ingress/egress driveway off Plummer Street. The Project would also include 30,726 sf of open space and landscaping, including two play areas (totaling 13,060 sf) and a kindergarten play area (totaling 1,300 sf). As a proposed elementary school, the Project would not conflict with existing uses in the area since there is a high school and middle school located approximately 1,000 feet to the east along Plummer Street.

Although the Project would remove 41 on-site trees/shrubs, including a few protected native trees/shrubs, the Project would replace all removed protected native trees or shrubs on a 1:4 ratio and all removed non-protected significant trees on a 1:1 ratio. The Project would retain 13 existing trees on the Site, including 12 non-protected significant trees (two of which are street trees) and one protected native tree. Section IV, *Biological Resources*, includes a detailed discussion of tree retention and removal activities associated with the Project in compliance with the City's tree protection policies. Furthermore, the existing on-site historic single-family residence would remain on the Site as part of the Project but would be adaptively reused into additional administrative space. As discussed in Section V, *Cultural Resources*, all character-defining features associated with the historic building would be preserved under the Project. Compared to the mostly

undeveloped conditions of the Site and considering the treatment of the on-site historic building, the Project would not degrade the existing visual character or quality of the Site.

Furthermore, the Project Site is in an area zoned RA-1 (Suburban Zone). There is a maximum height limit of 30 feet. The Proposed Project would have a height of 26.5 feet and would not conflict with RA-1 zoning or regulations governing building height, which influence public views. Because the Project would not conflict with applicable zoning and other regulations governing scenic quality, this impact would be less than significant.

d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?

Less Than Significant Impact. The Proposed Project would redevelop the mostly undeveloped Site into an elementary school. The Project Site is in a well-lit urban area where there are moderate to high levels of ambient nighttime lighting, including street lighting, vehicle headlights, architectural and security lighting, and indoor building illumination (light emanating from structures which passes through windows), all of which are common to densely populated areas. Artificial light impacts are largely a function of proximity and timing. Because the Project is in an urban area, light emanating from any one source contributes to lighting impacts rather than being solely responsible for lighting impacts on a particular use. As uses surrounding the Project Site are already impacted by lighting from existing development within the area, the amount of new light sources must be highly visible from light-sensitive uses to have any notable effect.

Construction activities associated with the Project would occur on weekdays between 8:00 a.m. and 3:00 p.m. Therefore, construction would occur during daylight hours and would not involve lighting during evening hours. At operation, the Project would include indoor lighting in the school and other amenity areas as well as exterior lighting and signage. The proposed elementary school would not include sports fields with potential for evening or nighttime events requiring lighting; therefore, exterior lighting at nighttime would be primarily for security purposes but would not be so bright as to cause substantial light to spill off the Site.

Outdoor lighting and signage would be designed and installed with shielding, such that lighting would be directed and focused on the Project Site and not on adjacent residential properties in accordance with LAMC lighting regulations. LAMC lighting regulations require that operational lighting be directed downward or on the specific on-site features to be lit or otherwise avoid direct glare onto exterior glazed windows or glass doors of existing and adjacent uses. Specifically, LAMC Section 93.0117(b) limits lighting intensity or direct glare onto exterior glazed windows or glass doors on any property containing residential units; elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units. LAMC Section 14.4.4.E, requires that no sign be arranged and illuminated in a manner that would produce a light intensity of greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property. Therefore, light impacts are not expected to be substantial or to adversely affect day or night views.

The Proposed Project would also utilize reflective materials, such as glass surfaces in its doors and windows, which could create glare during daylight hours. In addition, the Proposed Project would generate new vehicle traffic to and from the Project Site that would contribute light from vehicle headlamps and glare from vehicle surfaces and windows.

As with existing lighting, existing glare in the Project area is not substantial and is typical of a highly urbanized area, with sunlight reflected off reflective materials utilized in buildings and from vehicle windows and other surfaces. In accordance with City requirements (i.e., LAMC Chapter 9, Article 3, Division 1, Section 93.017(b)), the exterior of the proposed school building would use

materials such as, high-performance and/or low-reflective glass (no mirrorlike tints or films) and pre-cast concrete or fabricated wall surfaces that would minimize glare and reflected heat. To the extent glare is experienced by adjacent uses or the occupants of vehicles on nearby streets would be temporary, and continuously changing with the movement of the sun throughout the course of the day and the seasons of the year. Therefore, glare impacts are not expected to be substantial or to adversely affect day or night views. Light and glare impacts would be less than significant.

II. AGRICULTURE AND FORESTRY RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

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

No Impact. The Project Site is in an urban area. The site is surrounded by Plummer Street, I-405, and residential uses. The California Department of Conservation's (DOC) 2016 map of Los Angeles County Important Farmland indicates that the Project Site is located in an area designated as Urban Built-up land and is not within an area designated as Farmland (DOC 2016). Therefore, the Project would have no impact on farmland.

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

No Impact. The Project Site is not zoned for agricultural use or under any Williamson Act contract (DOC 2016). According to the Mission Hills - Panorama City - North Hills Community Plan, the Project Site is designated Low Density Residential, which corresponds to the RA-1 zone (Suburban Zone) and is intended to provide for areas appropriate for a range of detached single-family residential dwelling units, each located on a single legal lot, and does not include condominiums or cooperative housing (City of Los Angeles 2010). The Proposed Project would involve the development of a two-story elementary school building and associated open space, landscaping, and surface parking. A school is a permitted use under the RA-1 with approval of a Conditional Use Permit, which is included as part of Project approval. The Project Site does not include the conversion of farmland to non-agricultural uses. Therefore, the Proposed Project would have no impact with respect to agricultural zoning or conflict with a Williamson Act contract or other conversion of farmland to non-agricultural use.

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

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

No Impact. The Project Site and the immediate surrounding area is urban and entirely developed with residential uses. As described under impact b) of this section, the Project Site is zoned RA-1 (Suburban Zone). Neither the Project Site nor the surrounding area is zoned for forest land or timberland. Accordingly, the Project would not conflict with forest land or timberland zoning. Additionally, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact would occur.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. As discussed in the Phase I Environmental Site Assessment prepared by Alta Environmental in February 2022, the Site has historically included agricultural uses (Alta Environmental 2022). Several partial orchard rows are located at the rear (south) of the eastern parcel with the single-family historic residence. Although the project would remove these rows, the Site is not designated as farmland or forest land. Therefore, the project would not involve any development that would result in the conversion of designated farmland or forest land to another use. No impact would occur.

III. AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Rincon prepared an Air Quality and Greenhouse Gas Study in August 2022 to analyze the Project's air quality impacts related to both temporary construction activity and long-term operation of the Project. Rincon also prepared a Health Risk Assessment to assess impacts of the I-405 on the project site. The following analysis is based on the findings of the Air Quality and Greenhouse Gas Study and Health Risk Assessment, which are provided as Appendix A and Appendix B, respectively.

Air Quality Standards and Attainment

The Project Site is in the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). As the local air quality management agency, the SCAQMD is required to monitor air pollutant levels to ensure that state and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards.

Depending on whether the standards are met or exceeded, the SCAB is classified as being in "attainment" or "nonattainment." Under state law, air districts are required to prepare a plan for air quality improvement for pollutants for which the district is in non-compliance. The SCAQMD is in nonattainment for the federal standards for ozone and $PM_{2.5}$ and the state standards for ozone, PM_{10}, and $PM_{2.5}$. Areas of the SCAB located in Los Angeles County are also in nonattainment for lead. The SCAB is designated unclassifiable or in attainment for all other federal and state standards.

Air Pollutants of Primary Concern

Primary criteria pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere. Primary criteria pollutants include CO, NO_2, PM_{10}, $PM_{2.5}$, SO_2, and lead. Ozone is considered a secondary criteria pollutant because it is created by atmospheric chemical and photochemical reactions between reactive organic gases (ROG) and

nitrogen oxides (NO_X). The following subsections describe the characteristics, sources, and health and atmospheric effects of critical air contaminants.

Ozone

Ozone is produced by a photochemical reaction (triggered by sunlight) between NO_X and ROG.[1] Nitrogen oxides are formed during the combustion of fuels, while ROG are formed during combustion and evaporation of organic solvents. Since O_3 requires sunlight to form, it usually occurs in substantial concentrations between the months of April and October. Ozone is a pungent, colorless, toxic gas with direct health effects on humans including respiratory and eye irritation and possible changes in lung functions. Groups most sensitive to O_3 include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors.

Carbon Monoxide

Carbon monoxide is a local pollutant that is found in high concentrations only near fuel combustion equipment and other sources of CO. The primary source of CO, a colorless, odorless, poisonous gas, is automobile traffic. Therefore, elevated concentrations are usually only found near areas of high traffic volumes. Carbon monoxide's health effects are related to its affinity for hemoglobin in the blood. At high concentrations, CO reduces the amount of oxygen in the blood, causing heart difficulty in people with chronic diseases, reduced lung capacity, and impaired mental abilities.

Nitrogen Dioxide

Nitrogen dioxide is a by-product of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. Nitrogen dioxide is an acute irritant. A relationship between NO_2 and chronic pulmonary fibrosis may exist, and an increase in bronchitis in young children at concentrations below 0.3 parts per million (ppm) may occur. Nitrogen dioxide absorbs blue light, gives a reddish-brown cast to the atmosphere, and reduces visibility. It can also contribute to the formation of ozone/smog and acid rain.

Sulfur Dioxide

Sulfur dioxide is a colorless, pungent, irritating gas formed primarily by the combustion of sulfur-containing fossil fuels. When SO_2 oxidizes in the atmosphere, it forms sulfur trioxide. Collectively, these pollutants are referred to as sulfur oxides (SO_X). In humid atmospheres, SO_2 can also form sulfuric acid mist, which can eventually react to produce sulfate particulates that can inhibit visibility. Combustion of high sulfur-content fuels is the major source of SO_2, while chemical plants, sulfur recovery plants, and metal processing are minor contributors. At sufficiently high concentrations, SO_2 irritates the upper respiratory tract. At lower concentrations, when in conjunction with particulates, SO_2 appears to do still greater harm by injuring lung tissues. This compound also constricts the breathing passages, especially in people with asthma and people involved in moderate to heavy exercise. Sulfur dioxide causes respiratory irritation, including wheezing, shortness of breath, and coughing. Long-term SO_2 exposure has been associated with increased risk of mortality from respiratory or cardiovascular disease. Sulfur oxides, in

[1] CARB defines VOC and ROG similarly as, "any compound of carbon excluding CO, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate," with the exception that VOC are compounds that participate in atmospheric photochemical reactions (CARB 2009). For the purposes of this analysis, ROG and VOC are considered comparable in terms of mass emissions and the term ROG is used in this report.). SCAQMD uses the term VOC to denote organic precursors.

combination with moisture and oxygen, can yellow leaves on plants, dissolve marble, and eat away iron and steel.

Suspended Particulates

Atmospheric particulate matter is comprised of finely divided solids and liquids such as dust, soot, aerosols, fumes, and mists. The particulates that are of particular concern are PM_{10} (small particulate matter that measures no more than 10 microns in diameter) and $PM_{2.5}$ (fine particulate matter that measures no more than 2.5 microns in diameter). The characteristics, sources, and potential health effects associated with PM_{10} and $PM_{2.5}$ can be different. Major man-made sources of PM_{10} are agricultural operations, industrial processes, combustion of fossil fuels, construction, demolition operations, and entrainment of road dust into the atmosphere. Natural sources include windblown dust, wildfire smoke, and sea spray salt. The finer $PM_{2.5}$ particulates are generally associated with combustion processes as well as formation in the atmosphere as a secondary pollutant through chemical reactions. $PM_{2.5}$ is more likely to penetrate deeply into the lungs and poses a serious health threat to all groups, but particularly to the elderly, children, and those with respiratory problems. More than half of the small and fine particulate matter that is inhaled into the lungs remains there, which can cause permanent lung damage. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance.

Lead

Lead is a metal found naturally in the environment, as well as in manufacturing products. Lead occurs in the atmosphere as particulate matter. The major sources of lead emissions historically have been mobile and industrial sources. In the early 1970s, the United States Environmental Protection Agency (USEPA) set national regulations to gradually reduce the lead content in gasoline. In 1975, unleaded gasoline was introduced for motor vehicles equipped with catalytic converters. The USEPA completed the ban prohibiting the use of leaded gasoline in highway vehicles in December 1995. As a result of the USEPA's regulatory efforts to remove lead from gasoline, atmospheric lead concentrations have declined substantially over the past several decades. The most dramatic reductions in lead emissions occurred prior to 1990 due to the removal of lead from gasoline sold for most highway vehicles. Lead emissions were further reduced substantially between 1990 and 2008, with reductions occurring in the metals industries in part due to national emissions standards for hazardous air pollutants (USEPA 2013). As a result of phasing out leaded gasoline, metal processing is currently the primary source of lead emissions. The highest levels of lead in the air are generally found near lead smelters. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers. Lead may cause a range of health effects, including anemia, kidney disease, and neuromuscular and neurological dysfunction (in severe cases). The Proposed Project does not include any stationary sources of lead emissions. Therefore, implementation of the Project would not result in substantial emissions of lead, and this pollutant is not discussed further in this analysis.

Toxic Air Contaminants

Toxic air contaminants (TACs) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. One of the main sources of TACs in California is diesel engines that emit exhaust containing solid material known as diesel particulate matter (DPM; California Air Resources Board [CARB] 2022). TACs are different than

the criteria pollutants previously discussed because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects, and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and by chronic (i.e., of long duration) and acute (i.e., severe but of short duration) adverse effects on human health.

Air Quality Management Plan

Under State law, the SCAQMD is required to prepare a plan for air quality improvement for pollutants for which its jurisdiction is in non-compliance. The SCAQMD updates the plan every three years. Each iteration of the SCAQMD's Air Quality Management Plan (AQMP) is an update of the previous plan and has a 20-year horizon. The latest AQMP, the 2016 AQMP, was adopted on March 3, 2017. It incorporates new scientific data and notable regulatory actions that have occurred since adoption of the 2012 AQMP, including the approval of the new federal eight-hour ozone standard of 0.070 ppm that was finalized in 2015. The Final 2016 AQMP addresses several State and federal planning requirements and incorporates new scientific information, primarily in the form of updated emissions inventories, ambient measurements, and meteorological air quality models. The Southern California Association of Governments' (SCAG) projections for socio-economic data (e.g., population, housing, employment by industry) and transportation activities from the 2016 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) are integrated into the 2016 AQMP.

The 2016 AQMP builds upon the approaches taken in the 2012 AQMP for the attainment of federal PM and ozone standards and highlights the significant amount of reductions to be achieved. It emphasizes the need for interagency planning to identify additional strategies to achieve reductions within the timeframes allowed under the federal Clean Air Act, especially in the area of mobile sources. The 2016 AQMP also includes a discussion of emerging issues and opportunities, such as fugitive toxic particulate emissions, zero-emission mobile source control strategies, and the interacting dynamics among climate, energy, and air pollution. The 2016 AQMP also demonstrates strategies for attainment of the new federal eight-hour ozone standard and vehicle miles travelled emissions offsets, pursuant to recent USEPA requirements (SCAQMD 2017).

Sensitive Receptors

Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with a margin of safety, to protect public health and welfare. They are designed to protect that segment of the public most susceptible to respiratory distress, such as children under 14; the elderly over 65; people engaged in strenuous work or exercise; and people with cardiovascular and chronic respiratory diseases. Therefore, the majority of sensitive receptor locations are schools, hospitals, and residences. Sensitive receptors in the Project vicinity include single- and multi-family residences immediately to the east, south, and west; additional residences located approximately 130 feet to the north across Plummer Street; and Plummer Village Senior Community located approximately 215 feet east of the Project Site. In addition, the Proposed Project would include construction of an elementary school, which would add new sensitive receptors to the Project Site.

Regional Significance Thresholds

The SCAQMD recommends quantitative regional significance thresholds for temporary construction activities and long-term project operation in the region of the SCAB overseen by SCAQMD, shown in Table 2.

Table 2 SCAQMD Regional Significance Thresholds

	Mass Daily Emissions Thresholds (pounds per day)	
Pollutant	**Construction**	**Operation**
VOC	75	55
NO_X	100	55
CO	550	550
SO_X	150	150
PM_{10}	150	150
$PM_{2.5}$	55	55

Source: SCAQMD 2019

Localized Significance Thresholds

The SCAQMD has also developed Localized Significance Thresholds (LST) as a tool to assist lead agencies to analyze localized air quality impacts to sensitive receptors in the vicinity of a project. The SCAQMD's LST Methodology outlines how to analyze localized impacts from common pollutants of concern including NO_2, CO, PM_{10}, and $PM_{2.5}$ (SCAQMD 2008). Localized air quality impacts would occur if pollutant concentrations at sensitive receptors exceeded applicable NAAQS or CAAQS.

To minimize efforts, the SCAQMD developed mass rate lookup tables as a simple screening procedure. If a project's onsite emissions do not exceed the screening levels for any pollutant, it can be concluded that the Project would not cause or contribute to an adverse localized air quality impacts. Screening levels are provided for various distances between the Project boundary and the nearest sensitive receptor and various Project Site acreages. Screening levels increase, as the Project distance between the boundary and the nearest receiver increases. This is because air pollutant dispersion increases with distance. Screening levels increase, as the acreage increases. This is because the distance between construction sources and sensitive receptors increases with Project acreage.

The LST mass rate lookup tables account for ambient pollutant concentrations based on the Project's source receptor area (SRA). The LST mass rate lookup tables account for ambient pollutant concentrations based on a Project's source receptor area (SRA). The LST methodology includes screening levels for 1-, 2-, and 5-acre sites at distances of 82 feet (25 meters), 164 feet (50 meters), 328 feet (100 meters), 656 feet (200 meters), 1,640 feet (500 meters). Screening levels are more stringent for smaller sites which represent a more concentrated release.

LSTs have been developed for emissions generated by construction sites up to five acres in size. The Project Site is located in SRA 7 (East San Fernando Valley) and is approximately 2.06 acres in size. Pursuant to SCAQMD guidance, the two-acre LSTs were utilized for this analysis (SCAQMD 2008). The closest sensitive receptors to the Project Site are residences directly adjacent to the east, south and west. In addition, there are single-family residences located approximately 130 feet north of the Site across Plummer Street and Plummer Village Senior Community located approximately 215 feet east of the Site. According to the SCAQMD, projects with boundaries located closer than 82 feet to the nearest receptor should use the LSTs for receptors located at 82 feet (SCAQMD 2008). LSTs for construction on a two-acre site in SRA 7 for a receptor at 25 meters (82 feet) are shown in Table 3.

Table 3 SCAQMD LSTs for Construction

Pollutant	Allowable Emissions from a 2-acre Site in SRA 7 for a Receptor at 25 Meters (pounds/day)
Gradual conversion of NO_X to NO_2	63[1]
CO	786
PM_{10}	7
$PM_{2.5}$	3[2]

lbs/day = pounds per day; NO_x = nitrogen oxide; NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = particulate matter with a diameter no more than 10 microns; $PM_{2.5}$ = particulate matter with a diameter no more than 2.5 microns

[1]The screening criteria for NOx were developed based on the 1-hour NO_2 CAAQS of 0.18 ppm. Subsequently to publication of the SCAQMD's guidance the USEPA has promulgated a 1-hour NO_2 NAAQS of 0.100 ppm. This is based on a 98th percentile value, which is more stringent than the CAAQS. Because SCAQMD's LSTs have not been updated to address this new standard, to determine if project emissions would result in an exceedance of the 1-hour NO_2 NAAQS, an approximated LST was estimated to evaluate the federal 1-hour NO_2 standard. The revised LST threshold is calculated by scaling the NO_2 LST for by the ratio of 1-hour NO_2 standards (federal/State) (i.e., 114 lbs/day * (0.10/0.18) =63.3 lbs/day).

[2]The screening criteria for PM2.5 were developed based on an Annual CAAQS of 15 mg/m^3. Subsequently to publication of the SCAQMD's guidance the annual standard was reduced to 12 mg/m^3. Because SCAQMD's LSTs have not been updated to address this new standard, to determine if project emissions would result in an exceedance of the annual $PM_{2.5}$ CAAQS, an approximated LST was estimated. The revised LST threshold is calculated by scaling the $PM_{2.5}$ LST for by the ratio of 24-hour $PM_{2.5}$ standards (federal/State) (i.e., 4lb/day * (12/15) =3.2 lbs/day).

Source: SCAQMD 2009

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

No Impact. A project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding the forecasts used in the development of the AQMP. The 2016 AQMP relies on local general plans and the demographic forecasts contained in the SCAG 2016 RTP/SCS in its own projections for managing air quality in the SCAB. As such, projects that propose development that is consistent with the growth anticipated by SCAG's growth projections and/or the General Plan would not conflict with the SCAQMD AQMP. In the event that a project would propose development that is less dense than anticipated by the growth projections, the project would likewise be consistent with the AQMP.

The growth forecasts in SCAG's 2016 RTP/SCS estimate that the population of Los Angeles will be 4,609,400 in 2040, an increase of 763,900 people from a population of 3,845,500 in 2012 (SCAG 2016).2 The Proposed Project would involve the development of an elementary school for a maximum enrollment of 552 students, including 28 classrooms, administrative spaces, a multi-purpose room, and the adaptive reuse of the existing residence to accommodate additional administrative space. The Proposed Project would involve the development of an elementary school for an additional enrollment of 172 students. The Proposed Project would not directly increase the City's population because no new housing is proposed, and the purpose of this facility is for educational use. Furthermore, as shown in Table 4 and Table 5 under impact b) of this section, the Project would not generate criteria pollutant emissions in excess of SCAQMD thresholds for ozone precursors (VOC and NO_X) or $PM_{2.5}$. The Project would be consistent with the AQMP and would not conflict with or obstruct the applicable air quality plan. Therefore, no impacts would occur.

[2] On September 3, 2020, SCAG's Regional Council formally adopted the 2020-2045 RTP/SCS (2020 RTP/SCS), or Connect SoCal, which builds upon the progress made through implementation of the 2016 RTP/SCS and was developed through a four-year planning process to update population, housing and employment data as well as transportation strategies for the region through the horizon year of 2045. However, SCAQMD has not updated the 2016 AQMP to incorporate these new demographic projections (the next update to the AQMP is expected to occur in 2022).

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact. The City of Los Angeles is located in the SCAB, which is a non-attainment area for the NAAQS for ozone, $PM_{2.5}$, and lead as well as the CAAQS for ozone, PM_{10}, and $PM_{2.5}$. The Project does not include any stationary sources of lead emissions. Therefore, implementation of the Project would not result in substantial emissions of lead and this pollutant is not discussed further in this analysis. The below discussion assesses potential air quality impacts related to construction and operational emissions of criteria air pollutants for which the SCAB is in non-attainment, including ozone, PM_{10}, and $PM_{2.5}$.

Construction Impacts

Project construction would generate temporary air pollutant emissions associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions from heavy construction equipment and construction vehicles. In addition, construction equipment would release VOC emissions during the drying of architectural coating and paving phases. Table 4 summarizes the estimated maximum daily emissions of pollutants during project construction. As shown therein, construction-related emissions would not exceed SCAQMD thresholds. Therefore, project construction would not 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. Impacts would be less than significant.

