April 2024| Initial Study / Mitigated Negative Declaration
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James A. Garfield High School
Major Modernization Project

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OEHS
OFFICE OF ENVIRONMENTAL HEALTH & SAFETY

April 2024 | Initial Study

JAMES A. GARFIELD HIGH SCHOOL

Major Modernization Project

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(Available at https://www.lausd.org/ceqa)

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Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ADA	Americans with Disabilities Act
APN	Assessor Parcel Number
AQMP	air quality management plan
ARMR	Archaeological Resource Management Reports
BAAQMD	Bay Area Air Quality Management District
BMP	best management practices
BOE	LAUSD Board of Education
BUG	Backlight-Uplight-Glare
C&D	construction and demolition
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Code
Cal-IPC	California Invasive Plant Council
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulation
CGS	California Geological Survey
CHPS	Collaborative for High Performance Schools
CMP	Los Angeles County Congestion Management Program
CNDDB	California Natural Diversity Data Base
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CNRA	California Natural Resources Agency
CO_2e	carbon dioxide equivalent
COPC	chemical of potential concern

Abbreviations and Acronyms

CRHR	California Register of Historic Resources
dBA`	A-weighted decibel
LADWP	Department of Water and Power
DSA	Division of the State Architect (under the California Department of General Services)
EIR	Environmental Impact Report
EMF	electromagnetic field
ERP	Emergency Response Plan
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FETU	Facilities Environmental Technical Unit
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
GHG	greenhouse gas
HABS	Historic American Buildings Survey
HCM	Historic-Cultural Monument
HCP	habitat conservation plan
HRER	Historic Resource Evaluation Report
HVAC	heating, ventilation, and air conditioning
I-	Interstate
ICS	Incident Command System
IDA	International Dark-Sky Association
IES	Illuminating Engineering Society
in/sec PPV	inches per second peak particle velocity
IP	Internet Protocol
IPCC	Intergovernmental Panel on Climate Change
IS	Initial Study
LAA	Los Angeles Aqueduct
LACFCD	Los Angeles County Flood Control District
LACoFD	County of Los Angeles Fire Department
LADOT	City of Los Angeles Department of Transportation
LADWP	Los Angeles Department of Water and Power

Abbreviations and Acronyms

LAFD	Los Angeles Fire Department
LAPD	City of Los Angeles Police Department
LASPD	Los Angeles School Police Department
LAUSD	Los Angeles Unified School District
LBP	lead-based paint
LCM	lead-containing materials
L_{dn}	day-night average sound level
L_{eq}	equivalent continuous sound level
LID	Low-Impact Development
LRA	Local Responsibility Area
LST	localized significance threshold
LZ	lighting zone
MEP	maximum extent practicable
Metro	Los Angeles County Metropolitan Transportation Authority
mg/kg	milligrams per kilogram
MLD	Most Likely Descendant
MLO	Model Lighting Ordinance
MND	Mitigated Negative Declaration
mph	miles per hour
MRZ	mineral recovery zone
MT	metric ton
MWD	Metropolitan Water District of Southern California
MWELO	Model Water Efficient Landscape Ordinance
NAAQS	National Ambient Air Quality Standards
NCCP	natural community conservative plan
ND	Negative Declaration
NFHL	National Flood Hazard Layer
NIMS	National Incident Management System
NMFS	National Marine Fisheries Services
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory

Abbreviations and Acronyms

O&M	Operations and Maintenance
OEHS	Office of Environmental Health and Safety
OHP	Office of Historic Preservation
OITC	outdoor-indoor transmission class
PCB	Polychlorinated Biphenyls
PDF	project design feature
PEA-E	Preliminary Environmental Assessment – Equivalent
ppm	parts per million
PRC	Public Resources Code
PSHA	pipeline safety hazard assessment
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RTP	Regional Transportation Plan
SC	Standard Condition of Approval
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCS	sustainable communities strategy
SEMS	Standardized Emergency Management System
SoCAB	South Coast Air Basin
SR-	State Route
SRA	State Responsibility Area
SSO	school safety officers
STC	sound transmission class
SUP	School Upgrade Program
SWPPP	stormwater pollution prevention plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCR	tribal cultural resource
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
VMT	vehicle miles traveled
VOC	volatile organic compound

1. Introduction

1.1 OVERVIEW

The Los Angeles Unified School District (LAUSD or District) is proposing a major modernization of James A. Garfield High School Campus (Campus) located at 5101 East Sixth Street in East Los Angeles, an unincorporated area within Los Angeles County, California. The proposed James A. Garfield High School (Garfield HS) Major Modernization Project (Project) is intended to address the most critical physical needs of the Campus through building replacement, renovation, modernization, and reconfiguration. The proposed Project is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This Initial Study (IS) provides an evaluation of the potential environmental consequences associated with this proposed Project.

1.2 BACKGROUND

The District's bond program began in 1997 with the Proposition BB Initiative (Proposition BB), which authorized the District to issue $2.4 billion in general obligation bonds.[1] The initial focus on addressing overcrowded conditions – including the use of year-round multi-track calendars and busing of students to less crowded campuses – by providing new schools with traditional calendars. This goal was met with the opening of 131 new schools for K-12 students, allowing students to attend neighborhood schools operating on a two-semester, single-track calendar. Since the completion of the Program, the District's focus has shifted from constructing new facilities to correct decades of overcrowding, to now addressing aging existing school facilities. The District's priority now is to upgrade existing facilities and provide additional facilities to achieve the educational benefits of smaller learning environments.[2]

In 2014, the District embarked on a new bond program known as the "School Upgrade Program" (SUP). Initially in 2014, $7.85 billion was allocated for the development of projects. Over the course of the last 7 years new sources of funds have been allocated to the program, increasing the total amount of funds to support the development of projects to $9.2 billion. To date, nearly 2,000 projects valued at approximately $1.5 billion have been funded by the SUP and completed by Facilities, and nearly 690 additional projects valued at approximately $5.4 billion are underway.

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

[1] Los Angeles Unified School District Proposition BB School Bond Construction Program. https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/372/Bond%20Audits/MEASURE%20BB%2006.pdf
[2] LAUSD Facilities Services Division. 2023. Strategic Execution Plan.

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

The bond program is now focused on improving equity between newer and older schools so that every student has an equal opportunity for success. The updated SUP framework and the Measure RR Implementation Plan reflect the goals of and priorities for Measure RR, as outlined in the bond language approved by voters and the Proposed 2020 Bond Funding Priorities Package previously adopted by the Board. Moreover, they also reflect the input solicited earlier this year from Community of Schools Administrators and Local District leadership. The overarching goals and principals of the SUP will drive the development of future projects to upgrade, modernize, and replace aging and deteriorating District school facilities; update technology; and address District school facilities inequities in order to provide students with physically and environmentally safe, secure, and updated school facilities that support 21st century learning.[3]

Based on past experience and the magnitude of the proposed updates to the SUP framework, LAUSD staff determined that a Subsequent Program EIR (SPEIR) should be prepared due to substantial changes in the goals and funding for the SUP from what was evaluated in the 2015 SPEIR. The 2023 SPEIR was prepared according to CEQA 14 CCR Section 15162(a) and certified by the LAUSD Board of Education on December 12, 2023.

On November 9, 2021, the Board approved project definitions for the due diligence, planning, and feasibility activities necessary to propose scope recommendations, budgets, and schedules for the major modernization project at Garfield HS (Board Report No 122-21/22).[4] On November 15, 2021, the Board approved redefinition for the proposed Garfield HS Major Modernization Project to provide facilities that are safe, secure, and better aligned with the current instructional program at the Campus (Board Report No 074-22/23).[5]

1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by the CEQA[6] and the CEQA Guidelines.[7] CEQA was enacted in 1970 by the California Legislature to disclose to decision-makers and the public the significant environmental effects of projects and to identify ways to avoid or reduce the environmental effects through feasible alternatives or mitigation measures. Compliance with CEQA applies to California government agencies at all levels: local, regional, and State agencies, boards, commissions, and special districts (e.g., school districts and water districts). The District is the lead agency for this proposed Project and is therefore required to conduct an environmental review to analyze the potential environmental effects associated with the proposed Project.

California Public Resources Code (PRC) Section 21080(a) states that analysis of a project's environmental impact is required for any "discretionary projects proposed to be carried out or approved by public agencies…"

[3] LAUSD Facilities Services Division, Board of Education Report, Update to the School Upgrade Program to Integrate Measure RR Funding and Priorities, August 24, 2021.
[4] LAUSD. Board of Education Report. Resolution 2021-34. Report 122-21/22. https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/1431/boc%20meetings/2021%20resolutions/2021-34.pdf
[5] LAUSD. Board of Education Report. Regular Meeting Order of Business. Report 074-22/23. https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/1057/11-15-22RegBdOBPost.pdf
[6] California Public Resources Code, §21000 et seq (1970).
[7] California Code of Regulations, Title 14, Division 6, Chapter 3, §15000 et seq.

In this case, the District has determined that an IS is required to determine whether there is substantial evidence that construction and operation of the proposed Project would result in environmental impacts. An IS is a preliminary environmental analysis to determine whether an Environmental Impact Report (EIR), a Mitigated Negative Declaration (MND), or a Negative Declaration (ND) is required for a project.[8]

When an IS identifies the potential for significant environmental impacts, the lead agency must prepare an EIR,[9] however, if all impacts are found to be less than significant or can be mitigated to a less than significant level, the lead agency can prepare a ND or MND that incorporates mitigation measures into the project.[10]

1.4 ENVIRONMENTAL PROCESS

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

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

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

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

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

1.5 INITIAL STUDY

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

[8] California Code of Regulations, Title 14, Division 6, Chapter 3, §15063.
[9] California Code of Regulations, Title 14, Division 6, Chapter 3, §15064.
[10] California Code of Regulations, Title 14, Division 6, Chapter 3, §15070.

previously prepared EIR could be used with the project. The findings in this IS have determined that an MND is the appropriate level of environmental documentation for this proposed Project.

1.5.1 Negative Declaration or Mitigated Negative Declaration or Environmental Impact Report

The MND includes information necessary for agencies to meet statutory responsibilities related to the proposed Project. State and local agencies will use the MND when considering any permit or other approvals necessary to implement the project. A preliminary list of the environmental topics that have been identified for study in the IS/MND is provided Chapter 4, *Environmental Checklist and Analysis*.

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

1.5.2 Tiering

This type of project is one of many that were analyzed in the District's SUP SPEIR that was certified by the Board on December 23, 2023.[11] The District's SUP SPEIR meets the criteria for a Program EIR under CEQA Guidelines Section 15168 (a)(4) as one "prepared on a series of actions that can be characterized as one large project and are related…[a]s individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

The SPEIR enables LAUSD to streamline future environmental compliance and reduces the need for repetitive environmental studies.[12] The SPEIR serves as the framework and baseline for CEQA analyses of later projects through a process known as "tiering." Under CEQA Guidelines Sections 15152(a) and 15385, "Tiering" refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a program) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.[13]

The SPEIR is applicable to all projects implemented under the SUP. The SPEIR provides the framework for evaluating environmental impacts related to ongoing facility upgrade projects planned by the District.[14] Due to the extensive number of individual projects anticipated to occur under the SUP, projects were grouped into

[11] LAUSD. Subsequent Program EIR for the School Upgrade Program. Report. https://www.lausd.org/Page/2799
[12] LAUSD. Subsequent Program EIR for the School Upgrade Program. Report. https://www.lausd.org/Page/2799
[13] California Code of Regulations Title 14, § 3 Article 1-15152(a).
[14] Ibid, at 4-8.

four categories based on project scope, type of construction and location of project. The four categories of projects are as follows:[15]

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

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

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

1.5.3 Project Plan and Building Design

The proposed Project is subject to the California Department of Education (CDE) design and siting requirements, and the school architectural designs are subject to review and approval by the California Division of the State Architect (DSA). The proposed Project, along with all other SUP-related projects, is required to comply with specific design standards and sustainable building practices. Certain standards assist in reducing environmental impacts, such as the California Green Building Code (CALGreen Code),[16] the District's Standard Conditions of Approval (SC), and the Collaborative for High-Performance Schools (CHPS) criteria.[17]

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

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

1. Introduction

Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects. The SCs for District Construction, Upgrade, and Improvement Projects were adopted by the Board on December 12, 2023.[18] SCs are environmental standards that are applied to District construction, upgrade, and improvement projects during the environmental review process by the Office of Environmental Health and Safety (OEHS) CEQA team to offset potential environmental impacts. The most recently adopted SCs were updated in order to incorporate and reflect recent changes in the laws, regulations and the District's standard policies, practices and specifications (e.g., the LAUSD Design Guidelines and Design Standards, which are routinely updated and are referenced throughout the SCs).

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

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

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

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

[18] LAUSD. Los Angeles Unified School District Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/135/ceqa/2023_Standard_Conditions_UPDATE_Final.pdf

- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- Compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements.

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

The specific CHPS prerequisite criteria and LAUSD SCs are identified in the tables under each CEQA topic.[19] Federal, State, regional, and local laws, regulations, plans, and guidelines, CHPS criteria, PDFs, and SCs are considered part of the proposed Project and are included in the environmental analysis.

1.6 IMPACT TERMINOLOGY

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

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

1.7 ORGANIZATION OF THE INITIAL STUDY

The content and format of this report are designed to meet the requirements of CEQA and the CEQA Guidelines. The conclusions in this IS are that the proposed Project would have no significant impacts with the incorporation of mitigation. This report contains the following sections:

Chapter 1, *Introduction* identifies the purpose and scope of the MND and supporting IS and the terminology used.

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

[19] CHPS. CHPS Criteria. https://chps.net/chps-criteria.

1. Introduction

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

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

Chapter 5, *List of Preparers* identifies the individuals who prepared the MND and supporting IS and technical studies and their areas of technical specialty.

Appendices have data supporting the analysis or contents of this IS:

A. Air Quality Report

B. Arborist Report

C. Historic Resources Evaluation Report

D. Historic Resources Technical Report

E. Geotechnical Report

F. Phase I Environmental Site Assessment

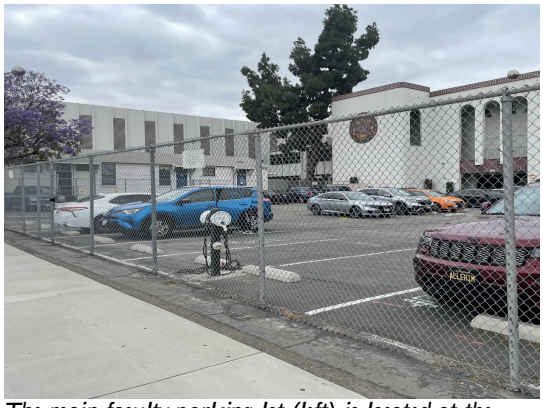
G. Traffic and Pedestrian Safety Study

H. Preliminary Environmental Assessment Equivalent Report

2. Environmental Setting

2.1 PROJECT LOCATION

Garfield HS is located at 5101 East Sixth Street within the neighborhood of East Los Angeles, an unincorporated community of Los Angeles County (Assessor Parcel Numbers [APNs] 5248-021-901, 5248-010-904, and 5248-012-914). The Campus sits on a 19.3-acre site bound by East Sixth Street to the south, South Woods Avenue to the east, residences and Escuela Street to the north, and Fraser Avenue to the west (see Figure 1).



The main faculty parking lot (left) is located at the corner of East Sixth Street and Clela Avenue.

Regional access to the Campus is provided by the Long Beach Freeway (U.S. Interstate [I-] 710) located approximately 0.75 miles west of the Campus and State Route 60 located approximately 0.55 miles north of the Campus. Local access is provided by South Atlantic Boulevard to the east, which is a four-lane arterial roadway, as well as East Sixth Street to the south, Fraser Avenue to the east, and Escuela Street to the north. The main faculty parking lot is accessible from East Sixth Street. Additional faculty parking is accessible via two gated entrances along South Woods Avenue. The primary pedestrian entrance to the Campus is on East Sixth Street via a portal through the multi-story Administration Building (Building 400). The building has a small, landscaped setback from the sidewalk. To the west is the Science Building (Building 300) and the Library/Classroom Building (Building 200), which is set back from the street with a parking area. To the east and west are additional classrooms and shop buildings, all of which are constructed close to the streets with minimal setback.

There are eight transit stops located in close proximity to the Campus including: two at the intersection of East Sixth Street and Fraser Avenue serving eastbound and westbound and connects with Alhambra Community Transit, City of Commerce Municipal Bus, the Metro, and Los Angeles Department of Transportation (LADOT) DASH Community Connection. Two transit stops at the intersection of South La Verne Avenue and Eagle Street serve eastbound and westbound Los Angeles Union Pacific. Two transit stops at the intersection of South Atlantic Boulevard and Eagle Street serve northbound and southbound Line 260 and Line 10 Whittier Boulevard. Two transit stops at the intersection of South Atlantic Boulevard and East Sixth Street serve northbound and southbound Los Angeles County Metropolitan Authority (Metro) Line 260, Metro Line 202, and Metro Line 60. The two closest transit stops to the Campus are served by the El Sol Shuttle going eastbound and westbound along East Sixth Street.[20]

[20] Public Works Los Angeles County. El Sol Los Angeles Shuttle. https://pw.lacounty.gov/transit/ElSolShuttle.aspx#schedule

2. Environmental Setting

Figure 1 Regional Location

wsp

Regional Location

FIGURE 1

Pedestrian facilities within the immediate vicinity of the Campus include sidewalks on both sides of East Sixth Street, South Woods Avenue, Fraser Avenue, and Escuela Street. Additionally, there are existing pedestrian crosswalks at the following intersections: East Sixth Street and Fraser Avenue; East Sixth Street and Clela Avenue; East Sixth Street and South Vancouver Avenue; and East Sixth Street and South Woods Avenue.

There are no striped bicycle lanes located within the vicinity of the Campus, therefore bicyclists generally share the roadway with vehicles. There are signs designating East Sixth Street, South Woods Avenue, and Fraser Avenue as a shared lane with bicycles and vehicles. However, in the immediate vicinity of the Campus, bicycles often share the sidewalk with pedestrians. The school provides bicycle racks for students.

The Campus is surrounded by paved sidewalks with striped crosswalks at all major intersections.

2.2 SURROUNDING LAND USES

In general, the Campus is surrounded by residential development, mostly comprised of single-family homes, particularly along the northern, southern, and western boundaries (see Figure 2):

- North: Escuela Street; single-family and multi-family residential properties.
- South: East Sixth Street; single-family and multi-family residential properties.
- East: South Woods; single-family and multi-family residential properties.
- West: Fraser Avenue; single-family and multi-family residential properties.

Commercial properties and a public park are located one block to the east of the Campus on East Sixth Street and South Atlantic Boulevard.

Commercial uses – including an auto shop, a fast-food restaurant, a public park and recreation center, and a laundromat – are located further east of the Campus, approximately 800 feet from the Project site (see Figure 2).

Figure 2 Surrounding Land Uses

2.3 SENSITIVE RECEPTORS

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

In addition to students, nearby sensitive receptors in close proximity to the proposed Project are described in Table 1.

Table 1 Nearby Sensitive Receptors

No.	Name	Address	Type	Location	Distance from Project Site (ft)
1	Multi-family residence	602 Clela Avenue	Residential	South of campus across East Sixth Street	92
2	Single-family residence	608 Fraser Avenue	Residential	South of campus across East Sixth Street	96
3	Single-family residence	5010 East Sixth Street	Residential	South of campus across East Sixth Street	100
4	Multi-family residence	5016 East Sixth Street	Residential	South of campus across East Sixth Street	104
5	Multi-family residence	5020 East Sixth Street	Residential	South of campus across East Sixth Street	108
6	Single-family residence	5034 East Sixth Street	Residential	South of campus across East Sixth Street	100
7	Multi-family residence	5018 East Sixth Street	Residential	South of campus across East Sixth Street	111
8	Multi-family residence	610 Clela Avenue	Residential	South of campus across East Sixth Street	119
9	Single-family residence	612 Clela Avenue	Residential	South of campus across East Sixth Street	137
10	Multi-family residence	613 Clela Avenue	Residential	South of campus across East Sixth Street	147

2. Environmental Setting

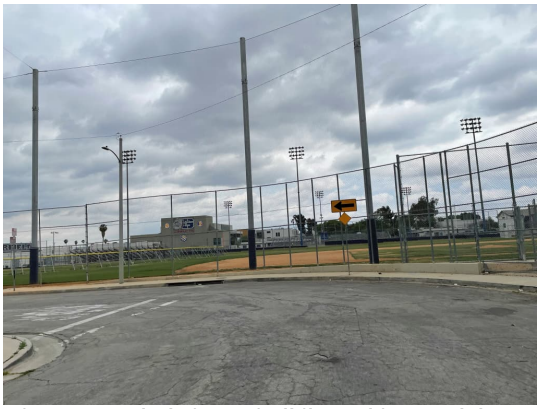
No.	Name	Address	Type	Location	Distance from Project Site (ft)
11	Multi-family residence	614 Clela Avenue	Residential	South of campus across East Sixth Street	188
12	Single-family residence	601 Fraser Avenue	Residential	Southwest of campus at the Fraser Avenue and East Sixth Street intersection	136
13	Multi-family residence	613 Fraser Avenue	Residential	Southwest of campus across Fraser Avenue	218
14	Single-family residence	569 Fraser Avenue	Residential	West of campus across Fraser Avenue	91
15	Single-family residence	573 Fraser Avenue	Residential	West of campus across Fraser Avenue	93
16	Single-family residence	565 Fraser Avenue	Residential	West of campus across Fraser Avenue	96
17	Single-family residence	579 Fraser Avenue	Residential	West of campus across Fraser Avenue	96
18	Single-family residence	559 Fraser Avenue	Residential	West of campus across Fraser Avenue	100
19	Single-family residence	555 Fraser Avenue	Residential	West of campus across Fraser Avenue	116
20	Single-family residence	4959 East Sixth Street	Residential	West of campus across Fraser Avenue	122
21	Atlantic Avenue Park	570 South Atlantic Boulevard	Park	East of campus across South Atlantic Boulevard	968

2.4 CAMPUS HISTORY

Garfield HS opened on September 4, 1925 with an initial enrollment of approximately 1,000 students in 7th through 12th grade. Prior to its development, this area was in agriculture with early residential development. The Campus contains a collection of buildings 45 years or more of age all constructed between 1925 and 1975,

with the majority constructed in the 1960s. Over time, many buildings have been demolished and replaced for various reasons, including the 1933 Long Beach Earthquake, and the need for expansion to accommodate increases in enrollment.

Garfield HS was among the "Walkout Schools," that participated in the 1968 East L.A. Chicano Student Walkouts, commonly known as "the Blowouts" (see V. CULTURAL RESOURCES in Section 4, *Environmental Checklist and Analysis* as well as Appendix C and D). During "the Blowouts," which helped to galvanize the national Chicano Civil Rights Movement, more than 15,000 students walked out of class to protest poor conditions at their schools.[21] This included 250 students from Garfield HS, who boycotted classes and marched from the Campus to Atlantic Park, carrying signs emblematic of their desired policy changes and identity.[22]



The Campus includes 11 buildings with potential historical significance, specifically the Playing Field and South Bleachers, where gatherings associated with the Blowouts occurred.

A Historic Resources Evaluation Report was prepared for Garfield HS, which concluded that the Campus meets the requirements described in the LAUSD Historic Context Statement, 1869-1970 and appears to be eligible for the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and local designation as a historic district under Criteria C/3/3.[23] The Campus is an outstanding representation of the theme of LAUSD and the Civil Rights Movement for its association with the "the Blowouts." The evaluation identifies the period of significance for this association as 1960, corresponding with the majority of the Campus' original construction.

2.5 EXISTING CONDITIONS

Garfield HS is a rectangular-shaped campus, with a total of 15 permanent buildings and 4 portable buildings as well as outdoor tennis courts, basketball courts, baseball fields, a football stadium and track (see Table 2 and Figure 3). Drop-off and pick-up most commonly occurs on the south side of the Campus near the Administration building on East Sixth Street and the east and west sides of campus on Fraser Avenue and South Woods Avenue. Feeder schools for the Campus include Belvedere Middle School, Brooklyn Avenue School, and Griffith STEAM Magnet Middle School.[24] Vehicular access to the on-site parking areas is provided via eight existing driveways along Fraser Avenue, East Sixth Street, and Woods Avenue.

Garfield HS had 2,247 students in 9th through 12th grade enrolled in the 2022-2023 school year.[25] The campus also hosts the Monterey Continuation High School which had 41 students enrolled in the 2022-2023 school

[21] GPA Consulting and Becky Nicolaides. 2015. Latino Los Angeles Historic Context Statement.
[22] Sosa. 2023. Fragmented Diversity: School Desegregation, Student Activism, and Bushing in Los Angeles, 1963-1982.
[23] ASM Affiliates, Inc. 2022. Final Historic Resource Evaluation Report for James A. Garfield High School.
[24] East Los Angeles Community of Schools. https://eastlacos.lausd.net/.
[25] California Department of Education. School Profile: James A. Garfield Senior High. https://www.cde.ca.gov/sdprofile/details.aspx?cds=19647331933381

year.[26] The school also offers a computer science magnet program[27] as well as the Gifted and Talented (GATE) Program, the Upward Bound (UB) Program, and the Junior Reserve Officers' Training Corp (JROTC) which help students attain entrance into college and prepare for success after high school.

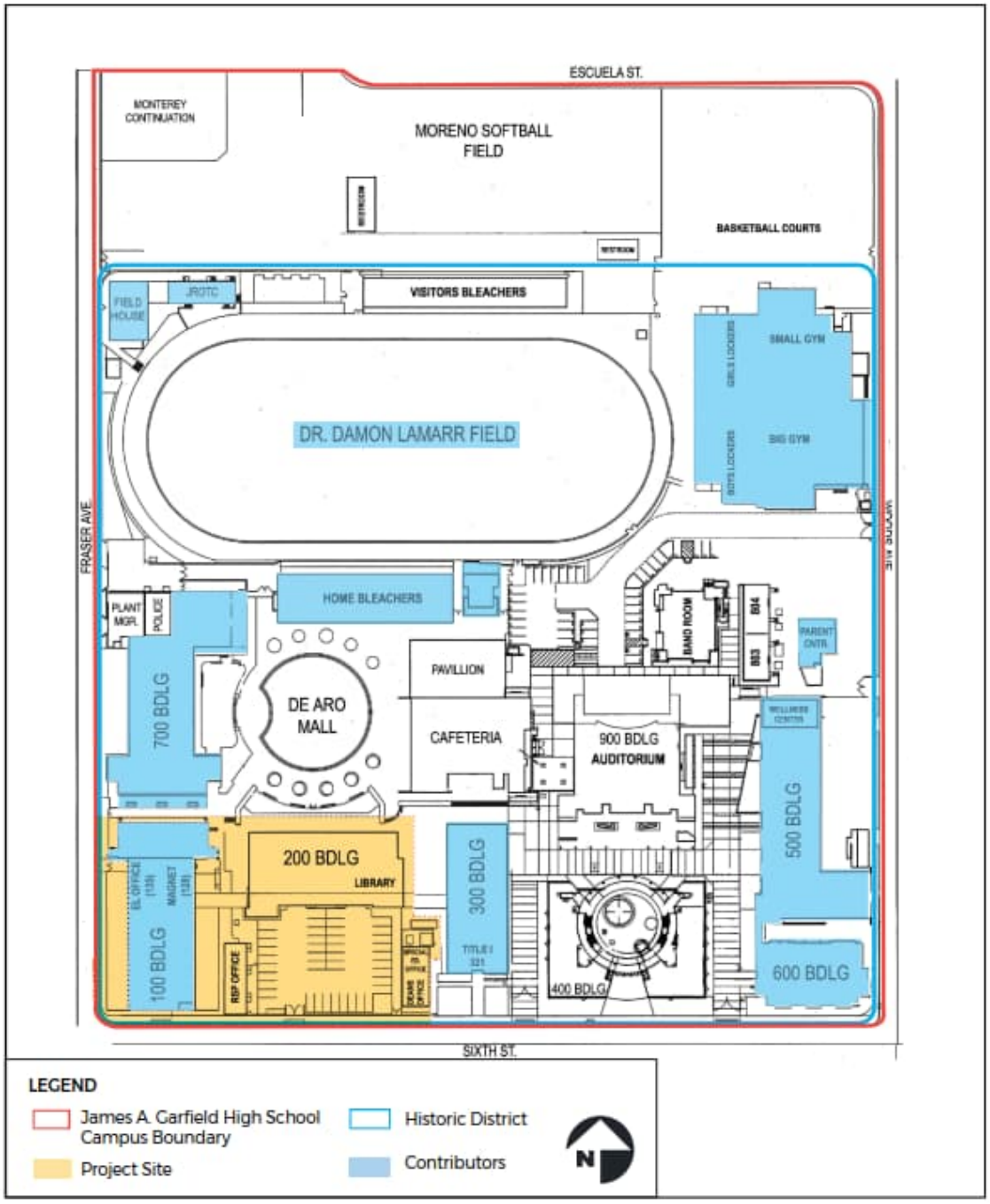
Table 2 Existing Garfield HS Campus

Feature Name	Approx. Square Footage	Year Built	Number of Stories	Historic District Status
Science Building (Building 300)	30,762	1925	3	Contributor
Parent Center	1,744	1940	1	Contributor
ROTC Building	3,603	1947	1	Contributor
Boy's Locker and Shower	2,662	1960	1	Contributor
Storage Building	364	1960	1	Non-Contributor
Cafeteria and Pavilion	18,996	1963/1968	1	Non-Contributor
Parking Garage/Classroom D (Building 100)	38,265	1963	4	Contributor
Classroom Building (Building 600)	15,001	1965	2	Contributor
Shop Building (Building 500)	32,879	1967	2	Contributor
Boys' and Girls' Gymnasium	36,926	1967	1	Contributor
Field Sanitary Building	1,161	1967	1	Contributor
Classroom/Utility Building (Building 700)	37,462	1968	2	Contributor
Library/Classroom Building (Building 200)	31,976	1975	3	Non-Contributor
Music Building	4,308	1983	1	Non-Contributor
Auditorium Building (Building 900)	50,092	2010	5	Non-Contributor
Administration and Classroom Building (Building 400)	36,257	2013	3	Non-Contributor
Stadium/Bleachers	-	1950	1	Contributor
Quad	-	1969	1	Non-Contributor

Notes: All numbers are provided in square feet (sf). All new square footages are approximate and subject to change during final site and architectural planning and design phases. These square footage changes would not significantly change the environmental analysis or findings in this IS. Square footage totals may not add up exactly due to rounding and the way usable space is calculated. All numbers are based on the Garfield HS Major Modernization Project – Design Criteria.