Table 4 Project Construction Emissions

	Maximum Emissions (lbs/day)					
Construction Year	**VOC**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
2023	6	58	56	< 1	12	6
2024	9	49	54	< 1	4	2
Maximum Daily Construction Emissions	**9**	**58**	**56**	**<1**	**12**	**6**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Maximum Daily On-site Emissions	**9**	**58**	**56**	**< 1**	**12**	**6**
SCAQMD Localized Significance Thresholds (LSTs)	N/A	114	786	N/A	7	4

Construction Year	Maximum Emissions (lbs/day)					
	VOC	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Threshold Exceeded?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

lbs/day = pounds per day; VOC = Volatile organic compounds; NO_X = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter 10 microns in diameter or less; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter.

Notes: All emissions modeling was completed using CalEEMod. See Appendix A for modeling results. Some numbers may not add up due to rounding. Emission data is pulled from "mitigated" results, which account for compliance with RCMs. Emissions presented are the highest of the winter and summer modeled emissions. Maximum on-site emissions are the highest emissions that would occur on the Project site from on-site sources such as heavy construction equipment and architectural coatings and excludes off-site emissions from sources such as construction worker vehicle trips and haul truck trips.

Operational Impacts

Operation of the project would generate criteria air pollutant emissions associated with area sources (e.g., architectural coatings, consumer products, and landscaping equipment), energy sources (i.e., use of natural gas for space and water heating), and mobile sources (i.e., vehicle trips to and from the project site). Table 5 summarizes the Project's operational emissions by emission source. As shown therein, operational emissions would not exceed SCAQMD regional thresholds for criteria pollutants. Therefore, project operation would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment, and impacts would be less than significant.

Table 5 Project Operational Emissions

Emission Source	Maximum Daily Emissions (lbs/day)					
	VOC	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Area	1	< 1	< 1	0	< 1	< 1
Energy	< 1	< 1	< 1	< 1	< 1	< 1
Mobile	3	3	24	< 1	5	1
Total Project Emissions	**4**	**3**	**24**	**<1**	**5**	**1**
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

lbs/day = pounds per day; NO_x = nitrogen oxide; NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = particulate matter with a diameter no more than 10 microns; $PM_{2.5}$ = particulate matter with a diameter no more than 2.5 microns

Notes: All emissions modeling was completed using CalEEMod. See Appendix A for modeling results. Some numbers may not add up due to rounding. Emission data is pulled from "mitigated" results that include compliance with SCAQMD Rule 403 and Rule 1113. Emissions presented are the highest of the winter and summer modeled emissions.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact With Mitigation. The following discussion addresses the Proposed Project's potential impacts regarding emissions of local carbon monoxide hotspots and TACs within the SCAB and local areas.

Localized Carbon Monoxide Hotspot Impact

A carbon monoxide hotspot is a localized concentration of carbon monoxide that is above a carbon monoxide ambient air quality standard. Localized carbon monoxide hotspots can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local carbon monoxide concentration exceeds the federal one-hour standard of 35.0 ppm or the federal and state eight-hour standard of 9.0 ppm (CARB 2016).

A detailed carbon monoxide analysis was conducted during the preparation of SCAQMD's 2003 AQMP. The locations selected for microscale modeling in the 2003 AQMP included high average daily traffic (ADT) intersections in the SCAB, those which would be expected to experience the highest CO concentrations. The highest CO concentration observed was at the intersection of Wilshire Boulevard and Veteran Avenue on the west side of Los Angeles near the I-405. The concentration of CO at this intersection was 4.6 ppm, which is well below the state and federal standards. The Wilshire Boulevard/Veteran Avenue intersection has an ADT of approximately 100,000 vehicles per day (SCAQMD 2003).

The total existing ADT for the nearest major intersection to the Project Area, Plummer Street and Sepulveda Boulevard, was estimated at 20,200 vehicles (City of Los Angeles 2016b). Based on the CalEEMod daily trips, the Project would generate approximately 1,232 daily trips. Operation of the Project would cause the ADT at this intersection to increase by 1,232 for a total of 21,432 daily trips. Both the existing and future ADT are below the 100,000-vehicle count on the Wilshire Boulevard/Veteran Avenue intersection, which was already below the CO standards. Project-generated local mobile-source CO emissions would not result in or substantially contribute to concentrations that exceed the one-hour or eight-hour CO standard. Therefore, impacts would be less than significant.

Localized Significance Thresholds

The *Final LST Methodology* was developed to be used as a tool to analyze localized impacts associated with project-specific level proposed projects. If the calculated emissions for the proposed construction or operational activities are below the LST emission levels found on the LST mass rate look-up tables (Appendix C of *Final LST Methodology;* SCAQMD 2009) and no potentially significant impacts are found to be associated with other environmental issues, then the proposed construction or operation activity is not significant for air quality. The Project analysis assumes main construction activity would occur immediately adjacent to single-family residences. The allowable emission for project utilizes the 82 feet receptor distance, and the project is in SRA 7(East San Fernando Valley). Table 6 summarizes the Project's maximum localized daily construction emissions from the Proposed Project. As shown therein, localized construction emissions would exceed SCAQMD LST thresholds for PM_{10} and $PM_{2.5}$. Therefore, Project construction would result in a potentially significant impact from localized criteria pollutant emissions.

Table 6 Unmitigated Project LST Construction Emissions

	Maximum Daily Emissions (lbs/day)					
Year	**VOC**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Maximum On-site Emissions	N/A	56	52	<1	11	6
SCAQMD LST	N/A	63	786	N/A	7	3
Threshold Exceeded?	**N/A**	**No**	**No**	**N/A**	**Yes**	**Yes**

lbs/day = pounds per day; VOC = volatile organic compounds; NO_x = nitrogen oxide; CO = carbon monoxide; PM_{10} = particulate matter with a diameter no more than 10 microns; $PM_{2.5}$ = particulate matter with a diameter no more than 2.5 microns; SO_x = sulfur oxide

Notes: Some numbers may not add up precisely due to rounding considerations. Maximum on-site emissions are the highest emissions that would occur on the project site from on-site sources, such as heavy construction equipment and architectural coatings, and excludes off-site emissions from sources such as construction worker vehicle trips and haul truck trips

Source: CalEEMod worksheets in Appendix A, see Table 3.2 – 3.6 "Overall Construction-mitigated" emissions. Highest of Summer and Winter emissions results are shown for all emissions. The mitigated emissions account for project sustainability features and/or compliance with specific regulatory standards.

Toxic Air Contaminants

TACs are defined by California law as air pollutants that may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. The following subsections discuss the Project's potential to result in impacts related to TAC emissions during construction and operation.

CONSTRUCTION

Construction-related activities would result in temporary project-generated emissions of diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for site preparation, grading, building construction, and other construction activities. DPM was identified as a TAC by CARB in 1998. The potential cancer risk from the inhalation of DPM (discussed in the following paragraphs) outweighs the potential non-cancer health impacts (CARB 2022a) and is therefore the focus of this analysis.

Generation of DPM from construction projects typically occurs in a single area for a short period. Construction of the Proposed Project would occur over approximately 12 months. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time.

The Proposed Project would be consistent with the applicable AQMP requirements and control strategies intended to reduce emissions from construction equipment and activities. However, given the construction area's proximity to nearby sensitive receptors, impacts from TACs could be potentially significant.

OPERATION

CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* (2005) provides recommended buffer distances between sensitive land uses and potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). CARB recommends that local agencies avoid siting new, sensitive land uses within 500 feet of a freeway. In addition, the City of Los

Angeles Planning Commission suggests that project applicants conduct a site-specific health risk assessment, improve indoor air quality with minimum efficiency reporting value (MERV)-Rated or high-efficiency particulate air (HEPA) filtration equipment, and further reduce exposure to TACs through various project design strategies. The Project Site is located approximately 440 feet east of I-405, a primary source of DPM with truck traffic traveling on the I-405 mainline. The Project would install MERV 13 filters, which remove approximately 90 percent of DPM from the intake air (Singer *et al*. 2016). Rincon prepared an operational Health Risk Assessment in August 2022 (Appendix B), which evaluated the potential health risk to on-site receptors due to TAC emissions from nearby roadway sources (i.e., I-405). Results of the analysis were compared to SCAQMD thresholds for a cancer risk threshold of 10 in a million, and a Hazard Index significance threshold of 1.0. As shown in Table 7, the maximum exposed individual receptor and worker (MEIR/MEIW) would not exceed SCAQMD's cancer risk and hazard index thresholds (Rincon 2022).

Table 7 Health Risks Associated with Operational Activity

Scenario	Excess Cancer Risk (per million)	Chronic Hazard Risk[1]	Acute Hazard Risk
Maximally Exposed Individual Receptor (MEIR)	1.97	0.029	0.011
Maximum Exposed Individual Worker (MEIW)	0.212	0.029	0.011
SCAQMD Significance Threshold	>10	>1	<1
Threshold Exceeded?	No	No	No

µg/m^3 = micrograms per cubic meter; SCAQMD = South Coast Air Quality Management District.

[1]Noncancer health impacts are determined by dividing the airborne concentration at the receptor by the appropriate Reference Exposure Level (REL) for that substance. A REL is defined as the concentration at which no adverse noncancer health effects are anticipated. Because noncancer health impacts are assessed as the ratio of airborne concentration versus the REL, the resulting hazard index is unitless.

For HARP model outputs, refer to the Valor Elementary School Project Health Risk Assessment (Rincon 2022)

Educational land uses are not considered land uses that generate substantial TAC emissions based on review of the air toxic sources listed in SCAQMD's and CARB's guidelines. It is expected that quantities of hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides, etc.) for the types of proposed land uses would be below thresholds warranting further study under the California Accidental Release Program. Because the Project would not include substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, it would not result in the exposure of off-site sensitive receptors to significant amounts of carcinogenic or toxic air contaminants. Impacts would be less than significant.

As shown in Table 8, the Project's maximum localized daily construction emissions would exceed SCAQMD LST thresholds for PM_{10} and $PM_{2.5}$. Therefore, implementation of Mitigation Measure AQ-3 would be required to reduce impacts from localized criteria pollutant emissions and construction-related TAC emissions.

Mitigation Measure

AQ-1. Construction Emissions Reduction

Prior to issuance of grading permits, the City Engineer and the Chief Building Official shall confirm that the grading plan, building plans, and specifications stipulate that the following measures shall be implemented:

- All mobile off-road equipment (wheeled or tracked) greater than 50 horsepower used during construction activities shall meet the USEPA Tier 4 final standards Tier 4 certification can be for the original equipment or equipment that is retrofitted to meet the Tier 4 Final standards.
- A copy of the equipment's certification or model year specifications shall be available upon request for all equipment on-site.
- All unpaved demolition and construction areas shall be wetted at least twice times per day during excavation and construction.
- Electricity shall be supplied to the site from the existing power grid to support the electric construction equipment. If connection to the grid is determined to be infeasible for portions of the project, a non-diesel fueled generator shall be used.
- The project shall comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than five minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these would minimize emissions of TACs during construction.

With incorporation of Mitigation Measure AQ-3, the project would reduce PM_{10}, $PM_{2.5}$, and DPM emissions, as compared to CalEEMod assumption equipment emissions standards, depending on the specific horsepower rating of each piece of equipment. As shown in Table 8, with incorporation of Mitigation Measure AQ-3, criteria pollutant emissions would be below LST thresholds. Therefore, construction activities would not expose sensitive receptors to criteria pollutants and construction-related health impacts, including construction TAC emissions, would be less than significant with mitigation incorporated.

Table 8 Mitigated Project LST Construction Emissions

	Maximum Daily Emissions (lbs/day)					
Year	**VOC**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Maximum On-site Emissions	N/A	9	66	<1	4	2
SCAQMD LST	N/A	63	786	N/A	7	3
Threshold Exceeded?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

lbs/day = pounds per day; VOC = volatile organic compounds; NO_x = nitrogen oxide; CO = carbon monoxide; PM_{10} = particulate matter with a diameter no more than 10 microns; $PM_{2.5}$ = particulate matter with a diameter no more than 2.5 microns; SO_x = sulfur oxide

Notes: Some numbers may not add up precisely due to rounding considerations. Maximum on-site emissions are the highest emissions that would occur on the project site from on-site sources, such as heavy construction equipment and architectural coatings, and excludes off-site emissions from sources such as construction worker vehicle trips and haul truck trips

Source: CalEEMod worksheets in Appendix A, see Table 3.2 – 3.6 "Overall Construction-mitigated" emissions. Highest of Summer and Winter emissions results are shown for all emissions. The mitigated emissions account for project sustainability features and/or compliance with specific regulatory standards.

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

Less than Significant Impact. The Project would generate oil or diesel fuel odors during construction from equipment operations. These odors would be limited to the temporary construction period and would dissipate rapidly with distance. Impacts from construction activities would be less than significant.

With respect to odors generated by Project operation, the SCAQMD's CEQA Air Quality Handbook (1993) identifies land uses associated with odor complaints to be agricultural uses, wastewater treatment plants, chemical and food processing plants, composting, refineries, landfills, dairies, and fiberglass molding. Educational uses are not identified on this list.

Furthermore, no odor-producing uses are located in the Project vicinity. In addition, the Project would be required to comply with SCAQMD Rule 402, which prohibits the discharge of air contaminants that would cause injury, detriment, nuisance, or annoyance to the public. Therefore, the Proposed Project would not generate objectionable odors affecting a substantial number of people. Impacts would be less than significant.

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IV. BIOLOGICAL RESOURCES

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

Rincon Consultants prepared an Arborist Report in August 2022 to address potential impacts to protected and non-protected significant trees from the Proposed Project. The following analysis is based on the findings of the Arborist Report, which is provided as Appendix C.

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

Less Than Significant With Mitigation. Special-status species are plants and animals that are: (1) listed, proposed for listing, or candidates for listing as Threatened or Endangered by the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) under the federal Endangered Species Act (ESA); (2) listed or proposed for listing as Rare, Threatened, or Endangered by the California Department of Fish and Wildlife (CDFW) under the California

Endangered Species Act (CESA); (3) animals recognized as Species of Special Concern (SSC) by the CDFW; (4) animals designated as Fully Protected by the California Fish and Game Code (CFGC); or (5) identified on lists 1 and 2 of the CDFW California Rare Plant Rank (CRPR) system. While migratory or other common nesting birds are not designated as special-status species, destruction of their eggs, nests, and nestlings is prohibited by the Migratory Bird Treaty Act (MBTA) and CFGC (Sections 3503, 3503.5, 3511, and 3513).

The 1.30-acre parcel is currently undeveloped and covered with grasses, shrubs, and various mature trees, and the 0.76-acre parcel is currently developed with a one-story single-family residence with similar vegetation as the larger parcel. A review of the California Natural Diversity Database (CNDDB) revealed that 5 special-status species (two plant species and three animal species) have records within the Van Nuys quad which includes the Proposed Project Site. However, no special-status species or sensitive natural communities have a potential to occur on-site (CDFW 2022a) due to the lack of suitable habitat for wildlife (chaparral, grassland, coastal scrub, etc.) on-site and in the surrounding area.

Migratory or other common nesting birds, while not designated as special-status species, are protected by the CFGC and Migratory Bird Treaty Act (MBTA) and may nest onsite in the ornamental trees and shrubs. Therefore, construction of the Project has the potential to directly (by destroying a nest) or indirectly (construction noise, dust, and other human disturbances that may cause a nest to fail) impact nesting birds protected under the CFGC and MBTA. As discussed in the Arborist Report (Appendix C), a total of 56 trees are located within the Site and an additional two street trees are located at the northern boundary of the site along Plummer Street. Of the 56 on-site trees, four trees are dead and would be removed along with an additional 41 trees consisting of 9 protected native trees and 32 non-protected significant trees. It is possible that these trees provide habitat for nesting birds, which would be impacts by development of the Project. Therefore, implementation of Mitigation Measure BIO-1 would reduce potential impacts to nesting birds to a less than significant level.

Mitigation Measure

BIO-1. Nesting Bird Avoidance

Project activities (including disturbances to native and non-native vegetation, structures and substrates) shall take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Wildlife Code Section 86). If Project activities cannot feasibly avoid the breeding bird season, beginning 30 days prior to the disturbance of suitable nesting habitat, the Applicant shall:

a) Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the Project Site, as access to adjacent areas allows. The surveys shall be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of clearance/construction work.
b) If a protected native bird is found, the Applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species until August 31.

c) Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.

d) The Applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.

b) 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?

No Impact. Plant communities are considered sensitive biological resources if they have limited distributions, have high wildlife value, include sensitive species, or are particularly susceptible to disturbance. Riparian habitats typically exist to a very limited extent along streams and flood channels where there is disturbance. The 1.30-acre parcel is currently undeveloped and covered with grasses, shrubs, and various mature trees, and the 0.76-acre parcel is currently developed with a one-story single-family residence with similar vegetation as the larger parcel. As such, no sensitive natural communities or riparian habitat are present on the Project Site. The nearest body of water is the channelized Bull Creek (designated as a riverine habitat) is approximately 1.2 miles west of the Project Site; however, no water bodies or riparian habitats occur on the Project Site or in the immediate vicinity (USFWS 2022). Therefore, no impact would occur to riparian habitat or other sensitive natural community.

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

No Impact. The Project Site does not contain any surface water bodies or potentially jurisdictional wetlands or waters identified in the National Wetlands Inventory (USFWS 2019). No wetlands are located immediately adjacent to the Project Site as it is surrounded by residential, commercial and industrial uses. The nearest water feature is the channelized Bull Creek (designated as a riverine habitat) located approximately 1.2 miles west of the Project Site. The Project would not directly or indirectly have adverse effects on Bull Creek or any other state and federally protected wetlands and no impact would occur.

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

No Impact. Wildlife movement corridors, or habitat linkages, are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. No native resident or migratory fish or wildlife species or native wildlife nursery sites exist on the Project Site. Urban land uses surrounding the Project Site also restrict regional wildlife movement. The CDFW Biogeographic Information and Observation System (BIOS) (CDFW 2022b) does not identify any mapped essential habitat connectivity areas or natural landscape blocks near the Project Site. The closest essential habitat connectivity area is located approximately one mile southwest of the Project Site at Mid-Valley Regional Library. As a result, the Project Site is not within an established or recognized native resident or migratory

wildlife corridor. Therefore, due to the distance from a wildlife corridor and the developed urban nature of the Site, the Project would not impede the use of native wildlife nursery sites. No impact would occur.

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

Less Than Significant With Mitigation. The City of Los Angeles has a tree preservation policy that protects all valley oak (*Quercus lobata*), California live oak (*Quercus agrifolia*), other native oak species, southern California black walnut (*Juglans californica*), western sycamore (*Platanus racemosa*), and California bay (*Umbellularia californica*) trees (Ordinance 177404, 2006). Scrub oak (*Quercus dumosa*) is excluded from this tree ordinance. As discussed in the Arborist Report (Appendix C) and impact a) of this section, a total of 56 trees are located within the Site and an additional two street trees are located at the northern boundary of the site along Plummer Street. Of the 56 on-site trees, four trees are dead and would be removed along with an additional 41 trees consisting of 9 protected native trees and 32 non-protected significant trees. Although the Project would remove 41 on-site trees/shrubs, including a few protected native trees/shrubs, the Project would replace all removed protected native trees or shrubs on a 1:4 ratio and all removed non-protected significant trees on a 1:1 ratio. The Project would retain 13 existing trees on the Site, including 12 non-protected significant trees (two of which are street trees) and one protected native tree. With implementation of Mitigation Measure BIO-2a and BIO-2b, impacts to non-protected significant trees and protected native trees would be less than significant.

Mitigation Measures

BIO-2a. Avoidance and Minimization Measures for Protected and Non-Protected Significant Trees

The following avoidance and minimization measures shall be implemented to reduce impacts to non-protected significant trees from Project activities.

Monitoring

No person shall impact the roots or canopy of trees without oversight of a certified arborist. The arborist shall be contacted no less than 72 hours prior to anticipated work within or immediately adjacent to the dripline of a tree to ensure availability and shall be present during initial ground disturbance activities that will occur within or immediately adjacent to the tree.

Fencing

Minimum 6-foot-tall chain-link fencing shall be placed between the construction area and the dripline. Fencing shall be maintained and in place through the duration of construction activities and until all equipment has been removed from the Site.

Root Impacts

Cutting or disturbing a large percentage of a tree's roots increases the likelihood of the tree's failure or death. Tree roots that are more than four inches in diameter shall never be cut, as roots that large are usually structural. Cutting them can destroy the stability of the tree, causing it to fall over. Where grading, cut-and-fill, trenching, or any other ground disturbing activity occurs or is specifically shown on the project plans within the dripline, the activity shall be done slowly to avoid ripping or tearing roots. Ripping or tearing roots can lead to rotting and decay and reduce stability and health in the tree. Hand tools or small hand-held power equipment shall be used instead

within the dripline of a tree. Cutting roots two inches in diameter or greater shall be avoided wherever possible.

The amount of allowable root disturbance shall be determined by the monitoring arborist. If the arborist determines that construction may compromise the tree's health or the structural integrity of the tree, work around that tree shall be suspended until measures to minimize the impact can be determined or until a permit is received by the city if the arborist determines that the tree may not survive the impact.

Roots that are two inches or more in diameter that are encountered shall be avoided until the arborist determines treatment measures. Cuts shall be prescribed by the arborist and should generally be done at right angles to the roots with a clean, sharp blade. New cuts shall be wetted and covered with absorbent tarp or heavy cloth fabric and remain in place until the trench/excavation is backfilled with soil and immediately watered.

Equipment Staging

Temporary equipment staging and storage shall be limited to designated areas away from the trees. No washing of equipment or vehicles shall occur within 50 feet of a preserved tree.

Soil compaction

Soil compaction imposes a complex set of physical, chemical, and biological constraints on tree growth. Principal components leading to limited growth are the loss of aeration and pore space, poor gas exchange with the atmosphere, lack of available water, and mechanical impedance of root growth. Soil compaction is the largest single factor responsible for the decline of trees on construction sites. The following guidelines shall be implemented to protect trees from soil compaction that may occur due to project activities:

- No equipment or materials shall be stored under canopies, or within the dripline of trees. On-site staging, storage and washing of construction materials and equipment shall be limited to designated and approved areas. In areas where vehicles or equipment may impact tree roots, steel plates or plywood shall be installed to protect the root zone as needed.

Mechanical Damage

Inadvertent damage to limbs and branches (i.e., mechanical damage) from project equipment may occur if work, including staging and access, are within the dripline. If damage occurs to limbs and branches, immediate trimming with clean and sharp pruners shall occur in accordance with the American National Standards Institute (ANSI) standards discussed above. If damage to the bark or trunk occurs, wound dressings are not recommended. Treatment of said damages shall be applied in accordance with the ANSI A300 Management of Trees and Shrubs during Site Planning, Site Development, and Construction (ANSI 2012).