[26] California Department of Education. School Profile: Monterey Continuation. https://www.cde.ca.gov/sdprofile/details.aspx?cds=19647331931989
[27] Garfield High School Computer Science Magnet. https://www.garfieldhs.org/apps/pages/MAGNET

Figure 3 Existing Site Plan



2.6 GENERAL PLAN AND EXISTING ZONING

Garfield HS is located in unincorporated Los Angeles County. The Campus is zoned PF-1 (Public Facility) and designated PF (Public Facilities) in the Los Angeles County General Plan.[28] However, the California Legislature granted school districts the power to exempt school property from local zoning requirements, provided the school district complies with the terms of Government Code Section 53094. On February 19, 2019, pursuant to Government Code Section 53094, the LAUSD Board of Education adopted a Resolution to exempt all LAUSD school sites, including Garfield HS, from local land use regulations.[29]

2.7 NECESSARY APPROVALS

It is anticipated that approval required for the proposed Project would include those listed below.

Responsible Agencies

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

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

Trustee Agencies

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

State

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

[28] County of Los Angeles. General Plan 2035. https://planning.lacounty.gov/long-range-planning/general-plan/
[29] Regular Meeting Stamped Order of Business, Board of Education Report No. 256-18/19. Los Angeles: LAUSD Board of Education, February 19, 2019.

Regional

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

Local

- Los Angeles County, Police Department
- Los Angeles County, Department of Planning
- Los Angeles County, Fire Department
- Los Angeles County, Department of Water and Power
- Los Angeles Department of Transportation
- Los Angeles County, Department of Building & Safety
- Los Angeles County, Department of Recreation and Parks
- Los Angeles County, Department of Environmental Affairs

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

Pursuant to Assembly Bill (AB) 52, LAUSD notified the Native American tribes/tribal representatives that are traditionally and culturally affiliated with the Project area. On August 23, 2023, LAUSD OEHS sent a notification of the proposed Project to Barbareño/Ventureño Band of Mission Indians, Chumash Council of Bakersfield, Coastal Band of the Chumash Nation, Fernandeño Tataviam Band of Mission Indians, Gabrieleño Band of Mission Indians – Kizh Nation (two separate contacts), Gabrieleño/Tongva San Gabriel Band of Mission Indians, Gabrielino/Tongva Nation, Gabrielino Tongva Indians of California Tribal Council (two separate contacts), Gabrielino-Tongva Tribe (two separate contacts), Northern Chumash Tribal Council, San Fernando Band of Mission Indians, Santa Rosa Band of Cahuilla Indians, Santa Ynez Band of Chumash Indians (four separate contacts), and Soboba Band of Luiseno Indians (two separate contacts). No Native American tribes have requested consultation with LAUSD, pursuant to PRC Section 21080.3.1.

3. Project Description

3.1 BACKGROUND

Garfield HS has been identified under the SUP as one of the schools most in need of critical upgrades and improvements. The goal of the SUP is to improve student health, safety, and education through the modernization of school facilities. The core principles of major modernization project scoping are as follows:

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

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

3. The District's reliance on relocatable buildings, especially for kindergarten through 12th grade instruction, should be reduced.

4. Necessary and prioritized upgrades will be made throughout priority school sites in order to comply with the program accessibility requirements of the Americans with Disabilities Act of 1990 (ADA) Title II Regulations, and the District's Self-Evaluation and Transition Plan under Title II of the ADA.

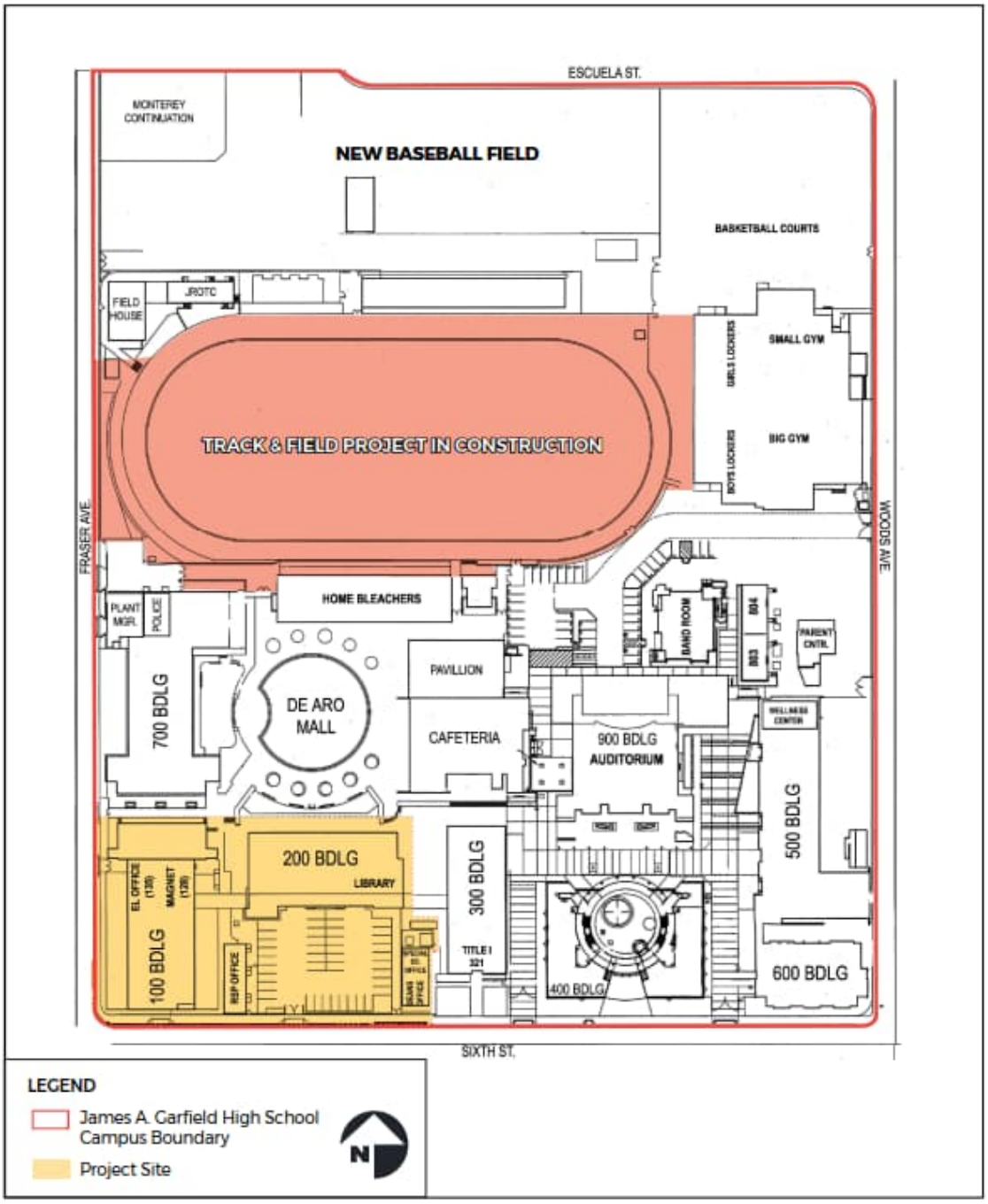
5. The exterior conditions of the school site will be enhanced including landscape and hardscape improvements around new buildings and/or areas impacted by construction and the painting of building exteriors throughout the school site.

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

3.2 PROPOSED PROJECT

The proposed Project would involve the demolition and replacement of existing buildings in an approximately 1.9-acre development zone (referred to as the Project site), located in the southwest corner of the Campus (see Figure 4). Four buildings would be demolished and replaced by a new consolidated building that would improve educational quality for students and staff. The proposed Project also includes several ancillary infrastructure improvements that would occur throughout the Campus, including new exterior and interior paint, Internet Protocol (IP) convergence, the removal of barriers and other accessibility upgrades, and various landscape and hardscape improvements.

Figure 4 Proposed Project Site Plan



3. Project Description

3.2.1 Campus Improvements

Demolition and Removal

The proposed Project includes demolition of two permanent buildings and two portable buildings:

- Building 100 – Parking Garage and Classrooms (1963)
- Building 200 – Library and Classrooms (1975)
- Portable AA-336
- Portable AA-2254

The proposed Project would begin with the demolition of Building 200 (including seven classrooms and the library) to make space for new construction. This would involve the demolition of the existing second-story pedestrian bridge connection Building 200 to Building 300. As described further in Section 2.4, *Campus History*, and Appendix C and D the Campus is eligible as a historic district. Building 300 is a contributing element and therefore the design-build contractor would be required to comply with all SCs related to historic architectural resources (see V. CULTURAL RESOURCES in Section 4, *Environmental Checklist and Analysis*). This would include the development of a noise and vibration plan to avoid potential impacts to adjacent historic resources. Six temporary replacement classrooms would be established in existing buildings across the Campus and/or in bungalows that would be located on the existing tennis courts and/or basketball courts. These classrooms would be used by the existing occupants of Building 200 throughout the duration of construction. Following the completion of construction, the original occupants from Building 200 and the occupants of Building 100 would be relocated into the new building. Building 100 would then be demolished and a new staff parking lot would be constructed in its place providing replacement of existing staff parking spaces (including electric vehicle charging stations).

New Construction

The scope of the proposed Project includes the construction of a new, consolidated four-story building consisting of approximately 31 general and specialty classrooms and support spaces, library, and administration space. Interior finishes and details shall follow the LAUSD Design Guidelines, Specifications and Technical Drawings. The proposed Project shall also comply with CHPS and the LAUSD Design Guidelines, Specifications, and Technical Drawings regarding sustainability.

Table 3 Proposed Project (Demolition, Remodel, and Construction)

Building No.	Building	Demolition (SF)	Remodel/ Modernization (SF)	New Construction (SF)	Existing to Remain (SF)
Demolition					
100	Classrooms and parking garage	38,265	--	--	--
200	Library and classrooms	31,976	--	--	--
AA-336	Portable classrooms and administrative space	1,763	--	--	--
AA-2254	Portable classrooms and administrative space	1,317	--	--	--
New Construction					
N/A	New Building	--	--	63,870	--
	Campus Total* (does not include outdoor pavements or landscaping areas)	41,345	--	63,870	--

Notes:

Currently, Building 100 consists of 21 classrooms and Building 200 consists of 10 classrooms. The Project will demolish both Building 100 and 200, consisting of a total of 31 classrooms. However, the New Building will provide 31 classrooms. Therefore, the classroom count will not change.

All numbers are provided in square feet (sf). All new square footages are approximate and subject to change during final site and architectural planning and design phases. These square footage changes would not significantly change the environmental analysis or findings in this IS.

* Square footage totals may not add up exactly due to rounding and the way usable space is calculated. All numbers are based on the Garfield HS Major Modernization Project – Design Criteria.

3.2.2 Utilities

Utility improvements would be limited to the provision of connections to the proposed building. Construction activities would involve the development of a 3-inch domestic water line and a 6-inch sewer line tying into main lines along 6th Street. LAUSD has consulted the utilities provider and received confirmation that there is existing capacity (e.g., transformers). A 5,500-sf at-grade bioswale would be constructed within the existing footprint of Building 100. This stormwater best management practice (BMP) would be designed to provide an overflow that meets the peak flow rate requirements are described in the Los Angeles County Hydrology Manual.

3.2.3 Site Access, Circulation, and Parking

As described in Section 2.1, *Project Location*, the primary pedestrian entrance to the Campus is on East Sixth Street via a portal through a new multi-story administration building. Student drop off and pick up areas are designated by white curbs in the front of the school and three "Passenger Loading Only" signs along East Sixth Street. Internal circulation is provided via outdoor plazas and courtyards as well as three fire lanes that lead to

East Sixth Street, two fire lanes that lead to South Woods Avenue, and one fire lane in the northwest portion of the Campus that leads to Fraser Avenue.

There would be no change to student access as a result of the proposed Project. Additionally, the proposed Project would not result in an increase in student enrollment and therefore would neither generate additional vehicle trips nor increase vehicle miles traveled. However, demolition and construction activities within the development zone would require the establishment of a temporary faculty parking area on the Campus. For example, the tennis courts and/or basketball may serve as a temporary parking location with access provided off of Woods Avenue. As previously described, following the completion of the new building and the demolition of Building 100, a new permanent staff parking lot would be constructed. At a minimum, this new faculty parking lot would replace the existing staff parking spaces (including electric vehicle charging stations). As with the existing staff parking lot, the new staff parking lot would be secured from the public with fencing and utilize existing driveways.

The proposed Project includes several elements to ensure that the Campus would comply with various federal, State, and local statutory and regulatory requirements. This includes the development of accessible paths of travel and accessible route signage across the Campus that adheres to the ADA and the California Building Code (CBC).

3.2.4 Landscaping

The proposed landscaping plan would be designed to be compatible with the Campus and would incorporate, to the extent possible, native plants and vegetation that are appropriate for the Campus and the Southern California setting. All plants and vegetation proposed for the Campus would be selected from the LAUSD's approved plant list or would be approved by the LAUSD prior to being placed on the Campus. No invasive plant species (e.g., species listed on the California Invasive Plant Council [Cal-IPC] Invasive Plant Checklist) would be planted on Campus.

There are at least 156 existing trees on the Campus,[30] of which approximately 16 are proposed for removal due to their locations within or immediately adjacent to the 1.9-acre Project site. (However, it should be noted that the number and tree locations may be subject to change as the design details are refined and finalized.) Each of the 16 trees proposed for removal would be replaced on the Campus. Additionally, all tree removal would be consistent with the LAUSD OEHS Tree Trimming and Removal Procedure as well as SC-BIO-3 (see IV. BIOLOGICAL RESOURCES in Section 4, *Environmental Checklist and Analysis*).[31] Recommendations from the Final Arborist Report would also be incorporated into the proposed tree removal. This would include, but shall not be limited to, inspection for contagious tree diseases. If any diseased trees are identified at the Campus, these trees would not be transported from the Campus without first being treated using BMPs relevant for each tree disease observed.

[30] Carlberg Associates. 2022. Draft Arborist Report for James A. Garfield High School.
[31] LAUSD OEHS. Tree Trimming and Removal Procedure. https://www.lausd.org/ceqa.

3.2.5 Construction Phasing and Equipment

The proposed Project would be developed in three phases over a 3.5-year period. The construction schedule would have limited to no overlap between phases. Construction activities are anticipated to be initiated in Q1 2026 and to be completed in Q3 2029.

- Phase 1: This first phase of construction is anticipated to be completed in approximately 6 months. During Phase 1, portable buildings and structures would be located on the existing tennis courts and/or basketball courts. Occupants from Building 200 would be temporarily relocated into these portable buildings and structures during the demolition and construction activities under Phase 2.
- Phase 2: This second phase of construction is anticipated to be completed in approximately 30 months. During Phase 2, Building 200 would be demolished and the new building will be built.
- Phase 3: This third and final phase of construction is anticipated to be completed in approximately 3 months. During Phase 3, occupants of Building 100 would be relocated into the new building and Building 100 would be demolished and converted into a surface parking lot.

Table 4 Construction Schedule and Equipment

Phase	Schedule	Equipment	Number
Utilities By-Pass and Interim Housing	July to December 2026	Cranes	1
		Forklifts	1
		Generator Sets	1
		Tractors/Loaders/Backhoes	1
		Haul Trucks/Pickups	1
Demolition of Existing Structures and Development of New Structures	January 2027 to June 2029	Concrete/Industrial Saws	1
		Rubber Tired Dozers	2
		Tractors/Loaders/Backhoes	4
		Graders	1
		Forklifts	2
		Generator Sets	2
		Cement and Mortar Mixers	2
		Pavers	1
		Rollers	1
		Water Trucks	-
		Haul Trucks/Pickups	-
		Cranes	1
Renovations/ Remodeling, Removal of Temporary Buildings	July to September 2029	Concrete/Industrial Saws	1
		Rubber Tired Dozers	2
		Tractors/Loaders/Backhoes	3
		Graders	1

3. Project Description

Phase	Schedule	Equipment	Number
		Forklifts	1
		Generator Sets	1
		Cement and Mortar Mixers	1
		Pavers	1
		Cranes	1

As described in the Pedestrian and Safety Study (see Appendix G), an estimated average of 50 workers would be on-site when students are present and a maximum of 150 workers would be on-site during peak periods (i.e., during summer break). No summer school sessions are currently held or planned to be held during the summer months. It is anticipated that construction worker parking would generally be accommodated on-site in the staging area during all phases of construction. Construction workers would not be permitted to park on local streets and would therefore not affect existing street parking. Construction-related traffic and deliveries would be scheduled to avoid student pick-up/drop-off hours, and during noise sensitive times as coordinated with the school administration.

It is anticipated that construction vehicles related to the export activities would have a capacity of approximately 14 cubic yards per truck. During the peak, up to 70 trucks per day (i.e., 35 inbound trucks and 35 outbound trucks) are anticipated.

In addition to construction haul trucks, additional trips may be generated by miscellaneous trucks traveling to and from the Project site. These trucks may consist of trucks delivering equipment and/or construction materials to the Project site. During the peak phase for deliveries (i.e., Building Construction), up to 12 delivery trucks are anticipated for this phase. It is estimated that if these deliveries all occur on a concentrated single day of that phase, up to 24 trucks per day (i.e., 12 inbound trucks and 12 outbound trucks) would be generated to and from the site.

It is anticipated that construction workers would primarily remain on-site throughout the day. The number of construction worker vehicles is estimated using an average vehicle ridership factor of 1.135 persons per vehicle (as provided in the South Coast Air Quality Management District [SCAQMD] in its CEQA Air Quality Handbook). Therefore, it is estimated that approximately 88 vehicle trips (44 inbound trips and 44 outbound trips) on a daily basis would be generated to/from the site by the construction workers during the peak period when a total of 50 construction workers are on-site.

It has been determined that the most intensive period of overall construction activity and construction truck traffic generation is expected to occur during the Demolition/Site Preparation phase for an approximate 6-month period. Other phases of construction are expected to be less intensive in terms of overall construction truck traffic generation.

4. Environmental Checklist and Analysis

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

On the basis of this initial evaluation:

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

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

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

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

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

Signature	4/5/24 Date
Carlos A. Torres Printed Name	CEQA Officer for LAUSD Title

4. Environmental Checklist and Analysis

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

ENVIRONMENTAL IMPACTS

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

(AE) Explanation:

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

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

LAUSD Standard Conditions of Approval	
SC-AE-1	LAUSD shall review all designs to ensure that demolition of existing buildings or construction of new buildings on its historic campuses are designed to ensure compatibility with the existing campus. The School Design Guide shall be used as a reference to guide the design. **School Design Guide[32]** This document outlines measures for re-use rather than destruction of historical resources. It requires the consideration of architectural appearance/consistency and other aesthetic factors during the preliminary design review for a proposed school upgrade project. Architectural quality must consider compatibility with the surrounding community.

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

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LAUSD Standard Conditions of Approval	
SC-AE-2	LAUSD shall review all designs to ensure that methods from the current School Design Guide are incorporated throughout the planning, design, construction, and operation of the project in order to limit aesthetic impacts. **School Design Guide** This document outlines measures to reduce aesthetic impacts around schools, such as shrubs and ground treatments that deter taggers, vandal-resistant and graffiti-resistant materials, painting, etc.
SC-AE-3	LAUSD shall assess the proposed project's consistency with the general character of the surrounding neighborhood, including, but not limited to, any proposed changes to the density, height, bulk, and setback of new buildings (including stadiums), additions, or renovations. Where feasible, LAUSD shall make appropriate design changes to reduce or eliminate viewshed obstruction and degradation of neighborhood character. Such design changes may include, but are not limited to, changes to the campus layout, height of buildings, landscaping, and/or the architectural style of buildings.
SC-AE-5	LAUSD shall review all designs and test new lights following installation to ensure that adverse light trespass and glare impacts are avoided. **School Design Guide** This document outlines Illumination Criteria, requirements for outdoor lighting and measures to minimize and eliminate glare that may impact pedestrians, drivers and sports teams, and to avoid light trespass onto adjacent properties.
SC-AE-6	The International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used as a guide for environmentally responsible outdoor lighting. The MLO has outdoor lighting standards that reduce glare, light trespass, and skyglow. The MLO uses lighting zones (LZ) 0 to 4, which allow the District to vary the lighting restrictions according to the sensitivity of the community. The MLO also incorporates the Backlight-Uplight-Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. The MLO establishes standards to: • Limit the amount of light that can be used. • Minimize glare by controlling the amount of light that tends to create glare. • Minimize sky glow by controlling the amount of uplight. • Minimize the amount of off-site impacts or light trespass.

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

No Impact. Scenic vistas provide visual access or panoramic views to a large geographic area. Panoramic views are usually associated with vantage points that provide a geographic orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, the ocean, or other water bodies. Garfield HS is located in the southern portion of East Los Angeles. In general, the community that surrounds the Campus is an urban mix of commercial and residential development, mostly comprised of single- and multi-family homes, particularly along the northern, southern, and western boundary of the Campus (refer to Section 2.2, *Surrounding Land Uses*). The topography of the Project site and the immediate surrounding vicinity does not provide clear views of scenic features such as Santa Monica Mountains, San Gabriel Mountains, etc.

The proposed Project – including all demolition, construction, and modernization/renovation elements – would not affect any designated scenic viewpoints or otherwise conflict with applicable policies from the Los Angeles County General Plan (e.g., Policy C/NR-13.2, *Scenic Resource Protection*).[33]

The proposed construction and modernization/renovation elements included in the proposed Project have been designed to conform with the existing historic architectural style of the existing site (refer to SC-AE-1 and see SC-CUL-1 and SC-CUL-2). None of these elements would obscure existing views across the Campus. Additionally, as described in the SPEIR, the proposed Project would comply with all applicable requirements of the LAUSD School Design Guide. Therefore, no impact to scenic vistas would occur. No mitigation or further evaluation is required.

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

No Impact. The California Scenic Highway Program seeks to preserve and protect areas of outstanding natural beauty that are visible from State highways.[34] The nearest designated State Scenic Highway to the site is State Route 2 (SR-2; Angeles Crest Highway), located approximately 13 miles northwest of the Campus.[35] Neither the Campus, nor the existing or proposed buildings on the Campus are visible from any designated State Scenic Highway. Therefore, development of the Project would result in no impacts to scenic resources within a designated State Scenic Highway. No mitigation or further evaluation is required.

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

Less than Significant Impact. Garfield HS is located in an urban area and surrounded by adjacent residential and commercial uses. The Campus is zoned PF-1 (Public Facility) and designated PF (Public Facilities).[36] The proposed Project includes demolition of two permanent buildings and two portable buildings and construction of a new, four-story building along with other Project site and building improvements. The proposed Project would not conflict with regulations governing scenic quality. Additionally, the California Legislature granted school districts the authority to exempt school properties from local zoning requirements, provided the school district complies with the terms of Government Code Section 53094[37]. On February 19, 2019 the LAUSD Board of Exemption Adopted a Resolution to exempt all LAUSD school sites from local land use regulations under Government Code Section 53094.[38]

[33] County of Los Angeles. General Plan 2035. Conservation and Natural Resources Element. https://planning.lacounty.gov/wp-content/uploads/2022/11/9.0_gp_final-general-plan-ch9.pdf
[34] California Department of Transportation (Caltrans). California Scenic Highway Program. http://www.dot.ca.gov/dist3/departments/mtce/scenic.htm.
[35] California Scenic Highway Mapping System. Los Angeles County. https://www.arcgis.com/home/item.html?id=f0259b1ad0fe4093a5604c9b838a486a.
[36] County of Los Angeles. General Plan 2035. https://planning.lacounty.gov/long-range-planning/general-plan/
[37] Government Code Section 53094. https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=53094.
[38] LAUSD. 2019. Regular Meeting Stamped Order of Business, Board of Education Report No. 256-18/19.

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The District would implement SC-AE-1 to ensure that demolition of existing buildings and the construction of the new, of the new consolidate building would be compatible with the existing campus. The implementation of SC-AE-2 to ensure that methods from the current LAUSD School Design Guide are incorporated throughout the planning, design, construction, and operation of the proposed Project to limit aesthetic impacts. The implementation of SC-AE-3 would ensure that the general character of the surrounding neighborhood is considered as a part of the design of the proposed Project. With the implementation of these SCs, no impacts to the scenic quality would occur and no mitigation or further analysis is required. The District would be consistent with the CCR, Title 5, Section 1410, which gives the California Department of Education School Facilities Planning Division regulatory authority to review and approve school designs based on factors such as scenic resources and aesthetics.

The SPEIR states impacts to views with respect to all SUP projects would be less than significant, as the District is required to incorporate measures from the LAUSD School Design Guide into site-specific Project design for the protection of character and quality of site surroundings.[39] With implementation of SC-AE-1, SC-AE-2, and SC-AE-3, impacts to the visual character and quality of the Campus and the surrounding community would be less than significant. No mitigation or further study is required.

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

Less than Significant Impact. The Project would result in less than significant impacts related to light and glare as described in further detail below.

Light spillage is typically defined as unwanted illumination from light fixtures on adjacent properties. Existing sources of light in the vicinity of the Campus come from streetlights, vehicle lights, parking lot lights, and building lights. The Campus itself generates nighttime light from security and parking lot lights and building lights (interior and exterior).

In compliance with County Municipal Code, Title 12, Chapter 12.08 (Noise Control), construction of the proposed Project would occur during daytime hours. Thus, construction of the proposed Project would not require portable nighttime lighting on the Campus during construction activities. Following the completion of construction activities, the proposed Project would not significantly increase nighttime lighting on the Project site because the new, consolidated building would replace existing buildings, and the proposed Project would not change the school's current operating hours from 8:00 AM to 2:23 PM, with after-school program uses until 6:00 PM. Further, the proposed Project would not include any new sources of high-intensity nighttime lighting, such as stadium lights. All lights on the new building and any new site lighting would be focused and directed to reduce spill light and glare off the Project site. The District would implement SC-AE-5, which requires review of all designs and testing of new lights following installation to ensure that adverse light trespass and glare impacts are avoided; and SC-AE-6, which requires the District to use the International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) lighting standards that reduce glare, light trespass, and skyglow. Consequently, implementation of the proposed Project

[39] LAUSD. Program EIR for the School Upgrade Program. Report. https://www.lausd.org/Page/2799

would not result in light spillage or otherwise adversely affect nighttime views in the area. Light impacts would be less than significant, and no mitigation or further analysis is required.

Glare Impacts

Glare occurs when a bright object is against (or reflects off) a dark background or shiny surface. Buildings with large facades constructed of reflective surfaces (e.g., brightly colored building façades, metal surfaces, and reflective glass) could increase existing levels of daytime glare. The proposed new, consolidated building would be constructed with limited high-glare materials. Implementation of SC-AE-6 would reduce glare impacts to residences, pedestrians, drivers, students, and sports teams. Given the minimal use of high-glare materials, reflective glare impacts would be less than significant.

Construction activities would be conducted in accordance with the LAUSD School Design Guide, and all lighting sources in connection with school construction projects shall be installed in such a manner as to minimize glare for pedestrians and drivers.[40] Implementation of the LAUSD School Design Guide and the adherence to the requirements set by the CHPS would ensure impacts related glare would remain less than significant. No mitigation or further study is required.

[40] LAUSD. School Design Guide. Report. http://www.laschools.org/documents/download/asset_management%2fschool_design_guide%2f2018_school_design_guide%2f2018_School_Design_Guide.pdf?version_id=313984351

4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997, as updated) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526) or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

(AG) Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact agriculture and forestry resources. The District spans an urban area with small areas of scattered important farmland, no land protected under Williamson Act contract, and no forest land or timberland. According to the SPEIR, projects implemented under the SUP are anticipated to have less than significant impacts related to the conversion of farmland to nonagricultural use and no impacts on land protected under a Williamson Act contract, forest land and timberland uses in the District. Therefore, there are no SCs for minimizing impacts to agriculture and forestry resources in areas where future Projects would be implemented under the SUP.

Project specific analysis provided below concludes that implementation of the proposed Project would have no impacts on agriculture and forestry resources.

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. Garfield HS is identified as Urban Built-Up Land by the California Department of Conservation's Important Farmland Finder and is not identified as an area of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[41] The Project site is surrounded by residential properties on all four sides and there is no agricultural or farm use on or in the vicinity of the Project site; thus, no conversion of farmland would occur as a result of the proposed Project. Therefore, no impact would occur, and no mitigation or further analysis is required.

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

No Impact. Williamson Act contracts restrict the use of privately owned land to agriculture and compatible open space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. The Campus is zoned PF-1 (Public Facility) and designated PF (Public Facilities and does not include any lands zoned for agricultural uses or enrolled in a William Act contract (i.e., an agreement between private landowners and their city and/or county where the landowner voluntarily restricts their land to agriculture and compatible open-space uses). Therefore, no impact would occur regarding conversion of existing agriculture uses or Williamson Act contracts. No mitigation or further study is required.

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

No Impact. The proposed Project would not conflict with existing zoning for forest land, timberland, or timberland production. Forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits."[42] Timberland is defined as "land….which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees."[43] As previously described, the Campus is zoned PF-1 (Public Facility) and designated PF (Public Facilities), and is not zoned for forest land or timberland use. Therefore, no impact would occur, and no mitigation or further analysis is required.

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

No Impact. No forest land uses are present on Garfield HS. Existing vegetation on the Campus is limited to ornamental trees and shrubs. Implementation of the proposed Project would not require any changes to the existing environment that could result in the loss or conversion of forest land to non-forest use. Therefore, no impact would occur and no mitigation or mitigation or further analysis is required.

[41] California Department of Conservation. California Important Farmland Finder. https://maps.conservation.ca.gov/dlrp/ciff/.
[42] California PRC Section 12220(g).
[43] California PRC Section 4526.

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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. Garfield HS is located within an urban area with no agricultural or forest land uses. There is no mapped important farmland or forest land on or near the Campus, and implementation of the proposed Project would not indirectly cause conversion of such land to nonagricultural or non-forest use. Therefore, no impact would occur, and no mitigation or further analysis is required.

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

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

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

Would the project:

a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

(AQ) Explanation:

The SPEIR evaluated the potential for implementation of the SUP-related site-specific projects to result in adverse air quality impacts, including impacts to students and faculty at the upgraded school sites. According to the SPEIR, some impacts, even with implementation of regulatory requirements and SCs would be potentially significant. This air quality impact analysis is based upon the Air Quality Technical Study prepared for the proposed Project (see Appendix A).

LAUSD recently updated SCs that are applied to LAUSD construction, upgrade, and improvement projects during the environmental review process by the OEHS CEQA team to offset potential environmental impacts. Applicable SCs related to air quality impacts associated with the Project are provided below.

LAUSD Standard Conditions of Approval	
SC-AQ-2	Construction Contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.
SC-AQ-3	Construction Contractor shall: • Maintain speeds of 15 miles per hour (mph) or less with all vehicles. • Load impacted soil directly into transportation trucks to minimize soil handling. • Water/mist soil as it is being excavated and loaded onto the transportation trucks. • Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site. • Minimize soil drop height into haul trucks or stockpiles during dumping. • During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks.

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LAUSD Standard Conditions of Approval	
	• Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed. • Place stockpiled soil on polyethylene sheeting and cover with similar material. • Place stockpiled soil in areas shielded from prevailing winds.
SC-AQ-4	LAUSD shall analyze air quality impacts: If site-specific review or monitoring data of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD's) regional and localized significance thresholds. Construction bid contracts shall include protocols that reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. The Construction Contractor shall be responsible for documenting compliance with the identified protocols. Specific air emission reduction protocols include, but are not limited to, the following. <u>Exhaust Emissions</u> • Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM). • Consolidate truck deliveries and limit the number of haul trips per day. • Route construction trucks off congested streets, as permitted by local jurisdiction haul routes. • Employ high pressure fuel injection systems or engine timing retardation. • Use ultra-low sulfur diesel fuel, containing 15 parts per million (ppm) sulfur or less in all diesel construction equipment. • Use construction equipment rated by the U.S. Environmental Protection Agency (USEPA) as having at least Tier 4 (model year 2008 or newest available model) emission limits for engines between 50 and 750 horsepower. • Restrict non-essential diesel engine idle time, to not more than five consecutive minutes. • Use electrical power rather than internal combustion engine power generators. • Use electric or alternatively fueled equipment, as feasible. • Use construction equipment with the minimum practical engine size. • Use low-emission on-road construction fleet vehicles. • Ensure construction equipment is properly serviced and maintained to the manufacturer's standards. <u>Fugitive Dust</u> • Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for 10 days or more). • Replace ground cover in disturbed areas as quickly as possible. • Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water). • Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip.

LAUSD Standard Conditions of Approval	
	• Pave unimproved construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles. • Pave all unimproved construction access roads for at least 100 feet from the main road to the project site. • Enclose, cover, water twice daily, or apply non-toxic soil binders according to manufacturers' specifications to exposed piles (i.e., gravel, dirt, and sand) with a 5 percent or greater silt content. • Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph. • Water disturbed areas of the active construction and unpaved road surfaces at least three times daily, except during periods of rainfall. • Limit traffic speeds on unpaved roads to 15 mph or less. • Prohibit fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD. • Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials. • Limit the amount of daily soil and/or demolition debris loaded and hauled per day. <u>General Construction</u> • Use ultra-low volatile organic compounds (VOCs) or zero-VOC surface coatings. • Phase construction activities to minimize maximum daily emissions. • Configure construction parking to minimize traffic interference. • Provide temporary traffic control during construction activities to improve traffic flow (e.g., flag person). • Prepare and implement a trip reduction plan for construction employees. • Implement a shuttle service to and from retail services and food establishments during lunch hours. • Increase distance between emission sources to reduce near-field emission impacts.

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O_3), carbon monoxide (CO), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), and lead (Pb). Areas are classified under the federal and California Clean Air Act as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the SCAQMD, is designated nonattainment for O_3, and $PM_{2.5}$ under the National Ambient Air Quality Standards (NAAQS) and California AAQS, nonattainment for PM_{10} under the California AAQS, and nonattainment for lead (Los Angeles County only) under the NAAQS.[44]

Further, the SCAQMD has identified regional thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including VOC, CO, NO_x, SO_X, PM_{10}, and $PM_{2.5}$. Development projects below the regional significance thresholds are not expected to generate sufficient criteria pollutant emissions to violate any air quality standard or contribute substantially to an existing or projected air quality violation. Where

[44] CARB. Area Designations Maps / State and National. http://www.arb.ca.gov/desig/adm/adm.htm.

available, the significance criteria established by the SCAQMD may be relied upon to make the following determinations.

Table 5 Federal and State Attainment Status

Pollutants	Federal Classification	State Classification
Ozone (O_3)	1- and 8-Hour Nonattainment (Extreme)	1- and 8-Hour Nonattainment
Particulate Matter (PM_{10})	Attainment (Maintenance)	Nonattainment
Fine Particulate Matter ($PM_{2.5}$)	Nonattainment (Serious)	Nonattainment
Carbon Monoxide (CO)	Attainment (Maintenance)	Attainment
Nitrogen Dioxide (NO_2)	Attainment (Maintenance)	Attainment
Sulfur Dioxide (SO_2)	Attainment	Attainment

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

Less than Significant Impact. The SCAQMD adopted the 2022 Air Quality Management Plan (AQMP) on December 2, 2022.[45] Regional growth projections used by SCAQMD to forecast future emission levels in the SoCAB are provided by the Southern California Association of Governments (SCAG) and are partially based on land use designations included in city/county general plans.

The proposed Project, which would redevelop a 1.9-acre area of the existing Campus, would be subject to the SCAQMD's AQMP, which contains a comprehensive list of pollution control strategies aimed at reducing emissions and achieving identified ambient air quality standards. The proposed major modernization would be consistent with all applicable AQMP standards related to transportation, economy, and community development as no population or transportation expansion would be anticipated within the Campus or surrounding vicinity. Additionally, due to the nature of the proposed Project, it would not result in an increase in student enrollment or new long-term employment. The proposed Project would not substantially affect housing, employment, or population projections within the region.

The proposed Project would not be considered a large, regionally significant project. The proposed Project would not affect the regional growth projections made by the SCAG and used by the SCAQMD in forming the AQMP. The student and faculty population at the existing Campus would not increase as a result of Project implementation and projected emissions would not exceed SCAQMD's regional significance thresholds. Therefore, the Project would be consistent with the AQMP requirements to reduce the SoCAB's construction-related emissions from construction equipment and related activities, and no conflict would occur with the implementation of the AQMP. Therefore, impacts would be less than significant, and no mitigation or further evaluation is required.

[45] SCAQMD. Air Quality Management Plan. http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=10.

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?

Less than Significant Impact. The following describes short-term construction-related and long-term operational impacts associated with proposed Project.

Short-Term Construction Emissions

Temporary construction activities would result in the generation of air pollutants. These emissions would primarily be: 1) exhaust from off-road diesel-powered construction equipment; 2) dust generated by construction activities; 3) exhaust from on-road vehicles; and 4) off-gassing of VOCs from paints and asphalt.

Construction activities associated with the redevelopment of the exiting high school are anticipated to disturb approximately 1.65 acres in the southwest corner of the Campus. The proposed Project would involve building and asphalt demolition and debris hauling, site preparation, fine grading, building construction, paving, and architectural coating. As described in Section 3.2.5, *Construction Phasing and Equipment*, construction is anticipated to start in the first quarter of 2026 and would occur intermittently until the third quarter of 2029. Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), Version 2020.4.0[46], and are based on the preliminary construction duration provided by the District. Where specific information regarding Project-related construction activities was not available, construction assumptions were based on CalEEMod defaults. Construction emissions modeling is shown in Table 6 and shows maximum daily emissions for ROG, NO_x, CO, PM_{10}, and $PM_{2.5}$ from construction-related activities would be less than their respective SCAQMD regional significance threshold values. Therefore, air quality impacts from Project-related construction activities would be less than significant and no mitigation or further analysis is required.

Table 6 Maximum Daily Unmitigated Construction Emissions

Construction Activity	Maximum Emissions (lbs/day)				
	ROG	NO_X	CO	$PM_{2.5}$	PM_{10}
Utilities By-Pass and Interim Housing (2026)	0.5	1.1	14.7	0.3	1.0
Demolition of Existing Structures (2027)	0.7	246	26.2	0.4	1.2
Development of New Structures (2027)	0.5	1.9	16.1	0.3	1.2
Development of New Structures (2028)	0.5	1.9	15.9	0.3	1.2
Development of New Structures (2029)	0.4	1.9	15.8	0.3	1.2
Removal of Temporary Buildings (2029)	0.8	2.7	31.3	0.3	1.1
Renovations/Remodeling (2029)	3.1	1.3	7.3	0.3	1.2
Maximum Daily Emissions	3.1	2.7	31.3	0.3	1.2

[46] California Air Pollution Control Officers Association (CAPCOA). 2024. California Emissions Estimator Model (CalEEMod). Version 2020.4.0. Developed by: ICF in collaboration with the Sacramento Metropolitan Air Quality Management District

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Construction Activity	Maximum Emissions (lbs/day)				
	ROG	NO_X	CO	$PM_{2.5}$	PM_{10}
SCAQMD Significance Thresholds	*75*	*100*	*550*	*55*	*150*
Exceeds Regional Threshold?	No	No	No	No	No

Source: Emissions calculated by WSP with CalEEMod (Version 2020.4.0).

Notes:

[1] The construction schedule is based on preliminary information provided or confirmed by the LAUSD. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by the SCAQMD.

[2] Includes implementation of fugitive dust control measures required by SCAQMD under Rule 403, and SC-AQ-3, which involves reducing speed limit to 15 mph on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers. Modeling also includes implementation of SC-AQ-4, which requires utilization of equipment that meets the USEPA Tier 3 emissions standards at minimum.

[3] Includes implementation of SC-AQ-2, which requires ensuring that construction equipment is properly tuned and maintained. This requirement would further contribute to minimizing generation of criteria air pollutant emissions during construction.

[4] Includes compliance with SCAQMD Rule 1113 that requires the use of architectural coatings with VOC content of 50 grams/liter or less for all interior paints.

Long-Term Operational Emissions

With respect to modernization projects, the SPEIR states that operational activities would be less than significant, as these projects would not increase capacity to existing schools. In fact, overall enrollment is forecast to decrease over the next 10 years and school operational emissions are not expected to increase in the long-term.

The proposed building upgrades and replacement of old, energy-inefficient structures with those that use less energy would reduce emissions from space heating and other on-site sources. No new vehicle trips would be generated, there would be no increase in vehicle miles traveled, and there would be no increase in mobile source emissions. Therefore, there would be no net increase in regional emissions of any criteria pollutant, and the impact would be less than significant, and no mitigation or further evaluation is required.

Single family residences are located adjacent to the Project site along East Sixth Street to the south of the Project site. Similarly, single family residents are also located to the west of the Project site.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. The proposed Project could expose sensitive receptors to elevated pollutant concentrations if it causes or significantly contributes to elevated pollutant concentration levels. Unlike regional emissions, localized emissions are typically evaluated in terms of air concentration rather than mass so they can be more readily correlated to potential health effects.

Localized Significance Thresholds

Localized significance thresholds (LSTs) are based on the California AAQS, which are the most stringent AAQS to provide a margin of safety in the protection of public health and welfare.[47,48] They are designated to protect sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise. The screening-level construction LSTs are based on the size of the Project site, distance to the nearest sensitive receptor, and Source Receptor Area 11 – East Los Angeles.[49] In addition to on-site sensitive receptors, which include students and staff, the nearest off-site sensitive receptors are the single-family residences along East Sixth Street to the south, Fraser Avenue to the west, and South Woods Avenue to the east of the Project site (refer to Figure 2).

Construction Emission Health Risk

Whenever a project would require: 1) the use of chemical compounds that have been identified in SCAQMD Rule 1401; 2) the use of chemical compounds placed on the California Air Resources Board's (CARB's) air toxics list pursuant to AB 1807, Air Contaminant Identification and Control Act (1983); or 3) the use of chemical compounds placed on the USEPA's National Emissions Standards for Hazardous Air Pollutants, a health risk assessment is required by the South Coast AQMD. The District would apply SC-AQ-4, which has 32 distinct requirements that substantially reduce construction emissions, exhaust emissions, and fugitive dust.

Toxic Air Contaminants (TACs)

According to SCAQMD methodology, health effects from toxic air contaminants (TACs) are usually described in terms of "individual cancer risk." "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Given the relatively limited number of heavy-duty construction equipment, the varying distances that construction equipment would operate to the nearby sensitive receptors, and the short-term construction schedule, the proposed Project would not result in a long-term (i.e., 70 years) substantial source of toxic air contaminant emissions and corresponding individual cancer risk.

The proposed Project is anticipated to be completed in approximately 42 months, which would limit the exposure to on-site and offsite receptors. Further, construction activities would be intermittent and would not generate on-site exhaust emissions that would exceed the screening-level construction LSTs. SCAQMD does not require the evaluation of long-term excess cancer risk or chronic health impacts for a short-term project.

Due to the limited scale and the temporary nature of construction activities, the proposed Project would not expose sensitive receptors to substantial pollutant concentrations during construction. Thus, construction

[47] SCAQMD. Final Localized Significance Threshold Methodology. http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.
[48] SCAQM7D. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf.
[49] SCAQMD. Source Receptor Areas. https://data-scaqmd-online.opendata.arcgis.com/maps/814d6e7a791044dabcb3d0d4b8af4df9/explore?location=34.060531%2C-118.098466%2C10.84

emissions would not pose a health risk to on-site and offsite receptors, and project-related construction health impacts would be less than significant.

Operational Localized Significance Thresholds

Operation of the proposed Project would not generate substantial emissions from on-site stationary sources. Land uses that have the potential to generate substantial stationary sources of emissions include industrial land uses, such as chemical processing and warehousing operations where truck idling would occur on-site and would require a permit from SCAQMD. The proposed Project does not fall within these categories of uses. While operation of the new building would use standard on-site mechanical equipment, such as heating, ventilation, and air conditioning (HVAC), air pollutant emissions would be nominal. Localized operational air quality impacts would be less than significant and no mitigation or further analysis is required.

Tables 7 through 10 show results of the localized significance analysis for the Project (see Appendix A).

Table 7 Localized Significance Analysis for Receptor No. 14 (569 Fraser Avenue; 91 feet from Project site)

	NO_x	CO	PM_{10}	$PM_{2.5}$
Peak On-site Emssions (lbs/day)	2.5	29.2	<1	<1
Localized Significance Threshold (lbs/day)	121	1,044	9	5
Significant?	No	No	No	No

Sources: Emissions calculated by WSP with CalEEMod (Version 2020.4.0).

Table 8 Localized Significance Analysis for Sensitive Receptors No. 2 (608 Fraser Avenue; 96 feet from Project site)

Construction Activity	NO_x	CO	PM_{10}	$PM_{2.5}$
Peak On-site Emssions (lbs/day)	2.5	29.2	<1	<1
Localized Significance Threshold (lbs/day)	121	1,049	9	5
Significant?	No	No	No	No

Sources: Emissions calculated by WSP with CalEEMod (Version 2020.4.0).

Table 9 Localized Significance Analysis for Sensitive Receptor No. 4 (5016 East Sixth Street; 104 feet from Project site)

Construction Activity	NO_x	CO	PM_{10}	$PM_{2.5}$
Peak On-site Emssions (lbs/day)	2.5	29.2	<1	<1
Localized Significance Threshold (lbs/day)	120	1,062	11	6
Significant?	No	No	No	No

Sources: Emissions calculated by WSP with CalEEMod (Version 2020.4.0).

Table 10 Localized Significance Analysis for Sensitive Receptor No. 10 (613 Clela Avenue; 147 feet from Project site)

Construction Activity	NO_x	CO	PM_{10}	$PM_{2.5}$
Peak On-site Emssions (lbs/day)	2.5	29.2	<1	<1
Localized Significance Threshold (lbs/day)	119	1,121	19	7
Significant?	No	No	No	No

Sources: Emissions calculated by WSP with CalEEMod (Version 2020.4.0).

Carbon Monoxide Hotspots

Vehicle congestion has the potential to create pockets of CO called hotspots. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles are backed-up and idle for longer periods and are subject to reduced speeds. These pockets could exceed the State one-hour standard of 20 ppm or the eight-hour standard of 9.0 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to ambient air quality standards is typically demonstrated through an analysis of localized CO concentrations.

The SoCAB has been designated attainment under both the NAAQS and California AAQS for CO. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection to more than 44,000 vehicles per hour – or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited – to generate a significant CO impact.[50] As the proposed Project would not result in an increase in student capacity, the proposed Project would not generate additional peak-hour trips. Therefore, implementation of the proposed Project would not have the potential to substantially increase CO hotspots at intersections in the vicinity of the Project site. Operational impacts would be less than significant, and no mitigation or further analysis is required.

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

Less than Significant Impact. The proposed Project would not result in other emissions, such as odors. The threshold for odor is if a project creates an odor nuisance pursuant to SCAQMD Rule 402, Nuisance.

The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The proposed Project involves the redevelopment of a portion of the high school and would not fall within the objectionable odors land uses or generate odors different than what is already generated on-site. Emissions from construction equipment, such as diesel exhaust and VOCs from architectural coatings and paving activities may generate odors. However, these odors would be low in concentration, temporary, and would not affect a substantial number of people. Odor impacts would be less than significant, and no mitigation or further analysis is required.

[50] Bay Area Air Quality Management District (BAAQMD). California Environmental Quality Act Air Quality Guidelines. https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines.

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

(BIO) Explanation:

The SPEIR evaluated the potential for implementation of the SUP-related projects to impact biological resources. According to the SPEIR, upon implementation of regulatory requirements and LAUSD SCs for SUP-related projects, impacts associated with nesting birds, wildlife movement, and native trees would be less than significant. The analysis in this section is based in part on the Garfield HS Tree Report prepared by Carlberg Associates, dated August 10, 2022 (see Appendix C).[51]

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

LAUSD Standard Conditions of Approval	
SC-BIO-1	An LAUSD-qualified nesting bird Surveyor or Biologist shall identify plant and animal species and habitat within and near the project site. LAUSD will conduct a literature search, which shall consider a 1-mile radius beyond the project construction site and shall be performed by a qualified nesting bird Surveyor or Biologist with knowledge of local biological conditions as well as the use and interpretation of the data sources identified below. Where appropriate, in the

[51] Carlberg Associates, 2022, August, *City of Los Angeles Tree Report – James A. Garfield High School*. Included as Appendix C.

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	opinion of the Biologist, the literature search shall be supplemented with a site visit and/or aerial photo analysis. Resources and information that shall be investigated for each site should include, but not be limited to: • U.S. Fish and Wildlife Service (USFWS) • National Marine Fisheries Services (NMFS) • California Department of Fish and Wildlife (CDFW) • California Native Plant Society (CNPS) • County and/or city planning or environmental offices for sensitive species, habitat, and/or heritage trees that may not exist on published databases. • California Natural Diversity Data Base (CNDDB) California Native Plant Society (CNPS) Rare Plant Inventory • Local Audubon Society • Los Angeles County Department of Regional Planning for information on Significant Ecological Areas • California Digital Conservation Atlas for District-wide location of reserves, plan areas, and land trusts that may overlap with project sites. <u>Biological Resources Report</u> If a report is necessary and the LAUSD qualified nesting bird Surveyor or Biologist determines that a school construction project will affect an identified sensitive plant, animal, or habitat, a biological resources report shall be prepared. To provide a complete assessment of the flora and fauna within and adjacent to a site-specific project impact area, with particular emphasis on identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats, the biological resources report shall include the following. • Information on regional setting that is critical to the assessment of rare or unique resources. • A thorough, recent floristic-based assessment of special status plans and natural communities, following the CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. CDFW recommends that floristic, alliance- and/or association-based mapping and vegetation impact assessments be conducted at the project site and neighboring vicinity. The Manual of California Vegetation (Sawyer et al.) should also be used to inform this mapping and assessment. Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions. • A current inventory of the biological resources associated with each habitat type on-site and within the area of potential effect. CDFW's California Natural Diversity Data Base (CNDDB) should be contacted to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code. • An inventory of rare, threatened, and endangered, and other sensitive species on-site and within the area of potential effect. Species to be addressed should include all those identified in CEQA Guidelines Section 15380, including sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at appropriate time of year and time of day when sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the CDFW and USFWS. • A discussion of the potential adverse impacts from light, noise, human activity, exotic species, and drainage. Drainage analysis should address project-related changes on

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	drainage patterns on and downstream from the site; the volume, velocity, and frequency of existing and post- project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site. • Discussions about direct and indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, wetland and riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a natural community conservation plan [NCCP]). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas. • Mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Measures should emphasize avoidance and reduction of biological impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be outlined. If on-site measures are not feasible or would not be biologically viable, offsite measures through habitat creation and/or acquisition and preservation in perpetuity should occur. This measure should address restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc. • Plans for restoration and vegetation shall be prepared by qualified nesting bird Surveyor or Biologist with expertise in southern California ecosystems and native plant vegetation techniques. Plans shall include, at a minimum: o Location of the mitigation site. o Plant species to be used, container sizes, and seeding rates. o Schematic depicting the mitigation area. o Planting schedule. o Irrigation method. o Measures to control exotic vegetation. o Specific success criteria. o Detailed monitoring program. o Contingency measures should the success criteria not be met. o Identification of the party responsible for meeting the success criteria and providing for conservation of the site in perpetuity. LAUSD shall consult with the U.S. Army Corps of Engineers, USFWS and/or the CDFW and comply with any permit conditions or directives from those agencies regarding the protection, relocation, creation, and/or compensation of sensitive species and/or habitats.
SC-BIO-2	LAUSD shall protect sensitive wildlife species from harmful or disruptive exposure to light by shielding light sources, redirecting light sources, or using low intensity lighting. All exterior light fixtures shall be listed as dark sky compliant as required under SC-AE-6.
SC-BIO-3	LAUSD shall comply with the following specifications related to bird and bat nesting sites. Project activities (including, but not limited to, staging and disturbances to native and non-native vegetation, structures, and substrates[52]) should occur outside of nesting season to avoid take of birds, bats, or their eggs.[53]

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

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	Bird Surveys – Construction Demolition or Vegetation Removal in or adjacent to Native Habitat • For construction projects occurring in or adjacent to native habitat, a qualified LAUSD nesting bird Surveyor or qualified Biologist (Surveyor/Biologist) may determine that additional surveys are required outside of the breeding and nesting season (February 1st through August 31st, beginning January 1st for raptors) to determine if protected birds occupy the area (e.g., project site is adjacent to areas with suitable habitat for Southwestern willow flycatcher). • If avoidance of the avian breeding season is not feasible, beginning 30 days prior to the initiation of the project activities, the Surveyor/Biologist with experience conducting nesting bird surveys shall conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of project activities. In areas that contain suitable habitat for listed species, species-specific surveys shall be conducted by a qualified Biologist authorized by the regulatory agencies. • If a protected bird is observed, additional protocol-level surveys may be required to determine if the sighting was a transient individual or if the site is used as nesting habitat for that species. Project activities shall be delayed until there is a final determination. • If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests), or as determined by the Surveyor/Biologist shall be delayed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, and/or construction fencing shall be used to demarcate the boundary of the 300- or 500-foot buffer between the project activities and the nest or tree. Project personnel, including all Construction Contractors working on site, shall be instructed on the sensitivity of the area. Protective measures shall be documented to show compliance with applicable State and Federal laws pertaining to the protection of birds. • If the Surveyor/Biologist determines that a narrower buffer between the project activities and active nests is warranted, a written explanation for the change shall be submitted to the LAUSD OEHS CEQA Project Manager. If approved, the Surveyor/Biologist can reduce the demarcated buffer. • A Surveyor/Biologist shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain outside the demarcated buffer and that the flagging, stakes, and/or construction fencing are maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager during the grubbing and clearing of vegetation, and shall notify LAUSD immediately if project activities damage avian nests. Bird Surveys – Construction, Demolition, or Vegetation Removal at Existing Campuses • If avoidance of the avian breeding season is not feasible, the Surveyor/Biologist with survey experience shall conduct a nesting bird surveys to determine if active nests are within or adjacent to the work area. • The survey shall be conducted no more than 3 days prior to construction activities. A memo describing results of the survey shall be submitted to the OEHS CEQA Project Manager. • If an active bird nest is observed, the Surveyor/Biologist shall determine the appropriate buffer around the nest. Buffers are determined on species-specific requirements and nest location.

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	• The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager. • No construction activity shall occur within the buffer zone until nest is vacated, juveniles have fledged, and there is no evidence of a second attempt at nesting. Bat Surveys • Bat species inventories and habitat use studies shall be completed for demolition or new construction projects in native habitat as well as projects that require the removal of mature conifer, cottonwood, sycamore or oak trees or abandoned buildings. • Bat surveys must be conducted by a qualified bat Surveyor or Biologist (Surveyor/Biologist). The Surveyor/Biologist shall use the appropriate combination of structure inspection, sampling, exit counts, and acoustic monitors to survey an area that may be affected by the project. • If bats are found, the Surveyor/Biologist shall identify the species and evaluate the colony to determine potential impacts. • Mitigation measures shall be determined on a project-specific basis and may include: o Avoidance o Humane exclusion prior to demolition ▪ Bats should not be evicted from roost sites during the reproductive period (May-September), or during winter hibernating periods to avoid direct mortality ▪ Bats should be flushed from trees prior to felling or trimming. • Off-site habitat improvements shall be conducted in coordination with the California Department of Fish and Wildlife.
SC-BIO-4	LAUSD shall comply with the following conditions if a new school would be located in an area containing native habitat or if a protected tree would be removed from an existing campus: **New Construction in Native Habitat** LAUSD shall avoid constructing new schools in areas containing mature native protected trees to the extent feasible. If site avoidance is not feasible, individual trees should be protected. If protected trees may be impacted, the following condition(s) may be required: • **Translocation of rare plants is prohibited in most instances.** CDFW, in most cases does not recommend translocation, salvage, and/or transplantation of rare, threatened, or endangered plant species, in particular oak trees, as compensation for adverse effects because successful implementation of translocation is rare. Even if translocation is initially successful, it will typically fail to persist over time. • **Permanent conservation of habitat.** To ensure the conservation of sensitive plant species, the preferred method is permanent conservation of habitat containing these species; any translocation proposed shall only be an experimental component of a larger, more robust plan. • **Off-site acquisition of woodland habitat.** Due to the inherent difficulty in creating functional woodland habitat with associated understory components, the preferred method is off-site acquisition of woodland habitat in the local area. All acquired habitat shall be protected under a conservation easement and deeded to a local land conservancy for management and protection. • **Creation of woodlands**. Any creation of functioning woodlands shall be of similar composition, structure, and function of the affected woodland. The new woodland shall mimic the function, demonstrate recruitment, plant density, canopy, and vegetation

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	cover, as well as other measurable success criteria before the measure is deemed a success. o All seed and shrub sources used for tree and understory species in the new planting site shall be collected or grown from on-site sources or from adjacent areas and may be purchased from a supplier that specializes in native seed collection and propagation. This method should reduce the risk of introducing diseases and pathogens into areas where they might not currently exist. o Woodland species should be replaced by planting seeds. Monitoring efforts, including the exclusion of herbivores, shall be employed to maximize seedling survival during the monitoring period. o Monitoring period for woodlands shall be at least 10 years with a minimum of 7 years without supplemental irrigation. This allows the trees to go through one typical drought cycle. This should also be the minimal time needed to see signs of stress and disease and determine the need for replacement plantings. LAUSD shall request CDFW review and comment on any translocation plans, habitat preservation, habitat creation and/or restoration plans. **Removal of Protected Trees on Existing Campuses** LAUSD shall comply with the LAUSD OEHS Tree Trimming and Removal Policy. This policy ensures the management of District trees while ensuring that District activities will not conflict with locally adopted tree preservation policies and ordinances.
SC-BIO-5	LAUSD shall comply with CDFW recommendations: • Project development or conversion that results in a reduction of wetland acreage or wetland habitat values shall not occur unless, at a minimum, replacement or preservation results in "no net loss" of either wetland habitat values or acreage. • All wetlands and watercourses, whether intermittent or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. • A jurisdictional delineation of creeks and their associated riparian habitats shall be conducted pursuant to the USFWS wetland definition. • Implementation of recommended measures shall compensate for affected mature riparian corridors and loss of function and value of wildlife corridors.

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

No Impact. Sensitive biological resources are habitats or species that have been recognized by federal, State, and/or local agencies as endangered, threatened, rare, or in decline throughout all or part of their historical distribution. The Project site is located on a high school campus and surrounded by urban land uses. Vegetation on the Project site is limited to ornamental school trees and shrubs. There is no native habitat and no suitable

habitat for threatened, endangered, or rare species on or near the site.[54,55] Therefore, no impact would occur, and no mitigation or further analysis is required.

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

No Impact. The Project site is located on a developed high school campus. The U.S. Fish and Wildlife Service (USFWS) manages the National Wetlands Inventory (NWI), a digital Wetlands Mapper with vetted data to represent current information on wetlands, riparian, and deep-water habitats.[56] The Project site is not within an adopted habitat conservation plan, natural community conservation plan, or similar plan. The Project site is not within a significant ecological area, land trust, or conservation plan.[57] There is no present riparian habitat present in or near the Project site.[58] Therefore, no impact would occur, and no mitigation or further analysis is required.

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. Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as swamps, marshes, and bogs. According to the USFWS's NWI, there are no wetlands near or within the Project site. The nearest wetland the Los Angeles River, which is located approximately 2.7 miles southwest of the Project site.[59] The proposed Project would not impact any protected wetland areas. No impact would occur, and no mitigation or further analysis is required.

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

Less than Significant Impact. The Garfield HS campus is surrounded by fencing and developed with buildings, asphalt, concrete surfaces, and small landscaped areas. As previously described, the Campus does not have any native habitat and is not serve as a wildlife corridor. According to the Arborist Report (see Appendix C), 156 trees of various species, sizes, and maturity are spread throughout the Campus,[60] which may provide nesting sites for resident or migratory birds. The proposed Project would require the removal of approximately 16 trees as part of the demolition phase. Construction near trees and structures may result in disturbances to birds during nesting season. Migratory nongame native bird species are protected by the California Fish and

[54] CDFW. Lands Viewer. https://apps.wildlife.ca.gov/lands/
[55] USFWS. Critical Habitat Mapper. https://www.arcgis.com/apps/mapviewer/index.html?layers=794de45b9d774d21aed3bf9b5313ee24
[56] USFWS. National Wetlands Inventory. https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/
[57] Los Angeles County Department of Regional Planning. Significant Ecological Area GIS Map. https://egis-lacounty.hub.arcgis.com/datasets/lacounty::significant-ecological-area-sea/about
[58] CDFW. https://gis.data.ca.gov/datasets/d0b55ff0c29a48b2b615852c40322d5b/explore?location=34.005978%2C-118.218320%2C13.23
[59] USFWS. National Wetlands Inventory. https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/
[60] Carlberg Associates. 2022. City of Los Angeles Tree Report for Garfield High School (see Appendix C).

Game Code, Sections 3503, 3503.5, and 3513, which prohibits the take of all birds and their active nests, including raptors and other migratory nongame birds.

LAUSD would comply with the California Fish and Game Code and would implement SC-BIO-3, which would ensure that if construction occurs during the avian breeding season, appropriate measures would be taken to avoid impacts to nesting birds. With implementation of these laws, regulations, and the standard condition, impacts to nesting birds would be less than significant and no mitigation or further analysis is required.

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

Less than Significant Impact. As previously described, the Campus – including the 1.9-acre Project site – is fully developed and is surrounded by urban land uses. According to the Arborist Report, there are 156 trees on the Garfield HS Campus.[61] Protected trees and shrubs as defined by the LAUSD OEHS Tree Trimming and Removal Policy are coast live oak (*Quercus agrifolia sp.*), western sycamore (*Platanus racemose sp.*) , Southern California black walnut (*Juglans californica sp.*), California bay laurel (*Ubellularia californica sp.*), Mexican elderberry (*Sambucus Mexicana sp.)* and toyon (*Heteromeles arbutifolia*) with trunk diameters (measured at 4.5 feet above grade) of 4 inches or greater. The Campus contains one protected tree, a western sycamore.[62]

Existing trees within the Project site would be removed to allow for construction of the new building and associated pavement.