Pruning

All pruning/trimming shall be performed consistent with the ANSI A300 Pruning Standard (ANSI 2017) and shall adhere to the most recent edition of ANSI Z133.1. Pruning/trimming of protected trees shall be limited to only what is necessary for construction and conducted under the direct supervision of a certified arborist. Climbing spurs and spikes shall not be used.

- A thorough inspection of the canopy shall be conducted to determine pruning specifications.
- Within no more than one week prior to excavation, trenching, or other subsurface work that would occur within the root zone, the soil within the dripline of the tree shall be deep irrigated.

This can be accomplished using a soaker hose for approximately 2 to 6 hours, depending on the volume of water and soil texture. This will allow water to be absorbed by the roots. This can be performed a few days before the root pruning is to be performed.

- In areas where grading, cut-and-fill, or trenching will take place, digging shall be by hand shovel for the first 2 to 3 feet where most roots are expected to occur.
- Any root pruning shall be performed carefully. The roots shall be exposed through hand digging. The roots shall be cut at a 90- degree angle and cut cleanly. No roots shall be torn or jagged, as this can lead to rotting and decay in the root zone and reduce stability and health in the tree. Excessive root pruning is not recommended. If a tree is in any stress or is lacking in health and vigor, the root pruning can contribute to the quick decline of a tree.
- If any root zone is left open for an extended period, the contractor shall lightly apply moisture to keep the roots from drying out. Also, roots shall not sit in a pool of water during construction. This situation can also cause rotting and decay.
- After root pruning is complete, backfill with native soil. Do not overly compact. Water every 1 to 2 feet to reduce air pockets.
- A Certified Arborist shall be on site to observe the root-pruning.

BIO-2b. Measures for Replacement of Protected and Non-Protected Significant Trees

In accordance with the City's Protected Tree Ordinance, the Board of Public Works may require the following for the removal of a protected tree. The following is assumed to apply to protected and non-protected significant trees:

1. Replacement with at least four specimens of a protected variety (i.e., 1:4 ratio). Each replacement tree shall be at least a 15-gallon, or larger specimen, measuring one inch or more in diameter one foot above the base, and be not less than seven feet in height measured from the base. The size and number of replacement trees shall approximate the value of the tree to be replaced.
2. Replacement with trees of a lesser size or of a different protected species to be planted as replacement trees, if replacement trees of the size and species otherwise required pursuant to the City's Protected Tree Ordinance are not available. In such event, a greater number of replacement trees may be required.
3. Relocation of a protected or non-protected significant tree to another location on the property, provided that the environmental conditions of said new location are favorable to the survival of the tree and there is a reasonable probability that the tree will survive. In addition, the City Planning Department policy requires mitigation at a 1:1 ratio for removal of the non-protected significant trees. The Board of Public Works may charge an in-lieu fee for removal of street trees, per LAMC Section 62.171 and 62.177.

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

Less Than Significant Impact. The Project Site is not located within the jurisdiction of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impact would occur.

V. CULTURAL RESOURCES

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

Rincon prepared a Cultural Resources Assessment in August 2022 in compliance with the requirements of CEQA and applicable local regulations, including the reporting requirements of the City of Los Angeles, Department of City Planning, Office of Historic Resources (OHR). Efforts include searches of the California Historical Resources Information System (CHRIS) and Native American Heritage Commission (NAHC) Sacred Lands File (SLF), background and archival research, a cultural resources field survey, historical resource impacts assessment and the preparation of this cultural resources assessment report in compliance with the California Office of Historic Preservation (OHP) Archaeological Resources Management Report (ARMR) and OHR guidelines. The following analysis is based on the findings of the Cultural Resources Assessment, which is provided as Appendix D.

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

Less Than Significant With Mitigation. The Cultural Resources Assessment confirmed the presence of one historical resource, 15526 West Plummer Street, at the Project Site. The resource encompasses one deep parcel developed with a single-family residence constructed in 1914 in a vernacular Craftsman Style, in addition to two contemporary sheds and the contemporary remains of what appears to have been a chicken coop. As acknowledged throughout the Cultural Resources Assessment (Appendix D), the existing single-family residence was identified by SurveyLA as eligible for listing in the National Register of Historical Resources (NRHP), California Register of Historical Resources (CRHR), and as a City of Los Angeles Historic-Cultural Monument (HCM) under Criteria A/1/1 as a rare remaining example of residential development representing the earliest pattern of development in North Hills and the San Fernando Valley (Architectural Resources Group 2014). It was successively nominated as a City of Los Angeles HCM and is currently working its way through the HCM nomination process. In concurrence with SurveyLA, the HCM nomination found the residence eligible for listing as a City of Los Angeles HCM under Criterion 1 as a rare remaining example of a single-family residence/poultry farm in the San Fernando Valley. The HCM nomination identified the residence's period of significance as 1914-1927, spanning from the property's construction to the close of the early development period in the San Fernando Valley (South Environmental 2021). Visual observation and historical aerial images of the property indicate that the construction of the existing sheds and chicken coop and planting of the existing orchard rows postdate the historic period and the property's period of significance, identified as 1914-1927; they therefore do not

contribute to its historical significance or ability to convey significance and their removal would not represent material impairment of the property. The research conducted as part of the current assessment did not identify any information that conflicts with previous findings and concurs that the property is eligible for listing in the NRHP, CRHR and as an HCM under Criteria A/1/1. As a property eligible for historic designation, 15526 West Plummer Street is considered a historical resource according to *CEQA Guidelines* Section 15064.5(a).

According to CEQA, 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. Substantial adverse change in the significance of an historical resource is defined in *CEQA Guidelines* Section 15064.5(b)(1) as 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. Furthermore, material impairment is defined in *CEQA Guidelines* Section 15064.5(b)(2) as the demolition or material alteration in an adverse manner those physical characteristics of a historical resource that convey its significance and justify its inclusion in or eligibility for inclusion in the CRHR or a local register of historical resources. For the purposes of CEQA, impacts to a historical resource are generally considered mitigated below a level of significance when the project conforms to the Secretary of the Interior's Standards for the Treatment of Historic Properties (SOI Standards) (*CEQA Guidelines* Section 15126.4 [b][1]).

The Project proposes to redevelop 15526 West Plummer Street, along with the parcel to its west, into an elementary school campus. This redevelopment would consist of the removal of contemporary sheds and structural remains and rehabilitation of the existing single-family residence, which is proposed to be completed in compliance with the SOI Standards. The residence would ultimately be adaptively reused to support administrative function of the school. The Proposed Project would not result in the physical demolition, destruction, relocation, or alteration of the existing building such that its significance would be materially impaired.

The physical characteristics of the property that convey its significance and justify its eligibility for designation have been previously explored, in both its HCM nomination and in the character defining features memorandum (hereafter referred to as "CDF memo") prepared by Teresa Grimes in support of the current Project. The HCM nomination identifies the following as the property's character-defining features: (site) large, deep lot, mature trees (exterior) single-story, distinct horizontal lines, low pitched roof, overhanging eaves, wood shingle cladding, partial-width porch, grouped windows, Craftsman style door, brick piers at porch, vertical wooden slate vents at gable. While generally consistent with those identified in the HCM nomination, the CDF memo provides additional detail in defining the features of the property that convey its significance, dividing them into primary, secondary, and non-character-defining and providing recommendations for their treatment.

The Project is proposed to be designed to minimize the alteration and removal of the property's character-defining features by following the recommendations included in the CDF memo related to its primary character-defining features, many of which relate to the existing building itself. The following character-defining features of the building, identified by the HCM nomination and the CDF memo, would be retained and would not be altered by the Project: orientation towards the street, U-shaped plan, roof form and details, symmetrical composition of primary elevation and asymmetrical composition of east and west elevations, form and function of primary entry including door itself, wood shingle cladding and wood-framed windows throughout, and wood gable vents.

Additionally, potential impacts resulting from ground-borne vibration associated with Project construction were analyzed in Noise and Vibration Study prepared by Rincon in August 2022, which is discussed further in Section XIII, *Noise*. The study assessed construction related

vibration associated with the Project in relationship to the Caltrans vibration limits, which are reflective of standard practice for analyzing vibration impacts on structures. The Caltrans Transportation and Construction Vibration Guidance Manual identifies impact criteria for several building types, including 'historic and similar old buildings' (Caltrans 2020). The analysis concluded that if bull dozers or other heavy earthmoving equipment were to work within approximately 10 feet or less of the existing building, vibration levels could exceed the threshold identified for historic buildings, potentially resulting in damage to the subject building as a result of vibration. Therefore, as discussed in Section XIII, *Noise*, Mitigation Measure NOI-1 would be implemented and would require that bull dozers or other heavy earthmoving equipment not be utilized within approximately 10 feet or less of the subject building, thereby eliminating potential impacts.

In addition to the rehabilitation of the existing residence and in consideration of proposed changes to its setting, the Project would result in the construction of two new buildings on the Project Site; one single-story building that would house a multipurpose room sited approximately 120 feet to the rear (south) of the existing residence behind a large play area, and a one- to two-story building that would contain classrooms located approximately 30 feet west of the existing residence. The wider setting of the property has been significantly altered since its period of significance, identified as 1914-1927. The research presented in the HCM nomination and reviewed as part of this assessment indicates that the property was likely once part of a larger, approximately 90-acre parcel, owned by the Plummer family, which by the 1920s had been subdivided into smaller parcels (South Environmental 2021). During the period of significance, the setting of the property would have been agricultural with little surrounding development. Consistent with larger development patterns throughout the San Fernando Valley, a review of historical aerial photographs confirms that in the decades following World War II, the area surrounding the property, that which formally comprised the Plummer family's 90-acres, was further developed with single-family homes. Today, due to encroaching development, the property's wider integrity of setting has been largely diminished and therefore does not contribute to its significance or ability to convey significance.

To minimize potential impacts to the immediate setting of the existing residence, two-story portions of the new classroom building would be located at the rear of the Site. Additionally, the setback of the classroom building would be consistent with that of the existing building. The multipurpose room would be sited at the rear (south) of the Project Site to provide a maximum distance between it and the existing building. Additionally, the following character-defining features of the property's setting that contribute to its significance, as identified by the HCM nomination and CDF memo, would be retained: depth of the property, the front yard setback of the subject building, extant mature trees that flank the subject building to the north. While the Proposed Project would further alter the setting of the existing building by increasing development in its vicinity, these alterations would not result in the property's material impairment.

While the Proposed Project is conceptually in compliance with the SOI Standards and, as currently presented, would not result in the material impairment of 15526 West Plummer Street, Project designs are currently conceptual in nature. Therefore, implementation of Mitigation Measure CUL-1 would reduce potential impacts to historical resources to a less than significant level as the Project design further develops.

Mitigation Measure

CUL-1. Historical Resource Design Review

The Project Applicant shall engage a qualified historical architect or architectural historian that meets the Secretary of the Interior's Professional Qualifications Standards (as codified in 36 CFR Part 61) to be part of the Project design team. The qualified consultant shall have demonstrated experience providing design guidance for projects of a similar scope involving the adaptive reuse of historical resources. The qualified consultant shall perform periodic reviews of the Project as its design progresses and provide input to the design team during the design process to ensure that the Project remains in compliance with the Secretary of the Interior Standards for the Treatment of Historic Properties (SOI Standards). Reviews shall be performed minimally when Project Plans are 50 percent and 80 percent complete. The reviews shall include a review of the Project's compliance with the SOI Standards and provide recommendations aimed at achieving compliance as necessary. Prior to the issuance of grading permits, the qualified consultant shall prepare a SOI Standards project review memorandum to document the Project's compliance with the SOI Standards. The memorandum shall be submitted to the City of Los Angeles for review, comment, and approval. In the event that the City does not concur with the findings of the memorandum, designs shall be modified until compliance with the SOI Standards and concurrence is obtained.

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

Less Than Significant With Mitigation. The Cultural Resources Assessment did not identify any archaeological resources or archaeological deposits in the Project Site, but the lack of surface evidence of archaeological materials does not preclude their subsurface existence. However, the absence of substantial prehistoric or historic-period archaeological remains in the immediate vicinity, along with the existing level of disturbance in the Project Site, suggest there is a low potential for encountering intact subsurface archaeological deposits. Nonetheless, Mitigation Measure CUL-2 would reduce potential impacts to archaeological resources to a less than significant level in the event of an unanticipated discovery of such resources.

Mitigation Measure

CUL-2. Unanticipated Discovery of Cultural Resources

In the unlikely event that archaeological resources, including trash pits associated with the existing 1914 single-family residence, are unexpectedly encountered during ground-disturbing activities, work in the immediate area shall be halted and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archeology (as codified in 36 CFR Part 61) shall be contacted immediately to evaluate the find. If the find is prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for California Register of Historical Resources (CRHR) eligibility. If the discovery proves to be eligible for the CRHR and cannot be avoided by the project, additional work, such as data recovery excavation, may be warranted to mitigate any significant impacts to historical resources.

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

Less Than Significant. No human remains are known to be present within the Project Site. However, the discovery of human remains is always a possibility during ground disturbing activities. If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a

determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be of Native American origin, the Coroner will notify the NAHC, which will determine and notify a Most Likely Descendant (MLD). The MLD has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the MLD does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from subsequent disturbance. Therefore, with compliance with existing regulations, impacts to humans remains would also be less than significant.

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VI. ENERGY

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

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

Less Than Significant Impact. During project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and vehicles used to deliver materials to the site. The Project would require site preparation and grading, including hauling material off-site; pavement and asphalt installation; building construction; architectural coating; and landscaping and hardscaping.

The total consumption of gasoline and diesel fuel during Project construction was estimated using the assumptions and factors from CalEEMod used to estimate construction air emissions (refer to Appendix A for annual emissions). As shown in Table 9, project construction would require approximately 10,980 gallons of gasoline and approximately 79,610 gallons of diesel fuel.

Table 9 Estimated Fuel Consumption during Construction

Source	Gasoline	Diesel	MMBtu1
Construction Equipment & Hauling Trips	-	79,610	10,147
Construction Worker Vehicle Trips	10,980	-	1,205
Total			**11,352**

See Appendix A for energy calculation sheets

[1] Energy consumption is converted to MMBtu for each source

The construction energy estimates represent a conservative estimate because the construction equipment used in each phase of construction was assumed to be operating every day of construction. Construction equipment would be maintained to all applicable standards, and construction activity and associated fuel consumption and energy use is typical for construction site and would be temporary. Therefore, the Project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and the construction-phase impact related to energy consumption would be less than significant.

Operational Energy Demand

Gasoline consumption for the Project would be attributed to the trips generated from individuals who are either working or dropping off children at the Proposed Project Site during normal

operations and building maintenance employees. The estimated number of average daily trips associated with the Project is used to determine the energy consumption associated with fuel use from the operation of the Project. Most of the fuel consumption would be from motor vehicles traveling to and from the Project Site. According to the CalEEMod calculations, the Project would result in 1,730,067 annual VMT (Appendix A). Table 10 shows the estimated total annual fuel consumption of existing mobile homes and the Project using the estimated trip generation and VMT with the assumed vehicle fleet mix (Appendix A). One gallon of gasoline is equivalent to approximately 109,786 Btu (CARB 2015), while one gallon of diesel is equivalent to approximately 127,460 Btu (Schremp 2017).

Table 10 Estimated Project Annual Transportation Energy Consumption

Source	Total Annual Energy/ Fuel Consumption	Total Energy Consumption (MMBtu)[1]
Transportation Fuels[2]		
Gasoline	76,853 gallons	8,437
Diesel	13,194 gallons	1,682
Other Energy		
Electricity	0.2 GWh	682
Natural Gas	3,854 U.S. therms	358
Total Energy Consumption		**11,159**

Notes: MMBtu = million metric British thermal units; GWh = Gigawatt hours

[1] Energy consumption is converted to MMBtu for each source

[2] The estimated number of average daily trips associated with the Project is used to determine the energy consumption associated with fuel use from operation of the Project. According to CalEEMod calculations (Appendix A), the Project would result in approximately 1,730,067 annual VMT.

Source: Appendix A

As shown in Table 10, operation of the Project would have a total energy consumption of 11,159 MMBtu. Operation of the Project would increase area energy demand from greater electricity, natural gas, and gasoline consumption when compared to the operation of the existing single-family home on the Project Site. Natural gas and electricity would be used for heating and cooling systems, lighting, appliances, water use, and the overall operation of the Project. Operation of the Project would consume approximately 0.2 GWh of electricity per year (electricity use provided in the CalEEMod output, Appendix A). The Project is located within the LADWP service area electricity demand. In 2020, the most recent year with available data, LADWP's electricity generation and distribution infrastructure delivered 21.0 million MWh of electricity to its customers. Commercial users consumed the most electricity supplied by the LADWP in 2020 with approximately 10.3 million MWh, or 49 percent of the total electricity provided by the LADWP. Residential customers consumed approximately 8.6 million MWh, or 41 percent, of electricity supplied by the LADWP in 2020. Industrial users consumed approximately 1.6 million MWh, or eight percent, while other LADWP customers consumed approximately 0.4 million MWh, or approximately 0.02 percent (CEC 2020a). LADWP would have sufficient supplies for the Project.

Estimated natural gas consumption for the Project would be 3,854 U.S. therms, per year (electricity use provided in the CalEEMod output, Appendix A). The Project's natural gas demand would be serviced by SCG. In 2020, a total of approximately 5,231 million therms of natural gas were consumed by SoCalGas' customers. Of this total, residential, industrial, commercial and miscellaneous other customers consumed 2,426 million, 1,616 million, 889 million, and 300 million therms of natural gas, respectively. In 2020, the total gas consumption for Los Angeles County was 2,937 million therms. Of this total, 1,699 million therms was for non-residential use and 1,238 therms was for residential use (CEC 2020b). The Project would comply with standards set in the Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC) and California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation**.** The Los Angeles Green Building Code contains mandatory measures for non-residential uses, particularly those related to energy efficiency (i.e., renewable energy, indoor and outdoor water use, and water reuse systems).

California's Green Building Standards Code (CALGreen; Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction projects. Furthermore, the Building Energy Efficiency Standards of the California Energy Code (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the Energy Commission. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. The standards are updated every three years and each iteration is more energy efficient than the previous standards. (CEC 2022a).

In conclusion, the construction of the Project would be temporary and typical of similar projects, and would not result in the wasteful, inefficient, or unnecessary consumption of energy. Project operations would increase the consumption of fuel, natural gas, and electricity when compared to existing conditions. However, the new school facility would be developed in conformance with regulatory compliance measures and the latest version of the Los Angeles Green Building Code, California's Green Building Standards Code, and California's Building Energy Efficiency Standards, which include measures related to renewable energy, indoor and outdoor water use, water reuse systems, and energy efficient light fixtures. Therefore, the Project would have a less than significant impact.

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

No Impact. Senate Bill (SB) 100 mandates the use of 100 percent clean sources for electricity for California by 2045. Because the Proposed Project would be powered by the existing electricity grid, the Project would eventually be powered by renewable energy sources mandated by SB 100 and would not conflict with this statewide plan. Furthermore, the City of Los Angeles adopted *Green LA: An Action Plan to Lead the Nation in Fighting Global Warming* (Green LA), in May 2007. Green LA set the goal of reducing the City's greenhouse gas emissions to 35 percent below 1990 levels by 2030. The emphasis of Green LA is on municipal facilities and operations followed by programs to reduce emissions in the community. To facilitate implementation of Green LA, the City adopted the Los Angeles Green Building Code. In addition, the LADWP will continue to implement programs to emphasize water conservation and will also pursue securing alternative water supplies, including recycled water and storm water capture. Furthermore, the City implemented the Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) plan to meet solid waste reduction goals by expanding recycling to multifamily dwellings, commercial establishments, and restaurants (City of Los Angeles 2011).

Under the RENEW LA plan, the City is also developing facilities that will convert solid waste to energy without incineration. These measures would serve to reduce overall emissions from the City. Green LA is being implemented through Climate LA, which provides detailed information about each action item discussed in the Green LA framework. Action items range from harnessing wind power for electricity production and energy efficiency retrofits in City buildings to converting the City's fleet vehicles to cleaner and more efficient models and reducing water consumption. On April 8, 2015, Los Angeles released the Sustainable City pLAn, which covers a multitude of environmental, social, and economic sustainability issues related to greenhouse gas reduction either specifically or by association. Actionable goals include increasing the green building standard for new construction, creating a benchmarking policy for building energy use, developing "blue, green, and black" waste bin infrastructure, reducing water use by 20 percent, and possibly requiring LEED Silver or better certification for new construction. In addition, as demonstrated further in Section 8, *Greenhouse Gas Emissions*, the Proposed Project is consistent with applicable strategies for reducing greenhouse gas emissions from the Southern California Association of Governments 2016 *Regional Transportation Plan/Sustainable Communities Strategy*. Therefore, no impact would occur.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☒	☐	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

A Geotechnical Investigation Report was prepared for the Project by LK Geotechnical Engineering in February 2022 (Appendix E). The Report concludes that the Project is feasible from a geotechnical engineering standpoint provided that the recommendations presented in the report are incorporated into the site design, grading, and construction. This section is based on the information and analysis contained in the Geotechnical Investigation Report.

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

iii) Seismic-related ground failure, including liquefaction?

iv) Landslides?

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region; however, according to the DOC, the Project Site is not located in an Alquist-Priolo Fault Zone, a liquefaction zone, or an earthquake-induced landslide zone. There are no faults present on the Project Site, and the closest mapped fault to the Project Site is the Northridge Hills fault located approximately 2.2 miles south of the site. The nearest Alquist-Priolo fault zone is the Sierra Madre/San Fernando Fault Zone located approximately 11.7 miles to the east of the site (DOC 2021a). Implementation of the Project would not exacerbate the existing risk of earthquake-induced landslides in the immediate vicinity because the Project would not directly result in a seismic event or destabilize soils prone to landslide. In addition, the Project Site and the surrounding area are relatively flat. Therefore, due to the Project's location from an Alquist-Priolo mapped zone, the Project would not directly or indirectly cause potential adverse effects related to rupture of a known earthquake fault, liquefaction, or earthquake-induced landslides. Impacts related to fault rupture, liquefaction, and landslides would be less than significant.

ii) Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region, where several fault systems are considered to be active or potentially active. Nearby active faults include the Northridge Hills fault, located approximately 2.2 miles south of the site. The nearest Alquist-Priolo fault zone is the Sierra Madre/San Fernando Fault Zone located approximately 11.7 miles to the east of the site (DOC 2021a). The Sierra Madre/San Fernando Fault Zone is capable of producing substantial ground shaking if a seismic event occurred along that fault. Similarly, a strong seismic event on any other fault system in Southern California has the potential to create considerable levels of ground shaking throughout the City. Nevertheless, the Project Site is not subject to unusual levels of ground shaking.

Design and construction of the Proposed Project would conform to the current seismic design provisions of the CBC. The CBC incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program, to mitigate losses from an earthquake and provide for the latest in earthquake safety. While the Project would be susceptible to seismic activity given its location within a seismically-active area, the Project would be required to minimize this risk, to the extent feasible, through the incorporation of applicable CBC standards. A large seismic event, such as a fault rupture, seismic shaking, or ground failure, could result in breakage of the proposed pipelines, failure of joints, and/or underground leakage from the pipelines. Therefore, due to the Project's application of CBC standards it would limit the Project's exposure of people or structures to potential substantial adverse effects involving strong seismic ground shaking. Impacts related to seismic ground shaking would be less than significant.