Although the proposed Project would not require the removal of any protected trees on the Project site, construction would require the implementation of SC-BIO-4 for the removal of approximately 16 total trees. SC-BIO-4 requires that all tree trimming and removal conducted on District property adhere to the procedures described in the LAUSD OEHS Tree Trimming and Removal Policy. This policy ensures the management of District trees while ensuring that District activities will not conflict with locally adopted tree preservation policies and ordinances, while ensuring the protection of breeding and nesting habitat of birds protected by the California Fish and Game Code, Migratory Bird Treaty Act, and bird species of special concern.[63] Final design of the proposed Project would include a landscape plan that would identify the number, location, and type of replacement trees to be provided. New canopy and accent trees would be installed

[61] Carlberg Associates. 2022. City of Los Angeles Tree Report for James A. Garfield High School. Carlberg Associates (see Appendix C).
[62] Carlberg Associates. 2022. City of Los Angeles Tree Report James A. Garfield High School. Carlberg Associates (see Appendix C).
[63] LAUSD Tree Trimming and Removal Procedure. https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/135/ceqa/LAUSD_TreeTrimmingRemovalApplication_20230404.pdf

to increase canopy coverage and provide shade while complimenting the aesthetics of hardscape areas throughout the Campus.

Therefore, the proposed Project would not conflict with local policies or ordinances protecting biological resources. Impacts would be less than significant, and no mitigation or further study is required.

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

No Impact. The Project site is not within an adopted habitat conservation plan (HCP), natural community conservation plan (NCCP), or similar plan.[64] The closest area protected by an HCP or NCCP is the Orange County Transportation Authority NCCP/HCP, which is approximately 15 miles southeast of the Project site.[65] Therefore, no impact would occur, and no mitigation or further analysis is required.

[64] CDFW. https://wildlife.ca.gov/Conservation/Planning/NCCP/Plans
[65] CDFW. CCP Plan Summary – Orange County Transportation Authority NCCP/HCP, https://wildlife.ca.gov/Conservation/Planning/NCCP/Plans/OCTA

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

(CUL) Explanation:

The analysis in this section is based on the Historic Resource Evaluation Report (HRER) for James A. Garfield High School, prepared by ASM Affiliates Inc., dated October 2022 (see Appendix C)[66] and the Cultural Resources Technical Report prepared by ASM Affiliates, Inc. (ASM), dated February 2024 (see Appendix D).[67]

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

LAUSD Standard Conditions of Approval	
SC-CUL-1	**Historic Architect** For projects involving structural upgrades to historic resources, the Design Team shall include a qualified Historic Architect with demonstrated project-level experience in historic projects. For campuses with qualifying historical resources under CEQA, the Design Team shall include a LAUSD-qualified Historic Architect. The Historic Architect/s shall meet the Secretary of the Interior's Professional Qualifications Standards and the standards described on page 8 of the LAUSD Design Guidelines and Treatment Approaches for Historic Schools. Throughout the project design progress the Historic Architect shall provide input to ensure compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD requirements and guidelines for the treatment of historical resources. Role of the Historic Architect The tasks of the Historic Architect on the Design Team shall include, but are not limited to: • The Historic Architect shall work with the Design Team (including the Structural Engineer) and LAUSD to ensure that project components, including new construction and modernization of existing facilities, comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The Historic Architect shall work with the Design Team and LAUSD throughout the design process to develop project options that facilitate compliance with the applicable historic preservation standards. • For new construction, the Historic Architect shall work with the Design Team and LAUSD to identify options and opportunities for: (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors,

[66] ASM Affiliates Inc., 2022. Historic Resource Evaluation Report (HRER) for Garfield School.
[67] ASM Affiliates Inc., 2024. Cultural Resources Technical Report (CRTR) for Garfield School.

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LAUSD Standard Conditions of Approval	
	and (2) ensuring that new construction is designed and sited in such a way that reinforces and strengthens, as much as feasible, character-defining site plan features, landscaping, and circulation corridors throughout campus. • For modernization and upgrade projects involving contributing (significant) buildings or features, the Historic Architect shall work with the Design Team and LAUSD to ensure that specifications for design and implementation of projects comply with the applicable historic preservation standards. • The Historic Architect shall participate in Design Team meetings during all phases of the project through 100 percent construction drawings, pre-construction, and construction phases, as applicable. • The Historic Architect shall prepare a memo at the 50 percent and at the 100 percent construction drawings stages, demonstrating how principal project components and treatment approaches comply with applicable historic preservation standards, including the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The memos shall be submitted to LAUSD OEHS for review. • The Historic Architect shall participate in pre-construction and construction monitoring activities, as appropriate, to ensure continuing conformance with Secretary's Standards and/or avoidance of a material impairment of the historical resources. • The Historic Architect shall provide specifications for architectural features or materials requiring restoration or removal, maintaining and protecting relevant features in place, or on-site storage. Specifications shall include detailed drawings or instructions where historic features may be impacted. • The Design Team and Historic Architect shall be responsible for incorporating LAUSD's recommended updates and revisions during the design development and review process.
SC-CUL-2	LAUSD shall follow the guidelines outlined in these documents to the maximum extent practicable when planning and implementing projects and adjacent new construction involving historical resources. The Design Team, Historic Architect, and Construction Contractor shall apply LAUSD School Design Guide and LAUSD Design Guidelines and Treatment Approaches for Historic Schools and the Secretary's Standards for all new construction and modernization projects. In keeping with the District's adopted policies and goals, historical resources shall be reused rather than destroyed, where feasible. General guidelines include: • Retain and preserve the character of historic resources. • Repair rather than remove, replace, or destroy character-defining features; if replacement is necessary, replace in-kind to match materials, dimensions, and appearance. • Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity. • Where practical, conceal reinforcement required for structural stability or the installation of life safety or mechanical systems. • Where necessary to halt deterioration and after the preparation of a condition assessment, undertake surface cleaning, preparation of surfaces, and other projects involving character-defining features using the least invasive, gentlest means possible.

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	Avoid using any abrasive materials or methods including sandblasting and chemical treatments.
SC-CUL-3	Prior to any major alteration to or adjacent to a historic resource that may potentially damage historic resources (or previously identified historic features), the Historic Architect shall develop a Temporary Protection Plan that identifies potential risks to the historic resource. The Temporary Protection Plan shall be prepared in coordination with the Construction Contractor and LAUSD prior to demolition or construction. The Temporary Protection Plan may include, but not be limited to, the following components: • Notation of the historic resource on construction plans. • Pre-construction survey to document the existing physical condition of the historic resource. • Procedures and timing for the placement and removal of temporary protection features, around the historic resource. • Monitoring of the installation and removal of temporary protection features by the Historic Architect, or designee. • Post-construction survey to document the condition of the historic resource after Project completion. • Preparation of a technical memorandum documenting the pre-construction and post-construction conditions of the historic resource and compliance with protective measures outlined Temporary Protection Plan.
SC-CUL-4	Prior to significant alteration or demolition of a historical resource, LAUSD shall retain an Architectural Photographer and/or a Historian or Architectural Historian who meet the Secretary of the Interior's Professional Qualifications Standards and who shall prepare a Historic American Buildings Survey (HABS)-like Historic Documentation Package (Package). The Package shall include photographs and descriptive narrative. Documentation will draw upon primary- and secondary-source research including available studies prepared for the property (measured drawings are not required). The specifications for the Package include: • **Photographs:** Photographic documentation shall focus on the historical resources/features proposed to be significantly altered or demolished, with overview and context photographs for the Campus and adjacent setting. A professional-quality camera will be used to take photographs of interior and exterior features of the buildings. Photographs will include context views, elevations/exteriors, architectural details, overall interiors, and interior details (if warranted). Digital photographs will be in black and white (as well as in color or as requested by the District) and provided in an electronic format. • **Descriptive and Historic Narrative:** The Historian or Architectural Historian shall prepare descriptive and historic narrative of the historical resources/features. Physical descriptions will detail each resource, elevation by elevation, with accompanying photographs and information on how the resource fits within the broader campus during its period of significance. The historic narrative will include available information on the Campus design, history, architect/contractor/designer as appropriate, history of the area, and historic context. In addition, the narrative will include a methodology section specifying the name of researcher, date of research, and sources/archives visited, as well as a bibliography. Within the written history, statements shall be footnoted as to their sources, where appropriate. • **Historic Documentation Package Submittal:** Upon completion of the descriptive and historic narrative, all materials will be compiled in electronic format and presented to

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	LAUSD for review and comment. Upon approval, one electronic copy and one hard copy shall be submitted to LAUSD OEHS. Photographs will be individually labeled and provided to LAUSD in electronic format.
SC-CUL-5	LAUSD shall comply with Design Specification 01 3591, Historic Treatment Procedures, as applicable. This Specification requires the Construction Contractor to submit a Historic Treatment Plan to the District for the protection, repair, and replacement of historic materials and features.
SC-CUL-6	LAUSD shall retain a qualified Archaeologist to be available on-call. The Archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology. To reduce impacts to previously undiscovered buried archaeological resources, following completion of the final grading plan and prior to any ground disturbance, a qualified archaeologist shall prepare an Archaeological Monitoring Program as described under SC-CUL-7.
SC-CUL-7	The Construction Contractor shall halt construction activities within a 30-foot radius of the find and shall notify the LAUSD. • LAUSD shall retain an Archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology. • The Archaeologist shall have the authority to halt any project-related construction activities that could impact potentially significant resources. • The Archaeologist shall be afforded the necessary time to recover and assess the find. Ground-disturbing activities shall not continue until the discovery has been assessed by the Archaeologist. With monitoring, construction activities may continue on other areas of the project site during evaluation and treatment of historic or unique archaeological resources. • If the find is determined to be of value, the Archaeologist shall prepare an Archaeological Monitoring Program and shall monitor the remainder of the ground-disturbing activities. • Significant archaeological resources found shall be curated as determined necessary by the Archaeologist and offered to a local museum or repository willing to accept the resource. • Archaeological reports shall be submitted to the South-Central Coastal Information Center at the California State University, Fullerton. • The Archaeological Monitoring Plan shall include: o Extent and duration of the monitoring based on the grading plans. o At what soil depths monitoring of earthmoving activities shall be required. o Location of areas to be monitored. o Types of artifacts anticipated. o Procedures for temporary stop and redirection of work to permit sampling, including anticipated radius of suspension of ground disturbances around discoveries and duration of evaluation of discovery to determine whether they are classified as unique or historical resources. o Procedures for maintenance of monitoring logs, recovery, analysis, treatment, and curation of significant resources.

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	o Procedures for archaeological resources sensitivity training for all construction workers involved in moving soil or working near soil disturbance, including types of archaeological resources that might be found, along with laws for the protection of resources. The sensitivity training program shall also be included in a worker's environmental awareness program that is prepared by LAUSD with input from the Archaeologist, as needed. o Accommodation and procedures for Native American monitors, if required. o Procedures for discovery of Native American cultural resources. • The construction manager shall adhere to the stipulations of the Archaeological Monitoring Plan.
SC-CUL-8	Cultural resources sensitivity training shall be conducted for all construction workers involved in ground-disturbing activities. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources and shall be included in a worker's environmental awareness program that is prepared by LAUSD with input from a qualified Archaeologist, as needed.
SC-CUL-9	LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. If feasible, the Archaeologist shall prepare a Phase III Data Recovery/Mitigation Program to outline procedures to recover a statistically valid sample of the archaeological remains and to document the site and reduce impacts to be less than significant. All documentation shall be prepared in the standard format of the Archaeological Resource Management Reports (ARMR) Guidelines, as prepared by the Office of Historic Preservation (OHP). Once a Phase III Data Recovery/Mitigation Program is completed, an Archaeological Monitor shall be present to oversee the ground-disturbing activities to ensure that construction proceeds in accordance with the Program.
SC-CUL-10	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified Archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.

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

Less than Significant Impact with Mitigation Incorporated. Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Federal, State, and local requirements regarding the definition of historical resources are described in this section.

Federal. The National Historic Preservation Act of 1966, as amended, defines the criteria to be considered eligible for listing in the NRHP:

> The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and:

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A. That are associated with events that have made a significant contribution to the broad patterns of our history; or

B. That are associated with the lives of persons significant in our past; or

C. That embody distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. That have yielded, or may be likely to yield, information important in prehistory or history (36 Code of Federal Regulations [CFR] Part 63).

State. Section 5024.1I, Title 14 of the CCR, Section 4852 of the PRC defines the criteria to be considered eligible for listing in the CRHR:

A resource may be listed as an historical resource in the California Register if it meets any of the following [National Register] criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

2. Is associated with the lives of persons important in our past;

3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

4. Has yielded, or may be likely to yield, information important in prehistory or history.

Los Angeles Unified School District. The LAUSD Historic Context Statement, 1870 to 1969 establishes guidelines for evaluating the significance of LAUSD campuses.[68] The context statement outlines historic contexts and themes, with eligibility standards, character-defining features, and integrity considerations for each. Garfield HS was considered under the appropriate contexts and themes, and associated property types, period of significance, areas of significance, and geographic location. The applicable eligibility standards, character-defining features, and integrity considerations for both individual significance and significance as a historic district are provided in the LAUSD Historic Context Statement.

Garfield HS contains a collection of buildings 45 years or more of age constructed from 1925 to 1975 with the majority constructed in the 1960s. The Historic Resources Evaluation Report (see Appendix C) concluded that the Campus is considered an NRHP- and CRHR-eligible historic district with a period of significance of 1968. The Cultural Resources Technical Report (see Appendix D) concurred with these findings, as the Garfield HS Historic District meets Criteria A/1 for the theme of *LAUSD and the Civil Rights Movement* and retains integrity to its period of significance of 1968.

[68] ASM Affiliates, Inc. 2022. Final Historic Resource Evaluation Report for James A. Garfield High School.

Table 11 indicates each building on the Campus, the year of construction, building integrity (ability to convey its historical significance), and its relation to the historic district. No buildings on the Campus are individually eligible historic resources.

Table 11 Garfield HS Eligible Historic District

Feature Name	Year Built	Status
Science Building (Building 300)	1925	Contributor
Parent Center	1940	Contributor
ROTC Building	1947	Contributor
Boy's Locker and Shower	1960	Contributor
Storage Building	1960	Non-Contributor
Cafeteria and Pavilion	1963/1968	Non-Contributor
Parking Garage/Classroom D (Building 100)	1963	Contributor
Classroom Building (Building 600)	1965	Contributor
Shop Building (Building 500)	1967	Contributor
Boys' and Girls' Gymnasium	1967	Contributor
Field Sanitary Building	1967	Contributor
Classroom/Utility Building	1968	Contributor
Library/Classroom Building (Building 200)	1975	Non-Contributor
Stadium/Bleachers	1950	Contributor
Quad	1969	Non-Contributor

Source: ASM Affiliates Inc. 2022.

The proposed Project would remove Buildings 100 and 200 and portables AA-336 and AA-2254. The Parking Garage and Classroom D (Building 100), as shown in Table 11, are contributors to the potential historic district, and the Library/Classroom Building (Building 200) as well as portables AA-336 and AA-2254 are non-contributors. The new, consolidated four-story building (which would include 31 classrooms, support spaces, library, and administration space) would be developed on the Project site. Other site improvements and modernization would occur to buildings that would remain. The following activities would have the potential to adversely impact the historic district:

- Removal of one non-contributing building, Building 200 (Library/Classroom Building);
- Removal of the contributing Building 100 (Parking Garage/Classroom D);
- Removal of the non-contributing portable AA-336;
- Removal of the non-contributing portable AA-2254; and
- Construction of one new, consolidated four-story building.

Under CEQA, for these activities to be considered a "substantial adverse change" to the potential historic district, it must be demonstrated that they would result in the physical alteration of the potential historic district such that its integrity, or ability to convey its historical significance and eligibility for historic listing, would be threatened.

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Potential Impacts from Proposed Building Removal

The proposed Project would remove one contributing building (Building 100), one non-contributing building (Building 200), and two portables (AA-336 and AA-2254). Given that only one of the eleven contributing buildings would be removed, a substantial majority of contributing buildings, in terms of built structure and historic fabric, would remain intact after removal of Building 100. Although Building 100 is a physical and visual component of the Campus and the historic district, due to its location at the southwest corner of the district, its loss would not be as disruptive to the cohesion of the district as would the loss of a more central contributor. The demolition of Building 100 would not result in the loss eligibility of the historic district as a whole, but would have a minor impact on the significance of the historical resource.

The proposed Project would retain Building 300, which is a tertiary contributor to the Garfield HS Historic District but is not individually significant. The proposed Project would result in the removal of the bridge connecting the Building 300 to the Building 200 to the west. However, Building 300 has been considerably altered over the years, including the addition of the bridge in 1975, when Building 200 was constructed (after the end of the period of significance for the historic district). At that time, the envelope of Building 300 was cut to accommodate the bridge. The opening providing access to the bridge and the loss of original materials have already altered the building without affecting its eligibility as a contributor to the historic district. Further alterations that would be required to close or revise the openings would not be likely to affect its character-defining features.

The existing bridge between Building 200 and Building 300 would be demolished. However, this feature was added in 1975 and its removal would not affect the integrity of Building 300 or its eligibility as a contributor.

Together, the remaining ten contributing buildings contain all the exterior character-defining features identified as important in conveying the historic significance of the potential historic district. Although the buildings planned for removal are representative of functions characteristic of schools constructed in the 1960s and 1970s, these buildings are not critical to understanding the historic significance of the potential historic district and the integration of the remaining contributing buildings would continue to convey the potential historic significance of the Campus.

Consistent with the requirements on SC-CUL-4, LAUSD would retain an Architectural Photographer and/or Historian or Architectural Historian to prepare a Historic American Buildings Survey (HABS)-like Historic Documentation Package includes photographs and descriptive narrative. Consistent with SC-CUL-1, LAUSD would also retain a historic architect to provide input and to ensure compliance with the Secretary of the Interior's Standards and LAUSD requirements and guidelines of the treatment of historical resources. and descriptive and historic narrative.

The proposed removal of one contributing building would not reduce the integrity of the potential historic district such that it can no longer convey its historic significance. Nevertheless, the proposed removal of Building 100, which is a contributor to the Garfield HS Historic District, could cause a potentially significant impact. The implementation of MM-CUL-1 would be required to reduce this impact to a less than significant level.

Potential Impacts from Proposed New Construction

The new building would diminish some of the historic materials, features, and spatial relationships that characterize the historic district. Nevertheless, the building would be compatible in terms of size, scale and proportion, and massing to avoid detracting from the historic district. The new building would be limited to four-stories, which is generally consistent with the existing three-story and two-story buildings on the Project site, including contributing buildings to the potential historic district (e.g., Building 300). The construction of one four-story building would not substantially alter the historic significance or integrity of the potential historic district such that its ability to convey its historic significance would be materially impaired. Additionally, SC-CUL-1, SC-CUL-2, and SC-CUL-3, which require involvement of a Historic Architect through the entire design process and development of a Temporary Protection Plan for those buildings to remain would be implemented. Therefore, construction of the new building by the proposed Project would result in less than significant impacts to potential historical resources.

After implementation of the proposed Project, the historic district would retain integrity of location, design, setting, workmanship, and association from the identified period of significance. Campus would continue to convey its significance of the 1968 student walkouts ("the Blowouts"). Therefore, long-term impacts to historical resources would be less than significant and no mitigation or further analysis is required.

Mitigation Measure:

Construction of the proposed Project would result in potentially significant direct impacts to Building 100, which is a contributor to the Garfield HS Historic District. CEQA generally considers historical resource impacts to be fully mitigated if the project conforms to Secretary of the Interior's Standards. If project redesign is not feasible to conform to the Secretary of the Interior Standards, mitigation measures to reduce the impact to less than significant have been identified and can be implemented in accordance with CEQA.

MM-CUL-1. LAUSD shall require the Construction Contractor to develop and implement an interpretative outdoor program:

- Outdoor Classroom/History Garden. The Construction Contractor shall develop an outdoor classroom/history garden that includes the following minimum requirements:

  The garden shall be a minimum of 2,000 sf in size, intended to be an area where students can collectively gather and learn as a classroom or collaborate in smaller groups surrounded by a natural, planted backdrop. The outdoor classroom shall include permeable pavers, seating for 32 students, and electrical outlets, wifi, and a blackboard.

  Features of the garden are intended to commemorate the events, people, and places associated with Garfield HS, particularly with regard to the school's role in the Blowouts and the Chicano Civil Rights

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Movement in Los Angeles. At a minimum, the garden shall incorporate interpretive panels, display cases, and plaques, as described below. These features could be placed throughout campus as well.

1. Opportunities to Communicate. Outdoor spaces shall be designed to encourage the exchange of stories and information pertinent to the historic events that took place on the campus. These spaces shall be open to students, faculty, and campus visitors (including alumni and the general public).

2. Interpretive Panels. The Construction Contractor shall develop content for interpretive panels to be placed in the History Garden and other locations on campus at Garfield HS, as well as the other East Los Angeles schools that participated in the Blowouts. Panels should include approximately 200 words of narrative text, as well as maps, photographs, and images that tell the story of the Blowouts. Permanent panels shall be installed in the History Garden, as well as throughout the campus referring to historic events associated with the Blowouts.

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

Less than Significant Impact. Archaeological resources are cultural resources of prehistoric or historic origin that reflect human activity. Archaeological resources include both structural ruins and buried resources. The term Unique Archaeological Resources is defined in PRC Section 21083.2(g) as follows:

> … 'unique archaeological resources' means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:
>
> (1) Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
>
> (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
>
> (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

According to the Preliminary Geotechnical Report conducted by Group Delta on November 10, 2022, the Project site is at an elevation ranging between 202 and 221 feet above mean sea level. The site slopes gently from west to east, and from north to south.[69]

Since the Project site has been highly disturbed and is covered by clayey fill soils, discovery of archaeological resources during shallow excavation activities is highly unlikely. In fact, given these conditions, ASM Affiliates, Inc. and LAUSD determined that an archaeological survey of the campus was not required. Nevertheless, in compliance with SC-CUL-6 to retain a qualified Archaeologist to be available on call to reduce impacts to previously undiscovered buried archaeological resources. Further, SC-CUL-7 through SC-CUL-10 require that if historical or unique archaeological resources are discovered during construction activities, all work shall stop

[69] Group Delta, 2022, Preliminary Geotechnical Report for James A. Garfield High School.

within a 30-foot radius of the discovery. LAUSD will retain a qualified archaeologist to make an evaluation of significance of the resource. If it is determined to be historical or a unique archaeological resource or if the discovery is not historical or unique but the archaeologist determines the possibility of further discoveries, a monitoring program will be prepared and implemented for the remainder of the earthwork activities. If archaeological or Native American resources are discovered, SC-CUL-10 would be implemented for handling and recovery.

With the implementation of these SCs, potential impacts to archaeological resources would be less than significant, and no mitigation or further analysis is required.

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

Less than Significant Impact. During construction of the previous development and again during construction of the school, extensive earthwork (excavation and grading) occurred. Therefore, human remains are not anticipated. No known cemeteries or other burial places are known to exist within the Campus and the Project is unlikely to disturb human remains. In the unlikely event that human remains are uncovered during demolition, grading, or excavation, California Government Code Sections 27460 et seq. mandate that there shall be no mitigation or further excavation or soil disturbance until the Los Angeles County Coroner has determined that the remains are not subject to the provisions of Section 27491 of the California Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of death, and the required recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in PRC Section 5097.98.

Pursuant to California Health and Safety Code Section 7050.5, the coroner shall make his or her determination within two working days of notification of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe that they are those of a Native American, he or she shall contact the Native American Heritage Commission (NAHC) within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the Most Likely Descendant (MLD) of the deceased Native American. The MLD shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains. Compliance with existing regulations would ensure that impacts to human remains would be less than significant and no mitigation or further analysis is required.

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

(ENG) Explanation:

All SUP projects are required to meet CCR Title 24 energy-efficiency standards. Therefore, site specific projects would be consistent with applicable goals of SCAG's 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS) (Connect SoCal), such as encouraging energy efficiency. LAUSD also applies SCs for minimizing impacts to GHG emissions and energy consumption. Applicable SCs related to energy impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-GHG-5	Implementation of SC-GHG-5 (see VIII. GREENHOUSE GAS EMISSIONS)

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

Less than Significant Impact. The Project would result in short-term construction and long-term operational energy consumption.

Short-Term Construction

Short-term construction activities associated with the proposed Project would consume energy, primarily in the form of diesel fuel (e.g., mobile construction equipment) and electricity (e.g., power tools). Construction activities would be subject to applicable regulations such as anti-idling measures, limits on duration of activities, and the use of alternative fuels, thereby reducing energy consumption. There are no aspects of the proposed Project that would foreseeably result in the inefficient, wasteful, or unnecessary consumption of energy during construction activities. For example, there are no unusual characteristics that would directly or indirectly cause construction activities to be any less efficient than would otherwise occur elsewhere (e.g., restrictions on equipment, labor, types of activities, etc.). The proposed major modernization would not result in the inefficient, wasteful, or unnecessary consumption of energy during construction activities.

Electrical Energy

Electricity use would vary during each phase of the proposed construction activities. Most of the initial phases would involve the use of heavy construction equipment, which would be diesel-powered. However, later phases would require the use of electric-powered equipment (e.g., power drills, table saws, etc.) for interior

construction, finishing, and architectural coatings. Electrical energy would be available for use during construction from existing connections, precluding the need for less-efficient generators. Therefore, construction activities associated with the proposed Project would not result in wasteful or unnecessary electricity demands, and impacts would be less than significant, and no mitigation or further analysis is required.

Natural Gas Energy

Construction equipment used for the proposed Project would be diesel powered and would not require the use of natural gas. Therefore, no natural gas demand is anticipated during construction. Impacts would be less than significant with respect to natural gas usage and no mitigation or further analysis is required.

Transportation Energy

Transportation energy use during construction activities associated with the proposed Project would come from delivery vehicles, haul trucks, and construction employee vehicles. In addition, transportation energy demand would come from the use of off-road construction equipment. It is anticipated that most of the off-road construction equipment, such as those used during demolition and grading, would be gas or diesel powered.

The use of energy resources by vehicles and equipment would fluctuate according to the phase of construction and would be temporary. In addition, all construction equipment would cease operating upon completion of construction activities associated with the proposed Project. Therefore, impacts related to transportation energy use during construction would be temporary and would not require expanded energy supplies or the construction of new infrastructure. Further, the construction equipment would be well maintained and meet the appropriate tier ratings per CALGreen Code or USEPA emissions standards so that adequate energy-efficiency level is achieved. To limit wasteful and unnecessary energy consumption, the Construction Contractor would be required to minimize nonessential idling of construction equipment in accordance with Section 2449 of the CCR, Title 13, Article 4.8, Chapter 9. Additionally, construction trips would not result in unnecessary use of energy since the Project site is centrally located and is served by numerous regional freeway systems (e.g., I-110) that provide the most direct routes from various areas of the region. Thus, transportation energy use during construction activities associated with the proposed Project would not be considered inefficient, wasteful, or unnecessary. Impacts would be less than significant, and no mitigation or further analysis is required.

Long-Term Operation

Operationally, the proposed major modernization at Garfield HS would be consistent with all appropriate design standards and sustainable building practices to reduce potential energy consumption. Standards will include the CALGreen Code, CHPS criteria, and the LAUSD's SCs included in this IS.[70] The CALGreen Code is a Statewide building standards code, which includes standards for reduced energy and water consumption and the reduction of GHG emissions from buildings.[71] The CHPS includes design criteria for energy and material efficiency. The proposed major modernization would replace or upgrade facilities on the Campus, but it would not increase the number of students or faculty at Garfield HS. The original Campus was constructed in the 1930s, the proposed Project would overall improve energy efficiency. The proposed Project would also

[70] LAUSD. Program EIR for the School Upgrade Program. Report. https://www.lausd.org/Page/2799.
[71] Building Standards Commission. 2018. CALGreen. https://www.dgs.ca.gov/BSC.

include utilities upgrades (e.g., new main distribution switchboard for the new building, charging stations for electric vehicles in the new surface parking lot, etc.), but would not require the expansion or construction of new electrical generation and/or transmission facilities and would not use large amounts of fuel or energy in an unnecessary, wasteful, or inefficient manner. The proposed major modernization would continue usage of local and regional energy supplies but would not constrain local or regional energy supplies, so the impacts would be less than significant. No mitigation or further study is required.

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

No Impact. The State's electricity grid is transitioning to renewable energy under California's Renewable Energy Program. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. Electricity production from renewable sources is generally considered carbon neutral. On September 10, 2018, Governor Brown signed Senate Bill (SB) 100 and under SB 100, the renewable portfolios standard (RPS) for public-owned facilities and retail sellers consists of 44 percent renewable energy by 2024, 50 percent by 2026, 52 percent by 2027, and 60 percent by 2030.

The Statewide RPS requirements do not directly apply to individual development projects, but to utilities and energy providers such as SCE, whose compliance with RPS requirements would contribute to the State's objective of transitioning to renewable energy. The proposed Project would not change any of the uses on the Campus and would comply with the current and future iterations of the Building Energy Efficiency Standards and CALGreen Code.

Also, in compliance with SC-GHG-5, the new building would not exceed the Building Energy Efficiency Standards and the CALGreen Code and would be more energy efficient than the existing buildings at the high school. The proposed Project would be reviewed by the DSA for compliance with design and construction and energy regulations, and by LAUSD for compliance with the applicable SCs. The proposed Project would not conflict with State or local plans for renewable energy or energy efficiency. No impacts would occur, and no mitigation or further analysis is required.

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

(GEO) Explanation:

The SPEIR evaluated the potential for implementation of the SUP-related projects to impact geological and soil resources. It was determined in the SPEIR that, upon implementation of regulatory requirements and SCs for SUP-related projects, the impacts associated with seismic hazards, underlying soil characteristics, slope stability, and erosion would be less than significant. The analysis for the proposed Project this section is based in part on Preliminary Geotechnical Report Campus Major Modernization Garfield School, prepared by Group Delta Consultants Inc., dated November 10, 2022 (see Appendix F).

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

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

LAUSD Standard Conditions of Approval	
SC-GEO-2	LAUSD shall retain a Paleontological Monitor to oversee specific ground-disturbing activities as determined by the scope of work and final grading plan. The Monitor shall provide the construction crew(s) with a brief summary of the sensitivity, the rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources. If paleontological resources are uncovered, the Construction Contractor shall halt construction activities within a 30 foot radius of the find and shall notify the LAUSD. • Ground-disturbing activities shall not continue until the discovery has been assessed by the Paleontologist. • The paleontologist shall have the authority to halt construction activities to allow a reasonable amount of time to identify potential resources. • Significant resources found shall be curated as determined necessary by the Paleontologist.

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

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

Less than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazards of surface faulting and fault rupture on habitable buildings. Fault rupture generally occurs within 50 feet of an active fault line and is limited to the immediate area where the fault breaks along the surface. Active earthquake faults are faults where surface rupture has occurred within the last 11,000 years. The Project site is not within or immediately adjacent to (i.e., within a few hundred feet) of an Alquist-Priolo Earthquake Fault Zone (surface fault rupture only). The nearest Alquist-Priolo Earthquake Fault Zone is the El Monte Fault Zone, which is located approximately 4.5 miles from the Project site.[72] The potential for tectonic fault rupture at the site is considered negligible.

The DSA approves designs for new school construction, and all projects must submit to DSA oversight and inspections during construction.[73] The DSA must then certify that each new school building meets State of California statutory safety requirements. Compliance with DSA and CBC requirements would ensure that potential impacts related to surface rupture from a known active fault would be less than significant. No mitigation or further study is required.

[72] California Department of Conservation. 2023. Alquist-Priolo Earthquake Fault Zones.
[73] Department of General Services. Division of the State Architect Enforcement Responsibility. https://www.dgs.ca.gov/DSA/About.

ii. Strong seismic ground shaking?

Less than Significant Impact. Southern California is a seismically active region. Impacts from ground shaking could occur many miles from an earthquake epicenter. The potential severity of ground shaking depends on many factors, including the distance from the originating fault, the earthquake magnitude, and the nature of the earth materials beneath a given site. There are several known faults in the Los Angeles region; the nearest mapped fault is the El Monte Fault Zone, which is approximately 4.5 miles from the Project site.[74] Moderate to strong ground shaking can be anticipated, as with current conditions. Because of the proximity to known faults and because the entire Southern California region is considered seismically active, there is a potential for people and structures to experience strong ground shaking in the future from local and regional faults. However, the site is not on or within 1,500 feet of a known active fault or geologically hazardous area.

The new, consolidated building would be designed in compliance with the California Building Code guidelines for evaluating and mitigating seismic hazards in California and the California Geological Survey "Checklist for the Review of Geologic/Seismic Reports for California Schools, Hospitals, and Essential Services Buildings."[75] The proposed Project also requires review from the DSA for compliance with design and construction and accessibility standards and codes, including seismic requirements. LAUSD, with oversight from DSA, would comply with these requirements in the design and construction of the new school building. Therefore, seismic ground shaking impacts would be less than significant and no mitigation or further analysis is required.

iii. Seismic-related ground failure, including liquefaction?

No Impact. Liquefaction is a phenomenon in which saturated cohesionless soils undergo a temporary loss of strength during severe ground shaking and acquire a degree of mobility sufficient to permit ground deformation. In extreme cases, the soil particles can become suspended in groundwater, resulting in the soil deposit becoming mobile and fluid-like. Liquefaction is generally considered to occur primarily in loose to medium dense deposits of saturated sandy soils. Thus, three conditions are required for liquefaction to occur: 1) a sandy soil of loose to medium density; 2) saturated conditions; and 3) rapid, large strain, cyclic loading, normally provided by earthquake motions.

According to the County of Los Angeles Seismic Safety Elements, the Project site is not in a seismic hazard zone for soil liquefaction or in a zone of required investigation for liquefaction.[76] Groundwater was not encountered in subsurface explorations to 60 feet below existing grade during the geotechnical investigation for the proposed Project; however, historical high groundwater levels provided by the California Geological Survey (CGS) indicate a shallowest groundwater table of approximately 100 feet below existing grades. Thus, due to the lack of shallow groundwater and density of the subsurface soils, the Project site is excluded from a liquefaction hazard zone. The proposed Project would not

[74] California Department of Conservation. 2023. Alquist-Priolo Earthquake Fault Zones
[75] California Geological Survey (CGS). 2022. Note 48 "Checklist for the Review of Geologic/Seismic Reports for California Public Schools, Hospitals, and Essential Services Buildings." https://www.conservation.ca.gov/cgs/Documents/Publications/CGS-Notes/CGS-Note-48-a11y.pdf
[76] Group Delta Inc. 2022. Preliminary Geotechnical Report Campus Major Modernization Project Report. James A. Garfield High School.

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expose people or the new school building to adverse effects from liquefaction. Therefore, there would be no impact and no mitigation or further analysis is required.

iv. Landslides?

No Impact. A landslide is a type of erosion in which masses of earth and rock move down slope as a single unit. Susceptibility of slopes to landslides and other forms of slope failure depend on several factors, which are usually present in combination and include steep slopes, condition of rock and soil materials, the presence of water, formational contacts, geologic shear zones, and seismic activity.

The Campus is situated within a broad alluvial plain with surrounding lots relatively level. There are no significant slopes that can present a landslide hazard at or near the site, nor is the school in the path of any known or potential landslides or seismic slope instability.[77] The proposed Project would not expose people or the new, consolidated four-story building to adverse effects from landslides. Therefore, there would be no impacts and no mitigation or further analysis is required.

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

Less than Significant Impact. Potential short-term construction-related and long-term operational impacts associated with soils erosion and/or loss of topsoil are discussed below.

Construction

The native topsoil was removed and/or compacted during development of the Campus; therefore, the proposed modernization would not result in the loss of topsoil.

Erosion is a normal and inevitable geologic process whereby earthen materials are loosened, worn away, decomposed or dissolved, and moved from one place to another. Precipitation, running water, waves, and wind are all agents of erosion. Ordinarily, erosion proceeds imperceptibly, but when the natural equilibrium of the environment is changed, the rate of erosion can be greatly accelerated. Accelerated erosion in an urban area can cause damage by undermining structures; blocking storm drains; and depositing silt, sand, or mud on roads and in tunnels. Eroded materials can eventually be deposited in local waters, where the carried silt remains suspended in the water for some time, constituting a pollutant and altering the normal balance of plant and animal life.

Project-related construction activities would expose soil through excavation, grading, and trenching, and thus could cause erosion during heavy winds or rainstorms. Construction projects of 1 acre or more are regulated under the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) issued by the State Water Resources Control Board (SWRCB). LAUSD would obtain coverage by preparing and implementing a Stormwater Pollution Prevention Plan (SWPPP), estimating sediment risk from construction activities to receiving waters, and specifying BMPs that would be incorporated into the construction plan to minimize stormwater pollution. The proposed Project would occur on approximately 1.9 acres of the approximate 19-acre Garfield HS Campus; thus, construction would be subject to the Statewide

[77] Group Delta Inc. 2022. Preliminary Geotechnical Report Campus Major Modernization Project Report. James A. Garfield High School.

Construction General Permit and implementation of BMPs specified in the SWPPP. This is also required under LAUSD SC-HWQ-2. Construction-phase soil erosion impacts would be less than significant, and no mitigation or further analysis is required.

Operation

After completion of the proposed Project, ground surfaces at the Project site would be either hardscape or maintained landscaping, and no large areas of exposed soil would be left to erode. The proposed Project would incorporate SC-HWQ-1, which would be consistent with the Low-Impact Development (LID) Standards Manual issued by the County of Los Angeles Department of Public Works (LADPW) in February 2014. The LID Standards Manual in turn is pursuant to the Municipal Stormwater Permit for coastal watersheds of Los Angeles County, Order No. R4-2012-0175, issued by the Los Angeles Regional Water Quality Control Board in 2012.

LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treat stormwater as a resource rather than a waste product. There are many practices that have been used to adhere to these principles, such as bioretention facilities, rain gardens, vegetated rooftops, rain barrels, and permeable pavements. By implementing LID principles and practices, water can be managed in a way that reduces the impact of built areas and promotes the natural movement of water within an ecosystem or watershed. Applied on a broad scale, LID can maintain or restore a watershed's hydrologic and ecological functions. LAUSD would comply with existing regulations. Therefore, soil erosion impacts would be less than significant, and no mitigation or further analysis is required.

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. As previously described, hazards arising from liquefaction and landslides would be less than significant. Potential hazards related to lateral spreading, subsidence, seismically induce settlement, and collapsible soils are described below.

Lateral spreading. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The geotechnical investigation assessed the potential for liquefaction on the Project site and found that the Project site is not susceptible to soil liquefaction. Therefore, the proposed Project would not expose people or structures on the Project site to adverse effects associated with lateral spreading. Impacts would be less than significant, and no mitigation or further analysis is required.

Subsidence. The major cause of ground subsidence is withdrawal of groundwater. The proposed Project would not require the withdrawal of groundwater. Implementation of the proposed Project would not pose substantial hazards to people or structures due to ground subsidence. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

Seismically Induced Settlement. Seismically induced settlement occurs in dry sands, in contrast to liquefaction, which occurs in saturated sand or gravel, and is often caused by loose to medium-dense granular soils densified during ground shaking. A potential total dry seismic settlement (above the groundwater table) of 1 to 1.75 inches, with differential seismic settlement estimated to be between 0.5- and 1-inch across a span

of 40 feet. Given that the historical high groundwater level at the site is approximately 100 feet below the ground surface, seismically induced settlement is unlikely. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

Collapsible Soils. Collapsible soils are typically geologically young, unconsolidated sediments of low density that may compress under the weight of structures. The proposed structures and modifications to existing buildings may be supported on conventional isolated and/or continuous shallow footings or a mat foundation, provided the subsurface soils are prepared in accordance with the Geotechnical Report. As part of the DSA review process, LAUSD is required to show how the proposed Project complies with a final engineering-level Geotechnical Report. This report includes, but is not limited to, identification of building setbacks, site preparation, specific locations and methods for fill placement, temporary shoring, groundwater seismic design features, excavation stability, foundations, soil stabilization, establishment of any deep foundations, concrete slabs and pavements, surface drainage, cement type and corrosion measures, erosion control, shoring and internal bracing, and plan review. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

The design and development of the proposed Project would incorporate all recommended measures outlined in the final engineering-level geotechnical report to ensure that safety is not compromised as required by existing regulations. Compliance with recommendations of the Geotechnical Report would minimize hazards from collapsible soils. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

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

Less than Significant Impact. Expansive soils possess clay particles that react to moisture changes by shrinking when dry or swelling when wet. These soils have the potential to crack building foundations and, in some cases, structurally distress the buildings themselves. Soils available from on-site excavations, less debris or organic matter, would be suitable for re-use in compacted fills. Soils placed behind retaining walls and within one foot of the finished subgrade for building floor slabs and hardscape would be predominately granular and non-expansive (E.I. of 20 or less). Such materials are anticipated to be available on-site within the upper 10 feet below existing grades. As discussed previously, LAUSD is required to show how the proposed Project complies with a final engineering-level Geotechnical Report, and DSA would ensure that the buildings are designed and constructed for this condition. The proposed Project would not expose people or structures to significant adverse effects associated with expansive soils. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

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

No Impact. The proposed Project would be connected to the existing municipal sewer system, and no septic tanks or alternative wastewater disposal systems would be necessary.[78] Therefore, no impact would occur, and no mitigation or further study is required.

[78] LAUSD. Program EIR for the School Upgrade Program. Report. https://www.lausd.org/Page/2799

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

Less than Significant Impact. A paleontological resource is a natural resource characterized as faunal or floral fossilized remains but may also include specimens of non-fossil material dating to any period preceding human occupation.

Los Angeles is rich in paleontological sites. Fossils have been found mostly in sedimentary rock that has been uplifted, eroded, or otherwise exposed. However, Garfield HS has been highly disturbed and is covered by fill soils, discovery of paleontological resources during shallow excavation activities is unlikely. In the event of a discovery, implementation of SC-GEO-2, which requires a Paleontological Monitor to oversee specific ground-disturbing activities, would reduce the potential impacts of potentially uncovered paleontological resources. There are no recognized unique geologic features at Garfield HS. Therefore, with incorporation of SC-GEO-2, impacts to unique paleontological resources and unique geologic features would be less than significant and no mitigation or further analysis is required.

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

(GHG) Explanation:

The SPEIR evaluated the potential for implementation of the SUP-related site-specific projects to contribute to GHG emission impacts. Because individually no one project is large enough to single-handedly result in a significant increase in global concentrations of GHG compounds, Project-related climate change impacts are inherently cumulative. This GHG emissions impact analysis is based upon the GHG modeling provided in the Air Quality Technical Study that was prepared for the proposed Project (see Appendix A).

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

LAUSD Standard Conditions of Approval	
SC-GHG-1	During operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
SC-GHG-2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.
SC-GHG-3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.
SC-GHG-4	LAUSD shall develop a water budget for landscape (both non-recreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources.
SC-GHG-5	LAUSD shall ensure that the designed time dependent valued energy shall be at least 10 percent, with a goal of 20 percent less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the Division of the State Architect.
SC-USS-1	Implementation of SC-USS-1 (see XX. UTILITIES AND SERVICE SYSTEMS)

The primary source of GHG is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs – water vapor, carbon dioxide (CO_2), methane (CH_4), and ozone (O_3) – that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other

GHG identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.[79]

Information on manufacture of cement, steel, and other "life cycle" emissions that would occur as a result of the proposed Project are not applicable and are not included in the analysis.[80] Black carbon emissions are not included in the GHG analysis because the CARB does not include this pollutant in the State's SB 32 and AB 1279 inventory and treats this short-lived climate pollutant separately.[81]

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

Less than Significant Impact. Global climate change is not confined to a particular area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough greenhouse gas emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

Project-related construction-phase GHG emissions are shown in Table 12. Implementation of the proposed Project would result in the redevelopment of a 1.9-acre of the existing Campus. However, because student capacity would not increase, operation of the proposed Project would not result in an increase in trips, vehicle miles traveled, water demand, or solid waste generation. In addition, GHG emissions from building energy use would be minimized because the existing two buildings and two portables to be removed, which were constructed prior to modern building energy codes, would be replaced with newer, more energy-efficient buildings that meet the current California Building and Energy Efficiency Standards. Annual average construction emissions were amortized over 30 years and included in the emissions inventory to account for one-time GHG emissions from the construction phase of the proposed Project. Overall, construction and operation of the proposed Project would not generate annual emissions that exceed the SCAQMD bright-line threshold of 3,000 metric tons of carbon dioxide equivalent (MT CO_2e) per year.[82] Additionally, SC-GHG-1 through -6 and SC-USS-1 would minimize operational GHG emissions through efficient irrigation, energy

[79] Water vapor (H_2O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.

[80] Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analyses were not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (California Natural Resources Agency [CNRA]. Final Statement of Reasons for Regulatory Action. http://resources.ca.gov/ceqa/docs/2018_CEQA_Final_Statement_of%20Reasons_111218.pdf). Because the amount of materials consumed during the operation or construction of the Project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials are also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (Governor's Office of Planning and Research [OPR]. 2008. CEQA and Climate Change: Addressing Climate Change through CEQA Review. Technical Advisory. http://www.opr.ca.gov/ceqa/pdfs/june08-ceqa.pdf).

[81] Particulate matter emissions, which include black carbon, are analyzed in Section III, Air Quality. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The state's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years (CARB. Final Proposed Short-Lived Climate Pollutant Reduction Strategy. https://www.arb.ca.gov/cc/shortlived/shortlived.htm).

[82] SCAQMD. Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15. http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf.

consumption, and waste generation. Therefore, the cumulative contribution of the proposed Project to GHG emissions would be less than significant and no mitigation or further analysis is required.

Table 12 Federal and State Attainment Status

	GHG Emissions ($MTCO_2e$)			
Construction Year	2026	2027	2028	2029
Annual GHG Emissions	189	594	451	380
Total Construction Emissions	1,614			
Total Operation Emissions	0			
Amortized Annual Emissions	54			
Total Project Emissions	54			
SCAQMD Significance Threshold	3,000			
Exceeds Threshold?	**No**			

Sources: Emissions calculated by WSP with CalEEMod (Version 2020.4.0).

Notes:

MT = metric tons; $MTCO_2e$ = metric ton of carbon dioxide equivalent.

[1] Student capacity at buildout would not change from existing conditions. Therefore, mobile and solid waste emissions were not evaluated. The modeling also assumes that landscaping would be a new use and accounts for GHG emissions from outdoor water use.

[2] Total construction emission is amortized over 30 years per SCAQMD methodology.

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

Less than Significant Impact. Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan, and Connect SoCal. CARB's latest Climate Change Scoping Plan (2022)[83] outlines the State's strategies to reduce GHG emissions in accordance with the targets established under AB 32, SB 32, and AB 1279. The Scoping Plan is applicable to State agencies and is not directly applicable to cities/counties and individual projects. Nonetheless, the Scoping Plan has been the primary tool that is used to develop performance-based and efficiency-based CEQA criteria and GHG reduction targets for climate action planning efforts.

Statewide strategies to reduce GHG emissions include the low carbon fuel standards, California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the CAFE standards, and other early action measures as necessary to ensure the State is on target to achieve the GHG emissions reduction goals of AB 32, SB 32, and AB 1279. In addition, new developments are required to comply with the current Building Energy Efficiency Standards and CALGreen Code. The proposed Project would comply with these GHG emissions reduction measures since they are statewide strategies. The GHG emissions associated with the proposed Project would be reduced from compliance with statewide measures that have been adopted since AB 32, SB 32, and AB 1279 were adopted. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

[83] CARB. Scoping Plan for Achieving Carbon Neutrality. https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf, accessed January 24, 2023.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy

Connect SoCal, which was adopted by SCAG in September 2020, finds that land use strategies that focus on new housing and job growth in areas rich with destinations and mobility options would be consistent with a land use development pattern that supports and complements the proposed transportation network.

Connect SoCal does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency to governments and developers. The proposed Project would redevelop and modernize facilities for the existing and future students at the high school. The proposed Project would not change underlying zoning or uses on the Campus. The proposed Project would continue to serve the local student population within the surrounding communities. Since the redevelopment of the existing school Campus would continue to be a local-serving land use, and because the proposed Project would not result in an increase in student capacity, the proposed Project would not generate an increase in vehicle miles traveled (VMT). Therefore, the proposed Project would not interfere with SCAG's ability to implement the regional strategies in Connect SoCal, and impacts would be less than significant. No impact would occur, and no mitigation or further analysis is required.

4. Environmental Checklist and Analysis

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

(HAZ) Explanation:

The analysis in this section is based in part on Phase I Environmental Site Assessment Garfield HS, prepared by Millennium Consulting Associates, dated January 27, 2022, the "Preliminary Environmental Assessment Equivalent Report" prepared by Terraphase Engineering, dated July 5, 2023. Copies of these reports are included as Appendix F and H.

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

LAUSD Standard Conditions of Approval	
SC-HAZ-1	LAUSD shall determine the proximity of electromagnetic field (EMF) generators to new classrooms or outdoor play areas to ensure the EMF generator does not pose a threat. **Criteria for School Siting in Proximity to High Voltage Power Lines or Cell Towers** Board of Education resolutions (Effects of Non-Ionizing Radiation-2000, Wireless Telecommunication Installations – 2009 and T-Mobile – Cell Tower Notification and Condemnation-2009) regarding electromagnetic field (EMF) and radio frequency exposures associated with cellular towers near schools whereby a prohibition exists regarding siting towers on school campuses.

LAUSD Standard Conditions of Approval	
	LAUSD's screening perimeter for new classroom construction or outdoor play area is 200 feet from cell towers and 500 feet from high voltage power lines.
SC-HAZ-2	LAUSD shall determine the proximity of new classrooms or outdoor play areas to ensure that these new facilities are placed outside of the established exclusion zone. **Pipeline Safety Hazard Analysis** This document outlines the process for evaluating safety hazards associated with underground and above-ground natural gas and hazardous liquid pipelines. The pipeline safety hazard assessment (PSHA) process determines whether potential releases of natural gas, petroleum product, and crude oil from pipelines located near a school site pose a safety risk to students and staff.
SC-HAZ-4	The Construction Contractor shall comply with the following OEHS Site Assessment practices and requirements (as applicable): • District Specification Section 01 4524, Environmental Import / Export Materials Testing. • Removal Action Workplan or Remedial Activities Workplan. • South Coast Air Quality Management District Rule 1466. • Guidelines and Procedures to Address Polychlorinated Biphenyls (PCBs) in Building Materials – particularly applicable to buildings that were constructed or remodeled between 1959 and 1979. • Lead and asbestos abatement requirements identified by the Facilities Environmental Technical Unit (FETU) in the Phase I / Phase II, or abatement plan(s).
SC-AQ-1	Implementation of SC-AQ-1 (refer to III. AIR QUALITY)

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. Potential impacts associated with the transportation, use, and disposal of hazardous materials are discussed below.

Existing Hazardous Materials Present or potentially Present on the Campus

Recognized Environmental Conditions

A recognized environmental condition (REC) is defined as the presence or likely presence of hazardous substances or petroleum products in, on, or at a property due to any release to the environment, under any conditions indicative of a release to the environment, or under conditions that pose a material threat of a future release to the environment.

The Phase I Environmental Site Assessment (ESA) identified the following RECs within or adjacent to the Project site in the southwest corner of the campus:

- A printing shop in the south portion of the former Building 700, which is located north of Building 100.

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- Pad-mounted transformers and electrical equipment operated by Southern California Edison are located south of Building 200.

Although not identified as RECs in the Phase I ESA, Terraphase identified the following additional environmental concerns:

- A spray-painting booth in the south portion of the former Building 700 located north of Building 100. A utility corridor was found to run east-west between Buildings 100 and 700, which potentially served as a conduit for chemicals of potential concern (COPCs).
- A photograph development laboratory located on the first floor on the north end of Building 100.
- A hydraulic lift elevator located along the east end of Building 200.

Areas of Concern

Based on the RECs identified in the Phase I ESA, LAUSD and Terraphase Engineering established that there are no areas of concern on the Campus or the Project site.

The results of the Preliminary Environmental Assessment – Equivalent (PEA-E) investigation included COPCs above their respective screening level or regulatory threshold. The PEA-E report noted the following regarding the chemicals of potential concern:

- Arsenic. Arsenic levels greater than the Southern California background arsenic concentration of 12 milligrams per kilogram (mg/kg) were reported in three areas within the development zone: south of Building 100 (SB-13), north of portable AA-336 (SB-25), and near the northeast corner of portable AA-2254 (SB-36). Detected concentrations at these locations ranged from 13 to 79 mg/kg. Soil samples from these three arsenic-impacted areas were subjected to leaching analysis and shown as likely to be characterized for disposal as non-hazardous.
- Lead. Lead concentrations exceeding the Department of Toxic Substance Control Screening Level of 80 mg/kg were reported in four locations within the development zone: surrounding Building 200 (SB-14, SB-22, and SB-34) and northeast of portable AA-2254 (SB-36). The lead-impacted soil at these locations ranges from 92 to 200 mg/kg. Soil samples from these four lead-impacted areas were subjected to leaching analysis and shown as likely to be characterized for disposal as non-hazardous.

All other remaining chemicals of concern, including the ones listed under the SCAQMD Rule 1466, were reported well below their respective screening level or below the 95 percent upper confidence limit of the arithmetic mean for the Site. Therefore, SCAQMD Rule 1466 is not applicable to the Project. Lead and arsenic impacted areas would be managed in accordance with a Site-specific Soil Removal Plan. This plan would govern excavation, segregation, and proper handling of soil with arsenic and lead exceedances discovered during the PEA-E.[84]

[84] Terraphase Engineering Inc. 2024. Soil Removal Plan James A. Garfield High School.

Lead-Based Paint and Other Lead Containing Materials

Based on the age of the buildings (1925 to 1967), it is possible that lead-based paint (LBP) and other lead-containing materials (LCMs) are present in buildings to be demolished. However, concentrations of lead were found below the screening criterion in five soil samples.[85]

Existing Hazardous Substances

Hazardous materials observed within or adjacent to the Project site on December 15, 2021, during site reconnaissance conducted for the Phase I ESA site investigation included the following:[86]

- Various chemical storages near Building 200 (chemistry chemicals).
- Oil storage drums (waste motor oil and coolant) in the existing auto body shop yard.
- Two 3-stage clarifiers (one in the auto shop yard and one in the outdoor quad area on the west side of Building 300).
- Transformers and utility poles within and adjacent the Project site.

These are all materials used in regular operation and maintenance of the existing Campus. No staining or other evidence of spills was observed.

Other Site Hazard Considerations

The Project site and locations of new classrooms/parking lot areas are not within 350 feet of existing high voltage power lines or cell towers. There are no hazardous pipelines or railroad track easements within 1,500 feet of the Project site.

Soil Import and Export

Any soil that is imported or exported must be chemically tested in accordance with specific written procedures as outlined in LAUSD Specifications, Section 01 4524, Environmental Import/Export Materials Testing.[87] This specification has the requirements for the sampling, testing, transporting, and certifying of imported fill materials or exported fill materials from school sites.

Demolition and Construction Activities

Hazardous materials that would be used during construction (e.g., petroleum-based products, paints, solvents, sealers, oils, grease, and cleaning fluids) would be properly transported, used, stored, and disposed per applicable SCs and regulatory requirements. The use of these materials would be short term in nature and would occur in accordance with standard construction practices.

Prior to any demolition, remodeling, and/or renovation activities at the Project site, untested suspect ACMs, LBP and other LCMs, and potential Polychlorinated Biphenyls (PCB)-containing building material that may be

[85] Terraphase Engineering Inc. 2023. Preliminary Environmental Assessment – Equivalent Report.
[86] Millennium Consulting Associates. 2022. Phase I Environmental Site Assessment James A. Garfield High School.
[87] LAUSD. 2011. LAUSD Asset Management, Guide Specifications: Division 01 General Requirements, Section 01 4524, Environmental Import/Export Materials Testing.

disturbed would be sampled and analyzed in accordance with applicable regulations. Abatement of known and suspect ACMs, LBP and other LCMs, and potential PCB-containing caulk and paints and any adjacent PCB-impacted building or construction materials should be performed prior to any demolition, remodeling, and/or renovation activities (that would disturb the ACMs and LBP and other LCMs) in accordance with applicable regulations. If renovation or demolition activities do not take place, known and suspect ACMs, LBP and other LCMs would be managed in accordance with applicable regulations, including the preparation and implementation of specific Operation and Maintenance (O&M) Plans. Soil samples were tested for PCBs during the PEA investigation and did not have elevated concentrations that would require further investigation or removal action.

LAUSD would ensure that all construction related activities are completed in accordance with all applicable federal, State, and local regulations, and all applicable LAUSD specifications, and standards. Construction would also comply with the applicable SCs, which include, but are not limited to, SC-USS-1, which requires that any construction waste be recycled to the maximum extent feasible.

The Construction Contractor would be required to comply with LAUSD standard specifications for proper packaging, transportation, and disposal of any discovered hazardous materials before building construction starts. Specifically, the Construction Contractor would be required to comply with worker training, health and safety, hazardous material containment, and offsite transport, and disposal of contaminated soil. The proposed Project would not subject people or the environment to substantial hazards related to hazardous materials on-site or potentially on-site. Therefore, impacts would be less than significant, and no mitigation or further mitigation or analysis is required.

Operation

Following the completion of the proposed Project, hazardous materials that might be handled, used, transported, or disposed of include: standard cleaning products, pesticides, herbicides, paints, fuels, and lubricants used in association with standard Campus janitorial, maintenance, and landscaping. Small volumes of hazardous wastes, such as waste paint, batteries, fluorescent lamps, mercury-containing equipment, or unused maintenance products would require management in accordance with standard LAUSD policies and practices. Most hazardous materials stored on school campuses present little risk of upset, since they are generally stored in small containers in designated areas.

The amounts and use of these materials would be limited and consistent with the historical uses of the Campus, and the transport, storage, use, and disposal of these materials would be subject to federal, State, and local health and safety requirements. All transport, handling, storage, use, and disposal of substances would comply with all federal, State, and local laws and regulations for the management and use of hazardous material. Therefore, the proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant, and no mitigation or further analysis is required.

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

Less than Significant Impact. The use, handling, storage, and disposal of hazardous materials during and following the completion of construction activities would not pose a substantial hazard to the public or the environment from reasonably foreseeable accidental release. Compliance with the previously discussed regulations is already standard practice at the school, including training school staff to safely contain and clean up hazardous materials spills; maintenance of hazardous materials spill containment and cleanup supplies on-site; implementing school evacuation procedures as needed; and contacting the appropriate hazardous materials emergency response agency immediately pursuant to requirements of regulatory agencies. Therefore, impacts from reasonably foreseeable upset and accident conditions would be less than significant and no mitigation or further analysis is required.

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

Less than Significant Impact. In addition to the Project site being located within the Garfield HS campus, the Fourth Street Primary Center is located within 0.25 mile of the Project site.

As noted above, ACM and LBP are assumed to be present in the buildings and grounds facilities at Garfield HS. As such, contaminants that could become airborne during demolition and hauling (e.g., ACM, LBP, or arsenic) would be removed in accordance with DTSC and SCAQMD requirements prior to demolition activities.

Operation of construction equipment and heavy trucks would generate diesel emissions, which would result in the generation of air pollutants due to diesel-powered construction equipment, dust generated by construction activities, and off-gassing of VOCs from paints and asphalt. Construction emissions were estimated using CalEEMod with input based on the construction schedule and equipment mix. The results of this analysis indicated that maximum daily emissions during the construction phase would be less than the SCAQMD's significance threshold values (refer to Table 6). Therefore, schools within 0.25 mile of the Project site would not be exposed to hazardous emissions during construction and impacts would be less than significant.

The proposed building upgrades and replacement of old, energy-inefficient structures with those that use less energy would reduce emissions from space heating and other on-site sources. No new vehicle trips would be generated, and there would be no increase in mobile source emissions. Therefore, there would be no net increase in regional emissions of any criteria pollutant. Sensitive receptors including nearby schools would not experience any increase in long-term hazardous emissions associated with the proposed Project.

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?

No Impact. California Government Code Section 65962.5 requires that lists of hazardous materials sites be compiled and made available to the public. These lists include:

- Hazardous waste facilities subject to corrective action.

- Hazardous waste discharges for which the SWRCB has issued certain types of orders.
- Public drinking water wells containing detectable levels of organic contaminants.
- Underground storage tanks with reported unauthorized releases.
- Solid waste disposal facilities from which hazardous waste has migrated.

The Phase I ESA for the proposed Project included a regulatory agency environmental database search from EDR. The Project site is not included on the Hazardous Waste and Substances Sites (Cortese) List. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

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

No Impact. The nearest public airports to the school site are Compton/Woodley Airport, approximately 10.8 mile southwest, and Hawthorne Airport, approximately 14 miles southwest. The Project site is not within the airport influence areas or the airport land use planning areas of these airports.[88] Development of the proposed Project would not result in a new use that would interfere with air traffic patterns or increase traffic levels or change traffic patterns. The proposed new, four-story buildings would be a similar height to the existing buildings on the Campus and would not create a safety hazard or expose building occupants excessive noise. Therefore, no impact would occur, and no mitigation or further analysis is required.

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

No Impact. Emergency response within the Project area is guided by Los Angeles County Operational Area Emergency Response Plan (ERP). The ERP identifies County agencies and other agencies that would be involved in emergency responses; threat summaries and assessments; and procedures for responding agencies that would be involved in coordinating and managing responses. The ERP is focused on emergencies beyond the scope of the daily functions of public safety agencies, such as emergencies requiring multi-agency and/or multi-jurisdictional responses.

Emergency preparedness and response planning would be coordinated through LAUSD's Office of Emergency Services. The existing school currently has an emergency school evacuation plan in compliance with District's "Integrated Safe School Plan." The Integrated Safe School Plan uses the Incident Command System (ICS). ICS is designed to centralize and coordinate emergency response actions among police, fire, and other public agencies, including school districts. It provides an effective framework for managing emergencies ranging from minor incidents to major earthquakes, using a school site incident management team. LAUSD's Integrated Safe School Plan is compliant with the National Incident Management System (NIMS) and the California Standardized Emergency Management System (SEMS).