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

Less Than Significant Impact. Soil erosion or the loss of topsoil may occur when soils are disturbed but not secured or restored, such that wind or rain events may mobilize disturbed soils,

resulting in their transport off the Project Site. Construction of the Project would require cut of approximately 12,500 cy of soil material. Of the 12,500 cy of cut soil, approximately 10,000 cy would be used as fill and redistributed on-site and the remaining 2,500 cy would be exported off the Site. However, standard construction BMPs would be implemented in order to avoid or minimize soil erosion associated with ground-disturbing activities. As discussed further in Section X, *Hydrology and Water Quality*, implementation of erosion control measures stated in LAMC Chapter 98.02, as well as adherence to requirements provided in the National Pollutant Discharge Elimination System (NPDES) permit for construction activities would avoid or minimize potential adverse impacts associated with erosion and loss of topsoil.

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

Less Than Significant Impact. According to the California Seismic Hazard Map, the Project Site is not located within an earthquake-induced landslide hazard zone (DOC 2021b). Subsidence is the sudden sinking or gradual downward settling of the earth's surface with little or no horizontal movement. Subsidence is caused by a variety of activities, which include, but are not limited to, withdrawal of groundwater, pumping of oil and gas from underground, the collapse of underground mines, liquefaction, and hydrocompaction. The Proposed Project does not include installation of new groundwater wells or use of groundwater from existing wells, pumping of oil and gas, or mining. Lateral spreading is the horizontal movement or spreading of soil toward an open face. The potential for failure from subsidence and lateral spreading is highest in areas where the groundwater table is high and where relatively soft and recent alluvial deposits exist. Lateral spreading hazards may also be present in areas with liquefaction risks; however, the Project Site is not located in a liquefaction zone. Nonetheless, the Project would be required to comply with the CBC requirements. Therefore, through compliance with the CBC requirements, impacts associated with unstable geologic units or soils that are potentially unstable would be less than significant.

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

Less Than Significant Impact With Mitigation. Expansive soils generally consist of a high percentage of clays, which increase in volume when saturated and shrink when dried. According to the Geotechnical Investigation Report (Appendix E), the Site consists of artificial fill and alluvium soils. The on-site artificial fill consists of silty sand with man-made debris and varies in depths across the Site. This material is considered unsuitable for foundation or slab support for the proposed structures and/or for support of new compacted fill. The on-site alluvium consists of dark brown to light brown silty sand and was observed to be medium dense and dry to slightly moist. Undisturbed alluvium is considered suitable for foundation or slab support for the proposed structures and/or for supported of new compacted fill provided Project implementation of geotechnical measures (LK Geotechnical Engineering 2022). Therefore, implementation of Mitigation Measure GEO-1 would be required to reduce potential impacts associated with expansive soils to a less than significant level.

Mitigation Measure

GEO-1. Geotechnical Engineering Measures

Final design and construction plans for the Project shall incorporate geotechnical engineering recommendations based on site specific soil investigations, and shall consider collapsible soils, protection from corrosive soils, and other applicable soil conditions. More specifically, final design

and plans shall incorporate geotechnical engineering recommendations from the Geotechnical Investigation Report prepared by LK Geotechnical Engineering in February 2022.

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

No Impact. The Proposed Project would not include the installation of new septic tanks or alternative wastewater disposal systems and no impact would occur.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact With Mitigation. Paleontological resources, or fossils, are the evidence of once-living organisms preserved in the rock record. They include both the fossilized remains of ancient plants and animals and the traces thereof (e.g., trackways, imprints, burrows, etc.). Paleontological resources are not found in "soil" but are contained within the geologic deposits or bedrock that underlies the soil layer. Typically, fossils are greater than 5,000 years old (i.e., older than middle Holocene in age) and are typically preserved in sedimentary rocks. Although rare, fossils can also be preserved in volcanic rocks and low-grade metamorphic rocks under certain conditions (Society of Vertebrate Paleontology [SVP] 2010). Fossils occur in a non-continuous and often unpredictable distribution within some sedimentary units, and the potential for fossils to occur within sedimentary units depends on several factors. It is possible to evaluate the potential for geologic units to contain scientifically important paleontological resources, and therefore evaluate the potential for impacts to those resources and provide mitigation for paleontological resources if they are discovered during construction of a development project.

Rincon evaluated the paleontological sensitivity of the geologic units that underlie the Project Site to assess the project's potential for significant impacts to scientifically important paleontological resources. The analysis was based on the results of a review of existing information in the scientific literature regarding known fossils within geologic units mapped at the project site. According to the SVP (2010) classification system, geologic units can be assigned a high, low, undetermined, or no potential for containing scientifically significant nonrenewable paleontological resources. Following the literature review, a paleontological sensitivity classification was assigned to each geologic unit mapped within the Project Site. This criterion is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present. The potential for impacts to significant paleontological resources is based on the potential for ground disturbance to directly impact paleontologically sensitive geologic units.

The Project Site is in the San Fernando Valley, a lowland plain between the Santa Monica Mountains, Santa Susana Mountains, San Gabriel Mountains, and Simi Hills, within the Transverse Ranges geomorphic province, one of eleven major geomorphic provinces in California (California Geological Survey 2002). According to geologic mapping by Campbell et al. (2014), the Project Site is underlain by a single geologic unit, Young alluvial-fan deposits (Unit 1). Young alluvial-fan deposits consist of unconsolidated gravel, sand, and silt, that were deposited by flooding streams and debris flows. Campbell et al. (2014) identified four subunits of Young alluvial-fan deposits of which Unit 1 is the oldest (based on geomorphic relationships, surface dissection, and soil development) being Holocene to late Pleistocene in age. Sediments that are younger than 5,000 years old are considered too young to preserve paleontological resources per the SVP (2010), but early Holocene and late Pleistocene alluvial sediments have produced scientifically significant paleontological resources throughout Los Angeles County, including mammoth (*Mammuthus*), wolf (*Canis, Aenocyon*), horse (*Equus*), bison (*Bison*), and ground sloth

(*Megalonyx*, *Paramylodon*) (Jefferson 2010; Paleobiology Database 2022; University of California Museum of Paleontology 2022). Therefore, Young alluvial-fan deposits (Unit 1) have low paleontological sensitivity at the surface before becoming old enough to preserve paleontological resources, and therefore having high paleontological sensitivity, at some unknown depth in the subsurface.

The Geotechnical Investigation Report discovered on to two feet of artificial fill in three of five test borings in the Project Site (LK Geotechnical Engineering 2022). Below the artificial fill (or from the surface in two of five test borings), alluvial sediments consisting of sandy silt or silty sand were encountered. There is no obvious indication of when these alluvial sediments become old enough (i.e., greater than 5,000 years old) to preserve paleontological resources.

Ground disturbance associated with this project is expected to consist primarily of surficial grading and excavation for proposed capture and reuse cisterns. Surficial grading will remove impact artificial fill, which has no paleontological sensitivity because it was placed by humans, and up to one foot of previously undisturbed sediment. These previously disturbed sediments impacted by grading will likely be too young to preserve paleontological resources. Excavations for capture and reuse cisterns could reach up to 17 feet below the ground surface. At this depth, it is likely that sediments of appropriate age to preserve paleontological resources (i.e., greater than 5,000 years old) occur. However, the total volume of potentially high sensitivity sediment disturbed by these excavations will be small, especially considering that the top-most several feet of sediment will be low sensitivity due to its age. Therefore, impacts to paleontological resources as a result of this project will likely be less than significant. Nonetheless, Mitigation Measure GEO-1 would reduce potential impacts to paleontological resources to a less than significant level in the event of an unanticipated discovery of paleontological resources.

Mitigation Measure

GEO-2. Unanticipated Discovery of Paleontological Resources

Paleontological Worker Environmental Awareness Program

Prior to the start of construction, a Qualified Professional Paleontologist (as defined by SVP [2010]) or their designee shall conduct a paleontological Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff.

Unanticipated Discovery of Paleontological Resources

In the event a fossil is discovered during construction of the project, excavations within 50 feet of the find shall be temporarily halted or delayed until the discovery is examined by a Qualified Professional Paleontologist. The project applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. If the find is determined to be significant, the applicant shall retain a Qualified Professional Paleontologist to direct all mitigation measures related to paleontological resources. The Qualified Professional Paleontologist shall design and carry out a data recovery plan consistent with the SVP (2010) standards.

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VIII. GREENHOUSE GAS EMISSIONS

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

Rincon prepared an Air Quality and Greenhouse Gas Study in August 2022 to analyze the Project's greenhouse gas emission impacts related to both temporary construction activity and long-term operation of the Project. The following analysis is based on the findings of the Air Quality and Greenhouse Gas Study, which is provided as Appendix A.

Climate Change and Greenhouse Gases

Climate change is the observed increase in the average temperature of Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. The term "climate change" is often used interchangeably with the term "global warming," but "climate change" is preferred to "global warming" because it helps convey other changes in addition to rising temperatures. The baseline against which these changes are measured originates in historical records identifying temperature changes that have occurred in the past, such as during previous ice ages. The global climate changes continuously, as evidenced by repeated episodes of substantial warming and cooling documented in the geologic record. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed substantial acceleration in the rate of warming during the past 150 years. The United Nations Intergovernmental Panel on Climate Change (IPCC) expressed that the rise and continued growth of atmospheric CO_2 concentrations is unequivocally due to human activities in the IPCC's Sixth Assessment Report (2021). Human influence has warmed the atmosphere, ocean, and land, which has led the climate to warm at an unprecedented rate in the last 2,000 years. It is estimated that between the period of 1850 through 2019, that a total of 2,390 gigatonnes of anthropogenic CO_2 was emitted. It is likely that anthropogenic activities have increased the global surface temperature by approximately 1.07 degrees Celsius between the years 2010 through 2019 (IPCC 2021). Furthermore, since the late 1700s, estimated concentrations of CO_2, methane, and nitrous oxide in the atmosphere have increased by over 43 percent, 156 percent, and 17 percent, respectively, primarily due to human activity (USEPA 2021). Emissions resulting from human activities are thereby contributing to an average increase in Earth's temperature.

Gases that absorb and re-emit infrared radiation in the atmosphere are called greenhouse gases (GHGs). The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6).

Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere, and natural processes, such as oceanic evaporation, largely determine its atmospheric concentrations.

GHGs are emitted by both natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely by-products of fossil fuel combustion, whereas CH_4 results from off-gassing associated with agricultural practices and landfills. Human-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and SF_6 (USEPA 2020).

Different types of GHGs have varying global warming potentials (GWPs). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as "carbon dioxide equivalent" (CO_2e), which is the amount of GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane has a GWP of 30, meaning its global warming effect is 30 times greater than CO_2 on a molecule per molecule basis (IPCC 2021).[3]

The accumulation of GHGs in the atmosphere regulates the earth's temperature. Without the natural heat-trapping effect of GHGs, the earth's surface would be about 33 degrees Celsius (°C) cooler (World Meteorological Organization 2022). However, since 1750, estimated concentrations of CO_2, CH_4, and N_2O in the atmosphere have increased by 36 percent, 148 percent, and 18 percent, respectively, primarily due to human activity (Forster et al. 2007). GHG emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, are believed to have elevated the concentration of these gases in the atmosphere beyond the level of concentrations that occur naturally.

Significance Thresholds

The majority of individual projects do not generate sufficient GHG emissions to create significant project-specific environment effects. However, the environmental effects of a project's GHG emissions can contribute incrementally to cumulative environmental effects that are significant, contributing to climate change, even if an individual project's environmental effects are limited (*CEQA Guidelines* Section 15064[h][1]). The issue of a project's environmental effects and contribution towards climate change typically involves an analysis of whether or not a project's contribution towards climate change is cumulatively considerable. Cumulatively considerable means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (*CEQA Guidelines* Section 15064[h][1]).

CEQA Guidelines Section 15064.4 recommends that lead agencies quantify GHG emissions of projects and consider several other factors that may be used in the determination of significance of GHG emissions from a project, including the extent to which the project may increase or reduce GHG emissions; whether a project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHG emissions.

CEQA Guidelines Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in

[3] The IPCC's (2021) *Sixth Assessment Report* determined that methane has a GWP of 30. However, the 2017 Climate Change Scoping Plan published by CARB uses a GWP of 25 for methane, consistent with the IPCC's (2007) *Fourth Assessment Report*. Therefore, as the analysis is based on consistency with the 2017 Climate Change Scoping Plan, this analysis utilizes a GWP of 25 for methane.

establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, as long as any threshold chosen is supported by substantial evidence (see *CEQA Guidelines* Section 15064.7[c]). The *CEQA Guidelines* also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see *CEQA Guidelines* Section 15130[f]). As a note, the *CEQA Guidelines* were amended in response to SB 97. In particular, the *CEQA Guidelines* were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

Per *CEQA Guidelines* Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem in the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of GHG emissions." Therefore, a lead agency can make a finding of less-than-significant for GHG emissions if a project complies with adopted programs, plans, policies and/or other regulatory strategies to reduce GHG emissions.

The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions and has not formally adopted a local plan for reducing GHG emissions. Neither the SCAQMD, the California Office of Planning and Research, CARB, CAPCOA, or any other state or relevant regional agency has adopted a numerical significance threshold for assessing GHG emissions that is applicable to the Project. Therefore, in recent environmental impact reports certified by the City of Los Angeles, the City has evaluated the significance of projects' potential impacts with regard to GHG emissions and climate change solely on consistency with plans and polices adopted for the purposes of reducing GHG emissions and mitigating the effects of climate change. The City has also quantified the project's GHG emissions for informational purposes but does not compare the quantified GHG emissions to a numeric threshold (City of Los Angeles 2021a, 2021b, and 2021c).

In the absence of any adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with *CEQA Guidelines* Section 15064.4(b) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For this Project, the most directly applicable adopted regulatory plans to reduce GHG emissions are the 2017 Scoping Plan, the 2020-2045 RTP/SCS, the City's LA Green Plan, and the Sustainable City pLAn/Green New Deal.

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

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

Less Than Significant Impact. Construction activities, energy use, daily operational activities, and mobile sources (traffic) due to the Proposed Project would generate GHG emissions. As discussed under *Significance Thresholds* of this section, the significance of the Project's GHG emissions is evaluated consistent with *CEQA Guidelines* Section 15064.4(b) by considering whether the Project complies with applicable plans, policies, regulations and requirements

adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Project construction and operational GHG emissions are quantified for informational purposes. CalEEMod version 2020.4.0 was used to calculate emissions resulting from Project construction and long-term operation.

Consistency with Applicable Plans and Policies

Senate Bill 32 and 2017 Scoping Plan

There are numerous state plans, policies, and regulations adopted for the purpose of reducing GHG emissions. The principal overall state plan is SB 32, the follow up to AB 32, the California Global Warming Solutions Act of 2006. The goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. CARB's 2017 Scoping Plan, which outlines a framework to achieve SB 32's 2030 target, emphasizes innovation, adoption of existing technology, and strategic investment to support its strategies for GHG emissions reductions. Statewide plans and regulations in support of these strategies, such as GHG emissions standards for vehicles (AB 1493), the Low Carbon Fuel Standard, and regulations requiring an increasing fraction of electricity to be generated from renewable sources, are being implemented at the statewide level; as such, compliance at a project-level would occur as implementation continues statewide. Therefore, the Project would be consistent with SB 32 and the 2017 Scoping Plan.

2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

The SCAG's 2020-2045 RTP/SCS is forecast to help California reach its GHG reduction goals. According to the 2020-2045 RTP/SCS, the updated target for the SCAG region is 19 percent below 2005 per capita emissions levels by 2035. The revised 2035 target is higher than the previous CARB target of 13 percent for the SCAG region. The 2020-2045 RTP/SCS includes implementation strategies for focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region. The Project's consistency with the 2020-2045 RTP/SCS is discussed in Table 11. As shown therein, the Proposed Project would be consistent with the GHG emission reduction strategies contained in the 2020-2045 RTP/SCS.

Table 11 Project Consistency with Applicable SCAG RTP/SCS GHG Emission Reduction Strategies

Strategy/Action	Project Consistency
Focus Growth Near Destinations & Mobility Options. • Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations • Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets • Plan for growth near transit investments and support implementation of first/last mile strategies. • Promote the redevelopment of underperforming retail developments and other outmoded non-residential uses • Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods	**Consistent.**. The Proposed Project is an infill development that would involve construction of a new public elementary school. The Proposed Project would be within walking and biking distance of existing residential and commercial uses and would include 115 bicycle parking spaces for students and staff. In addition, the Project is within 0.5-mile of bus stops for Metro bus routes 166, 167, and 234. These features would incentivize the use of public transit and active transportation for traveling to and from the Site. Therefore, the Proposed Project would focus growth near destinations and mobility options.

Strategy/Action	Project Consistency
• Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations)Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking)	
Leverage Technology Innovations. • Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space • Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments • Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	**Consistent.** Related to energy production and usage, the Project would be required to equip 10 percent of the total number of on-site parking spaces with EV charging stations and designate 30 percent of parking spaces as EV spaces, in accordance with LAMC Sections 99.05.106.5.3.3 and 99.05.106.5.3.6. Of the required parking spaces for the Project, at least 10 percent would be equipped with EV charging stations and at least 30 percent would be designated EV/clean air vehicles spaces.
Support Implementation of Sustainability Policies. • Pursue funding opportunities to support local sustainable development implementation projects that reduce GHG emissions • Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations • Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space • Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies • Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region • Continue to support long range planning efforts by local jurisdictions • Provide educational opportunities to local decision makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	**Consistent.** The Project would be designed and operated to meet the applicable requirements of CALGreen and the City's Green Building Code. The Project's indoor water use would be minimized by 20 percent. Furthermore, energy use would be reduced by implementing the requirements of 2022 Title 24 standards, including energy-efficient lighting and appliances. Therefore, the Project would support implementation of sustainability policies.
Promote a Green Region. • Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards • Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration	**Consistent**. The Project is an infill development that would involve construction of a new public elementary school. Because the project is an infill development, it would not interfere with regional wildlife connectivity or convert agricultural land. The Project would comply with Sustainable City pLAn, Green New Deal, and Title 24, including CALGreen. Therefore, the Project would support development of a green region.

Strategy/Action	Project Consistency
• Integrate local food production into the regional landscape • Promote more resource efficient development focused on conservation, recycling and reclamation • Preserve, enhance and restore regional wildlife connectivity • Reduce consumption of resource areas, including agricultural land • Identify ways to improve access to public park space	

Source: SCAG 2020

Green LA and Sustainable City pLAn/Green New Deal

Table 12 and Table 13 summarize the Project's consistency with the Green LA and Sustainable City pLAn, respectively. As discussed therein, the Project would be consistent with the actions and measures contained in these local GHG reduction plans.

Table 12 Project Consistency with Applicable Green LA Actions

Action	Project Consistency
Energy	
Present a comprehensive set of green building policies to guide and support private sector development.	**Consistent.** The Project would be designed and operated to meet the applicable requirements of CALGreen and the City's Green Building Code.
Water	
Meet all additional demand for water resulting from growth through water conservation and recycling. Reduce per capita water consumption by 20 percent	**Consistent.** While this action primarily applies to the City and LADWP, the Project would incorporate water conservation features, such as low-flow fixtures, required pursuant to the California Plumbing Code, CALGreen, Los Angeles Plumbing Code, and Los Angeles Green Building Code.
Transportation	
Promote walking and biking to work, within neighborhoods, and to large events and venues.	**Consistent.** The Project Site is located approximately 55 feet east of the Plummer/Orion bus stop for Metro Bus Line 167 and approximately 820 feet west of the Sepulveda/Plummer bus stop for Metro Bus Line 234. The Proposed Project would be within walking and biking distance of existing residential and commercial uses and would include 115 bicycle parking spaces for students and staff. Therefore, the Project would promote walking and biking to work and within the local neighborhood.
Waste	
Recycle 70 percent of trash by 2015.	**Consistent.** The City of Los Angeles has achieved a landfill diversion rate of 76 percent (Los Angeles Sanitation and Environment 2022). The Project would be subject to the requirements of the statewide commercial recycling program, which established a statewide goal of diverting at least 75 percent of solid waste from landfills by 2020. Compliance with existing City and state programs would achieve consistency with this measure.

Source: City of Los Angeles 2007

Table 13 Project Consistency with Applicable Sustainable City pLAn/Green New Deal Measures

Action	Project Consistency
Renewable Energy • LADWP will supply 55% renewable energy by 2025; 80% by 2036; and 100% by 2045. • Increase cumulative megawatts by 2025; 2035; and 2050 of: o Local solar to 900-1,500 MW; 1,500-1,800 MW; and 1,950 MW. o Energy storage capacity to 1,654-1,750 MW; 3,000 MW; and 4,000 MW. o Demand response (DR) programs to 234 MW (2025) and 600 MW (2035).	**Consistent.** While this action primarily applies to the City and LADWP, LADWP is required to generate electricity that would increase renewable energy resources to 44 percent by 2024, 60 percent by 2030, and 100 percent by 2045 under SB 100. Because LADWP would provide electricity service to the Project Site, the Project would use electricity consistent with the requirements of SB 100 and City goals.
Local Water • Source 70% of L.A.'s water locally and capture 150,000 acre-feet per year of stormwater by 2035. • Recycle 100% of all wastewater for beneficial reuse by 2035. • Build at least 10 new multi-benefit stormwater capture projects by 2025; 100 by 2035; and 200 by 2050. • Reduce potable water use per capita by 22.5% by 2025; and 25% by 2035; and maintain or reduce 2035 per capita water use through 2050 • Install or refurbish hydration stations at 200 sites, prioritizing municipally-owned buildings and public properties such as parks, by 2035.	**Consistent.** While this action primarily applies to the City and LADWP, the Project would incorporate water conservation features to reduce water use. The Project would be required to comply with the City's water use restrictions on timing, area, frequency, and duration of specified allowable water usage. The Project would also be required to comply with the Title 24 standards for Water Efficiency and Conservation that are in effect at the time of development. These standards include actions such as separate water submeters for subsystems, prescriptive reduced flow rates for water and fixtures, wall-mounted urinals, and plumbing fixtures and fittings.
Clean and Healthy Buildings • All new buildings will be net zero carbon by 2030; and 100% of buildings will be net zero carbon by 2050. • Reduce building energy use per sf for all building types 22% by 2025; 34% by 2035; and 44% by 2050.	**Consistent.** The Project would be constructed in accordance with the applicable requirements of CALGreen and the City's Green Building Code.
Mobility & Public Transit • Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35% by 2025; 50% by 2035; and maintain at least 50% by 2050. • Reduce vehicle miles traveled per capita by at least 13% by 2025; 39% by 2035; and 45% by 2050. • Ensure Los Angeles is prepared for Autonomous Vehicles (AV) by the 2028 Olympic and Paralympic Games.	**Consistent.** The Proposed Project is an infill development that is located approximately 55 feet east of the Plummer/Orion bus stop for Metro Bus Line 167 and approximately 820 feet west of the Sepulveda/Plummer bus stop for Metro Bus Line 234. The Project would be within walking and biking distance of existing residential and commercial uses and would include 115 bicycle parking spaces for students and staff. Therefore, the Project would support increasing the percentage of trips made by walking, biking, and transit as well as the reduction of per capita VMT.
Zero Emissions Vehicles • Increase the percentage of electric and zero emission vehicles in the city to 25% by 2025; 80% by 2035; and 100% by 2050. • Electrify 100% of LA Metro and LADOT buses by 2030. • Reduce port-related GHG emissions by 80% by 2050.	**Consistent.** In accordance with LAMC Sections 99.05.106.5.3.3 and 99.05.106.5.3.6, the Project would equip 10 percent of the total number of on-site parking spaces with electric vehicle charging stations and designate 30 percent of parking spaces as electric vehicle spaces.