Project site plans would be reviewed by the Los Angeles Fire Department for adequate fire access. The District would comply with SC-PS-1 which requires that the local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval and SC-PS-2 requires that LAUSD prepare an

[88] Airnav.com. 2023. https://airnav.com/cgi-bin/airport-search

Emergency Preparedness Plan for the school with emergency preparedness and response procedures. The proposed Project construction and operation would not interfere with existing emergency response plans or emergency evacuation plans. Therefore, no impact would occur, and no mitigation or further analysis is required.

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 located in an urban area, which does not contain any wildlands in the immediate vicinity of the Campus. The Project site is generally flat without significant topography, and there are no steep slopes where high winds can exacerbate wildfire risks. Furthermore, CAL FIRE does not classify the Project site or any adjacent areas as being within a very high fire hazard safety zone (VHFHSZ).[89] Project development would not place people or structures at risk from wildfire. Therefore, no impact would occur, and no mitigation or further analysis is required.

[89] CAL FIRE. FHSZ Viewer. https://egis.fire.ca.gov/FHSZ/

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

(HWQ) Explanation:

The SPEIR evaluated the potential for implementation of the SUP-related projects to have impacts associated with hydrology and water quality. Upon implementation of regulatory requirements and SCs, the impacts associated with hydrology and water quality would be less than significant. The analysis in this section is based in part on Preliminary Geotechnical Investigation Proposed Major Modernization James A. Garfield High School, prepared by Group Delta Consultants Inc., dated November 10, 2022. A complete copy of this report is included as Appendix F.

Applicable SCs related to hydrology and water quality impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-HWQ-1	LAUSD shall design and construct the project to meet or exceed the current and applicable stormwater guidelines. **Stormwater Technical Manual**

LAUSD Standard Conditions of Approval	
	This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). These guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) and the mandated post-construction element of the NPDES program requirements
SC-HWQ-2	LAUSD shall implement the applicable stormwater requirements during construction activities. **Compliance Checklist for Storm Water Requirements at Construction Sites** This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.
SC-HWQ-3	LAUSD shall implement the following programs and procedures, as applicable: • Environmental Training Curriculum – a qualified environmental Monitor shall provide a worker's environmental awareness program that is prepared by LAUSD for the project. • Hazardous Waste Management Program (Environmental Compliance/Hazardous Waste). • Medical Waste Management Program. • Environmental Compliance Inspections. • Safe School Inspection Program. • Integrated Pest Management Program. • Fats Oil and Grease Management Program. • Solid Waste Management Program. • Other related programs overseen by OEHS.
SC-HWQ-4	LAUSD shall analyze potential flood hazards for new projects. The analysis for new projects shall include evaluation of all possible flood hazards as determined by: (1) review of FEMA flood maps; (2) review of flood information provided by local City or County floodplain managers; (3) review of California Department of Water Resources dam safety information; and (4) local drainage analysis by a civil engineer. The flood hazard determination shall include consideration of tsunamis and debris flow. New projects should be located outside of these hazard areas, if practical. Where placing the project outside the floodplain is impractical, the school or project structure shall be protected from flooding by containment and control of flood flows (e.g., elevating lowest floors at least one foot above the expected 100-year flood level).
SC-HWQ-5	LAUSD shall evaluate tsunami hazards to determine if the project site is within a tsunami inundation zone as delineated by California Emergency Management Agency or National Oceanic and Atmospheric Administration. If the project site is within a tsunami hazard zone LAUSD shall prepare a Tsunami Awareness and Evacuation Plan in compliance with the LAUSD Emergency Operations Plan.
SC-HWQ-6	LAUSD shall consult with the Los Angeles County Department of Public Works, and/or local city officials, as appropriate, regarding the debris flow potential near the mouth of or in natural

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LAUSD Standard Conditions of Approval	
	canyons and feasible mitigation measures shall be developed to reduce any potential risk. Potential debris flow hazards shall be reduced by one or more of the following: • Adequate building setbacks from natural slopes. • Construction of debris control facilities in upstream areas. • Monitoring and maintaining potential debris flow areas and basins. In addition, potential loss shall be minimized by establishing an evacuation plan, and elevated awareness and early warning of pending events.

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

Less than Significant Impact. A significant impact would occur if the proposed Project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. A significant impact would also occur if the proposed Project does not comply with all applicable regulations with regard to surface water quality as governed by the SWRCB.

New construction projects generally result in two types of potential water quality impacts: 1) short-term impacts from discharge of soil through erosion, sediments, and other pollutants during construction; and 2) long-term impacts from impervious surfaces (e.g., buildings, roads, parking lots, and walkways) that prevent water from being absorbed/soaking into the ground, thereby increasing the pollutants in stormwater runoff. Impervious surfaces can increase the concentration of pollutants, such as oil, fertilizers, pesticides, trash, soil, and animal waste, in stormwater runoff. Runoff from short-term construction and long-term operation can flow directly into lakes, local streams, channels, and storm drains and eventually be released untreated into the ocean.

The proposed Project would be constructed in an area that is already developed and already produces nonpoint-source pollutants. There is a storm drain maintained by the Los Angeles County Flood Control District (LACFCD) that runs directly through the northern portion of the campus and along the eastern site of the Campus on South Woods Avenue.[90]

Construction

As described in VII, GEOLOGY AND SOILS, construction projects of 1 acre or more are regulated under the NPDES Construction General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order WQ No. 2022-0057-DWQ) issued by the SWRCB. Project applicants obtain coverage by developing and implementing a SWPPP, estimating pollutants from construction activities to receiving waters, and specifying BMPs that would be incorporated into the construction plan to minimize stormwater pollution. Prior to redevelopment, all applicable agencies would be contacted for requirements related to storm water run-off (including the SWRCB) and other development- and construction-related environmental requirements would be implemented (such as dust suppression). This would include the preparation and implementation of a SWPPP. This is also required under LAUSD Standard Condition of

[90] Los Angeles County Public Works Department. Los Angeles County Storm Drain System. https://pw.lacounty.gov/fcd/StormDrain/index.cfm.

Approval SC-HWQ-2. Therefore, construction phase soil erosion and sedimentation would not degrade or violate water quality standards and impacts would be less than significant.

Operation

Following completion of the proposed Project, ground surfaces at the Project site would be either hardscape or maintained landscaping, as with current conditions, and no large areas of exposed soil would be left to erode off the Campus. The proposed Project would incorporate SC-HWQ-1, which requires implementation of cost-effective and low impact development like those provided in the LID Standards Manual issued by the County of LADPW in February 2014. The LID Standards Manual also complies with the Municipal Stormwater Permit for coastal watersheds of Los Angeles County, Order No. R4-2012-0175-A01, issued by the Los Angeles Regional Water Quality Control Board.

LID stormwater management would be incorporated into the Project design. LAUSD would comply with existing regulations and SC-HWQ-1. Therefore, operational phase stormwater runoff would not degrade or violate water quality standards and impacts 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. Garfield HS is located within the Central Subbasin of the Coastal Plain of Los Angeles Groundwater Basin. The City of Los Angeles Department of Water and Power (LADWP) supplies water to the Project site and the surrounding community. LADWP water supplies consist of about 12 percent local groundwater, most of which is from the San Fernando Valley Groundwater Basin; 86 percent imported water from Northern California via the State Water Project, from the eastern Sierra Nevada via the Los Angeles Aqueduct, and from the Colorado River via the Colorado River Aqueduct; and two percent recycled water. Groundwater was not encountered in subsurface explorations to 81.5 feet below existing grade during the geotechnical investigation of the site. Historical data provided by the CGS indicates historical high groundwater depth of approximately 100 feet below predominant site grades in the vicinity of the Project site.[91] The proposed Project would not lower the groundwater table or deplete groundwater supplies. Further, redevelopment of the 1.9-acre Project site would not interfere with groundwater recharge. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

[91] Group Delta Consultants Inc. 2022. Preliminary Geotechnical Report Campus Modernization Project James A. Garfield High School.

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

i) Result in a substantial erosion or siltation on- or off-site

Less than Significant Impact. There are no streams or rivers on the Project site. There is a storm drain line maintained by the LACFCD that runs directly through the northern portion of the Campus and along the eastern site of the Campus on South Woods Avenue.[92]

Construction

Construction-related activities that expose soils to rainfall/runoff and wind can result in temporary erosion and siltation. Construction activities associated with the proposed Project would expose soils through excavation, grading, and trenching. However, the proposed construction activities would comply with the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP and SC-HWQ-2, which requires the completion of a Compliance Checklist for Storm Water Requirements at Construction Sites. These requirements include provisions for erosion and pollution control measures to protect water quality in stormwater runoff and would not result in substantial erosion or siltation on- or off-site. Impacts would be less than significant, and no mitigation or further analysis is required.

Operation

Following the completion of the proposed Project, drainage from the Project site would continue to be captured on-site or conveyed via the storm drain lines along the northern portion of the Campus and along the eastern site of the Campus on South Woods Avenue. The entire Project site would discharge less stormwater because of LID requirements. The County of Los Angeles has prepared the 2014 LID Standards Manual to comply with the requirements of the NPDES Municipal Separate Storm Sewer System (MS4) Permit for stormwater and non-stormwater discharges from the MS4 within the coastal watersheds of Los Angeles County (CAS004001, Order No. R4-2012-0175). LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treats stormwater as a resource rather than a waste product. There are many practices that have been used to adhere to these principles, such as bioretention facilities, rain gardens, vegetated rooftops, rain barrels, and permeable pavements. By implementing LID principles and practices, water can be managed in a way that reduces the impact of built areas and would not result in substantial erosion or siltation on- or off-site. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

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

Less than Significant Impact. The drainage pattern of the proposed Project would be similar to existing conditions. Pursuant to LID standards and the State Model Water Efficient Landscape Ordinance

[92] Los Angeles County Public Works Department. 2023. Los Angeles County Storm Drain System. https://pw.lacounty.gov/fcd/StormDrain/index.cfm

(MWELO), the proposed on-site drainage system would discharge a net decrease in runoff to municipal storm drains. As described in Section 3.2.2, *Utilities*, a 5,500-sf at-grade bioswale would be constructed within the existing footprint of Building 100. This stormwater BMP would be designed to provide an overflow that meets the peak flow rate requirements are described in the Los Angeles County Hydrology Manual. The proposed Project would not increase the amount of surface runoff in a manner that would result in flooding on- or off-site. Impacts would be less than significant, and no mitigation or further analysis is required.

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

Less than Significant Impact. Re-development of the 1.9-acre Project site would not result in runoff exceeding the capacity of the municipal storm drain system. As previously described, the proposed on-site drainage system would result in a net decrease in runoff to municipal storm drains, pursuant to LID standards and the State MWELO for landscaped areas. Runoff would not exceed the existing capacity of the stormwater drainage systems and impacts would be less than significant.

iv) Impede or redirect flood flows?

Less than Significant Impact. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), Panel No. 06037C1643F, the Project site is located in Zone X (unshaded) and is outside of 100-year and 500-year flood zones mapped by the Federal Emergency Management Agency.[93] However, as stated above, the Project would incorporate SC-HWQ-1, which requires implementation of cost-effective and low impact development like those provided in the LID Standards Manual issued by the County. The proposed on-site drainage system would result in a net decrease in runoff to municipal storm drains, pursuant to LID standards and the State MWELO for landscaped areas. Therefore, the proposed Project would not impede or redirect flood flows, and impacts would be less than significant.

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

No Impact. As previously described, the Campus is located outside of 100-year and 500-year flood zones mapped by FEMA.[94] A seiche is an oscillating surface wave in a restricted or enclosed body of water, generated by ground motion, usually during an earthquake. Seiches are of concern for water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. There are no adjacent body of water that would pose a flood hazard to the site due to a seiche. The Campus is not at risk of inundation by seiche.

Tsunamis are a type of earthquake-induced flooding produced by large-scale sudden disturbances of the sea floor. Tsunami waves interact with the shallow sea floor when approaching a landmass, resulting in an increase

[93] FEMA. FEMA's National Flood Hazard Layer (NFHL) Viewer. https://msc.fema.gov/portal/search?AddressQuery=750%20E%2049th%20St%2C%20Los%20Angeles%2C%20CA%2090011
[94] FEMA. FEMA's NFHL Viewer. https://msc.fema.gov/portal/search?AddressQuery=750%20E%2049th%20St%2C%20Los%20Angeles%2C%20CA%2090011

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in wave height and a destructive wave surge into low-lying coastal areas. The Project site is at an elevation of approximately 202 feet to 221 feet above sea level[95] and is approximately 18 miles inland from the Pacific Ocean.

The Campus is located outside the tsunami hazard zone and would not be affected by a tsunami. The proposed Project would not release pollutants as the result of floods, tsunami, or seiche. Therefore, no impact would occur, and no mitigation or further analysis is required.

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

No Impact. Construction of the proposed Project would be subject to the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP and SC-HWQ-2 (Compliance Checklist for Storm Water Requirements at Construction Sites) that also requires control measures. After completion of the proposed Project, ground surfaces would be either hardscape or maintained landscaping. The proposed Project would incorporate SC-HWQ-1, which requires compliance with the LID Standards Manual issued by the LADPW in February 2014. The LID Standards Manual is compliant with the Municipal Stormwater Permit for coastal watersheds of Los Angeles County, Order No. R4-2012-0175-A01, issued by the Los Angeles Regional Water Quality Control Board. The proposed Project would comply with existing regulations and SC-HWQ-1 and SC-HWQ-2. The proposed Project would not obstruct implementation of a water quality control plan. Additionally, the proposed Project would not affect groundwater and would not obstruct implementation of a sustainable ground water management plan. Therefore, no impact would occur, and no mitigation or further analysis is required.

[95] Group Delta Inc. 2022. Preliminary Geotechnical Report Major Modernization Project Report. James A. Garfield High School.

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

(LU) Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact existing land uses in the LAUSD service area and to conflict with applicable land use plans, policies and regulations, including habitat for wildlife conservation plans. To avoid impacts on existing land uses in areas where future projects would be implemented under the SUP, the SPEIR requires site specific projects to be consistent with applicable state regulations. For Garfield HS, these include: (1) Education Code Section 17251, (2) CCR, Title 5, Sections 14001 through 14012, and 3) California Education Code Section 38131(b): Civic Center Act.

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

a) Physically divide an established community?

No Impact. The physical division of an established community generally refers to the construction of a feature such as an interstate highway or railroad tracks, or removal of an access point, such as a local road or bridge that would impact mobility or access to or between an existing community. The Campus and the surrounding area is fully developed with urban land uses, including residential, recreational, and institutional uses. The proposed Project would be developed within the existing Campus boundaries and would not divide an established community. Therefore, no impact would occur, and no mitigation or further analysis is required.

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 Campus and surrounding developments are within the unincorporated area of Los Angeles County. The Campus is zoned PF-1 (Public Facility) and designated PF (Public Facilities) in the Los Angeles County General Plan.[96] New construction on the Project site would not represent a change in land use and would not conflict with existing plans, policies, or regulations adopted for the purpose of avoiding or mitigating environmental effects. On February 19, 2019, the LAUSD Board of Education Adopted a Resolution to exempt all LAUSD school sites from local land use regulations under Government Code Section 53094. LAUSD school sites are exempt from all local ordinances, such as those pertaining to building height,

[96] Los Angeles County Planning. General Plan. 2035. https://planning.lacounty.gov/long-range-planning/general-plan/

parking, preservation and replacement of trees, construction permits (except those in the public right of way), recordation of parcel maps, signage, site plan review, and inspection. Therefore, the proposed Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect and impacts would be less than significant.

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

The SPEIR evaluated the potential for implementation of SUP-related projects to impact mineral resources. The State geologist-classified Mineral Resource Zone-2 (MRZ-2) sites are located in two regions within the LAUSD area: one in central Los Angeles, and the other in the east-central San Fernando Valley.[97] According to the SPEIR, projects implemented under the SUP are anticipated to have no impacts on mineral resources in the LAUSD region. The analysis provided below concludes that implementation of the proposed Project would have no impacts on mineral resources in the Project area.

(MR) Explanation:

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

No Impact. The Project site is mapped Mineral Resource Zone 3 (MRZ-3) by the California Department of Conservation,[98] indicating that it is in an "area containing mineral deposits the significance of which cannot be evaluated from available data" No active mines are in the local vicinity. The closest mine to the Project site is the Durbin Mine, located approximately 10 miles northeast.[99,100] Neither the Project site nor the surrounding community is available for mining. The nearest active oil well is located approximately 1.6 miles to the south; and the nearest oil/gas field is the Bandini Oil & Gas Field located approximately 1 mile south of the Project site.[101] Development of the proposed Project would not cause a loss of availability of a known mineral resource valuable to the region and the state. Therefore, no impact would occur, and no mitigation or further analysis is required.

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 previously described, the Project site is not mapped in a mineral resource area, a surface mining district, an oil drilling district, or in a State-designated oil field. No zoning, general plan, specific plan, or any other land use plan delineates the site as a site containing mineral resources. As such, it is not currently used for mineral resource extraction, and there are no plans to use the site for mineral resource extraction in the

[97] According to SMARA, MRZ-1 are areas of no significant mineral resource deposits, MRZ-2 are areas that contain identified mineral resources, MRZ-3 are areas of undetermined mineral resource significance, and MRZ-4 are areas of unknown resource potential.
[98] California Department of Conservation. CGS Information Warehouse: Mineral Land Classification. https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc.
[99] California Department of Conservation. Division of Mine Reclamation. https://maps.conservation.ca.gov/mol/index.html.
[100] California Department of Conservation. Division of Mine Reclamation. https://maps.conservation.ca.gov/mol/index.html.
[101] California Department of Conservation. Well Finder. https://maps.conservation.ca.gov/doggr/wellfinder/.

future due to the lack of presence of mineral resources. Development of the proposed Project would not cause a loss of availability of a mining site. Therefore, no impact would occur, and no mitigation or further analysis is required.

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

(NOI) Explanation:

The SPEIR evaluated the potential for implementation of the SUP-related site-specific projects to result in adverse noise impacts to students and faculty at the upgraded school sites and to surrounding areas. LAUSD has SCs for minimizing impacts to noise. Applicable SCs related to noise impacts associated with the Project are provided below.

LAUSD Standard Conditions of Approval	
SC-N-1	LAUSD shall design new buildings and other noise-generating sources to include features such as sound walls, building configuration, and other design features that attenuate exterior noise levels on a school campus to less than 67 A-weighted decibels (dBA) equivalent continuous sound level (L_{eq}).[102]
SC-N-2	LAUSD shall analyze the acoustical environment of the site (such as traffic) and the characteristics of planned building components (such as HVAC), and designs shall achieve interior classroom noise levels of less than 45 dBA L_{eq} with a target of 40 dBA L_{eq} (unoccupied), and a reverberation time of 0.6 seconds. Noise reduction methods shall include, but are not limited to, sound walls, building and/or classroom insulation, HVAC modifications, double-paned windows, and other design features. • New construction should achieve classroom acoustical quality consistent with the current School Design Guide and CHPS standard of 45 dBA L_{eq}. • New HVAC installations should be designed to achieve the lowest possible noise level consistent with the current School Design Guide. HVAC systems shall be designed so that noise from the system does not cause the ambient noise in a classroom to exceed the current School Design Guide and CHPS standard of 45 dBA L_{eq}. • Modernization of existing facilities and/or HVAC replacement projects should improve the sound performance of the HVAC system over the existing system. • The District's purchase of new units should give preference to HVAC manufacturers that sell the lowest noise level units at the lowest cost.

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

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LAUSD Standard Conditions of Approval	
	• Existing HVAC units operating in excess of 45 dBA L_{eq} inside classrooms should be modified.
SC-N-3	LAUSD shall incorporate long-term permanent noise attenuation measures between new playgrounds, stadiums, and other noise-generating facilities and adjacent noise-sensitive land uses, to reduce noise levels to meet jurisdictional standards or an increase of 3 dB or less over ambient. Operational noise attenuation measures include, but are not limited to: • Buffer zones; • Berms; • Sound barriers; • Buildings; • Masonry walls; • Enclosed bleacher foot wells; and/or • Other site-specific project design features
SC-N-4	LAUSD or its Construction Contractor shall consult and coordinate with the school principal or site administrator, and other nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. Coordination between the school, nearby land uses and the Construction Contractor shall continue on an as-needed basis throughout the construction phase of the project to reduce school and other noise sensitive land use disruptions.
SC-N-5	LAUSD shall require the Construction Contractor to minimize blasting for all demolition and construction activities, where feasible.
SC-N-6	For projects where pile driving activities are required within 150 feet of a structure, a detailed vibration assessment shall be provided by an acoustical engineer to analyze potential impacts related to vibration to nearby structures and to determine feasible mitigation measures to eliminate potential risk of architectural damage.
SC-N-7	LAUSD shall meet with the Construction Contractor to discuss alternative methods of demolition and construction for activities within 25 feet of a historic building to reduce vibration impacts. During the preconstruction meeting, the Construction Contractor shall identify demolition methods not involving vibration-intensive construction equipment or activities. For example: sawing into sections that can be loaded onto trucks results in lower vibration levels than demolition by hydraulic hammers. • Prior to construction activities, the Construction Contractor shall inspect and report on the current foundation and structural condition of the historic building. • The Construction Contractor shall implement alternative methods identified in the preconstruction meeting during demolition, excavation, and construction, such as mechanical methods using hydraulic crushers or deconstruction techniques. • The Construction Contractor shall avoid use of vibratory rollers and packers adjacent to the building. • During demolition, the Construction Contractor shall not phase any ground-impacting operations near the building to occur at the same time as any ground impacting operation associated with demolition and construction.

LAUSD Standard Conditions of Approval	
	During demolition and construction, if any vibration levels cause cosmetic or structural damage to the building or structure, a "stop-work" order shall be issued to the Construction Contractor immediately to prevent further damage. Work shall not restart until the building is stabilized and/or preventive measures to relieve further damage to the building are implemented.
SC-N-8	Projects within 500 feet of a non-LAUSD sensitive receptor, such as a residence, shall be reviewed by OEHS to determine what, if any, feasible project specific noise reduction measures are needed. The Construction Contractor shall implement project specific noise reduction measures identified by OEHS. Noise reduction measures may include, but are not limited to, the following: <u>Source Controls</u> • Time Constraints – prohibiting work during sensitive nighttime hours. • Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential: only between 7:00 AM and 7:00 PM). • Equipment Restrictions – restricting the type of equipment used. • Substitute Methods – using quieter methods and/or equipment. • Exhaust Mufflers – ensuring equipment has quality mufflers installed. • Lubrication & Maintenance – well maintained equipment is quieter. • Reduced Power Operation – use only necessary size and power. • Limit Equipment On-Site – only have necessary equipment on-site. • Noise Compliance Monitoring – technician on site to ensure compliance. • Quieter Backup Alarms – manually-adjustable or ambient sensitive types. <u>Path Controls</u> • Noise Barriers – semi-permanent or portable wooden or concrete barriers. • Noise Curtains – flexible intervening curtain systems hung from supports. • Enclosures – encasing localized and stationary noise sources. • Increased Distance – perform noisy activities farther away from receptors, including operation of portable equipment, storage and maintenance of equipment. <u>Receptor Controls</u> • Window Treatments – reinforcing the building's noise reduction ability. • Community Participation – open dialog to involve affected residents. • Noise Complaint Process – ability to log and respond to noise complaints. Advance notice of the start of construction shall be delivered to all noise sensitive receptors adjacent to the project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the Construction Contractor and the District. In the event of noise complaints noise shall be monitored from the construction activity to ensure that construction noise is not obtrusive.
SC-N-9	Construction Contractor shall ensure that LAUSD interior classroom noise and exterior noise standards are met to the maximum extent feasible, or that construction noise is not disruptive to

4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval
the school environment, through implementation of noise control measures, as necessary.[103] Noise control measures may include, but are not limited to: Path Controls • Noise Attenuation Barriers[104] – Temporary noise attenuation barriers installed blocking the line of sight between the noise source and the receiver. Intervening barriers already present, such as berms or buildings, may provide sufficient noise attenuation, eliminating the need for installing noise attenuation barriers. Source Controls • Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential areas: only between 7:00 AM and 7:00 PM). • Substitute Methods – using quieter methods and/or equipment. • Exhaust Mufflers – ensuring equipment has quality mufflers installed. • Lubrication & Maintenance – well maintained equipment is quieter. • Reduced Power Operation – use only necessary size and power. • Limit Equipment On-Site – only have necessary equipment on-site. • Quieter Backup Alarms – manually-adjustable or ambient sensitive types. If OEHS determines that the above noise reduction measures will not reduce construction noise to below the levels permitted by LAUSD's noise standards LAUSD shall mandate that construction bid contracts include the following receptor controls: Receptor Controls • Temporary Window Treatments – temporarily reinforcing the building's noise reduction ability. • Temporary Relocation – in extreme otherwise unmitigable cases, students shall be moved to temporary classrooms / facilities away from the construction activity.

Noise is defined as unwanted sound and is known to have potential adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known adverse effects of noise, the federal government, State of California, County of Los Angeles, and LAUSD have established criteria to protect public health and safety and to prevent the disruption of certain human activities, such as classroom instruction.

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

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

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

Less than Significant Impact. Noise is unwanted or harmful sound; sound that is too loud is distracting or, worse, injurious. For school projects, the State of California, County of Los Angeles, and LAUSD have established noise standards to protect public health and safety and to prevent the disruption of certain human activities, such as classroom instruction.

State Noise Regulations

The CALGreen Code has requirements for insulation that affect exterior-interior noise transmission for non-residential structures.[105] Pursuant to CALGreen Code Section 5.507.4.1, Exterior Noise Transmission,[106] wall and roof-ceiling assemblies exposed to the noise source making up the building or addition envelope or altered envelope shall meet a composite sound transmission class (STC) rating of at least 50 or a composite outdoor-indoor transmission class (OITC) rating of no less than 40 with exterior windows of a minimum STC of 40 or OITC of 30 within a 65 dBA Community Noise Equivalent Level (CNEL) or day-night average sound level (L_{dn}) noise contour of an airport, freeway or expressway, railroad, industrial source or fixed-guideway source. Where noise contours are not readily available, buildings exposed to a noise level of 65 dBA L_{eq} during any hour of operation shall have building, addition or alteration exterior wall and roof-ceiling assemblies exposed to the noise source meeting a composite STC rating of at least 45 (or OITC 35), with exterior windows of a minimum of STC 40 (or OITC 30).

County of Los Angeles Noise Regulations

The County of Los Angeles regulates noise through the County Municipal Code, Title 12, Chapter 12.08 (Noise Control). These standards do not gauge the compatibility of development, but restrict the amount and duration of noise generated, as measured at the property line of the noise receptor. The noise standards in Table 13, unless otherwise indicated, apply to all property within a designated noise zone. It is also noted that the levels presented in Table 13 shall be reduced by 5 decibels for any source of sound which emits a pure tone or impulsive noise. However, under Section 12.08.570, outdoor activities conducted on public or private school grounds are exempt from the Chapter 12.08 restrictions.

[105] Multi-family residential buildings greater than three stories are considered under the non-residential standards in Title 24.
[106] California Green Building Standards Code. Chapter 5 Nonresidential Mandatory Measures. Division 5.1 PLANNING AND DESIGN. Section 5.507 Environmental Comfort. 5.507.4.1 Exterior noise transmission, prescriptive method. https://up.codes/viewer/california/ca-green-code-2016/chapter/5/nonresidential-mandatory-measures#5.

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Table 13 County of Los Angeles Exterior Noise Standards

Noise Zone	Time Period	Standard 1 (L_{50})	Standard 2 (L_{25})	Standard 3 (L_8)	Standard 4 (L_2)	Standard 5 (L_{max})
Noise-Sensitive Area	Anytime	45	50	55	60	65
Residential Properties	10:00 PM to 7:00 AM	45	50	55	60	65
	7:00 AM to 10:00 PM	50	55	60	65	70
Commercial Properties	10:00 PM to 7:00 AM	55	60	65	70	75
	7:00 AM to 10:00 PM	60	65	70	75	80
Industrial	Anytime	70	75	80	85	90

Source: County of Los Angeles Municipal Code, Section 12.08.390. https://library.municode.com/index.aspx?clientId=16274.
Notes: Maximum Permissible Noise Level (dBA):
- According to Section 12.08.390, if the ambient noise levels exceed the exterior noise standards then the ambient noise level becomes the noise standard. If the source of noise emits a pure tone or impulsive noise, the exterior noise levels limits shall be reduced by five decibels.
- If the measurement location is on a boundary property between two different zones, the noise limit shall be the arithmetic mean of the maximum permissible noise level limits of the subject zones; except when an intruding noise source originates on an industrial property and is impacting another noise zone, the applicable exterior noise level shall be the daytime exterior noise level for the subject receptor property.

According to the County Municipal Code, Title 12, Chapter 12.08 (Noise Control):

- Standard No. 1 shall be the exterior noise level which may not be exceeded for a cumulative period of more than 30 minutes in any hour. Standard No. 1 shall be the applicable L_{50} noise level shown above; or, if the ambient L_{50} exceeds the foregoing level, then the ambient L_{50} becomes the exterior noise level for Standard No. 1.

- Standard No. 2 shall be the exterior noise level which may not be exceeded for a cumulative period of more than 15 minutes in any hour. Standard No. 2 shall be the applicable L_{50} noise level shown above plus 5 dB; or, if the ambient L_{25} exceeds the foregoing level, then the ambient L_{25} becomes the exterior noise level for Standard No. 2.

- Standard No. 3 shall be the exterior noise level which may not be exceeded for a cumulative period of more than five minutes in any hour. Standard No. 3 shall be the applicable L_{50} noise level shown above plus 20 dB; or, if the ambient L_8 exceeds the foregoing level, then the ambient L_8 becomes exterior noise level for Standard No. 3.

- Standard No. 4 shall be the exterior noise level which may not be exceeded for a cumulative period of more than one minute in any hour. Standard No. 4 shall be the applicable L_{50} noise level shown above plus 15 dB; or, if the ambient L_2 exceeds the foregoing level, then the ambient L_2 becomes the exterior noise level for Standard No. 4.

- Standard No. 5 shall be the exterior noise level which may not be exceeded for any period of time. Standard No. 5 shall be the applicable L_{50} noise level shown above plus 20 dB; or, if the ambient L_0 exceeds the foregoing level then the ambient L_{max} becomes the exterior noise level for Standard No. 5.

County construction noise is restricted by "[o]perating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of 7:00 PM and 7:00 AM, or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real-property line, except for emergency work of public service utilities or by variance issued by the health officer is prohibited."[107] The county also sets maximum noise levels at residential structures from mobile equipment (unscheduled, intermittent, short-term operations for less than 10 days) as shown in Table 14.

Table 14 County of Los Angeles Mobile Construction Equipment Noise Level

	Single-Family Residential	Multi-Family Residential	Semi-Residential / Commercial
Daily, except Sundays and legal holidays, 7:00 AM to 8:00 PM	75 dBA	80 dBA	85 dBA
Daily, 8:00 PM to 7:00 AM and all day Sunday and	60 dBA	64 dBA	70 dBA

Source: County of Los Angeles Municipal Code, Section 12.08.440. https://library.municode.com/index.aspx?clientId=16274

Maximum noise levels at residential structures from stationary equipment (scheduled daily and long-term operations of 10 days or more) are summarized in Table 15.