Action	Project Consistency
Waste and Resource Recovery • Increase landfill diversion rate to 90% by 2025; 95% by 2035; and 100% by 2050 • Reduce municipal solid waste generation per capita by at least 15% by 2030, including phasing out single-use plastics by 2028 • Eliminate organic waste going to landfill by 2028 Increase proportion of waste products and recyclables productively reused and/or repurposed within Los Angeles County to at least 25% by 2025; and 50% by 2035.	**Consistent.** The City of Los Angeles has achieved a landfill diversion rate of 76 percent (Los Angeles Sanitation and Environment 2022). The Project would be subject to the requirements of the statewide commercial recycling program, which establishes a statewide goal of diverting at least 75 percent of solid waste from landfills by 2020. Compliance with existing City and state programs would achieve consistency with this measure.
Urban Ecosystems and Resilience • Increase tree canopy in areas of greatest need by at least 50% by 2028. • Complete or initiate restoration identified in the 'ARBOR' Plan by 2035. • Create a fully connected LARiverWay public access system that includes 32 miles of bike paths and trails by 2028. • Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035. • Ensure proportion of Angelenos living within 1/2 mile of a park or open space is at least 65% by 2025; 75% by 2035; and 100% by 2050. • Achieve and maintain 'no-net-loss' of native biodiversity by 2035.	**Consistent.** The Project would be an infill development in an urbanized area and thus would not adversely impact native biodiversity.

Source: City of Los Angeles 2020

Conclusion

The plan consistency analysis demonstrates that the Project complies with or exceeds the requirements of policies, regulations and GHG reduction actions/strategies outlined in the 2017 Scoping Plan, the 2020–2045 RTP/SCS, the LA Green Plan, and the Sustainable City pLAn/Green New Deal. Consistency with the above plans, policies, regulations and GHG reduction actions/strategies would reduce the Project's incremental contribution of GHG emissions to a less than significant level.

GHG Emissions Quantification

Construction Emissions

The SCAQMD has recommended amortizing construction-related emissions over a 30-year period in conjunction with the Proposed Project's operational emissions. As shown in Table 14, construction of the Project would generate an estimated 1,208 MT CO_2e, or 40 MT CO_2e year when amortized over a 30-year period.

Table 14 Estimated Construction GHG Emissions

Year	Emissions (MT CO_2e)
2023	389
2024	819
Total	1,208
Total Amortized over 30 Years	**40**

See Appendix A for CalEEMod worksheets.

Combined Total Annual Emissions

Table 15 combines the construction, operational, and mobile GHG emissions associated with development of the Proposed Project. As shown therein, the Project's emissions would be approximately 753 MT CO_2e.

Table 15 Combined Annual GHG Emissions

Emission Source	Annual Emissions (MT CO_2e)
Construction	40
Area	<1
Energy	84
Mobile	592
Solid Waste	23
Water	14
Total	**753**

See Appendix A for CalEEMod worksheets.

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IX. HAZARDS AND HAZARDOUS MATERIALS

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

NV5 Alta Environmental prepared a Phase I ESA Report and a Limited Asbestos Survey in February 2022 to identify conditions indicative of releases and threatened releases of hazardous substances, pollutants, contaminants, petroleum and petroleum products, and controlled substances on, at, in, or adjacent to the site. The Phase I ESA Report is included as Appendix F and the Limited Asbestos Survey is included as Appendix G. A follow up Phase II ESA Report was prepared by NV5 Alta Environmental in March 2022 based on the findings of the Phase I ESA Report. The Phase II ESA is included as Appendix H. The following analysis is based on the findings of these reports.

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

Less Than Significant Impact. Project construction would involve the use of potentially hazardous materials such as vehicle fuels and fluids that could be released should an accidental leak or spill occur. However, standard construction BMPs for the use and handling of such materials would be implemented to avoid or reduce the potential for such conditions to occur. Any use of potentially hazardous materials utilized during construction of the Proposed Project would comply with all local, State, and federal regulations regarding the handling of potentially hazardous materials. Operation and maintenance of the Proposed Project would likely involve an incremental increase the use of common household materials in the project vicinity. Cleaning and degreasing solvents, fertilizers, pesticides, and other materials used in the regular maintenance of the building and landscaping would also be utilized in the secondary activities associated with residential uses. additional use of these materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, State, and local agencies related to storage, use, and disposal of hazardous materials. The transport, use, and storage of hazardous materials during the construction of the project would be conducted in accordance with all applicable State and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22. Impacts would be less than significant.

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

Less Than Significant Impact With Mitigation. As described above, construction of the Proposed Project would involve the use of potentially hazardous materials such as vehicle fuels and fluids that could be released should an accidental leak or spill occur. However, standard construction BMPs for the use and handling of such materials would be implemented to avoid or reduce the potential for such conditions to occur. The transport, use, and storage of hazardous materials during the construction of the Project would be conducted in accordance with all applicable State and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22.

As discussed in the Phase I ESA Report (Appendix F), the historical land uses of the Project Site include previous agricultural uses and currently contains residential uses (i.e., single-family home). Based on the results of the site reconnaissance, no evidence of a Controlled Recognized Environmental Condition (REC) or Historical REC were identified in connection with the Site. However, several other RECs were identified during the assessment. The Phase I ESA Report identified a potential REC associated with the historic agricultural activities on-site. Although no information or observations indicating the misuse or misapplication of pesticides, herbicides, or fertilizers were obtained during the Site reconnaissance, in certain instances, the chemicals historically applied to the property, or their breakdown products, could be persistent and not biodegrade. As with any agriculturally developed land, there exists the possibility that pesticides, herbicides, or fertilizers have been applied that may still be present at residual concentrations. Furthermore, records indicate that the Site included unapproved/non-permitted auto storage/repairing activities, which typically utilize petroleum products and other hazardous substances. In addition, other database records report that, in 2005, construction materials were unlawfully dumped at the Site (NV5 Alta Environmental 2022a). The Phase I ESA recommended additional shallow soil sampling to further assess these identified RECs, which were documented as part of a Phase II ESA Report. According to the Phase II ESA Report, and based on the results

of soil samplings, no concentrations of Title 22 metals, organochlorine pesticides (OCP), total petroleum hydrocarbons (TPH), and volatile organic compounds (VOC) in the soil were found above their respective regulatory agency health-risk based careening levels and no further action was determined with respect to the previously identified RECs (NV5 Alta Environmental 2022b).

The Phase I ESA also noted the potential presence of an underground septic tank based on an interview with the current Site tenant; however, the location of the tank is unknown. The Phase I ESA concluded that, based on the presumed domestic sewer usage of the septic tank, it is not considered a REC. Nonetheless, the septic tank, if present on-site, could be encountered during project construction and grading activities. Therefore, Mitigation Measure HAZ-1 would reduce potential impacts related to the potential encounter and removal of an on-site septic tank to a less than significant level.

Furthermore, the Asbestos Survey Report concluded that, based on sampling of exterior materials associated with the on-site single family residence, samples of black penetration mastic located at the northeast portion of the roof was identified to have asbestos-containing materials (ACMs). These materials could pose as hazards to the environment during the construction stage of the Project, particularly with adaptive reuse of the residence. Therefore, implementation of HAZ-2 would reduce impacts related to removal of ACMs to a less than significant level.

Mitigation Measures

HAZ-1. Septic Tank Removal

If encountered, the septic tank shall be properly removed in accordance with all applicable City of LA regulatory requirements. If evidence of a release of a petroleum product or hazardous materials from the septic tank is observed at the time of removal, the Project Applicant shall stop all removal work and retain a qualified environmental consultant (Professional Geologist [PG] or Professional Engineer [PE]) to prepare a Soil Management Plan and conduct a Subsurface Investigation.

HAZ-2. Asbestos-Containing Materials

The Project Applicant shall have the asbestos containing materials (ACMs) at the existing on-site structure identified in the Limited Asbestos Survey prepared by NV5 Alta Environmental in February 2022 removed according to proper abatement procedures recommended by an asbestos consultant. All abatement activities shall be in compliance with California and Federal Occupational Safety and Health Administration, and with the South Coast Air Quality Management District (SCAQMD) requirements. Only asbestos trained and certified abatement personnel shall be allowed to perform asbestos abatement activities onsite. All ACMs removed from onsite structure shall be hauled and disposed of by a transportation company certified to handle asbestos and hazardous materials. If additional ACMs are found to be present, a qualified asbestos abatement consultant shall abate ACMs in compliance with the SCAQMD Rule 1403 as well as all other State and federal rules and regulations.

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

No Impact. The nearest existing schools are the Francisco Sepulveda Junior High School and Sepulveda Middle School located approximately 0.2 mile east of the Project Site. During construction of the Proposed Project, hazardous and potentially hazardous materials would be utilized for the transport and operation of vehicles and machinery. As discussed above, the transport, use, and storage of hazardous materials during the construction of the Project would be conducted in accordance with all applicable State and federal laws, such as the Hazardous

Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22. Furthermore, operation and maintenance of the Project would likely involve the use of common commercial cleaning materials comparable to those materials already in use in the Site vicinity. For these reasons, emissions or hazardous materials releases near the schools would be less than significant.

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

Less Than Significant Impact. The following databases and listings compiled pursuant to Government Code Section 65962.5 were checked (June 2022) for known hazardous materials contamination at the Project Sites:

- USEPA
  - Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS)/Superfund Enterprise Management System (SEMS)/Envirofacts database search
- State Water Resources Control Board (SWRCB)
  - GeoTracker search for leaking underground storage tanks (LUST) and other cleanup sites
- Department of Toxic Substances Control (DTSC)
  - EnviroStor database for hazardous waste facilities or known contamination sites
  - Cortese List of Hazardous Waste and Substances Sites

As discussed in impact b) of this section, the Phase I ESA recommended additional shallow soil sampling to further assess identified RECs associated with the historic agricultural uses, unapproved/non-permitted auto storage/repairing activities, and unlawfully dumped construction materials on-site. According to the Phase II ESA Report, and based on the results of subsequent soil samplings, no concentrations of Title 22 metals, OCPs, TPHs, and VOCs in the soil were found above their respective regulatory agency health-risk based careening levels and no further action was determined with respect to the previously identified RECs (NV5 Alta Environmental 2022a; NV5 Environmental 2022b). Furthermore, SEMS database search did not produce any results associated with the Project Site, indicating that the Project Site is devoid of known hazards and contaminants. The Project Site is not located on or directly adjacent to any known hazardous or contaminated sites that are actively being monitored. A search of the Geotracker database shows that the nearest listing to the site is approximately 700 feet east of the Project Site boundary at the Arco facility on the corner of Plummer Street and Sepulveda Boulevard intersection. The database report indicates that the status of the leaking underground storage tank (LUST) was deemed complete, and the case closed on April 2003. Due to the status of the LUST, it is unlikely that the contaminated site would have adverse impacts on the Project Site (SWRCB 2022). In addition, the construction and operation of the Proposed Project would not create a significant hazard to the public or the environment. Therefore, impacts would be less than significant.

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

No Impact. The airports closest to the Project Site are the Van Nuys Airport, located approximately 2.3 miles to the southwest and the Whiteman Airport, located approximately 3.5 miles to the northeast. While the Project Site would be subject to temporary and intermittent noise from aircraft overflights, the Site is not located in either airports' noise contours and would not be affected by substantial noise from aircraft operations (Los Angeles County 2003). In addition, the Project Site is not near a private airport. Therefore, the Project would not expose people residing or working in the Project area to excessive noise levels from aircraft noise and no impact would occur.

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

Less Than Significant Impact. The Proposed Project would not involve the development of structures that could potentially impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The Safety Element of the City of Los Angeles General Plan shows Van Nuys Boulevard (located approximately 1.1 miles east of the Site) to be a Selected Disaster Route. However, in accordance with the Safety Element of the General Plan, emergency response and evacuation procedures would be developed though the City in coordination with the police and fire departments. The Project would include construction of an ingress/egress driveway along the south side of Plummer Street. The existing driveway providing access to the on-site single-family residence and two of the existing fenced driveways along the existing vacant lot will be removed. Nonetheless, the Proposed Project would not require the development of additional streets or introduce new features that would interfere with or obstruct an adopted emergency response plan. Implementation of the Project would increase traffic to and from the Project Site; however, the Project Site is surrounded by major roadways, including I-405, Plummer Street, Sepulveda Boulevard and Van Nuys Boulevard, which have sufficient capacity to provide access to and from the Project Site. Therefore, impacts would be less than significant.

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

No Impact. The Project Site is in an urban area of the City of Los Angeles and is not located in a Fire Hazard Severity Zone (FHSZ) or Very High Hazard Severity Zone (VHFHSZ) for wildland fires (California Department of Forestry and Fire Protection [CALFIRE] 2022). Due to the urban nature of the Project Site, there is low potential for wildland fires to occur creating a significant risk for injury, or death involving wildland fires, and no impacts involving wildland fires would occur.

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X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i. Result in substantial 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 off-site;				
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				
iv. Impede or redirect flood flows?				
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

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

Less Than Significant Impact. The Proposed Project would include the development of a two-story elementary school building and associated open space, landscaping, and surface parking. Construction of the Project would require cut of approximately 12,500 cy of soil material. Of the 12,500 cy of cut soil, approximately 10,000 cy would be used as fill and redistributed on-site and the remaining 2,500 cy would be exported off the Site. Construction activities associated with the Project have the potential to degrade water quality through the exposure of surface runoff (primarily rainfall) to exposed soils, dust, and other debris, as well as from runoff from construction equipment. Construction associated with the Project would be subject to the requirements of Los Angeles Regional Water Quality Control Board (LARWQCB) Order No. R4-2012-0175, National Pollution Discharge Elimination System (NPDES) No. CAS004001, effective December 28, 2012, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (the “Los Angeles County MS4 Permit”),

which controls the quality of runoff entering municipal storm drains in Los Angeles County. Section VI.D.8 of the Los Angeles County MS4 Permit, Development Construction Program, requires permittees (which include the City) to enforce implementation of best management practices (BMPs), including, but not limited to, approval of an Erosion and Sediment Control Plan (ESCP) for all construction activities within their jurisdiction. ESCPs are required to include the elements of a SWPPP. Accordingly, the construction contractor for the Project would be required to implement BMPs that would meet or exceed local, State, and federal mandated guidelines for stormwater treatment to control erosion and to protect the quality of surface water runoff during the construction period. Furthermore, LAMC Section 91.106.4.1.14 requires that applicants incorporate BMPs necessary to control stormwater pollution from sediments, erosion, and construction materials leaving the construction site into the plan documents. BMPs utilized could include, without limitation: disposing of waste in accordance with all applicable laws and regulations; cleaning up leaks, drips, and spills immediately; conducting street sweeping during construction activities; limiting the amount of soil exposed at any given time; covering trucks; keeping construction equipment in good working order; and installing sediment filters during construction activities.

With respect to water quality during operation of the Project, Los Angeles County and all incorporated cities within Los Angeles County (except the City of Long Beach) are permittees under the Los Angeles County MS4 Permit. Section VI.D.7 of the Los Angeles County MS4 Permit, Planning and Land Development Program, is applicable to, among others, land-disturbing activities that result in the creation or addition or replacement of 5,000 sf or more of impervious surface area on an already developed site, which would apply to the Project. This Program requires, among other things, that the Project runoff volume from the following be retained on-site: (a) the 0.75 inch, 24-hour rain event; or (b) the 85th percentile, 24-hour rain event, as determined from the Los Angeles County 85th percentile precipitation isohyetal map, whichever is greater. The Project would also be subject to the BMP requirements of the Standard Urban Storm Water Mitigation Plan (SUSMP) adopted by LARWQCB. As a permittee, the City is responsible for implementing the requirements of the County-wide SUSMP within its boundaries. A Project-specific SUSMP would be implemented during the operation of the Project. In compliance with the Los Angeles County MS4 Permit and SUSMP requirements, the Project would be required to retain, treat and/or filter stormwater runoff through biofiltration before it enters the City stormwater drain system. The system incorporated into the Project must follow design requirements set forth in the MS4 permit and must be approved by the City. Adherence to the requirements of the MS4 Permit and SUSMP would ensure that potential impacts associated with water quality would be less than significant.

In addition, the Project would be subject to the provisions of the City's Low Impact Development (LID) Ordinance, which is designed to mitigate the impacts of increases in runoff and stormwater pollution as close to the source as possible. LID comprises a set of site design approaches and BMPs that promote the use of natural systems for infiltration, evapotranspiration and use of stormwater, as appropriate. The LID Ordinance requires the Project to incorporate LID standards and practices to encourage the beneficial use of rainwater and urban runoff, reduce stormwater runoff, promote rainwater harvesting, and provide increased groundwater recharge. In this regard, the City has established review procedures to be implemented by the Los Angeles Department of City Planning, Department of Building and Safety (LADBS), and Department of Public Works (LADPW) that parallel the review of the SUSMP discussed above. Incorporation of these features would minimize the increase in stormwater runoff from the Project Site. The SUSMP consists of structural BMPs built into the Project for ongoing water quality purposes over the life of the Project. Additionally, because the Project Site does not currently operate under a SUSMP, implementation of the Project with a SUSMP would improve water quality leaving the Project Site compared to existing conditions. With appropriate Project design and compliance with the applicable federal,

State, local regulations, and permit provisions, impacts related to water quality degradation associated with construction and operation of the Project would be less than significant.

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

Less Than Significant Impact.

The Project does not involve the extraction of groundwater and it would not result in a reduction in aquifer volume or lower the local groundwater table. According to the Geotechnical Investigation Report (Appendix E), no groundwater was observed on the site to a maximum depth of 31.5 feet below existing grade. According to the State of California Seismic Hazard Zone Report of the Van Nuys Quadrangle, the site is located within an area with the historically highest groundwater level reportedly greater than 150-feet below ground surface (LK Geotechnical Engineering 2022). Construction of the Project is not anticipated to involve ground disturbance and drilling to depths beyond 30 feet; therefore, no dewatering (i.e., removal of groundwater) during construction is anticipated. While the Project would increase impervious surfaces on the Site compared to existing conditions, it would retain permeable landscaped areas throughout the Site. Furthermore, the Project does not proposed groundwater extraction and would not contribute to a substantial net deficit in the aquifer volume or lowering of the local groundwater table. Therefore, impacts on groundwater would be less than significant.

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

i. Result in substantial erosion or siltation on- or off-site;

Less Than Significant Impact. As discussed in impact a) of this section, the Project would be designed to comply with the City of Los Angeles's LID design standard. Further, Project construction would comply with applicable NPDES and City requirements including those requiring the preparation of a Project-specific SWPPP. Pursuant to the LID Ordinance, the Project would be required to capture and manage the first three quarters of an inch of runoff flow during storm events as defined in the City's BMPs. The Project would result in less than significant impacts associated 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 off-site;

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less Than Significant Impact. Runoff associated with the Project would be collected in a proposed on-site catch basin, directed in non-erosive drainage devices to landscaped areas for evaporation, and/or directed to the existing City storm drain system. The Project would be subject to the provisions of the LID Ordinance. In this regard, the City has established review procedures to be implemented by the Department of City Planning, LADBS, LADPW that expand the review of the SUSMP discussed above. Incorporation of these features would minimize the stormwater runoff from the Project Site. It can be reasonably anticipated, then, that the existing storm drain system has adequate capacity to accommodate flows from the Project Site. Therefore, impacts would be less than significant.

iv. Impede or redirect flood flows?

No Impact. According to Federal Emergency Management Agency flood plain data presented in the site-specific Environmental Data Resources (EDR) Geocheck Report, the Site is not located within a 100- or 500-year flood zone (EDR 2021). The Project Site is located in Zone X of the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) (Map # 06037C1305F, dated September 26, 2008) (FEMA 2008). Zone X is characterized as an area determined to be outside the 0.2 percent annual chance floodplain. The Proposed Project would not have the potential to impede flood flows and no impact would occur.

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

No Impact. As discussed under impact c.iv) of this section, the Project is not located within a 100- or 500-year flood zone and is in Zone X according to the FEMA FIRM, which is characterized as an area determined to be outside the 0.2 percent annual chance floodplain. Furthermore, the Site is located approximately 14 miles from the coast of the Pacific Ocean and is approximately 869 feet above mean sea level. Therefore, the Site is not located in an area potentially impacted by a tsunami. There are no other large bodies of water in the Site vicinity. As such, the Project is not in a flood hazard, tsunami, or seiche zone and there is no potential for risk of the release of pollutants due to project inundation. No impact would occur.

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

No Impact. As discussed in impact a) and b) of this section, the Project would comply with applicable NPDES and City requirements, which would include the use of BMPs during construction and operation of the Project as detailed in a SWPPP and in the LID Ordinance. Project construction would occur in accordance with City Building Code Chapter IX, which requires necessary permits, plans, plan checks, and inspections to avoid or reduce the effects of sedimentation and erosion. In addition, the Project would require approval of an erosion control plan and would be required to prepare a SWPPP in accordance with the NPDES permit. The SWPPP incorporates BMPs in accordance with the City of Los Angeles' Best Management Practices Handbook to control erosion including grading and dust control measures. The Project would not conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts would be less than significant.

XI. LAND USE AND PLANNING

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

a) Physically divide an established community?

No Impact. The Project Site is in an urban area surrounded by Plummer Street, I-405, and residential uses. The Project would not cause any permanent street closures, block access to any surrounding land use, or cause any change in the existing street grid system. Since the Project would be developed within a long-established urban area, the Project would not physically divide an established community by creating new streets or by blocking or changing the existing street grid pattern. Therefore, the proposed would not physically divide an established community and no impact would occur.

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

Less Than Significant Impact. The Proposed Project involves the development of a two-story elementary school building and associated open space, landscaping, and surface parking. The Project Site is currently zoned RA-1 (Suburban Zone). As referenced in LAMC Section 12.19, schools are allowed in the RA-1 zone with a Conditional Use Permit. According to the Mission Hills - Panorama City - North Hills Community Plan, the Project Site is also designated Low Density Residential, which corresponds to the RA-1 zone and is intended to provide for areas appropriate for a range of detached single-family residential dwelling units, each located on a single legal lot (City of Los Angeles 2010). Therefore, the Proposed Project would not be consistent with the site's current zoning and land use designation. However, Proposed Project entitlements includes a Conditional Use Permit to allow a school use in the RA-1 Zone District.