Table 15 County of Los Angeles Stationary Construction Equipment Noise Level

	Single-Family Residential	Multi-Family Residential	Semi-Residential / Commercial
Daily, except Sundays and legal holidays, 7:00 AM to 8:00 PM	60 dBA	65 dBA	70 dBA
Daily, 8:00 PM to 7:00 AM and all day Sunday and	50 dBA	55 dBA	60 dBA

Source: County of Los Angeles Municipal Code, Section 12.08.440. https://library.municode.com/index.aspx?clientId=16274

The maximum noise levels at business structures from mobile equipment (unscheduled, intermittent, short-term operations for less than 10 days) is 85 dBA. This limit applies every day, including Sunday and legal holidays, and at all hours.

Chapter 12.08.440 also stipulates that all mobile or stationary internal-combustion-engine powered equipment or machinery shall be equipped with suitable exhaust and air-intake silencers in proper working order. In case of a conflict between this chapter and any other ordinance regulating construction activities, provisions of any specific ordinance regulating construction activities shall control.

[107] County of Los Angeles Municipal Code, Section 12.08.440. https://library.municode.com/index.aspx?clientId=16274.

4. Environmental Checklist and Analysis

Construction Noise

Noise generated during construction is based on the type of equipment used, the location of the equipment relative to sensitive receptors, amount of equipment operating at the same time, and the timing and duration of the noise-generating activities. Sensitivity to noise is based on the location of the equipment relative to sensitive receptors, time of day, and the duration of the noise-generating activities. Two types of short-term noise could occur during construction: 1) mobile-source noise from the transport of workers, material deliveries, and debris/soil hauling; and 2) on-site noise from use of construction equipment. Construction is anticipated to start in the second quarter of 2025 and finish in the second quarter of 2029.

Construction Vehicles

The transport of workers and equipment to the construction site would incrementally increase noise levels along access roadways. The highest construction worker and vendor traffic would have a maximum of about 36 worker and vendor trips per day over a time span of 33 days during site preparation. Throughout construction, the size of the work crew at the school each day would vary depending on the construction phase and construction activities.[108]

The number of construction-related trips would not significantly increase traffic noise when compared to the level of noise currently generated on the roadways. The additional 36 worker and vendor construction-related trips would be negligible.

SC-T-4 requires that construction trips avoid peak hour traffic periods; therefore, trips would be spread out throughout the day. While individual construction vehicle pass-bys may create momentary noise levels of up to approximately 85 dBA (L_{max}) at 50 feet from the vehicle, these occurrences would be infrequent and primarily during nonpeak traffic periods. Therefore, noise impacts from construction-related traffic would be less than significant and no mitigation or further analysis is required.

Construction Equipment

Each stage of construction involves the use of different kinds of construction equipment and therefore has its own distinct noise characteristics. Table 16 lists maximum construction equipment noise levels at 50 feet.[109]

Table 16 Construction Equipment Noise Levels

Equipment	Noise Level (dBA, L_{max}) at 50 ft
Auger Drill Rig	85
Backhoe	80
Chain Saw	85
Clam Shovel	93
Compactor (ground)	80
Compressor (air)	80

[108] Worker trips based on California Emissions Estimator Model (CalEEMod), version 2016.3.2.

[109] Duty cycles (see table) are related to the percentage of utilization of each piece of equipment at typical construction phases for development projects such as schools, and are used to calculate average noise levels in a given period.

Equipment	Noise Level (dBA, L_{max}) at 50 ft
Concrete Mixer Truck	85
Concrete Pump	82
Concrete Saw	90
Crane (mobile or stationary)	85
Dozer	85
Dump Truck	84
Excavator	85
Front End Loader	80
Generator (25 KVA or less)	70
Generator (more than 25 KVA)	82
Grader	85
Hydra Break Ram	90
Jackhammer	85
Mounted Impact Hammer (hoe ram)	90
Paver	85
Pneumatic Tools	85
Pumps	77
Scraper	85
Tractor	84
Vacuum Excavator	85
Vibratory Concrete Mixer	80

Source: Federal Highway Administration (FHWA), 2006. Construction Noise Handbook. August.
Notes: KVA = kilovolt amps

Construction equipment typically moves around the site and has variable power levels. Noise from construction equipment decreases by approximately 6 dBA with each doubling of distance from the source. For example, the noise levels from a bulldozer that generates 85 dBA at 50 feet would attenuate to 79 dBA at 100 feet, 73 dBA at 200 feet, 67 dBA at 400 feet, and 61 dBA at 800 feet. Also, noise levels are reduced by the amount of use as well as barrier effects provided by buildings.

On-Campus Receptors

LAUSD's interior noise threshold is 45 dBA and depending on the classroom activity, interior levels above this threshold may be disruptive to the learning environment. However, low-intensity construction phases would generate lower noise levels and would be less likely to result in disruptions due to excessive interior noise environments.

Building 700 and Building 300, which are located approximately 50 feet from and have a direct sight line to the Project site may experience exterior noise levels as high as 90 dBA L_{max} during the use of a concrete saw associated with demolition activities. With a typical 25 dB exterior-to-interior noise reduction, interior noise levels in these buildings may be as high as 65 dBA L_{max}.

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Implementation of SC-N-4, SC-N-7 and SC-N-9 requires construction equipment that is properly tuned and maintained to ensure excessive noise is not generated; coordination between the Construction Contractor and school administrators prior to and throughout construction to schedule high noise producing activities at times that minimize disruption to classes; and where feasible, alternative methods of demolition and construction for activities within 25 feet of a historic building (or non-historic buildings more than 45 year old) to reduce noise and vibration impacts. Additionally, compliance with SC-N-8 requires source controls (time constraints, equipment location and type restrictions, etc.), path controls (noise barriers capable of attenuating construction noise by 15 dBA), and/or receptor controls (notification and noise complaint process) to reduce noise impacts. The specific method under SC-N-8 would depend on the type of construction noise, duration, and classroom disruption. As with other construction projects occurring at schools throughout the District, if construction occurs while classes are in session, SC-N-4 and SC-N-7 would be implemented to avoid noise disruptions. Additionally, SC-N-8 would be implemented to control the timing for the operation of noise-generating equipment and would make every effort to move students away from noisy construction areas. Finally, if the construction noise disruption cannot be avoided the contractor would install noise barriers, as appropriate, to limit construction noise levels. Construction would not generate a substantial noise increase in excess of established standards. Impacts would be less than significant, and no mitigation or further analysis is required.

Off-Site Receptors

The nearest off-site sensitive receptors from the acoustical center of the construction site are the single-family residences to the south across East Sixth Street and to the west across Fraser Avenue. The acoustical center of the construction site would be located approximately within the center of the Project site. The maximum and average noise levels – grouped by construction phase – are summarized in Table 17.

Table 17 Project-Related Construction Noise Levels

Construction Phase	Maximum at 50 feet (L_{max} dBA)	Residences 96 feet to the South[a] (L_{max} dBA)	Residences 91 feet to the West[a] (L_{max} dBA)
Demolition	85	79.3	79.8
Site Prep	80	74.3	74.8
Grading	85	79.3	79.8
Building Construction	90	84.3	84.4
Architectural Coating	85	79.3	79.8
Paving	85	79.3	79.8

Note: [a] Noise levels are L_{max} dBA, as measured from the acoustical center of the construction site to the nearest property line.

According to County Municipal Code, Title 12, Chapter 12.08 (Noise Control) construction noise is restricted by "[o]perating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of 7:00 PM and 7:00 AM, or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real-property line, except for emergency work of public service utilities or by variance issued by the health officer is prohibited." The District would require that the Construction Contractor comply with County regulations for construction hours.

As shown in Table 17, the construction noise levels would average between 74 and 85 dBA L_{max} at the nearest sensitive receptors. Implementation of SC-N-8 requires all feasible measures to reduce construction noise through source controls (e.g., scheduling, equipment restrictions, mufflers, reduced power, noise compliance monitoring), path controls (e.g., temporary noise barriers, noise curtains, enclosures), and receptor controls (e.g., community participation, noise complaint response and communications). With implementation of SC-N-8 construction noise levels could be reduced by up to 15 dBA. During building construction, which is estimated to be the loudest phase, SC-N-8 would reduce construction noise levels to approximately 70 dBA L_{max}, which would not exceed the County of Los Angeles 75 dBA L_{max} daytime standard for a residential use. With the implementation of SCs by the Construction Contractor, construction would not generate a substantial noise increase in excess of established standards. Impacts would be less than significant, and no mitigation or further analysis is required.

Mobile Source Noise

To determine if a project would cause a substantial noise to increase from project-related traffic, consideration must be given to the magnitude of the increase and the affected receptors. In general, for community noise, a noise level increase of 3 dBA (which equals a doubling of the noise source energy) is considered barely perceptible, while an increase of 5 dBA is considered clearly noticeable. An increase of three dBA is often used as a threshold for a substantial increase.

The proposed Project would not result in an increase in student capacity and therefore would not increase traffic volumes and corresponding noise levels. Therefore, long term noise impacts along local roadways would be less than significant and no mitigation or further analysis is required.

Stationary Source Noise

Following the completion of construction activities, operational noise sources would include use of rooftop HVAC. Such equipment would typically generate noise levels ranging up to 72 dBA at a distance of 3 feet. The noise generated by mechanical systems to be installed on the new building is expected to be similar to the mechanical equipment noise generated by surrounding buildings in the area. At a distance of 50 feet, HVAC noise would attenuate to approximately 48 dBA, thereby the overall noise from HVAC would not exceed County noise standards for adjacent residential uses.[110] SC-N-2 has restrictions on HVAC noise to limit potential noise impacts for HVAC installation that would exceed established standards. Impacts would be less than significant, and no mitigation or further analysis is required.

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

Less than Significant Impact. Potential impacts associated with construction-related and operational groundborne vibration and noise are discussed below.

Construction Vibration

Construction activities can generate varying degrees of ground vibration, depending on the construction procedures, the equipment used, and the proximity to vibration-sensitive uses. Operation of construction

[110] Los Angeles Municipal Code Section 111.03.

equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings near a construction site varies depending on soil type, ground strata, and receptor building construction. The generation of vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight damage at the highest levels. Ground vibrations from construction activities rarely reach levels that can damage structures but can achieve levels in buildings close to a construction site that are perceptible.[111] Table 18 lists vibration levels for different types of construction equipment.

Table 18 Construction Equipment Vibration Levels

Equipment	Approximate RMS[1] Velocity at 25 feet (VdB)	Approximate PPV[2] at 25 feet (in/sec)
Pile Driver, Impact (Upper Range)	112	1.518
Pile Driver, Impact (Typical)	104	0.644
Pile Driver, Sonic (Upper Range)	105	0.734
Pile Driver, Sonic (Typical)	93	0.170
Vibratory Roller	94	0.210
Large Bulldozer	87	0.089
Caisson Drilling	87	0.089
Loaded Trucks	86	0.076
Jackhammer	79	0.035
Small Bulldozer	58	0.003

Source: FTA. 2018. Transit Noise and Vibration Impact Assessment.
Notes:
1 RMS velocity calculated from vibration level (VdB) using the reference of 1 microinch/second and a crest factor of 4.
2 PPV – peak particle velocity measured in inches/second.

Construction vibration effects are typically assessed in terms of either annoyance or architectural damage. Construction equipment such as jackhammers, high-power or vibratory tools, and rolling stock equipment (e.g., tracked vehicles, compactors, etc.) could generate vibration in the immediate vicinity.

Typical construction equipment rarely exceeds vibration levels that are perceptible.[112] Groundborne vibration is rarely annoying to people who are outdoors, so it is usually evaluated in terms of indoor receivers. For annoyance, vibration is typically noticed nearby when objects in a building generate noise from rattling windows or picture frames; impacts are based on the distance to the nearest building.[113]

[111] Federal Transit Administration (FTA). 2018, September. Transit Noise and Vibration Impact Assessment. U.S. Department of Transportation (DoT). FTA-VA-90-1003-06.
[112] As measured at a distance of 25 feet from an individual piece of equipment perceptible vibration would be 0.1 peak particle velocity (PPV) in inches per second. Architectural damage at typical building structures may occur at 0.2 to 0.5 PPV in inches per second.
[113] FTA. 2018, September. Transit Noise and Vibration Impact Assessment. United States Department of Transportation. FTA-VA-90-1003-06.

Off-Site Receptors

Human annoyance occurs when vibration rises significantly above the threshold of human perception for extended periods of time. A threshold commonly used to assess when construction vibration becomes annoying is above 78 VdB for residential uses.[114]

Vibration annoyance is typically assessed via a spatial-averaging methodology (i.e., as heavy construction equipment moves around the construction site, average vibration levels at the nearest structures would diminish with increasing distance between structures and the equipment). This methodology is implemented by using the distance from the center of the construction zone to the nearest sensitive receptors.

Table 19 shows the vibration levels from typical construction equipment at adjacent receptors. As shown, vibration from construction activities is not anticipated to be perceptible at the nearest receptors.

Table 19 Construction Equipment Vibration Annoyance

Equipment	Vibration Annoyance		
	Reference Vibration VdB at 25 feet	Residences 96 feet to the South[a]	Residences 91 feet to the West[a]
Vibratory Roller	94.0	76.5	77
Static Roller	82.0	64.5	65
Large Bulldozer	87.0	69.5	70
Loaded Trucks	86.0	68.5	69
Jackhammer	79.0	61.5	62
Small Bulldozer	58.0	40.5	41
FTA Threshold (Residences)	-	*78*	*78*
Exceeds FTA Threshold?	-	No	No

Source: FTA. 2018. Transit Noise and Vibration Impact Assessment.
Notes:
[1] Construction activities are typically distributed throughout the Project site and would only occur for a limited duration when vibration producing equipment is operating in close proximity to receptors. Therefore, distances to the nearest receptors are measured from the center of the construction site to represent the average vibration level.
[2] Residences have a daytime residential threshold of 78 VdB; industrial buildings have a "office" threshold of 84 VdB; the storage facility has a "workshop" threshold of 90 VdB (because of the lack of occupancy during any given day).
[3] A large bulldozer is above an operating weight of 85,000 pounds (represented by a Caterpillar D8-class or larger); medium bulldozer has an operating weight range of 25,000 to 60,000 pounds (such as a Caterpillar D6- or D7-class); and a small bulldozer has an operating weight range of 15,000 to 20,000 pounds (such as a Caterpillar D3-, D4-, or D5-class).

As heavy construction equipment moves around the Project site, average vibration levels at the nearest structures would diminish with increasing distance between structures and the equipment and would generally not be perceptible. Additionally, under SC-N-4, LAUSD Facilities Division or its Construction Contractor shall coordinate with nearby sensitive receptors to schedule high noise or vibration producing activities to minimize disruption.

[114] FTA. 2018. Transit Noise and Vibration Impact Assessment Manual.

4. Environmental Checklist and Analysis

Overall, with the implementation of SCs, potential impacts to on-site sensitive receptors would be less than significant and no mitigation or further analysis is required.

On-Site Receptors

To the maximum extent feasible, construction activities associated with the proposed Project would occur during school breaks when students are not on Campus. Nevertheless, since construction activities would also take place while school is in session, it is possible that the students' learning activities could be affected, particularly within Building 700 and Building 300. Generally, students in classrooms may experience vibration levels more than 78 VdB when vibratory rollers operate within approximately 85 feet of the classrooms, and within approximately 50 feet of large bulldozers and other heavy equipment. Vibration levels would diminish rapidly with increased distance between the receptors and the equipment, and construction activities farther than 85 feet from classrooms would not be felt.

Implementation of SC-N-5 would reduce construction vibration and annoyance to staff and students in adjacent buildings. School administration and the Construction Contractor would work together to communicate and coordinate construction activities, location, schedule, and potential vibration-intensive activities during each construction phase. Administrators may arrange for alternative classroom occupancy in the event that construction vibration causes any disturbance to classroom instruction. Other typical methods for dealing with classroom disruption are for the Construction Contractor to conduct vibration-intensive activities before or after class instruction at the nearest classrooms. Some construction work would be conducted during school breaks when students are not on Campus.

Overall, with the implementation of SCs, potential impacts to on-site sensitive receptors would be less than significant and no mitigation or further analysis is required.

Construction Vibration Induced Architectural Damage

Since damage from vibrational energy is typically a one-time event and is most likely to occur when the source and receptor are very close. The threshold for the assessment of risk of architectural damage is 0.2 inches per second peak particle velocity (in/sec PPV) for typical residential and school buildings.[115] Vibration levels exceed 0.2 PPV in/sec if a vibratory roller is operated within approximately 25 feet of the receiving structure, or when large bulldozers or loaded trucks are operated at distances closer than 15 feet.

Table 20 shows the reference vibration levels for typical construction equipment. With the implementation of SCs, impacts would be less than significant, and no mitigation or further analysis is required.

Table 20 Construction Equipment Vibration Damage

Equipment	Vibration Levels at 25 Feet PPV (inch/sec)
Vibratory Roller	0.21
Static Roller	0.05
Large Bulldozer	0.089
Small Bulldozer	0.003

[115] FTA category "non-engineered timber and masonry buildings"

Equipment	Vibration Levels at 25 Feet PPV (inch/sec)
Jackhammer	0.035
Loaded Trucks	0.076

Source: Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment, September 2018.

Off-Site Receptors

The nearest off-Campus structure is a residence approximately 96 feet to the south and 91 feet to the west of the Project site boundary. At 10 feet, there could be a potential for architectural damage due to construction vibration from vibratory rollers and large bulldozers. Maximum vibration levels could reach up to 0.830 in/sec PPV from the use of a vibratory roller within 10 feet, which would be above the threshold of 0.2 in/sec PPV. However, vibration levels are estimated to exceed within 25 feet and the residences are located over 90 feet from the Project site boundary.

Additionally, the classroom/utility building (Building 700) approximately 24 feet to the north from the development zone boundary is eligible as a historic resource, therefore, SC-N-7 would be applied to reduce the possibility of architectural damage to historic buildings. SC-N-7 requires the use of less-vibration-intensive equipment when working next to existing historic buildings. Alternatives shall include mechanical methods using static, non-vibratory rollers or small bulldozers in lieu of large bulldozers. Additionally, implementation of inspection and reporting on the current foundation and structural condition of the existing building. Therefore, with implementation of these SCs, impacts from vibration-induced architectural damage would be less than significant to the historic on-site building and off-site sensitive receptors.

On-Campus Receptors

Many on-site buildings are located adjacent to areas where demolition of existing buildings and/or construction of the new building would occur. Operation of large heavy construction equipment (vibratory rollers, large bulldozers or loaded trucks) close to Campus buildings may exceed the FTA's 0.2 in/sec PPV criterion, which could potentially result in vibration-induced architectural damage.

Building 700, the cafeteria/lunch pavilion, Building 300, the Parent Center, the ROTC Building, storage building, Building 100, Building 600, Building 500, the gymnasium, Building 200, the stadium/bleachers, and the quad were all identified as potentially historic. As part of the proposed Project, implementation of SC-N-6 requires that if demolition is necessary adjacent to historic or fragile structures the Construction Contractor would avoid using impact tools, if feasible. SC-N-8 requires the Construction Contractor to identify alternative methods of demolition and construction for activities that do not involve vibration-intensive equipment or activities.

Implementation of SC-N-6 and SC-N-8 would reduce vibration-induced architectural damage to adjacent, on-Campus buildings to below the threshold of damage. Vibration impacts would be less than significant, and no mitigation or further analysis is required.

4. Environmental Checklist and Analysis

Operational Vibration

Typically, the land uses that result in vibration impacts are industrial businesses that use heavy machinery or railroads where passing trains generate perceptible levels of vibration. The proposed Project is a high school, and there would be no significant vibration-generating sources during operation; therefore, no impacts would occur.

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. There are no private airstrips within 10 miles of the Project site. There are several private heliports within 10 miles of the Project site; the closest are:[116]

- USC University Hospital Heliport located 3.29 miles northwest.
- Norwalk Sheriff Station Heliport located 9.21 miles southeast.
- PIH Health Good Samaritan Hospital Helipad 3 located 6.34 miles northwest.
- California Mart Heliport (private) located 5.64 miles west.
- Multiple private helipads for residential and commercial high-rises near the International Tower Heliport (private) located 6.02 miles west.

While operations at these private aircraft facilities may, at times, be audible at the site, the relatively limited and sporadic use of these heliports for corporate travel or medical/public safety emergencies, coupled with the distances between them and the site, would result in negligible amounts of noise at the Project site. The proposed Project would not expose people on-site to excessive noise levels from helicopters approaching or departing these heliport facilities. No impact would occur and no mitigation or further analysis is required.

The nearest airport to the school is San Gabriel Valley Airport in the City of El Monte, a public airport approximately 8 miles northeast.[117] The site is not within the airport influence area or the airport land use planning area of the airport.[118] The site is outside the 65 dBA CNEL noise exposure contours of the airport. Thus, implementation of the proposed Project would not expose people working on-site to excessive airport noise levels. No impacts would occur, and no mitigation or further analysis is required.

[116] Airnav.com. Airport Search. https://airnav.com/cgi-bin/airport-search
[117] Airnav.com. Airport Information. http://www.airnav.com/airports
[118] Los Angeles County Department of Public Works. Los Angeles County Airports. http://dpw.lacounty.gov/avi/airports/map.aspx?extent=-13182592.650342794,4063015.015811797,-13180758.161663902,4064543.7563775414.

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

(PED) Explanation:

The SPEIR evaluated the potential for implementation of the SUP-related projects to impact pedestrian safety. Most of LAUSD's campuses, including Garfield HS, are located in urban areas with established street systems that provide access to the various school sites, including facilities such as crosswalks, crossing signals, etc. The analysis in this section is based in part on Pedestrian and Safety Study for the James A. Garfield High School Major Modernization Project prepared by Linscott, Law & Greenspan, Engineers (LLG), dated December 19, 2023. A copy of this report is included as Appendix H.

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

LAUSD Standard Conditions of Approval	
SC-PED-1	LAUSD shall participate in the Safe Routes to School (SR2S) program. **California Department of Transportation (Caltrans) SR2S Program** LAUSD is a participant in the SR2S program administered by Caltrans, local law enforcement, and transportation agencies. OEHS provides pedestrian safety evaluations as a component of traffic studies conducted for new school projects. This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25-mile radius of a proposed school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic.
SC-PED-2	LAUSD shall implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program. **OEHS Traffic and Pedestrian Safety Program** LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for: student drop-off areas, vehicle access, and pedestrian routes to school. School traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.

4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval	
SC-PED-3	LAUSD shall implement the applicable sidewalk requirements outlined in the School Design Guide. LAUSD shall also coordinate with the responsible traffic jurisdiction/agency to implement infrastructure improvements prior to the opening of a school. Improvements shall include, but are not limited to: • Clearly designate passenger loading areas with the use of signage, painted curbs, etc. • Install new walkway and/or sidewalk segments where none exist. • Substandard walkway/sidewalk segments shall be improved to a minimum of eight feet wide. • Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades.
SC-PED-4	LAUSD shall design the project to comply with the traffic and pedestrian guidelines in the School Traffic Safety Reference Guide. **School Traffic Safety Reference Guide REF- 4492.1** This Reference Guide replaces Reference Guide 4492.0, School Traffic Safety, September 30, 2008. Updated information is provided, including new guidance on passenger loading zones and the Safety Valet Program. This guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.
SC-PED-5	LAUSD shall design new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide. **School Design Guide** The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.
SC-T-2	Implementation of SC-T-2 (see XVIII. TRANSPORTATION AND CIRCULATION)
SC-T-3	Implementation of SC-T-3 (see XVIII. TRANSPORTATION AND CIRCULATION)
SC-T-4	Implementation of SC-T-4 (see XVIII. TRANSPORTATION AND CIRCULATION)

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

Less than Significant Impact. Potential construction-related and operational impacts to vehicular and pedestrian safety hazards are discussed below.

Construction

Construction activities associated with the proposed Project would require the use of heavy haul trucks, equipment, worker vehicles, and construction activities on the Campus while students are in school. The construction and demolition activities would result in a temporary increase in construction vehicles and heavy haul truck activity on the roadway network (refer to Section 3.2.5, *Construction Phasing and Equipment*).

To avoid conflicts between construction activities and students, the District would implement SC-T-4, which would require the Construction Contractor to prepare a Construction Worksite Traffic Control Plan prior to commencement of construction (see XVIII. TRANSPORTATION AND CIRCULATION). This plan would establish methods to avoid conflicts between the construction traffic and the existing vehicle, pedestrian, and bicycle traffic on the Campus and in the neighborhood. LAUSD's construction BMPs, identified in the Construction Worksite Traffic Control Plan, would include the notification requirements, approved haul routes, hours of construction, protective devices (e.g., pedestrian detours, covered walkways, etc.), warning signs, and access to transit stops and other adjacent properties.

As described in the Pedestrian and Safety Study (see Appendix G), in accordance with SC-PED-2 and SC-PED-4, it is recommended that a minimum of one traffic monitor / crossing guard be stationed near each of the loading areas surrounding the campus: 1) near the East Sixth Street main loading area; and 2) along the west side of Woods Avenue. The monitors should be present primarily for the oversight of drop-off/pick-up activities at the designated loading zone.

Additionally, during periods of heavy construction activities with the demolition of Building 200 and construction of the new building, it is recommended that the south side of Escuela Street between Clela Avenue and Woods Avenue be designated as a temporary loading zone to alleviate the usage of the main loading area. As loading activities are currently prohibited along the south side of Escuela Street today ("No Stopping" during School days between 7:00 AM to 5:00 PM), this segment of Escuela Street would involve the provision of new signage by the Los Angeles County Department of Public Works since LAUSD does not have jurisdiction over street signage. In providing three separate areas for student loading/unloading activities during construction (i.e., along north side of East Sixth Street, west side of Woods Avenue and south side of Escuela Street), some of the loading activities would be expected to shift to Escuela Street and Woods Avenue, thereby reducing the vehicle queues currently observed on East Sixth Street and Vancouver Avenue. In addition, during construction, buses are recommended to utilize Fraser Avenue for loading operations in order to provide greater separation for vehicle loading activities, bus loading, and construction activities.

The scope of work is primarily on the Garfield HS Campus and does not include sidewalk improvements. However, in the event of a design change and in accordance with SC-PED-3, the Construction Contractor will maximize the sidewalk width for pedestrians to a feasible extent to ensure safety between pedestrians using the sidewalks and vehicles using the adjacent roadways.

The Construction Contractor would work closely with the school administration to coordinate activities and ensure students and pedestrians remain safe during all construction activities. With the implementation of SC-PED-2, SC-PED-3, and SC-PED-4 impacts would be less than significant, and no mitigation or further analysis would be required.

4. Environmental Checklist and Analysis

Operation

Following the completion of construction activities, pedestrian access to the Campus would not change. Students would continue to use the main entrance on East Sixth Street for student pick up and drop off. However, the proposed Project does include several elements to ensure that the Campus would comply with various federal, State, and local statutory and regulatory requirements. This includes the development of accessible paths of travel and accessible route signage across the Campus that adheres to the ADA and the CBC.

The proposed Project would also involve the construction of a new, replacement surface parking lot for faculty. As with the existing parking lot, the new, replacement parking lot would be secured from the public with fencing. However, the driveway accesses from East Sixth Avenue would be abandoned and removed with the existing driveway along Fraser Avenue serving as the entry/exit. SC-T-2 would require vehicular access and parking designs to comply with the Vehicular Access and Parking Standards of the LAUSD School Design Guide. With the implementation of SC-T-2, operational impacts associated with the new surface parking area would be less than significant, and no mitigation or further analysis is required.

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

Less than Significant Impact. During construction, the contractors would be required to submit and implement a Construction Worksite Traffic Control Plan to OEHS for review in accordance with SC-T-4. This plan would ensure pedestrian safety measures, access, and warning signs during construction are properly implemented. With the implementation of SC-T-4 and the compliance with existing regulations and programs, the impacts to students walking from local neighborhoods would be reduced to less than significant during construction.

The Project site is located within the boundary of the Campus and would not result in changes to off-site circulation. The proposed Project may result in changes to the internal site circulation; however, it would not create unsafe routes to schools for students walking from local neighborhoods with the implementation of SCs and compliance with local ordinances and regulations. The location and design of pedestrian areas and access would implement SC-PED-4 to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bicycle paths, crossing guards, pedestrian, and traffic signals, stop signs, warning signs, and other pedestrian access measures. Pursuant to the requirements of SC-PED-3, LAUSD shall implement the applicable sidewalk requirements outlined in the LAUSD School Design Guide by coordinating with Los Angeles County Department of Public Works to implement any required infrastructure improvements affecting pedestrian safety. LAUSD shall implement SC-PED-2 through SC-PED-4, to implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program and design the proposed Project to comply with the traffic and pedestrian guidelines in the School Traffic Safety Reference Guide. Therefore, impacts to existing routes to school would be less than significant and no mitigation or further analysis is required.

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

Less than Significant Impact. The Project site is approximately 0.75 miles east of I-710 and 0.59 mile south of California State Route (SR-) 60. The nearest four-lane arterial roadway to the Project site is South Atlantic Boulevard, approximately 0.07 mile to the west, classified as a Major Highway in the Los Angeles County Highway Plan.[119] The proposed Project site is not adjacent to or near a major arterial roadway or freeway that may pose a safety hazard. No impacts would occur, and no mitigation or further analysis is required.

[119] Los Angeles County Public Work Department. 2016. Los Angeles County Highway Plan. https://pw.lacounty.gov/ldd/lddservices/streetandbridge/docs/hwy_s.pdf

4. Environmental Checklist and Analysis

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

(PH) Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact population growth in the LAUSD service area and cause displacement of people and housing. According to the SPEIR, new construction, renovation and modernization projects implemented under the SUP on existing LAUSD campuses are anticipated to have less than significant impacts related to indirect population growth and no impacts related to displacement of housing and people in the LAUSD region. Similarly, the project-specific analysis below concludes that implementation of the Project would also have less than significant impacts related to indirect population growth and no impacts related to displacement of housing and people in the Project area.

LAUSD has an SC addressing potential impacts to population and housing; however, the proposed Project would not displace any residences or businesses. Therefore, the implementation of LAUSD's Relocation Assistance Advisory Program would not be applicable to the proposed 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)?

No Impact. The Project site is a developed Campus surrounded by an urbanized community. The proposed Project does not include the construction of any new homes or businesses or changes to the existing land uses. The proposed Project would not increase the number of classrooms nor accommodate an increase above planned student enrollment capacity. Therefore, no impacts would occur, and no mitigation or further analysis is required.

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

No Impact. The proposed Project is located within an established Campus that does not contain any housing or unhoused persons. Development of the proposed Project would not involve the removal or relocation of any housing and would not displace any people or require the construction of any replacement housing. Therefore, no impact would occur, and no mitigation or further analysis is required.

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

(PS) Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact public services in the LAUSD region. Proposed new construction projects under the SUP could lead to an expansion of existing school campuses, an increase in total building area, or changes in access, circulation and site plans, thereby generating increased demands for fire and police protection services. LAUSD has SCs for minimizing impacts to public services. Applicable SCs related to public services impacts associated with the proposed Project are provided below:

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

a) Result in adverse impacts related to fire protection?

Less than Significant Impact. The County of Los Angeles Fire Department (LACoFD) currently provides fire protection and emergency medical services to the Project site. The nearest LACoFD fire station to the site is Fire Station 22 located at 928 South Gerhart Avenue in the City of Commerce, approximately 1.3 miles east of the Project site and would continue to be the primary responder.[120] Construction-related activities on Campus may result in a temporary increase in demand for fire protection and emergency medical services due to the presence of construction workers on-site. However, the proposed major modernization would not result in an increase in student capacity or long-term employment within LAUSD or at Garfield HS. Therefore,

[120] County of Los Angeles Fire Department (LACoFD). 2023. Fire Station Locator. https://locator.lacounty.gov/fire/Location/3039381/los-angeles-county-fire-department---station-22

implementation of the proposed Project would not require the need for additional fire protection services or require construction of new or expanded fire stations.

Pursuant to SC-PS-1, the proposed Project would accommodate fire equipment access during construction. Additionally, specifications for new emergency access driveways and fire protection systems would be approved by the State Fire Marshall. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

b) Result in adverse impacts related to police protection?

Less than Significant Impact. The Los Angeles Police Department's (LAPD) Newton Community Police Station at 3400 South Central Avenue, approximately 1 mile northeast of the Campus,[121] provides police service to the Campus and surrounding neighborhood. The Newton Community Police Station services Fashion District, Pueblo Del Rio, South Park-Entertainment; the stations boundaries extend from Alameda Street in the east, Florence Avenue in the south, I-110 in the west, and 7th Street in the north.[122]

LAUSD's Los Angeles School Police Department (LASPD) is responsible for Campus safety and creating safe school passages for students, staff, and the school community.[123] The Campus is served by LASPD's East Division. LASPD is a recognized independent school police department, with 211 sworn police officers, 25 non-sworn school safety officers (SSO), and 32 civilian support staff dedicated to serving the District. LASPD officers are assigned to support school traffic safety, parking enforcement and facility protection.[124]

The proposed Project would not increase student capacity; therefore, it would not require the need for additional police protection services or require construction of new or expanded police stations. Any increase in police demands due to construction activities would be temporary and would not require construction of new or expanded police facilities. Thus, implementation of the proposed Project would not substantially increase demands for police services in the area, and the elementary school upgrades would not require construction of new or expanded police stations. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

c) Result in adverse impacts related to schools?

No Impact. The proposed Project would neither increase student capacity nor create a substantial number of new jobs that could result in increased demand for school services as part of long-term operations. Therefore, no impact on the provision of schools would occur and no mitigation or further study is required.

d) Result in adverse impacts related to parks?

No Impact. The proposed Project would not have an adverse physical impact on any parks near the Project site, including Atlantic Boulevard County Park, located approximately 950 feet to the east of the Project site. The proposed Project would not induce growth in the community and would not require the construction of

[121] LAPD. Newton Community Police Station. https://www.lapdonline.org/lapd-contact/central-bureau/newton-community-police-station/?zip=%20%2090011
[122] LAPD. Newton Community Police Station Service Area. https://lapdonlinestrgeacc.blob.core.usgovcloudapi.net/lapdonlinemedia/2021/03/NEWT11x17.pdf
[123] LASPD. Los Angeles School Police Department. https://ca01000043.schoolwires.net/Page/12393
[124] LASPD. About Us. https://www.lausd.org/Page/15609

new parks. Additionally, Garfield HS has its own athletic playfields and recreational facilities for use by its students, which would be improved with implementation of the proposed major modernization. Therefore, the proposed Project would not create increased demands for parks. No impact would occur, and no mitigation or further analysis is required.

e) Result in adverse impacts related to other public facilities?

No Impact. The proposed Project would not result in impacts associated with the provision of other new or physically altered public facilities (e.g., libraries, hospitals, childcare, teen or senior centers). Physical impacts to public services are usually associated with population in-migration and growth, which increase the demand for public services and facilities. The proposed Project would not result in population growth. Therefore, no impacts would occur, and no mitigation or further analysis is required.

4. Environmental Checklist and Analysis

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

(REC) Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact existing recreation facilities and parks in the LAUSD region, due to increased demand or adverse effect on the environment from the provision of new and/or expanded recreational facilities. According to the SPEIR, projects implemented under the SUP are anticipated to have no impacts on parks and recreation facilities in the LAUSD region. Therefore, the analysis provided below concludes that implementation of the Project would have less than significant impacts on existing park and recreation facilities in the Project area and no impact on the provision of new and/or expanded facilities.

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

Less than Significant Impact. In compliance with Education Code 38131 (b) Civic Center Act, every school in the District makes facilities available for various nonprofit community organizations and members of the public to use for supervised recreational activities, meetings, and public discussions. Schools are available during designated hours when regular school activities will not be disrupted. School facilities that can be used are gymnasiums, play fields, stadiums, auditoriums, multipurpose rooms, cafeterias, and classrooms. Designated year-round hours for civic center use start two hours after the close of school, and are typically 6:00 PM until 9:30 PM on weekdays, 8:00 AM until 9:30 PM on Saturday, and 12:00 PM until 5:00 PM on Sundays. No civic center use is allowed at elementary schools on Sundays. A permit from LAUSD is required in order to access school facilities.[125]

Demands for park and recreational facilities are typically generated by an increase in population in the park's service area. The proposed major modernization at Garfield HS would not increase the student capacity, long-term employment, or population in the area as it consists of replacement and repair of buildings and other infrastructure on the Campus. In addition, as previously described, Garfield HS has its own athletic playfields and recreational facilities for use by its students, which would be enhanced and expanded with the implementation of the Project. Therefore, the implementation of the proposed Project would not cause physical deterioration of or cause accelerated physical deterioration of neighborhood and regional parks or

[125] LAUSD. Civic Center Permits. https://www.lausd.org/Page/2792.

other recreational facilities. No impacts to recreation would occur and no mitigation or further analysis is required.

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

No Impact. The proposed major modernization would not develop recreational facilities outside of LAUSD-owned properties.[126] Garfield HS has existing athletic and recreational facilities including a gymnasium, a football field, a baseball and softball field, and tennis courts (refer to Section 2.4, *Existing Conditions*). Under the proposed Project, upgrades including new exterior and interior paint, removal of barriers and other accessibility upgrades, hardscape areas, landscape areas, and replacement of staff parking area with electric vehicle charging stations would be included in the proposed Project. During construction, neighboring LAUSD facilities may be used to provide temporary recreational accommodation for the students (e.g., student athletes). However, LAUSD does not anticipate the need to make improvements to the local parks or facilities located outside of its jurisdiction.

The proposed modernization of Garfield HS would not result in any unique impacts to recreational resources in the East Los Angeles community. Pursuant to the requirements of the Civic Center Act, school facilities such as gyms, playing fields, stadiums, auditoriums, multipurpose rooms, cafeterias, and classrooms may be permitted by LAUSD for public use within designated times outside school hours (California Education Code Sections 38130-38139). No impacts to recreation would occur and no mitigation or further analysis is required.

[126] LAUSD. Program EIR for the School Upgrade Program. Report. https://www.lausd.org/Page/2799

4. Environmental Checklist and Analysis

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

(T) Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to result in impacts related to transportation and traffic. All SUP projects are required to meet CCR Title 24 energy-efficiency standards. Therefore, site specific projects would be consistent with applicable goals of Connect SoCal, such as encouraging active/non-motorized transportation (such as bicycling and walking). The following information is supported by information within the site-specific Site Circulation Report conducted by LLG in 2023 (see Appendix G).

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

LAUSD Standard Conditions of Approval	
SC-T-2	LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process. **School Design Guide** Vehicular access and parking shall comply with the Vehicular Access and Parking guidelines of the School Design Guide. The Design Guide contains the following regulations related to traffic: • Parking Space Requirements • General Parking Guidelines • Vehicular Access and Pedestrian Safety • Parking Structure Security
SC-T-3	LAUSD shall coordinate with the local City or County jurisdiction and agree on the following: • Compliance with the local jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project. • Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds. • Implementation of SR2S, traffic control and pedestrian safety devices. • Fair share contribution and/or other mitigation measures for potential traffic impacts.

LAUSD Standard Conditions of Approval	
	• Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events. • Traffic study will use the latest version of Institute of Transportation Engineer's (ITE) Trip Generation manual (or comparable guidelines) to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility and the specific school type (e.g., Magnet, Charter, etc.), unless otherwise required by local jurisdiction. • Loading zones will be analyzed to determine the adequacy as pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.
SC-T-4	LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.

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

Less than Significant Impact. Level of service standards established by jurisdictions/agencies are intended to regulate long-term traffic increases associated with new development and do not apply to short-term, temporary traffic increases that occur during construction. School capacity and long-term employment would remain the same following the proposed modernization activities, and there would be no permanent increase in traffic generated by the proposed Project. Potential impacts associated with the proposed Project would be limited to construction activities. Specifically, increased vehicle trips and potential congestion generated by construction-related passenger vehicles and heavy haul trucks would cease when construction is complete, and implementation of the proposed Project would not result in any long-term, ongoing effects related to traffic and congestion. The Los Angeles County Congestion Management Program (CMP) requires evaluation of all CMP arterial monitoring intersections where the project adds 50 or more new peak hour trips. However, because the proposed modernization activities would not increase student capacity or staff at the school, there would be no permanent increase in traffic generated by the proposed Project.

Existing Conditions

Construction activities associated with the proposed Project may temporarily affect sidewalk accessibility at Garfield HS. However, any effects on sidewalk accessibility would be temporary and transient. Pedestrian access to the Campus during the construction phase would be minimally altered and any temporary changes to pedestrian access during construction would be completed as outlined in a Construction Worksite Traffic Control Plan (refer to SC-T-4, which requires the implementation of a Construction Worksite Traffic Control Plan subject to OEHS review and approval). The proposed Project does not include changes to existing roadways or study area intersections or public transit, bicycle or pedestrian facilities in the vicinity of the Campus. With the implementation of SC-T-4, temporary, construction-related impacts to pedestrian safe access

points would be less than significant. For these reasons, the proposed Project would not conflict with policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities and impacts would be less than significant. No mitigation or further study is required.

Vehicular Access

Student pick-up and drop-off occurs curbside along East Sixth Street, at the front of the existing Campus. Vehicular access to the on-site parking areas is currently provided via eight existing driveways: two driveways along the east side of Fraser Avenue, two driveways along the north side of East Sixth Street, and four driveways along the west side of Woods Avenue. The proposed Project would remove the existing on-site surface parking spaces which would eliminate the two existing vehicle access points on the north side of East Sixth Street just east of Fraser Avenue. The new vehicular access point for the replacement staff surface parking lot is planned to be along the east side of Fraser Avenue. It is anticipated that the primary passenger loading zone would continue to be provided along the north side of East Sixth Street, with secondary passenger loading on the west side of Woods Avenue, similar to current conditions. Any late arrivals or access to campus during school hours would require controlled entry and access via East Sixth Street with check-in required.

Intersections

- East Sixth Street at Fraser Avenue: 4-way stop
- East Sixth Street and Clela Avenue: 3-way stop
- East Sixth Street and South Vancouver Avenue: 3-way stop
- East Sixth Street at South Woods Avenue: 4-way stop

Pedestrian Facilities

Sidewalks are present on each side of all roadways surrounding the Campus. Yellow school crossing crosswalks are present at all intersections. Pedestrian access to the Project site is currently provided via multiple entrances along East Sixth Street, which forms the Project site's southern boundary, near the existing staff parking lot, the main entrance within Administration/Library/Classroom Building, and one additional entrance near the intersection of East Sixth Street and South Woods Avenue. Additional pedestrian access entrances are located along Fraser Avenue and South Woods Avenue, which form the Project site's eastern and western boundaries near the existing track and field.

Transit Service

Transit service to the Project site is provided by the El Sol Los Angeles Shuttle, which operates eastbound and westbound along East Sixth Street, directly adjacent to the Project site and approximately 51 feet south of the Project site. Regional service is provided by the Metro E Line, along South Atlantic Boulevard.[127] The closest station to the Project site is Atlantic Station, approximately 0.24-mile northeast. Additionally, school buses pick-up and drop off students on East Sixth Street, along the southern portion of the Campus.

[127] Los Angeles Metro. E Line. https://cdn.beta.metro.net/wp-content/uploads/2023/12/01154128/804_TT_12-10-23-1.pdf

Construction

Construction of the proposed Project is anticipated to start in the first quarter of 2026 and is expected to take 42 months to complete. Construction work would be phased and conducted in stages during the 42-month period, while the Campus remains an active school site. Project close out and occupation is anticipated in the third quarter of 2029.

Construction staging (i.e., storage of equipment and materials) would be contained on the Project site. Parking for construction workers is anticipated to be provided in the staging area while school is in session and in Campus parking lots during school breaks.

Based on the anticipated construction schedule, construction workers are expected to arrive at the school before 7:00 AM (before peak morning commute hours). Assuming the typical workday ends at 3:30 PM, approximately 50 percent of the workers are assumed to leave the site between 3:30 PM and 4:00 PM, 25 percent between 4:00 PM and 4:30 PM, and the remaining 25 percent after 4:30 PM (including supervisors). Importantly, construction worker trips and heavy haul truck trips would not occur at the same time because workers would arrive before 7:00 AM and hauling cannot start until 7:00 AM and must avoid peak commute, as well as student pick up and drop off times. Construction traffic associated with the proposed Project would not significantly impact nearby roadways. Construction vehicles would cause only temporary and intermittent increases in traffic on area roadways and would not contribute to a significant increase in traffic volumes. Additionally, it is not anticipated that any roadway, lane closures, or detours would be required.

Construction traffic associated with the proposed Project would not displace bus stops or impact public transit bus services on the surrounding roadways. Additionally, the Construction Worksite Traffic Control Plan (SC-T-4) would include measures to prevent traffic and pedestrian hazards between heavy haul trucks entering and exiting the Project site (refer to XIV. PEDESTRIAN SAFETY).

Overall, impacts associated with the proposed Project would be less than significant, and no mitigation or further analysis is required.

Operation

The proposed Project would demolish the existing parking structure associated with Building 100 and would replace this parking structure with a new surface parking lot for faculty. The driveway accesses from East Sixth Avenue would be abandoned and removed with the existing driveway along Fraser Avenue serving as the entry/exit. Additionally, the District would implement SC-T-2, which would require the implementation of applicable vehicular access and parking design guidelines during the planning process. Following the completion of construction, the proposed Project would not increase student capacity at the school. Therefore, the proposed Project would not result in changes to the volume of traffic or the distribution of trips over roadways near the Project site.

The proposed Project would not change bicycle or pedestrian access within the vicinity of the Campus. Following the completion of construction activities, the proposed modernization activities would not interfere with the safety or performance of the circulation system and would not interfere with Metro bus services operating near the Project site. Therefore, the proposed Project would not conflict with policies, plans, or

programs regarding transit, bicycle, or pedestrian facilities, and the proposed Project would not decrease the performance or safety of such facilities, and no mitigation or further analysis is required.

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

No Impact. According to the CEQA Guidelines Section 15064.3(b), generally, VMT is the most appropriate measure of transportation impacts. For the purposes of this section, VMT refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. The section establishes that a land use project's effect on automobile delay shall not constitute a significant environmental impact.

Construction activities associated with the proposed Project would involve construction equipment and additional vehicles for construction workers to access the Project site. Construction equipment would primarily remain on site for the duration of the construction except for haul trucks. LAUSD encourages carpooling for the construction workers getting to and from the Project site and would work with the contractor to minimize vehicle trips to the extent feasible. Construction equipment and contractor travels to the Project site would be temporary in nature, ceasing at the completion of the proposed Project.

The proposed Project would not change the land use of the school, increase the capacity of the school, or change the attendance boundaries of the school. Because the proposed Project would not generate an increase in traffic or a change in traffic patterns; thus, the proposed Project would have no impact pertaining to VMT during operation of the proposed Project. No impacts would occur, and no mitigation or further analysis is required.

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. Potential impacts associated with geometric design features during and following the completion of construction are discussed below.

Construction

During construction, equipment, trucks, and workers would drive to and from the staging area on the Project site. Construction trips would be spread out throughout the workday and would not occur during nonpeak traffic periods. Also, construction trips would not overlap with student drop-off and pickup. In accordance with SC-T-4, LAUSD's Construction Contractor would prepare a Construction Worksite Traffic Control Plan prior to commencement of construction. This plan would establish methods to avoid conflicts between construction traffic and the existing vehicle, pedestrian, and bicycle traffic. LAUSD's construction BMPs, identified in the construction worksite traffic control plan, would include the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. Additionally, construction fencing and/or covered walkways would be installed around the Project site to separate construction zones from students and to ensure safety. The proposed Project construction would not create new hazards or conflicts and impacts related to vehicular or pedestrian and bicycle safety would be less than significant, and no mitigation or further analysis is required.

Operation

The proposed Project would not change the land use of the school, increase the capacity of the school, or change the attendance boundaries of the school and would therefore, not increase operational traffic on or around the Campus. The proposed Project would not alter the use of the Campus or drop off/pick up locations, and no new incompatible uses would be introduced. Therefore, no operational impacts would occur, and no mitigation or further analysis is required.

d) Result in inadequate emergency access?

Less than Significant Impact. The access and circulation features at the Project site would continue to accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. All access features are subject to and must satisfy State Fire Marshall design requirements. The proposed Project would not result in inadequate emergency access. Therefore, no impacts would occur, and no mitigation or further analysis is required.

4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. TRIBAL CULTURAL RESOURCES.				
Has a California Native American Tribe requested consultation in accordance with Public Resources Code section 21080.3.1(b)?		☐ Yes		☒ No
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	☐	☐	☐	☒
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☐	☒	☐

(TCR) Explanation:

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

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

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

Native American Consultation

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

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)?

No Impact. No supporting documents indicated that the Project site should be considered to have a high potential for containing TCRs. The California Historic Resources System (CHRIS-3) records search identified no resources – including Native America or prehistoric within 0.5 mile of the Project site, none of which include Native American or prehistoric cultural resources. While the Campus and its individual components meet the requirements for potential significance under the NRHP and CRHR criteria A/1, B/2, C/3, and D/4 and meets local significance criteria (refer to Section 4.5, *Cultural Resources*), this eligibility is not based on the presence of any known TCRs. Therefore, Native American monitoring for TCRs during all ground disturbances is not necessary or required. In the unlikely event that construction-related ground disturbance results in the discovery of potential TCRs, compliance with SC-TCR-1 and SC-TCR-2 would ensure that potential impacts to TCRs are avoided. Therefore, no impacts would occur, and no mitigation or further analysis is required.

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

Less than Significant Impact. AB 52 requires meaningful consultation with California Native American tribes on potential impacts to tribal cultural resources, as defined in PRC Section 21074. TCRs are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe

that are either eligible or listed in the California Register of Historical Resources or local register of historical resources.[128]

Two Native American Tribes, the Gabrieleño Band of Mission Indians–Kizh Nation and the Fernandeño Tataviam Band of Mission Indians, have requested notification through the PRC Section 21080.3.1 process with LAUSD. Pursuant to AB 52, LAUSD notified the Native American tribes/tribal representatives that are traditionally and culturally affiliated with the Project area, as identified by the NAHC. LAUSD sent Project notifications to the following Tribes: Barbareño/Ventureño Band of Mission Indians; Chumash Council of Bakersfield; Coastal Band of the Chumash Nation; Fernandeño Tataviam Band of Mission Indians; Gabrieleño Band of Mission Indians – Kizh Nation (two separate contacts); Gabrieleño/Tongva San Gabriel Band of Mission Indians; Gabrielino/Tongva Nation; Gabrielino Tongva Indians of California Tribal Council (two separate contacts); Gabrielino-Tongva Tribe (two separate contacts); Northern Chumash Tribal Council; San Fernando Band of Mission Indians; Santa Rosa Band of Cahuilla Indians; Santa Ynez Band of Chumash Indians (four separate contacts); and Soboba Band of Luiseno Indians (two separate contacts). No Native American tribes have requested consultation with LAUSD, pursuant to PRC Section 21080.3.1. With implementation of SC-TCR-1 and SC-TCR-2, the impacts of the proposed Project pursuant to criteria set forth in PRC Section 5024.1(c) would be less than significant and no mitigation or further analysis is required.

[128] California Natural Resources Agency. AB 52 Regulatory Update. http://resources.ca.gov/ceqa/.

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

(USS) Explanation:

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

LAUSD Standard Conditions of Approval	
SC-USS-1	Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities: **School Design Guide.** Establishes a minimum non-hazardous construction and demolition (C&D) debris recycling requirements of 75 percent by weight. Construction and demolition waste shall be recycled to the maximum extent feasible. **Construction & Demolition Waste Management.** This document outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of non-hazardous waste materials generated during demolition and/or new construction to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling, salvaging and/or reusing a minimum of 75 percent of the C&D waste generated by weight.

4. Environmental Checklist and Analysis

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

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

Less than Significant Impact. The Project site is completely developed, is currently using existing utilities and service systems. Construction at the Project site would require temporary additional usage of water, electric power, and diesel. However, the additional utility usage during construction would be minimal and well within the capacity of the existing utility facilities that already serve the Campus.

The operation of the proposed Project would not increase utility consumption through capacity increase or modification to existing operations. Due to the age of the existing structures, the proposed new building and replacement facilities would be more resource efficient when compared to the existing structures and facilities. The proposed Project would not change the land use of the Campus, increase the capacity, or change the attendance boundaries and would not require the relocation or construction of new water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities.

With the implementation of SC-USS-2 and SC-GHG-1 to SC-GHG-3, the Campus' resource consumption and stormwater production are expected to reduce with the implementation of the proposed Project. Therefore, no new or expanded utility facilities would need to be constructed and no relocations of the existing facilities would be needed. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

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. LADWP provides water to the existing Project site. The primary water sources for LADWP are from the Los Angeles Aqueducts (LAA), local groundwater, State Water Project (supplied by Metropolitan Water District of southern California [MWD]), and Colorado River Aqueduct (supplied by

MWD). Additional sources include recycled water and other imported water sources. The Campus currently serves students living in the region, and the proposed Project would not increase the student population or long-term water demands. Water would be used on site during construction for dust suppression and similar activities. The Project site would be expected to increase its water use during the construction phase of the proposed Project to assist with dust suppression measures and related construction activities. However, the small amount of water that would be used for the construction of the proposed Project is not expected to impact the availability of the existing water supply and would not result in the need for new or expanded water entitlements. Installation of landscape and irrigation improvements would comply with SC-USS-2 and SC-GHG-1, SC-GHG-2, and SC-GHG-3 for water conservation; therefore, the proposed Project would not result in an increase in water demands for landscaping. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

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

Less than Significant Impact. As previously described, construction of the proposed Project would involve a minor increase in wastewater production due to construction activities and construction personnel. However, the minor increase in wastewater production is temporary and would cease following the completion of construction activities. The Campus would continue to serve students currently living in the region and would not generate an increase in the regional student population or the amount of wastewater treatment required. The proposed Project would not affect wastewater treatment capacity. Therefore, the proposed Project would have a less than significant impact on the adequacy of the local wastewater treatment capacity, and no mitigation or further analysis is required.

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. The two largest destinations for solid waste generated in the City of Los Angeles are the Chiquita Canyon Landfill in Castaic, an unincorporated area of Los Angeles County; and the Sunshine Canyon Landfill in the Community of Sylmar in the City of Los Angeles.

Construction

Demolition and construction waste would be generated and disposed of at local landfills. The excavated soil would be segregated and managed as non-hazardous, non-Resource Conservation and Recovery Act (RCRA) hazardous, or RCRA hazardous waste. The proposed Project may require haul and disposal of approximately of contaminated soil and material. Contaminated soil and material would result in an incremental and intermittent increase in solid waste disposal at licensed landfills and other waste disposal facilities within Los Angeles County.

Section 5.408 (Construction Waste Reduction, Disposal, and Recycling) of the CALGreen Code (Title 24, CCR, Part 11, Section 5.408.1.1) requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. During construction, the proposed Project would generate demolition and construction related solid waste. However, the amount of

solid waste would be minimized per SC-USS-1 requirements. SC-USS-1 requires the minimum recycling of 75 percent of the nonhazardous construction debris by weight. In addition, the proposed Project would comply with all waste recycling/reuse requirements in CALGreen Code and the LAUSD School Design Guide & Specification 01340, Construction & Demolition Waste Management which requires the collection and separation of all construction and demolition waste materials on-site and that they be reused or recycled to the extent feasible. Thus, the proposed Project improvements would not adversely impact such landfills. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

Operation

The proposed Project would not increase the student population and thus would not increase solid waste generation. The District would also implement SC-USS-3, which would implement recycling programs on Campus to reduce solid waste production. With the implementation of SC-USS-3, the proposed Project is expected have a less than significant impact during operation on solid waste production. The proposed Project would not 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. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

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

Less than Significant Impact. The District currently complies with or incorporates federal, State, and local statutes and regulations related to solid waste, and would continue this practice. Section 5.408 (Construction Waste Reduction, Disposal, and Recycling) of the CALGreen Code (Title 24, CCR, Part 11, Section 5.408.1.1) requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. This standard is also required under the CHPS criteria. Under SC-USS-1, LAUSD has established a minimum construction and demolition debris salvage, recycle, and reuse requirement of 75 percent. Construction of the proposed Project would adhere to these established standards. Operationally, SC-USS-3 would reduce the solid waste generated on site by incorporating an on-site recycling program. Therefore, impacts would be less than significant no mitigation or further analysis is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE.				
Is the project located in or near state responsibility areas or lands classified as high fire hazard severity zones?	☐ Yes		☒ No	
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, 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 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?	☐	☐	☐	☒

(WF) Explanation:

Wildland fire protection in California is the responsibility of either the State, local government, or the federal government. State Responsibility Areas (SRAs) are the areas in the state where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. The SRA forms one large area over 31 million acres to which the California Department of Forestry and Fire Protection (CAL FIRE) provides a basic level of wildland fire prevention and protection services[129].

Local responsibility areas (LRA) include incorporated cities, cultivated agriculture lands, and portions of the desert. LRA fire protection is typically provided by city fire departments, fire protection districts, counties, and by CAL FIRE under contract to local government.[130] CAL FIRE uses an extension of the state responsibility area Fire Hazard Severity Zone model as the basis for evaluating fire hazard in local responsibility area. The local responsibility area hazard rating reflects flame and ember intrusion from adjacent wildlands and from flammable vegetation in the urban area. The City of Los Angeles Fire Department (LAFD) provides fire protection and emergency medical services within the Project area.

[129] California Department of Forestry and Fire Protection (CAL FIRE). 2023. https://www.fire.ca.gov/what-we-do/fire-protection
[130] California Department of Forestry and Fire Prevention (CAL FIRE). https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildfire-preparedness/fire-hazard-severity-zones/fire-hazard-severity-zones-map/

4. Environmental Checklist and Analysis

Fire Hazard Severity Zones (FHSZ) are identified by Moderate, High and Very High in an SRA, and Very High in an LRA. The nearest FHSZ in the SRA is a Very High about 4.28 miles east in Whittier Narrows Recreation Area.[131] The nearest fire in the LRA is approximately 2.91 miles north in the Ascot Hills Park area.[132] Garfield HS is not located within a FHSZ, therefore, the implementation of SCs for LAUSD projects in High FHSZ are not applicable.

The Project site is not located in or near state responsibility areas or lands classified as high fire hazard severity.

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

No Impact. As previously described in XVI. PUBLIC SERVICES, emergency response within the Project area is guided the ERP, which identifies County agencies and other agencies that would be involved in emergency responses; threat summaries and assessments; and procedures for responding agencies that would be involved in coordinating and managing responses. The ERP is focused on emergencies beyond the scope of the daily functions of public safety agencies, such as emergencies requiring multi-agency and/or multi-jurisdictional responses.

Emergency preparedness and response planning would be coordinated through LAUSD's Office of Emergency Services. The existing school currently has an emergency school evacuation plan in compliance with District's "Integrated Safe School Plan."[133] The proposed Project would not interfere with any other existing emergency response plans or emergency evacuation plans. Therefore, no impact would occur, and no mitigation or further analysis is required.

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 is located in an urban area with no wildlands in the surrounding vicinity. The Project site is generally flat without significant topography, and there are no steep slopes where high winds can exacerbate wildfire risks. Furthermore, CAL FIRE does not classify any adjacent areas as VHFHSZ. Project development would not place people or structures at risk from wildfire. Therefore, no impact would occur, and no mitigation or further analysis is required.

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

No Impact. The proposed Project would not require the installation or maintenance of new infrastructure that may exacerbate fire risk. Therefore, no impact would occur, and no mitigation or further analysis is required.

[131] California Department of Forestry and Fire Protection (CAL FIRE). 2023. https://egis.fire.ca.gov/FHSZ/
[132] CAL FIRE. 2023. https://egis.fire.ca.gov/FHSZ/
[133] LAUSD. 2020. Integrated Safe School Plan. https://www.lausd.org/Page/16314#:~:text=LAUSD%20schools%20are%20required%20to,traffic%20safety%20and%20crisis%20intervention.

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 generally flat without significant topography, and there are no steep slopes where high winds can exacerbate wildfire risks. There are no vegetated slopes susceptible to wildfire in the surrounding area. Thus, implementation of the proposed Project would not result in result of runoff, post-fire slope instability, or drainage changes. Therefore, no impact would occur, and no mitigation or further analysis is required.

4. Environmental Checklist and Analysis

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

(MFS) Explanation:

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

Less than Significant Impact. The proposed Project would neither degrade the quality of the environment nor substantially impact any endangered plant, animals, or habitat. As previously described, since the Campus is fully developed and the surrounding area is highly urbanized, the proposed Project would not impact the habitat or population level of a fish, plant, animal community or reduce/restrict the range of a rare or endangered plant or animal. Therefore, impacts related to biological resources would be less than significant and no mitigation or further analysis is required.

The proposed Project would demolish two buildings, two portables, the second story bridge connecting Building 200 and Building 300, the parking garage attached to Building 100, and construct a new, consolidated four-story building. This would not change the character of the surrounding neighborhoods. As previously described, following implementation of the proposed Project, the potential historic district would retain integrity of location, design, setting, workmanship, and association from the identified period of significance. Additionally, since the Project site has been highly disturbed and is covered by fill soils, discovery of archaeological and paleontological resources during excavation activities is unlikely. Therefore, impacts related to archaeological, paleontological, and historic resources and human remains would be less than significant and no mitigation or further analysis is required.

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. Based on the preceding analysis, with implementation of SCs and compliance with existing regulations, the proposed Project would not result in significant adverse impacts that could contribute to a cumulatively considerable impact. In consideration of the preceding analysis, the proposed Project's contribution to cumulative impacts would be less than significant, and therefore, Project impacts would not be 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. As discussed in the above analyses, the prosed Project would not result in significant direct or indirect adverse impacts or result in substantial adverse effects on human beings. No mitigation or further analysis is required.

5. List of Preparers

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