Upon approval of the requested Conditional Use Permit, the Proposed Project would comply with City zoning standards, including maximum height limits, parking, open space requirements, and yard setbacks. In addition, as discussed in the impact analyses for biological resources, cultural resources, and tribal cultural resources, the Project would comply with necessary measures and would not conflict with applicable policies aimed at mitigating environmental effects. Table 16 discusses the Proposed Project's consistency with relevant policies from the Mission Hills - Panorama City - North Hills and City of Los Angeles General Plan Housing Element. Policies that call for City actions independent of review and approval or denial of the Proposed Project have been omitted. The ultimate determination of whether the Proposed Project is consistent with applicable general plans lies with the City's decision-making body, specifically the Planning Commission, and City Council if the Proposed Project is appealed.

Table 16 Project Consistency with Relevant City Policies

Policy	Discussion
Mission Hills - Panorama City - North Hills Community Plan	
Goal 6: Appropriate locations and adequate facilities for schools to serve the needs of the existing and future population	
Policy 6-1.1: Encourage compatibility in school locations, site layout and architectural design with adjacent land uses and community character and, as appropriate, use schools to create a logical transition and buffer between differing uses.	Consistent: The Proposed Project would include the development of a two-story elementary school building and associated open space, landscaping, and surface parking. As discussion in Section I, *Aesthetics*, the Project would not degrade the character of the Site. As a proposed elementary school, the Project would not conflict with existing uses in the area since there is a high school and middle school located approximately 1,000 feet to the east along Plummer Street.
Policy 6-1.2: Site schools in a manner which compliments and preserves the existing stable single family and multiple-family residential neighborhoods.	Consistent: The Proposed Project would be developed in an urban area. Land uses surrounding the site include single family and multi-family residences.
Policy 6-1.3: Proximity to noise sources should be avoided whenever possible or the school design should buffer classrooms from such noise.	Consistent: The Proposed Project would be compatible with the existing noise environment without the implementation of noise buffers, as discussed in Section XII, *Noise*.
Policy 6-1.6 Encourage cooperation to provide recreation facilities for the community.	Consistent: The Proposed Project would include 30,726 sf of open space and landscaping, including two play areas (totaling 13,060 sf) to accommodate a maximum enrollment of 552 students. The student's recreational needs will be met on-site and will not significantly impact off-site recreational facilities.
City of Los Angeles General Plan Framework Element – Chapter 9 Infrastructure and Public Services	
Goal 9N: Public schools that provide a quality education for all of the City's children, including those with special needs, and adequate school facilities to serve every neighborhood in the City so that students have an opportunity to attend school in their neighborhoods.	
Policy 9.32.1: Work with the Los Angeles Unified School District to ensure that school facilities and programs are expanded commensurate with the City's population growth and development.	Consistent: The Project would serve existing elementary grade students currently enrolled in classes at Panorama Baptist Church located at 8755 Woodman Avenue (approximately two miles southeast) in the neighboring community of Arleta. The existing school is currently renting temporary space (i.e., 16 classrooms) from the Panorama Baptist Church and is at full capacity with an enrollment of 380 students. The Project would provide a new school for these students and would not include demolition of property at Panorama Baptist Church once school services are transferred to the Project Site since the Applicant does not own the church property. Therefore, the Project would provide expanded school facilities compared to current operations at Panorama Baptist Church to accommodate an additional 172 students.
Policy 9.32.2: Explore creative alternatives for providing new school sites in the City, where appropriate.	Consistent: The Proposed Project would include the development of a two-story elementary school building and associated open space, landscaping, and surface parking. The site is currently zoned as RA-1 and includes a single-family residence. The residence is listed in SurveyLA and is, therefore, recognized by the City as having historic significance. Rather than demolishing the structure, the residence would be adaptively reused and school administrative space and would remain onsite.

Source: City of Los Angeles 2001

Based on the consistency analysis provided in Table 16 the Proposed Project would be consistent with the Mission Hills - Panorama City - North Hills Community Plan and City of Los Angeles General Plan Framework Element. The Proposed Project would not conflict with any applicable land use plan, policy, or regulation, and impacts would be less than significant.

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XII. MINERAL RESOURCES

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

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

No Impact. The Project Site is in an urban area surrounded by Plummer Street, I-405, and residential uses. The Site itself consists of grasses, shrubs, various mature trees, and a one-story historic single-family residence. The Project Site is zoned RA-1 (Suburban Zone) and is also designated as Low Density Residential under the Mission Hills - Panorama City - North Hills Community Plan. According to the California DOC Mineral Land Classification Maps, the Project Site is located in an area with a Mineral Resource Zone (MRZ) designation of MRZ-3, indicating an area containing known or inferred Portland cement concrete aggregate resource of undetermined mineral resource significance (DOC 2021c). However, there are no ongoing extraction activities at or near the Site. Because there are no known mineral resources on the Project Site or in the vicinity of the site, the Project would have no impact on the availability or recovery of mineral resources that would be of value to the region and residents of the state.

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

No Impact. As discussion under impact a) of this section, the Project Site is in a developed urban area, is zoned RA-1 (Single-Unit Residential) and is also designated as Low Density Residential under the Mission Hills - Panorama City - North Hills Community Plan. The Project Site is in an area with an MRZ-3 designation, indicating an area containing known or inferred Portland cement concrete aggregate resource of undetermined mineral resource significance (DOC 2021c). However, there are no ongoing extraction activities at or near the Site. Because there are no known mineral resources on the Project Site or in the vicinity of the site, the Project would have no impact on the availability or recovery of locally-important mineral resource recovery sites.

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XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Rincon prepared a Noise and Vibration Study dated August 2022 to analyze the Project's noise and vibration impacts related to both temporary construction activity and long-term operation of the Project. The following analysis is based on the findings of the Noise and Vibration Study, which is provided as Appendix I.

Noise

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs (e.g., the human ear). Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (California Department of Transportation [Caltrans] 2013).

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 Hertz (Hz) and less sensitive to frequencies around and below 100 Hz (Kinsler, et. al. 1999). Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as a doubling of traffic volume, would increase the noise level by 3 dB; similarly, dividing the energy in half would result in a decrease of 3 dB (Crocker 2007).

Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not "sound twice as loud" as one source. It is widely accepted that the average healthy ear can barely perceive an increase (or decrease) of up to 3 dBA in noise levels (i.e., twice [or half] the sound energy); that a change of 5 dBA is readily perceptible (8 times the sound energy); and that an increase (or decrease) of 10 dBA sounds twice (or half) as loud (10.5 times the sound energy) (Crocker 2007).

Descriptors

The impact of noise is not a function of loudness alone. The time of day when noise occurs, its frequency, and the duration of the noise are also important. In addition, most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors have been developed.

One of the most frequently used noise metrics that considers both duration and intensity is the equivalent noise level (L_{eq}). The L_{eq} is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time. Typically, L_{eq} is equivalent to a one-hour period, even when measured for shorter durations as the noise level of a 10- to 30-minute period would be the same as the hour if the noise source is relatively steady. L_{max} is the highest Root Mean Squared (RMS) sound pressure level within the sampling period, and L_{min} is the lowest RMS sound pressure level within the measuring period (Crocker 2007). Normal conversational levels at three feet are in the 60- to 65-dBA Leq range and ambient noise levels greater than 65 dBA L_{eq} can interrupt conversations (Federal Transit Administration [FTA] 2018).

Noise that occurs at night tends to be more disturbing than that which occurs during the day. Community noise is usually measured using Day-Night Average Level (L_{dn} or DNL), which is a 24-hour average noise level with a +10 dBA penalty for noise occurring during nighttime (10:00 p.m. to 7:00 a.m.) hours, or Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a +5 dBA penalty for noise occurring from 7:00 p.m. to 10:00 p.m. and a +10 dBA penalty for noise occurring from 10:00 p.m. to 7:00 a.m. (Caltrans 2013). Noise levels described by DNL and CNEL usually differ by about 0.5 dBA. Quiet suburban areas typically have a CNEL in the range of 40 to 50 dBA, while areas near arterial streets are typically in the 50 to 70+ CNEL range.

Propagation

Sound from a small, localized source (approximating a “point” source) radiates uniformly outward as it travels away from the source in a spherical pattern, known as geometric spreading. The sound level decreases or drops off at a rate of approximately 6 dBA for each doubling of distance.

Traffic noise is not a single, stationary point source of sound. Rather, the movement of vehicles makes the source of the sound appear to emanate from a line (line source) rather than a point. The drop-off rate for a line source is approximately 3 dBA for each doubling of distance.

Vibration

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of hertz (Hz). The frequency of a vibrating object describes how rapidly it oscillates.

Descriptors

Vibration amplitudes are usually expressed in peak particle velocity (PPV). The PPV is normally described in inches per second (in/sec). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used in monitoring of vibration because it is related to the stresses that are experienced by buildings (Caltrans 2020).

Response to Vibration

Caltrans has developed limits for the assessment of vibrations from transportation and construction sources. The Caltrans vibration limits are reflective of standard practice for analyzing vibration impacts on structures. The Caltrans *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020) identifies impact criteria for buildings. Table 17 presents the impact criteria for buildings.

Table 17 Vibration Damage Potential

Structure and Condition	Maximum PPV (in./sec.)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient mountains	0.12	0.08
Fragile buildings	0.20	0.10
Historic and similar old buildings	0.50	0.25
Older residential structures	0.50	0.30
New residential structures	1.00	0.50
Modern industrial/commercial buildings	2.00	0.50

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls (i.e., a loose steel ball that is dropped onto structures or rock to reduce them to a manageable size). Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

PPV = peak particle velocity; in./sec. = inches per second

Source: Caltrans 2020

Propagation

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High-frequency vibrations diminish much more rapidly than low frequencies, so low frequencies tend to dominate the spectrum at large distances from the source. Variability in the soil strata can also cause diffractions or channeling effects that affect the propagation of vibration over long distances (Caltrans 2020). When a building is exposed to vibration, a ground-to-foundation coupling loss (the loss that occurs when energy is transferred from one medium to another) will usually reduce the overall vibration level. However, under rare circumstances, the ground-to-foundation coupling may amplify the vibration level due to structural resonances of the floors and walls.

Sensitive Receivers

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. According to the City of Los Angeles Noise Element, the following land uses are considered noise-sensitive: single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodgings and other residential uses, houses of worship, hospitals, libraries, schools, auditoriums, concert halls, outdoor theaters, nature and wildlife preserves, and parks (City of Los Angeles 1999).

Vibration-sensitive receivers, which are similar to noise-sensitive receivers, include residences and institutional uses, such as schools, churches, and hospitals. Vibration-sensitive receivers also include buildings where vibrations may interfere with vibration-sensitive equipment that is affected by vibration levels that may be well below those associated with human annoyance (e.g., recording studies or medical facilities with sensitive equipment).

As shown in Figure 11, Noise Measurement and Sensitive Receiver Locations, the Site is surrounded by residential uses. The nearest sensitive receivers consist of residences directly adjacent to the east, south, and west, and residences approximately 130 feet to the north across Plummer Street, as well as Plummer Village Senior Community approximately 215 feet to the east. The Project Site includes an existing residence that would be converted into additional administrative space for the proposed elementary school. In addition, the Project would include construction of an elementary school, which would add new sensitive receivers to the Project Site.

Project Noise Setting

The most common source of noise in urban areas is vehicular traffic. In the Project Area, vehicular traffic along Plummer Street is the primary noise source with steady traffic on the I-405, located approximately 440 feet west of the Site, being barely perceptible. Ambient noise levels are generally highest during the daytime and peak traffic hours unless congestion substantially slows speeds.

To further characterize ambient noise levels at and near the Project Site, two 15-minute noise level measurements were collected by Rincon on May 25, 2022 between 8:57 a.m. and 9:31 a.m. using an Extech (Model 407780A) ANSI Type 2 integrating sound level meter. An additional 24-hour noise level measurement was collected between May 25, 2022 and May 26, 2022. Table 18 summarizes the short-term noise measurement results and Figure 11 shows the noise measurement locations. Short-term noise measurement (ST) 1 is located at the northern property line of the Site facing Plummer Street and ST 2 is located along Orion Avenue adjacent to single-family residences. The long-term noise measurement (LT) 1 is located near the southern property line of the Site. Noise levels for the 15-minute measurements are provided in L_{eq} for the measurement period; L_{min} and L_{max} are also provided. The noise level for the 24-hour measurement is provided in CNEL. Table 19 summarizes the long-term noise measurement. Detailed sound level measurement data are included in Appendix I.

Table 18 Project Vicinity Sound Level Monitoring Results

	Measurement Location	Sample Times	Approximate Distance to Primary Noise Source	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)
ST1	Northern property line of Site	8:57 a.m. – 9:12 a.m.	30 feet from centerline of Plummer Street	70	53	93
ST2	West of Site, adjacent to residences	9:16 a.m. – 9:31 a.m.	15 feet from centerline of Orion Avenue	59	54	75

See Appendix I for noise monitoring data. Noise level measurements have been rounded to the nearest whole number.
Source: Rincon field visit between May 25, 2022 and May 26, 2022

Table 19 Project Site Long-Term Noise Monitoring Results

Sample Time[1]	dBA L_{eq}	Sample Time[1]	dBA L_{eq}
24-hour Measurement – 5/25- 5/26/2022			
8:42 a.m.	57	8:42 p.m.	50
9:42 a.m.	51	9:42 p.m.	49
10:42 a.m.	51	10:42 p.m.	48
11:42 a.m.	53	11:42 p.m.	49
12:42 p.m.	49	12:42 a.m.	50
1:42 p.m.	51	1:42 a.m.	47
2:42 p.m.	46	2:42 a.m.	49
3:42 p.m.	48	3:42 a.m.	51
4:42 p.m.	50	4:42 a.m.	51
5:42 p.m.	48	5:42 a.m.	57
6:42 p.m.	51	6:42 a.m.	53
7:42 p.m.	50	7:42 a.m.	57
24-hour Noise Level (CNEL)			**58**

dBA = A-weighted decibels; L_{eq} = equivalent noise level; CNEL = community equivalent noise level

[1]Sample times shown in this table are the correct sample times. The date and time located in the raw data is not shown correctly due to an input error.

See Figure 11 for noise measurement locations; see Appendix A for full measurement details.

Figure 11 Noise Measurement and Sensitive Receiver Locations

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Regulatory Setting

City of Los Angeles Noise Element

The goals, policies, and actions contained in the City of Los Angeles General Plan Noise Element focus on establishing and applying criteria for acceptable noise levels for different land uses in order to minimize the negative impacts of noise, especially at sensitive receiver locations. In support of these goals and policies, the City's Noise Element contains a land use and noise compatibility matrix (shown in Table 20) that determines the normally acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable noise levels for various land uses. According to the City's noise compatibility matrix shown in Table 20, ambient noise up to 60 CNEL is normally acceptable for schools whereas ambient noise up to 70 CNEL is conditionally acceptable for schools. In addition, consistent with state noise insulation standards (California Building Code Title 24, Part 2, Section 1206.4), the City's Noise Element limits interior noise to a maximum of 45 CNEL in any habitable room (City of Los Angeles 1999).

Table 20 Land Use and Noise Compatibility Matrix (CNEL)

Land Use	Normally Acceptable[1]	Conditionally Acceptable[2]	Normally Unacceptable[3]	Clearly Unacceptable[4]
Single-Family, Duplex, Mobile Homes	50 – 55	55 – 70	70 – 75	75+
Multi-Family	50 – 60	60 – 70	70 – 75	75+
School, Library, Church, Hospital, Nursing Home	50 – 60	60 – 70	70 – 80	80+
Transient Lodging, Motel, Hotel	50 – 60	60 – 70	70 – 75	75+
Auditorium, Concert Hall, Amphitheater	–	50 – 65	–	65+
Sports Arena, Outdoor Spectator Sports	–	50 – 70	–	70+
Playground, Neighborhood Park	50 – 65	–	65 – 75	75+
Golf Course, Riding Stable, Water Recreation, Cemetery	50 – 70	–	70 – 75	75+
Office Building, Business, Commercial, Professional	50 – 65	65 – 75	75+	–
Agriculture, Industrial, Manufacturing, Utilities	50 – 70	70 – 75	75+	–

[1] Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

[2] Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning would normally suffice.

[3] Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

[4] Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: City of Los Angeles 1999

City of Los Angeles Municipal Code

The City implements and enforces construction and operational noise regulations through the Los Angeles Municipal Code (LAMC). LAMC Section 91.1206 establishes noise insulation performance standards to protect persons within new hotels, motels, dormitories, residential care facilities, apartment houses, dwellings, private schools, and places of worship from the effects of excessive noise, including but not limited to, hearing loss or impairment and interference with speech and sleep. According to Subsection 91.1206.14.1, these structures shall be designed to prevent the intrusion of exterior noise beyond prescribed levels when located in noise critical areas, such as proximity to highways, country roads, city streets, railroads, airports, and commercial or industrial areas. Proper design shall include, but shall not be limited to, orientation of the structure, setbacks, shielding, and sound insulation of the building itself. According to Subsection 91.1206.14.3, structures identified under Subsection 91.1206.1 that are exposed to airport noise greater than 60 dBA L_{dn} or CNEL, shall require an acoustical analysis showing that the proposed design will achieve the allowable interior noise level.

LAMC Section 111.02 provides procedures and criteria for the measurement of the sound level of "offending" noise sources. In accordance with the LAMC, a noise source that causes a noise level increase of 5 dBA over the existing average ambient noise level as measured at an adjacent property line creates a noise violation. This standard applies to radios, television sets, air conditioning, refrigeration, heating, pumping and filtering equipment, powered equipment intended for repetitive use in residential areas, and motor vehicles driven on-site. To account for people's increased tolerance for short-duration noise events, the LAMC provides a 5 dBA allowance for a noise source that causes noise lasting more than five but less than 15 minutes in any one-hour period, and an additional 5 dBA allowance (for a total of 10 dBA) for a noise source that causes noise lasting five minutes or less in any one-hour period.

LAMC Section 111.03 indicates that, in cases where the actual ambient noise conditions are not known, the City's presumed daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) minimum ambient noise levels should be used, as shown in Table 21. For example, for residential-zoned areas, the presumed ambient noise level is 50 dBA during the daytime and 40 dBA during the nighttime. According to LAMC Section 111.03, where the ambient noise level is less than the presumed ambient noise level shown in Table 21, the presumed ambient noise level is to be considered the minimum ambient noise level.

Table 21 Noise Level Monitoring Results

	Presumed Ambient Noise Level (dbA)	
Zone	**Day 7 a.m. to 10 p.m.**	**Night 10 p.m. to 7 a.m.**
Residential (A1, A2, RA, RE, RS, RD, RW1, RW1, RW2, R1, R2, R3, R4, and R5)	50	40
Commercial (P, PB, CR, C1, C1.5, C2, C4, C5, and CM)	60	55
Manufacturing (M1, MR1, and MR2)	60	55
Heavy Manufacturing (M2 and M3)	65	65

Note: At the boundary between two zones, the presumed ambient noise level of the quieter zone is to be applied.

Source: LAMC Section 111.03

LAMC Section 112.01 prohibits noise from radios, musical instruments, television sets, and other sound-amplifying devices from being audible at a distance in excess of 150 feet from the property line of the noise source within 500 feet of any residential zone or from exceeding the ambient noise level on the premises of any other occupied property.

LAMC Section 112.02 limits increases in noise levels from air conditioning, refrigeration, heating, pumping, and filtering equipment. Such equipment may not be operated in such manner as to create any noise that would cause the noise level on the premises of any other occupied property, or, if a condominium, apartment house, duplex, or attached business, within any adjoining unit, to exceed the ambient noise level by more than 5 dBA.

LAMC Section 112.04 prohibits the operation of any lawn mower, backpack blower, lawn edger, riding tractor, or any other machinery equipment, or other mechanical or electrical device, or any hand tool which creates a loud, raucous or impulsive sound, within any residential zone or within 500 feet of a residence between 10:00 p.m. and 7:00 a.m. LAMC Section 114.03 prohibits the loading or unloading of any vehicle, operation of any dollies, carts, forklifts, or other wheeled equipment, which causes any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building between 10:00 p.m. and 7:00 a.m.

LAMC Section 112.05 limits noise from construction equipment located within 500 feet of a residential zone to 75 dBA between 7:00 a.m. and 10:00 p.m., as measured at a distance of 50 feet from the source, i.e. construction site, unless compliance is technically infeasible. Technical infeasibility means that noise limitations cannot be met despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of construction equipment. LAMC Section 41.40 also restricts construction activity to the hours below:

- Monday through Friday between 7:00 a.m. and 9:00 p.m.
- Saturdays and national holidays between 8:00 a.m. and 6:00 p.m. except for individual homeowners engaged in the repair or construction of a single-family residence
- No construction on Sundays except for individual homeowners engaged in the repair or construction of a single-family residence

LAMC Section 113.01 prohibits collecting or disposing of rubbish or garbage, operating any refuse disposal truck, or collecting, loading, picking up, transferring, unloading, dumping, discarding, or disposing of any rubbish or garbage, as such terms are defined in LAMC Section 66.00, within 200 feet of any residential building between the hours of 9:00 p.m. and 6:00 a.m. of the following day, unless a permit has been duly obtained beforehand from the Board of Police Commissioners.

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

Less Than Significant Impact. The Proposed Project involves the construction of an elementary school and the adaptive reuse of the existing on-site residence for additional administrative space. The immediate surrounding area, consisting of residential uses, may be subject to both temporary construction noise and long-term operational noise. On-site noise source associated with operation of the Project would consist of noise from periodic delivery and trash hauling services; rooftop-mounted heating, ventilation, and air conditioning (HVAC) equipment; and student recreational activity in outdoor areas. The Project would also generate off-site operational noise from vehicle trips. The following discussion analysis each temporary and permanent noise source.

Construction Noise

Construction activity would result in temporary increases in ambient noise in the Project Site vicinity on an intermittent basis and, as such, would expose surrounding noise sensitive receivers to increased noise. Construction noise was estimated using the FHWA Roadway Construction Noise Model (RCNM) (FHWA 2006). Using RCNM, noise was modeled at the property line of the nearest noise-sensitive receptors from the edge of proposed construction activity. As discussed

in discussed in *Sensitive Receivers* of this section, sensitive receivers nearest to the Project Site include single-family residences directly adjacent to the east, south, and west and the Plummer Street Senior Community approximately 215 feet to the east. RCNM calculations are included in Appendix I.

Pursuant to LAMC Section 112.05, in which construction noise in a residential zone shall not exceed 75 dBA L_{max} between 7:00 a.m. and 10:00 p.m. at a distance of 50 feet, construction noise was modeled at a distance of 50 feet from the nearest residential receivers. In addition, construction activities are limited to the hours of 7:00 a.m. and 9:00 p.m. on weekdays and between the hours of 8:00 a.m. and 6:00 p.m. on Saturday pursuant to LAMC Section 41.40.

Construction noise is typically loudest during activities that involve excavation and moving soil, such as site preparation and grading. A potential high-intensity construction scenario based on client provided information includes a grader, excavator and concrete saw working during site preparation to excavate and move soil. At a distance of 50 feet, a grader, excavator and concrete saw would generate a noise level of 90 dBA L_{max}. Therefore, construction noise could exceed the threshold of 75 dBA L_{max}. The approximate 75 dBA L_{max} noise contour for project construction is estimated at 150 feet (i.e., if construction occurs at a distance of 150 feet or greater from a sensitive receptor, it would not exceed the threshold). Therefore, if construction occurs within 150 feet of sensitive receivers, noise levels from construction may exceed the City's construction noise limit.

The nearest sensitive receivers include single-family residences adjacent to the east, south, and west of the project boundary. Other sensitive receivers include single-family residences approximately 130 feet to the north across Plummer Street, as well as Plummer Village Senior Community approximately 215 feet to the east. At nearby residences, construction noise could exceed the 75 dBA L_{max} threshold since construction activity could occur within 50 feet of these sensitive receptors if uncontrolled. Construction noise at the Plummer Village Senior Community, approximately 215 feet to the east of the project boundary, is not estimated to exceed the 75 dBA L_{max} threshold.

However, compliance with the City's RCMs would reduce impacts related to construction noise. In particular, compliance with RCM-1 would reduce construction noise by at least 15 dBA, thereby reducing construction noise levels to 75 dBA L_{max}. Therefore, with RCM-1, this impact would be less than significant.

Regulatory Compliance Measures

RCM-1 Adherence to Existing Noise Standards

The Proposed Project shall comply with the City of Los Angeles General Plan Noise Element, the City of Los Angeles Noise Ordinance, and any subsequent ordinances that prohibit the emission or creation of noise beyond certain levels at adjacent uses.

To implement RCM-1 and reduce construction noise, the construction Contractor would be required to implement noise-reducing during construction, which may include but are not limited to:

- Schedule construction activities to avoid operating several pieces of equipment simultaneously, which can cause high noise levels.
- Retrofit mobile equipment with an industrial grade silencer or silencer of similar capacity.
- Enclose stationary equipment.

- Locate all construction areas for staging and warming up as far as possible from adjacent residential buildings and sensitive receivers.
- Erect temporary noise barriers with a minimum height of 12 feet along the project boundaries. The noise barriers shall be constructed with solid material with a density of at least 1 pound per square foot with no gaps from the ground to the top of the barrier and be lined on the construction side with acoustical blanket, curtain or equivalent absorptive material rated sound transmission class (STC) 32 or higher.

RCM-2 Construction Hours

The Proposed Project shall comply with LAMC Section 41.40, which restricts construction activities to the hours of 7:00 a.m. to 9:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday and national holidays with no construction permitted on Sunday.

RCM-3 Construction Site Noticing

The Proposed Project shall comply with the City's Building Regulations Ordinance No. 178,048 (LAMC Section 91.106.4.8), which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor or owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and the Applicant's telephone number where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

On-Site Operational Noise

Delivery and Trash Hauling

The Project would require periodic delivery and trash hauling services. However, noise associated with delivery and trash-hauling trucks would be an intermittent noise source and are already a common occurrence in the Project area due to existing residential and commercial uses that make up the developed urban area. Therefore, such services associated with the Project would not result in a substantial permanent increase in ambient noise levels without the Project. Furthermore, LAMC Section 114.03 prohibits the loading or unloading of any vehicle, operation of any dollies, carts, forklifts, or other wheeled equipment, which causes any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building between 10:00 p.m. and 7:00 a.m. Therefore, operational noise impacts associated with delivery and trash-hauling trucks would be less than significant.

HVAC Units

The primary on-site operational noise source from the Project would be HVAC units. The HVAC used in the analysis was a Trane Split System Heat Pump. Specific model data for the future HVAC systems are not available at this stage of Project design; however, this analysis assumes the use of a typical Trane HVAC system. The unit used in this analysis is a 5-ton Carrier 4TWA4036A3, which has a sound power level of 75 dBA (see Appendix I for manufacturer's specifications). Based on the location of the proposed buildings, it is anticipated that the closest rooftop-mounted HVAC unit would be installed on the proposed multi-purpose building located approximately 30 feet from the nearest off-site sensitive receivers east of the Project Site. HVAC equipment would diminish at a rate of at least 6 dBA per doubling of distance (conservatively ignoring other attenuation effects from ground and shielding effects).

The nearest sensitive receivers are single-family residences, which are approximately 30 feet from the nearest proposed multi-purpose building to the east. A 2.5-foot-high parapet wall is proposed on the rooftop, which would reduce HVAC noise levels by approximately 5 dBA. At a distance of 30 feet and with the shielding from the proposed parapet wall, HVAC noise would attenuate to approximately 43 dBA or less, which would not exceed the lowest measured hourly L_{eq} at LT-1 of 46 dBA. According to LAMC Section 111.03, where the ambient noise level is less than the presumed ambient noise level shown in Table 18, the measured ambient becomes the standard. Project HVAC noise would be less at other sensitive receptors located at further distances. This impact would be less than significant.

Outdoor Noise

The primary on-site noise source associated with operation of the Project would consist of student recreational activity in the proposed outdoor play areas. Outdoor noise would be an intermittent and periodic noise source, which would be limited to the daytime during school hours and when staff and students are outdoors (e.g., mornings prior to class start times, study breaks or lunch breaks throughout the day, afterschool prior to students getting picked up). The new elementary school would serve traditional kindergarten through grade four. Campus hours of operation for Valor Elementary School would be from 7:15 a.m. to 6:00 p.m., Monday through Friday during normal school months. During the summer months, the school campus would be closed. The proposed school would not host athletic events that would occur during the late afternoon/early evening hours. No lighting is proposed for the proposed playfields and a limited amount of special events are proposed throughout the school years. Additionally, there would be no PA system proposed for recreational activities. Since student recreational activities would be limited to daytime hours and there are no proposed PA systems for sports activities, impacts would be less than significant.

Off-site Operational Noise

Traffic Noise

The Project would generate new vehicle trips and incrementally increase traffic on area roadways, particularly on Plummer Street due to the location of the Project's proposed driveway. According to the TA prepared by the LLG, the Project would result in approximately 1,232 daily vehicle trips on Plummer Street (LLG 2022). As discussed in the TA, new traffic count data could not be collected due to the COVID-19 pandemic (LLG 2022). While the TA uses the City's peak hour traffic data, the TA does not include 24-hour traffic volume data for the segment of Plummer Street nearest to the Site. Based on the City's 24-hour traffic volume data, the segment of Plummer Street nearest to the Site has a volume of approximately 17,710 ADT.[4] Conservatively adding all 1,232 daily vehicle trips generated by the Project to Plummer Street would increase traffic along these roadways by approximately seven percent. This traffic increase would, in turn, increase traffic noise by an estimated 0.3 CNEL along Plummer Street.[5] Therefore, the Project would not generate substantial traffic noise from vehicle trips that would result a perceptible 3-dBA increase above existing traffic noise at Plummer Street. Noise impacts associated with off-site traffic generated by the Project would be less than significant.

[4] Based on the City's 24-hour traffic volume data, the nearest intersection (Plummer Street West of Orion Avenue) had approximately 16,100 ADT in 2012 (City of Los Angeles 2012). To estimate current year traffic volumes, the 16,100 ADT were increased by a one percent annual traffic growth rate through the year 2022.

[5] A doubling of traffic is required for an audible 3 dB increase in traffic noise levels. However, the increase in traffic generated by the Proposed Project would be approximately seven percent of the estimated existing daily traffic along Plummer Street.

Land Use Compatibility

As discussed in *Project Noise Setting* of this section and shown in Table 19, the peak hour ambient noise level along Plumer Street is 70 dBA L_{eq}, which indicates that future classrooms closest to Plummer Street could be exposed to ambient noise levels on the order of 70 CNEL. According to the City's noise compatibility matrix shown in Table 20, ambient noise up to 60 CNEL is normally acceptable and noise up to 70 CNEL is conditionally acceptable for a school use. Based on existing noise levels described in *Project Noise Setting*, the project is anticipated to be within the "conditionally acceptable" range for school uses at the project site. RCM-4 would require that future classrooms are designed for an interior noise environment of 45 dBA L_{eq} or less, and impacts would be less than significant.

Regulatory Compliance Measure

RCM-4 Interior Noise Reduction

The Applicant shall consider the noise and land use compatibility of the site (such as traffic) and the characteristics of planned building components (such as Heating, Ventilation, and Air Conditioning [HVAC]), and project designs shall achieve interior classroom noise levels of 45 dBA L_{eq} or less with a target of 40 dBA L_{eq} (unoccupied), and a reverberation time of 0.6 seconds. Noise reduction methods shall include, but are not limited to, sound walls, building and/or classroom insulation, HVAC modifications, double-paned windows, and other design features.

- New construction should achieve classroom acoustical quality consistent with the current School Design Guide and California High Performance Schools (CHPS) standard of 45 dBA L_{eq}.
- New HVAC installations should be designed to achieve the lowest possible noise level consistent with the current School Design Guide. HVAC systems shall be designed so that noise from the system does not cause the ambient noise in a classroom to exceed the current School Design Guide and CHPS standard of 45 dBA L_{eq}
- Modernization of existing facilities and/or HVAC replacement projects should improve the sound performance of the HVAC system over the existing system.
- The Applicant's purchase of new units should give preference to HVAC manufacturers that sell the lowest noise level units at the lowest cost.
- Exterior doors would have a solid core with perimeter weather-stripping and threshold seals with a Sound Transmission Class (STC) rating of at least 32, with the potential for STC rating of 36 or higher if necessary.
- Exterior walls would include minimum of 5/8-inch of stucco or brick veneer over a minimum ½-inch plywood or OSB shear panel, R11 insulation and interior 5/8-inch gypsum board.
- Walls would have a STC rating of at least 46.
- Dual-paned windows would be installed with a STC rating of at least 32, with the potential for STC rating of 36 or higher if necessary.
- If exterior sliding glass doors are included, high-performance glazing would be installed with a minimum STC rating of 36.

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

Less Than Significant Impact With Mitigation. Operation of the Project would not include stationary sources of significant vibration, such as heavy equipment operations. Therefore, operational vibration impacts would be less than significant. Rather, construction activities have the potential to generate groundborne vibration affecting nearby structures. Construction of the Project would utilize loaded trucks and bulldozers and other heavy-duty construction equipment during the grading phase. Vibratory rollers are not proposed for use during the paving phase.

Vibration impacts are assessed based on the distance from the location of vibration-intensive construction activities, conservatively assumed to be at edge of the Project Site, to the edge of nearby off-site structures. Based on the distance of the nearest structures to the Project Site, heavy-duty equipment could potentially come within very close distances to the adjacent single-family residences and the existing building on site with historic significant per SurveyLA. If dozers or other heavy earthmoving equipment were to work within approximately 10 feet or less of adjacent single-family structures, vibration levels could reach 0.352 in/sec PPV or greater and exceed the threshold of 0.3 in/sec PPV for typical residential structures. If such equipment were to work within approximately 12 feet or less of the existing on-site structure, vibration levels could reach 0.268 in/sec PPV or greater and exceed the threshold of 0.25 in/sec PPV for historic structures. Therefore, construction vibration impacts would be considered significant. Implementation of Mitigation Measure NOI-1 would reduce this impact to a level of less than significant.

Mitigation Measure

NOI-1. Construction Vibration

Grading and earthwork activities within 12 feet of adjacent residential structures or within 10 feet of the on-site existing building shall be conducted with off-road equipment that is limited to 100 horsepower or less.

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

No Impact. The airports closest to the Project Site are the Van Nuys Airport, located approximately 2.3 miles to the southwest and the Whiteman Airport, located approximately 3.5 miles to the northeast. While the Project Site would be subject to temporary and intermittent noise from aircraft overflights, the Site is not located in either airports' noise contours and would not be affected by substantial noise from aircraft operations (Los Angeles County 2003). In addition, the Project Site is not near a private airport. Therefore, the Project would not expose people working in the Project area to excessive noise levels from aircraft noise and no impact would occur.

XIV. POPULATION AND HOUSING

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

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. The Proposed Project would not induce direct population growth. The elementary school would serve students already living in the area and accommodate enrollment in addition to other nearby schools, including the existing San Francisco Sepulveda Junior High School and Sepulveda Middle School. The Project area is a developed urban area, and implementation of the new school would not attract new residents to the region. The Proposed Project would be served by existing roads and other infrastructure, and no new roads, expanded utility lines, and housing that could induce population growth would be constructed or required as part of the Proposed Project. No impacts related to population growth would occur.

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

Less Than Significant Impact. The Site itself consists of grasses, shrubs, various mature trees, and a one-story single-family residence currently rented by two tenants. The residence would remain on the Site as part of the Project but would be adaptively reused for additional administrative space for the school and would include a conference room, counselor office, staff support space, and psychologist office. While the Project would not demolish the residence, it would displace its current tenants and change its use. Assuming a maximum displacement of two people and one housing unit, Project development would not displace a substantial number of housing units or require replacement housing and impacts would be less than significant.

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XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☐	☒
e. Other public facilities?	☐	☐	☒	☐

a) Fire protection?

Less Than Significant Impact. Fire protection services in the City are provided by the Los Angeles Fire Department (LAFD). In particular, the primary duties of the LAFD Fire Development Services Unit is to conduct Fire Life Safety Plan Checks and Fire Life Safety Inspections which aim to enforce applicable standards of the Fire Code, Title 19, Uniform Building Code, City, and National codes concerning new construction and remodeling. Furthermore, the Hydrants and Access Unit reviews plans to evaluate adequacy of site access and hydrant placement.

The Proposed Project is within the existing service area of the LAFD. The nearest fire station to the Project Site is LAFD Station No. 7 located approximately a mile east of the site at 14630 Plummer Street. Currently, the average response times for Fire Station No. 7 are approximately six minutes for emergency medical services (EMS) and non-emergency medical services (NON-EMS), and six minutes for structure fires (LAFD 2022). Although the Proposed Project would not cause a growth in the City's population (as discussed in Section XIV, *Population and Housing*), the Project would accommodate a maximum enrollment of 552 students compared to existing conditions, which would incrementally increase demand and call load for fire protection services. LAFD works with the City's Planning Department to review and make recommendations relating to all land use cases, including development projects, in the City. Therefore, the Proposed Project would also be required to comply with applicable fire and life safety standards and code requirements, such as fire hydrant flows, hydrant spacing, adequate fire lane turning-radius, access, and design to comply with LAFD's fire protection requirements, as well as standard design requirements (e.g., fire sprinklers and fire alarm devices) in accordance with the CBC. Upon implementation of LAFD requirements, including compliance with all applicable standards required by the LAFD as a result of the Fire Life Safety Plan Checks and Fire Life Safety Inspections processes, the Proposed Project would not place an unanticipated burden on fire protection services. In addition, emergency access to the Project Site would be maintained at all times during both Project construction and operation. As such, the Proposed Project would therefore not substantially affect response times or service ratios such that new or expanded fire facilities would be needed. Impacts would be less than significant.

b) Police protection?

Less Than Significant Impact. Police protection services in the City are provided by the Los Angeles Police Department (LAPD). The Project would not include an increase of residents but would accommodate a maximum enrollment of 552 students. The nearest police station to the Project Site is the Mission Community Police Station, located at 11121 Sepulveda Boulevard, approximately two miles north of the site, which serves the neighborhoods of Arleta, Mission Hills, North Hills, Panorama City and Sylmar under the under the jurisdiction of the Valley Bureau. The Mission Community Police Station serves 25.1 square miles with an estimated population of 225,849 persons. The Proposed Project would not place an unanticipated burden on police protection services and would therefore not affect response times or service ratios such that new or expanded police facilities would be needed. The Proposed Project would comply with all applicable regulations required by the LAPD during the plan check process. Impacts would be less than significant.

c) Schools?

Less Than Significant Impact. The Project would serve existing elementary grade students currently enrolled in classes at Panorama Baptist Church located at 8755 Woodman Avenue (approximately two miles southeast) in the neighboring community of Arleta. The existing school is currently renting temporary space (i.e., 16 classrooms) from the Panorama Baptist Church and is at full capacity with an enrollment of 380 students. The Project would provide a new school for these students and would not include demolition of property at Panorama Baptist Church once school services are transferred to the Project Site since the Applicant does not own the church property. Therefore, the Project would provide expanded school facilities compared to current operations at Panorama Baptist Church to accommodate an additional 172 students.

The Proposed Project would not increase demands for schools and would not require construction of other new or expanded school facilities. Furthermore, as discussed in this document, construction of the Project would include mitigation measures to reduce potential impacts. Therefore, the Proposed Project would not result in the need for or construction of school facilities that would result in significant impacts. Impacts would be less than significant.

d) Parks?

No Impact. As discussed in Section XIV, *Population and Housing*, the Proposed Project would not induce direct population growth. The Proposed Project would include 30,726 sf of open space and landscaping, including two play areas (totaling 13,060 sf) and a kindergarten play area (totaling 1,300 sf) to accommodate a maximum enrollment of 552 students and alleviate the burden on existing park and recreational facilities. It is anticipated that all recreational demands generated by the Project would be met on school grounds. Therefore, there would not be an increase in the demand for usage of existing parks and recreational facilities in the city necessitating the need for construction of new or expanded facilities elsewhere. No impact would occur.

e) Other public facilities?

Less Than Significant Impact. Physical impacts to public services are usually associated with population growth, which increase the demand for public services and facilities, including libraries. As discussed in Section XIV, *Population and Housing*, the Proposed Project would not induce direct population growth. The Los Angeles Public Library (LAPL) provides library services to the City. As a proposed elementary school, students accommodated by the Project may require the use of the City's library facilities for supplemental research and education; however, it is anticipated that the Project would supply its students with resources and tools to complete

coursework thereby reducing the need for use of off-site public libraries. Therefore, impacts would be less than significant.

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XVI. RECREATION

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

a) Would the project Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

No Impact. As discussed in Section XIV, *Population and Housing*, the Proposed Project would not induce direct population growth. The Project would serve existing elementary grade students currently enrolled in classes at Panorama Baptist Church located at 8755 Woodman Avenue (approximately two miles southeast) in the neighboring community of Arleta. The existing school is currently renting temporary space (i.e., 16 classrooms) from the Panorama Baptist Church and is at full capacity with an enrollment of 380 students. The Project would provide a new school for these students and would not include demolition of property at Panorama Baptist Church once school services are transferred to the Project Site since the Applicant does not own the church property. Therefore, the Project would provide expanded school facilities compared to current operations at Panorama Baptist Church to accommodate an additional 172 students.

The Proposed Project would include 30,726 sf of open space and landscaping, including two play areas (totaling 13,060 sf) and a kindergarten play area (totaling 1,300 sf). It is anticipated that all recreational demands generated by the Project would be met on school grounds. Therefore, there would not be an increase in the demand for usage of existing parks and recreational facilities in the city resulting in substantial or accelerated deterioration. No impact would occur.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. As discussed under impact a) of this section, the Project would not directly increase the population in the city and would include 30,726 sf of open space and landscaping including play areas. Therefore, sufficient recreational facilities to support students accommodated by the Proposed Project would be constructed as part of the new school. The environmental effects of the construction and operation of these recreational facilities are considered throughout the environmental analysis herein. As discussed in this document, construction of the Project would not result in impacts that would not be reduced to a less than significant level with mitigation. The Proposed Project would not require the construction or expansion of additional recreational facilities elsewhere that would have an adverse effect on the environment. No impact would occur.

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XVII. TRANSPORTATION

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

Linscott Law & Greenspan Engineers (LLG) prepared a Transportation Assessment in May 2022 to assess traffic operations and potential impacts resulting from implementation of the Proposed Project. The transportation analysis follows the Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines (TAG). The City's TAG are focused on transportation metrics that promote: the reduction of greenhouse gas emissions, the development of multimodal networks and access to diverse land uses, as well as safety, sustainability and smart growth. In compliance with CEQA, the City's TAG identifies vehicle miles traveled (VMT) as the primary metric for evaluating a project's transportation impacts along with whether the project conflicts or is inconsistent with local plans and policies. As a non-CEQA impact, Level of Service (LOS) impacts are not discussed in this section but are included in the Transportation Assessment, which is provided as Appendix J for reference.

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

Less Than Significant Impact. As discussed in the Transportation Assessment, The Project would not conflict with the relevant City plans, policies and programs and does not include any features that would preclude the City from completing and complying with these guiding documents and policy objectives. The Project is most likely not required to make modifications to the public right-of-way but would make any modifications to the public right-of-way as required by BOE. The Project would not conflict with plans or policies such as LADOT's Manual of Policy and Procedures (MPP) Section 321, Driveway Design, and the Citywide Design Guidelines – Guideline 2. The Project has been found to be consistent with the GHG reduction targets forecasted in *Connect SoCal,* the SCAG RTP/SCS discussed in Section VIII, *Greenhouse Gas Emissions*. Additionally, the Project has been found to be consistent with the transportation-related elements of the Plan for a Healthy Los Angeles (Healthy LA), Vision Zero, the Mobility Hubs Reader's Guide, the City's Walkability Checklist, and the Mission Hills-Panorama City-North Hills Community Plan. Furthermore, the Project Applicant would comply with existing applicable City ordinances (e.g., the City's existing transportation demand management (TDM) Ordinance in LAMC Section 12.26.J) and other requirements pursuant to the LAMC. It is noted that the City's TDM Ordinance is currently being updated. Although not yet adopted, the Project Applicant would

comply with the terms of the proposed TDM Ordinance update, which is expected to be completed prior to the anticipated construction of the Project. Therefore, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities (LLG 2022), and the impact would therefore be less than significant.

b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant With Mitigation. Senate Bill 743 mandates that guidelines be amended to provide an alternative to LOS for evaluating transportation impacts. The amended *CEQA Guidelines*, specifically Section 15064.3, recommend the use of VMT for land use and transportation impact evaluation. In general terms, VMT quantifies the amount and distance of automobile travel attributable to a project or region. 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. The City of Los Angeles implemented the VMT metric on July 30, 2019, prior to the July 1, 2020 compliance date.

Per Section 2.3.3 of the City's TAG, a non-residential, non-office, non-retail project would have a potential VMT impact if it would generate work VMT per employee exceeding 15 percent below the existing work VMT per employee for the Area Planning Commission (APC) area in which the project is located. As the Project is located in the North Valley APC, the VMT impact criteria (i.e., 15 percent below the APC average) applicable to the Project is 15.0 Daily Work VMT per Employee (LLG 2022).

Based on the VMT Calculator (Version 1.3) results, the Proposed Project would generate a total of 1,144 daily vehicle trips. The estimated Daily Work VMT per Employee for the Project (with the considering of proposed bicycle parking) is 16.8 Daily Work VMT per Employee, which is greater than the North Valley APC significance threshold of 15.0 Daily Work VMT per Employee. Therefore, the Project would result in a significant Daily Work VMT per Employee impact prior to the consideration of potential mitigation measures.

Implementation of Mitigation Measures TRAF-1 and TRAF-2, which would 1) require promotions and marketing tools to educate employees about alternative transportation options and 2) implement a ride-share program would reduce the estimated daily vehicle trips to 1,088. In turn, the Project's Daily Work VMT per Employee would reduce to 14.6 Daily Work VMT per Employee, which is less than the North Valley APC significance threshold of 15.0 Daily Work VMT per Employee. Therefore, Mitigation Measures TRA-1 and TRA-2 would reduce VMT impacts to a less than significant level.

Mitigation Measures

TRAF-1. Alternative Transportation Options

The Project shall utilize promotional and marketing tools to educate and inform employees about alternative transportation options and the effects of their travel choices. Rather than two-way communication tools or tools that would encourage an individual to consider a different mode of travel at the time the trip is taken (i.e., smartphone application, daily email, etc.), this TDM strategy includes passive educational and promotional materials, such as posters, information boards, or a website with information that employees can choose to read at their own leisure.

TRAF-2. Ride-Share Program

The Project shall proactively aim to increase employee vehicle occupancy by providing ride-share matching services, designating preferred parking for rideshare participants, designing adequate

passenger loading/unloading and waiting areas for rideshare vehicles, and providing a website or message board to connect riders and coordinate rides.

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

Less Than Significant Impact. As discussed in the Transportation Assessment, impacts regarding the potential increase of hazards due to a geometric design feature generally relate to the design of access points to and from the project site, and may include safety, operational, or capacity impacts. No roads would be permanently closed as a result of construction or operation of the Proposed Project. The Project proposes to remove a portion of the existing shared driveway along the Project Site's Plummer Street frontage at the northwesterly portion of the Project Site (which currently provides access to the on-site single-family residence) and proposes a new driveway approximately 10 feet east of the Project Site's westerly frontage along Plummer Street. The Project would also remove the remaining driveways along the Project Site's Plummer Street frontage. Thus, the number of driveways along the Project Site's Plummer Street frontage will be reduced to one driveway. The new driveway would be located approximately 150 feet east of the Orion Avenue/Plummer Street intersection and would provide access to the on-site parking lot and drop-off/pick-up area. Furthermore, the driveway will be designed to meet City standards to ensure adequate maneuvering by vehicles entering and exiting the Project Site. The driveway would accommodate right-turn ingress and egress movements only (i.e., left-turn ingress and egress movements would not be permitted) and reduce potential vehicle conflicts with pedestrians and bicyclists (LLG 2022).

The Project would include a pathway connecting the Project Site to the existing sidewalk provided along the Project Site's Plummer Street frontage, and signalized crossings are provided within convenient walking distance to the Project Site along Plummer Street. The Project will also make improvements as required by BOE to the sidewalk along the Project Site's Plummer Street frontage, including at the Project Site access point, to enhance the pedestrian experience, enhance connections to and from the pedestrian destinations in the direct vicinity of the Project Site, and reduce the potential for vehicle/pedestrian conflicts at the proposed driveway. Furthermore, as the student drop-off/pickup area is internal to the Project Site, students will not have to utilize the public right-of-way to walk to and from the main school building (LLG 2022).

Furthermore, per the City's TAG, because the Project would not add 25 or more trips to nearby freeway off-ramps (e.g., I-405) serving the Project Site during either the a.m. or p.m. peak hour, a freeway safety analysis is not required (LLG 2022). The Proposed Project would not result in inadequate emergency access or introduce any design features or incompatible uses, such as sharp curves or dangerous intersections, that would substantially increase hazards. Impacts would be less than significant.

d) Result in inadequate emergency access?

Less Than Significant Impact. Implementation of the Project would increase traffic to and from the Project Site; however, the Project Site is surrounded by major roadways, including I-405, Plummer Street, Sepulveda Boulevard and Van Nuys Boulevard, which have sufficient capacity to provide access to and from the Project Site. The Proposed Project would not result in inadequate emergency access because it would be subject to the LAFD review and acceptance of site plans, and structures prior to occupancy to ensure that required fire protection safety features, including adequate driveway access to buildings and adequate emergency access are implemented. Impacts would be less than significant.

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XVIII. TRIBAL CULTURAL RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☒	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

As of July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted and expands CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes 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" (Public Resource Code [PRC] Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is:

1. Listed or eligible for listing in the California Register of Historical Resources (CRHR) or in a local register of historical resources as defined in PRC section 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 PRC Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified or adopted. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the Proposed Project." Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant With Mitigation. As part of the Cultural Resources Assessment prepared for the Project (Appendix D), Rincon contacted the NAHC on May 2, 2022, to request a SLF search of the project site. The NAHC emailed a response on June 16, 2022, stating that the SLF search was "negative" for tribal heritage resources (indicating no known cultural resources were present on the project site).

Pursuant to PRC Section 21080.3.1, the City sent out consultation letters on September 20, 2022 to 10 Native American contacts and tribal groups with traditional and/or cultural affiliation with the geographic area in which the Project is located. In these letters, the City requested information on potential cultural resources in the Project Site vicinity that may be impacted by the Proposed Project's development. Of the 10 contacts and tribal groups, the City received one response, from the Gabrieleno Band of Mission Indians – Kizh Nation on September 27, 2022, requesting consultation; a consultation meeting was subsequently scheduled for November 8, 2022. On November 8, 2022, Brandy Salas, a representative of the Kizh Nation, contacted the City to inform that Chairman Andy Salas opted to defer consultation on the project to Chairwoman Donna Yocum of the San Fernando Band of Mission Indians. The scheduled consultation meeting with the Kizh Nation was subsequently cancelled. Chairwoman Yocum had been previously contacted by the City, in a letter sent on September 20, 2022, and did not provide a response. Furthermore, no other response was received from the remaining Native American contacts and tribal groups contacted by the City within the 30-day consultation period. Although the City did not receive a response from the San Fernando Band of Mission Indians within the consultation period, the City opted to contact with Chairwoman Yocum on November 8, 2022, again requesting information on potential cultural resources in the Project Site vicinity. Additional information associated with this follow-up will be included as part of the Final Initial Study/MND for the project.

In addition to the SLF search, the SCCIC record search results, background research, and a pedestrian field survey conducted as part of the Cultural Resources Assessment (Appendix D) did not indicate the presence of tribal cultural resources existing within the Project Site as specified in PRC Section 21074 (a)(1)(A) and (B). Despite the disturbances of the Project area that may have displaced or submerged archaeological resources relating to tribal cultural resources on the surface, intact archaeological resources, which may qualify as tribal cultural resources, may exist at depth given the proven prehistoric occupation of the region and the favorable natural conditions that would have attracted prehistoric inhabitants to the area. In the event such previously unknown archaeological resources are found, significant effects may occur to that resource if the resource is disturbed, destroyed, or otherwise improperly treated. As such,

Mitigation Measure TCR-1 would reduce potential impacts to tribal cultural resources to a less than significant level in the event of an unanticipated discovery of such resources.

Mitigation Measure

TCR-1. Unanticipated Discovery of Tribal Cultural Resources

In the event that tribal cultural resources of Native American origin are found during Project-related ground disturbance, excavation and other construction activity in that area shall cease. If the City of Los Angeles, in consultation with local Native Americans, determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with State guidelines and in consultation with Native American groups. The mitigation plan may include but would not be limited to avoidance, capping in place, excavation and removal of the resource, interpretive displays, sensitive area signage, or other mutually agreed upon means.

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XIX. UTILITIES AND SERVICE SYSTEMS

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

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

Water

Less Than Significant Impact. The Los Angeles Department of Water and Power (LADWP) supplies water inside City limits. According to the City's 2020 Urban Water Management Plan (UWMP), the primary LADWP sources of water supplies are water purchased from the Metropolitan Water District (MWD), the Los Angeles Aqueducts (LAA), and local groundwater. Recycled water projects are progressing and expected to be a greater portion of LADWP water supply in the future. Overall, these sources of water provide the necessary water to meet LADWP's water supply needs. According to the 2020 UWMP, the City's average water demand between 2016 and 2020 was 495,685-acre feet per year (AFY) (LADWP 2021). The 2020 UWMP water demand projection for 2025 is approximately 642,600 AF under an average weather year assuming passive conservation efforts, which is an increase of approximately 146,915 AF (LADWP 2021).

The Proposed Project would demand an estimated 3.6 million gallons (13.3 AFY) of water according to CalEEMod estimations (Appendix A). Project water demand would represent less than 0.01 percent of the projected increase in water demand between 2020 and 2025. Furthermore, according to the 2020 UWMP, LADWP anticipates all demand will be met by available supplies under all hydrologic scenarios for the next 25 years (LADWP 2021). Nonetheless, the Proposed Project's projected water demand is within forecasted water supply required to for the service area and would not require the construction of new water supply facilities, or expansion of existing facilities. Impacts would be less than significant.

Wastewater

Less Than Significant Impact. The Los Angeles Bureau of Sanitation (LASAN) operates and maintains the City's wastewater infrastructure. The City's wastewater collection system serves over four million residential and business customers in a 600 square mile service area that includes Los Angeles and 29 contracting cities and agencies. Over 6,700 miles of public sewers connect to the City's four wastewater treatment and water reclamation plants, which have a combined capacity to treat an average of 580 million gallons per day (MGD) of wastewater. Of the four reclamation plants, the Donald C. Tillman Water Reclamation Plant treats approximately 55 MGD per day with a capacity of 80 MGD and serves the area between Chatsworth and Van Nuys in the San Fernando Valley (LASAN 2019).

The Project would continue to connect to the existing storm drain system operated and maintained by the City. The Proposed Project would create demand for an estimated 3.6 million gallons of water per year, or approximately 9,863 gallons per day, according to CalEEMod estimates (Appendix A). Conservatively assuming that 100 percent of this water would subsequently be treated as wastewater, 9,863 gallons per day (or 0.01 MGD) demanded by the Proposed Project represents approximately 0.04 percent of the remaining treatment capacity of 25 MGD of wastewater at the Tillman Water Reclamation Plant. Therefore, the Tillman Water Reclamation Plant would have adequate capacity to provide wastewater treatment for the Project and the Project would not require the construction of new or expanded wastewater conveyance or treatment facilities. Impacts would be less than significant.

Stormwater Drainage

Less Than Significant Impact. As discussed in Section IX, *Hydrology and Water Quality*, the Proposed Project would comply with current regulations pertaining to retention/detention of site runoff into storm drains and receiving waters, as well as LID requirements that would apply to the construction and operation (e.g., proposed catch basin) of the Proposed Project to further reduce storm water runoff. Compliance with these requirements would reduce potential impacts to local storm water drainage facilities to a less than significant level and no new conveyance infrastructure would be required.

Electric Power, Natural Gas, Telecommunications

Less Than Significant Impact. The Project Site is in an existing developed area of the City of Los Angeles, which has existing infrastructure for electric power, natural gas, and telecommunications services. The Proposed Project would involve construction of a two-story elementary school building, which is contingent upon the approval of the applicant's Conditional Use Permit. If approved, the subject site's zoning would be consistent with the proposed educational use (Section XI, *Land Use and Planning*). The proposed two-story elementary school building would not cause substantial unplanned population growth (Section XIV, *Population and Housing*), would not result in wasteful or inefficient use or energy (see Section XI, *Energy*), and would not require or result in the construction of new electric power, natural gas, or

telecommunication facilities or expansion of existing facilities. As such, although the Proposed Project would create an incremental increase in demand on these facilities, this impact would be less than significant.

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

Less Than Significant Impact. As discussed under impact *a)* in this section, the LADWP supplies water inside City limits. As shown in Table 22, LADWP projects that water supplies will be sufficient to meet all demands through the year 2045 during normal, single dry year, and multiple dry year hydrologic conditions (LADWP 2021).

Table 22 Water Supply and Demand in Single and Multiple Dry Years (AF)

Year-Type	2025	2030	2035	2040	2045
Average Year					
Total Supplies	642,600	660,200	678,800	697,800	710,500
Total Demands	642,600	660,200	678,800	697,800	710,500
Single Dry Year					
Total Supplies	674,700	693,200	712,700	732,700	746,000
Total Demands	674,700	693,200	712,700	732,700	746,000
Multiple Dry Year (1st, 2nd, and 3rd Year Supply)					
Total Supplies	657,900	675,800	694,900	714,400	727,400
Total Demands	657,900	675,800	694,900	714,400	727,400

Units in acre-feet (AF)
Source: LADWP 2021

The Proposed Project would demand an estimated 3.6 million gallons (13.3 AFY) of water according to CalEEMod estimations (Appendix A). As discussed under impact a) of this section, project water demand would represent less than 0.01 percent of the projected increase in water demand between 2020 and 2025. Furthermore, according to the 2020 UWMP, LADWP anticipates all demand will be met by available supplies under all hydrologic scenarios for the next 25 years (LADWP 2021). Because sufficient water is available to serve the Project during average, single and multiple dry year conditions, new sources of water supply would be not required to meet Project water needs. Impact would be less than significant.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As discussed under impact a) of this section, the Proposed Project would create demand for an estimated 3.6 million gallons of water per year, or approximately 9,863 gallons per day, according to CalEEMod estimates (Appendix A). Conservatively assuming that 100 percent of this water would subsequently be treated as wastewater, 9,863 gallons per day (or 0.01 MGD) demanded by the Proposed Project represents approximately 0.04 percent of the remaining treatment capacity of 25 MGD of wastewater at the Tillman Water Reclamation Plant. The Proposed Project would not require the construction of new treatment facilities because the Tillman Water Reclamation Plant would have adequate

capacity to treat the wastewater produced by the Proposed Project. Impacts would be less than significant.

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

Less Than Significant Impact. LASAN manages solid waste collection in the City, which involves public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. Solid waste generated in the City is currently disposed of at the Sunshine Canyon Landfill. Table 23 summarizes the permitted daily throughput, estimated average waste quantities disposed, remaining capacity, and closure date for the landfill.

Table 23 Solid Waste Disposal Facilities

Facility	Permitted Daily Throughput (tons/day)	Average Daily Waste Quantities Disposed (tons/day)	Estimated Remaining Daily Capacity (tons/day)[1]	Estimated Closure Date
Sunshine Canyon Landfill	12,100	6,469	5,631	2037

[1] Estimated remaining daily capacity was calculated by subtracting the average daily waste quantities disposed from the permitted daily throughput.

Sources: CalRecycle 2019

The Proposed Project has two components (construction and operation) that would result in the generation of solid waste. The handling of all debris and waste generated during construction would be subject to the State's requirements under AB 939 for salvaging, recycling, and reuse of materials from construction activity on the Project Site. Construction of the Proposed Project would also involve site preparation activities that would generate waste materials; however, construction would be temporary. In addition, the Proposed Project would be required to comply with the City's Construction and Demolition (C&D) Waste Recycling Ordinance. All construction and demolition waste generated by the Proposed Project would be required to be taken to a certified C&D waste processor.

According to CalEEMod, operation of the Proposed Project would generate 0.1 tons of waste per day (Appendix A). This estimate is conservative since it does not factor in any recycling or waste diversion programs. The 0.1 tons generated by the Project would result in less than 0.01 percent of the estimated remaining daily capacity of 5,631 tons of waste per day at Sunshine Canyon Landfill. Furthermore, the Proposed Project would comply with federal, State, and local statutes and regulations related to solid waste, such as AB 939. As there is adequate remaining daily landfill capacity in the region to accommodate project-generated waste, impacts related to solid waste and waste facilities would be less than significant.

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

Less Than Significant Impact. The Project would comply with all federal, state, and local management and reduction statutes and regulations related to solid waste. As discusses under impact d), the handling of all debris and waste generated during construction would be subject to the State's requirements under AB 939 for salvaging, recycling, and reuse of materials from construction activity on the Project Site. Construction of the Proposed Project would also involve site preparation activities that would generate waste materials; however, construction would be

temporary. In addition, the Proposed Project would be required to comply with the City's C&D Waste Recycling Ordinance. All construction and demolition waste generated by the Proposed Project would be required to be taken to a certified C&D waste processor. Impacts would be less than significant.

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XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation 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?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

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

No Impact. A FHSZ is a mapped area that designates zones (based on factors such as fuel, slope, and fire weather) with varying degrees of fire hazard (i.e., moderate, high, and very high). While FHSZs do not predict when or where a wildfire will occur, they do identify areas where wildfire hazards could be more severe and therefore are of greater concern. FHSZs are meant to help limit wildfire damage to structures through planning, prevention, and mitigation activities/requirements that reduce risk. The FHSZs serve several purposes: they are used to designate areas where California's wildland urban interface building codes apply to new buildings, they can be a factor in real estate disclosure, and they can help local governments consider fire hazard severity in the safety elements of their general plans.

The Project Site is in an urban area of the City of Los Angeles. Undeveloped wildland areas are not located in proximity to the Project Site. According to the California FHSZ Viewer, the Project Site is not located in a FHSZ or VHFHSZ for wildland fires (CALFIRE 2022). The nearest VHFHSZ is located approximately four miles northwest of the Project Site on the opposite side of I-405 and SR-118. Therefore, the Project Site is not located near a VHFHSZ, state responsibility area nor is the site classified as having a high fire hazard.

As discussed above, the LAFD provides fire protection and emergency response for the Project Site and greater Los Angeles area. The LAFD also provides several other services to the City, including Fire Life Safety Plan Checks and Fire Life Safety Inspections which aim to enforce applicable standards of the Fire Code, Title 19, Uniform Building Code, City, and National codes concerning new construction and remodeling. Furthermore, the Hydrants and Access Unit reviews plans to evaluate adequacy of site access and hydrant placement. Through site plan review,

construction of the Proposed Project would maintain adequate emergency access to the site and would not interfere with an emergency response plan or evacuation route. No impact would occur.

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

No Impact. The Project Site and the surrounding area are relatively flat and located within an urban area of Los Angeles. Undeveloped wildland areas are not located in proximity to the Project Site. Undeveloped wildland areas, streams, or rivers are not located on or adjacent to the Project Site, and the Project Site and surrounding areas are not at high risk to frequent high windspeeds, downslopes, downstream flooding, or landslides that may exacerbate wildfire risk. Residents and visitors of the Project Site would not be exposed to exacerbated wildfire risks or associated pollutant concentrations and uncontrolled spreads from such wildfires. No impact would occur.

c) 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?

No Impact. The Project Site is in an urban area of the City of Los Angeles. Undeveloped wildland areas are not located in proximity to the Project Site. According to the California FHSZ Viewer, the Project Site is not located in a FHSZ or VHFHSZ for wildland fires (CALFIRE 2022). As previously mentioned, undeveloped wildland areas, streams, or rivers are not located on or adjacent to the Project Site, and the Project Site and surrounding areas are not at high risk to high windspeeds, downslopes, downstream flooding, or landslides that may exacerbate wildfire risk. Furthermore, as discussed in Section XIX, *Utilities and Service Systems,* the Project would not require the installation or expansion of any utilities that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. . No impact would occur.

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

No Impact. The Project Site is in an urban area of the City of Los Angeles. Undeveloped wildland areas are not located in proximity to the Project Site. According to the California FHSZ Viewer, the Project Site is not located in a FHSZ or VHFHSZ for wildland fires (CALFIRE 2022). The Project would be served by existing infrastructure, including roads and utilities. Therefore, the Proposed Project would not require additional roads, fuel breaks, emergency water sources, power lines or other utilities that would exacerbate fire risk and temporary or ongoing impacts to the environment would not occur.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact. As discussed in Section IV, *Biological Resources*, the Project area does not include any mapped essential habitat connectivity areas in the immediate vicinity of the Project Site. In addition, regional wildlife movement is restricted given the built-out nature of the Project area surroundings, and no native resident or migratory fish or wildlife species, established native resident or migratory wildlife corridors, or native wildlife nursery sites exist on the Project Site. However, construction of the Project has the potential to directly (by destroying a nest) or indirectly (construction noise, dust, and other human disturbances that may cause a nest to fail) impact nesting birds protected under the CFGC and MBTA. However, as discussed in Section IV, *Biological Resources*, the Proposed Project includes Mitigation Measure BIO-1 that would require the Project Site to be surveyed if construction occurs during the nesting bird season (generally February 1 to August 31). If active nests are identified, construction buffers would be implemented to reduce proximity to nests and minimize impacts to nesting birds. Therefore, with implementation of the Mitigation Measure BIO-1, potential impacts would be less than significant. Furthermore, as discussed in Section V, *Cultural Resources*, Section VII, *Geology and Soils*, and Section XVIII, *Tribal Cultural Resources*, the Proposed Project would have a less than significant impact on unanticipated cultural resources, paleontological resources, and tribal cultural resources with implementation of Mitigation Measures CUL-1, CUL-2, GEO-2, and TCR-1, which would require adherence to existing local, State and federal regulations and specific monitoring

procedures related to the discovery of any unanticipated cultural resources, paleontological resources, and tribal cultural resources. Furthermore, in the event human remains are found on-site during Project construction, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be of Native American origin, the Coroner will notify the NAHC, which will determine and notify a MLD. The MLD has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the MLD does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from subsequent disturbance. Therefore, with compliance with existing regulations, impacts to humans remains would also be less than significant.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. As concluded in Sections I through XX of this document, the Project would have no impact, a less than significant impact, or a less than significant impact with mitigation with respect to all environmental issues considered in this document. Cumulative impacts of several resource areas have been addressed in the individual resource sections, including air quality, GHG, noise, and transportation. As discussed in the analysis herein, the Proposed Project would result in less than significant impacts with respect to air quality and GHG emissions. Therefore, the Project would not contribute to cumulative impacts related to these issues. Both the noise and traffic analyses (see Sections XIII and XVII, respectively) consider cumulative increases in traffic under Existing plus Project conditions and conclude that impacts would be less than significant with respect to noise and less than significant with mitigation with respect to traffic. Some of the other resource areas (agricultural and mineral) were determined to have no impact in comparison to existing conditions. As such, the Project would not contribute to cumulative impacts related to these types of issues. Other location specific impacts (e.g., geology, hazards, and hazardous materials) are by their nature specific to the area and impacts at one location do not add to impacts at other locations or create additive impacts. As such, cumulative impacts would be less than significant (not cumulatively considerable).

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

Less Than Significant Impact. In general, impacts to human beings are associated with air quality, GHG emissions, hazards and hazardous materials, and noise impacts. As detailed in analyses for air quality, GHG emissions, hazards and hazardous materials, and noise, the Proposed Project would not result, either directly or indirectly, in adverse hazards related to air quality, hazardous materials or noise. Compliance with applicable rules, regulations, and recommended mitigation measures reduce potential impacts on human beings to a less than significant level.

5 PREPARERS AND PERSONS CONSULTED

Rincon Consultants, Inc.

Deanna Hansen, Principal-In-Charge
Vanessa Villanueva, Project Manager/Senior Environmental Planner
Josh Carman, Director – Noise, Air Quality & GHG
Shannon Carmack, Principal – Architectural History
Nichole Jordan, Principal – Cultural Resources
Steven Treffers, Supervising Archaeologist
Bill Vosti, Senior Environmental Planner
Heather Dubois, Senior Environmental Planner
Kelly Lewis, Senior Biologist
Rachel Perzel, Senior Archaeologist
Jennifer DiCenzo, Senior Paleontologist
Andrew McGrath, Paleontologist
Destiny Brenneisen, Associate Environmental Planner
Aaron Rojas, Associate Environmental Planner
Rachel Irvine, Associate Environmental Planner

Linscott Law & Greenspan (LLG), Engineers

David S. Shender, P.E., Principal
Amrita Shankar, Transportation Engineer

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