October 22, 2019| Initial Study/Mitigated Negative Declaration

RESEDA CHARTER HIGH SCHOOL

Comprehensive Modernization Project

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Abbreviations and Acronyms

AAQS	Ambient Air Quality Standards
ARB	Air Resources Board
AQMP	Air Quality Management Plan
BUG	Backlight-Uplight-Glare
Bgs	Below Ground Surfaces
BMPs	Best Management Practices
BOE	Los Angeles Unified School District's Board of Education
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAT	Climate Action Team
CBC	California Building Code
CDE	California Department of Education
CEQA	California Environmental Quality Act
CGP	Construction General Permit
CH_4	Methane
CIWMA	California Integrated Waste Management Act
CMP	Congestion Management Program
CO_2	Carbon Dioxide
CWC	California Water Code
CO_2e	CO2 equivalents
DSA	Division of the State Architect
EPA	Environmental Protection Agency
FEMA	Federal Emergency Management Agency
GHG	Greenhouse Gases
HFCs	Hydrofluorocarbons
IDA	International Dark –Sky Association
IES	Illuminating Engineering Society
LACSD	Los Angeles County Sanitation District
LAUSD	Los Angeles Unified School District
LAUSD Program EIR	Los Angeles Unified School District Program EIR
LSTs	Localized Significance Thresholds
MEP	Maximum Extent Practicable
Metro	County of Los Angeles Metropolitan Transit Authority

Abbreviations and Acronyms

MLD	Most Likely Descendant
MLO	Model Lighting Ordinance
MPR	Multi-Purpose Room
MRZ-1	Mineral Resources Zone 1
NAHC	Native American Heritage Commission
NPDES	National Pollution Discharge Elimination System
NOx	Nitrogen Oxides
N_2O	Nitrous Oxide
OAL	Office of Administrative Law
OPR	Office of Planning and Research
O_3	Ozone
PDFs	Project Design Features
PFCs	Perfluorocarbons
PM10	Coarse Inhalable Particulate Matter
PM2.5	Fine Inhalable Particulate Matter
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SC	Standard Conditions of Approval
SCAG	Southern California Association of Governments
SCCIC	South Central Coastal Information Center
SF_6	Sulfur Hexafluoride
SFHA	Special Flood Hazard Areas
SLF	Sacred Lands File
SoCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SRRE	Source Reduction and Recycling Element
STEAM	Science Technology Engineering Arts and Math
SUSMP	Standard Urban Storm Water Mitigation Plan
SWRB	State Water Resources Board
SWPPP	Stormwater Pollution Prevention Plan
TACs	Toxic Air Contaminants
UWMP	Urban Water Management Plan
WDR	Waste Discharge Requirements
WSA	Water Supply Assessment

Abbreviations and Acronyms

WRP	Water Reclamation Plant
VHFHSZ	Very High Fire Hazard Severity Zone
VAPA	Visual And Performing Arts

Abbreviations and Acronyms

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1. Introduction

2.1 OVERVIEW

The Los Angeles Unified School District (LAUSD or District) is proposing a comprehensive modernization of Reseda Charter High School (Reseda HS or Campus) located at 18230 Kittridge Street in the Reseda neighborhood of the City of Los Angeles. Comprehensive Modernization Projects are designed to address the most critical physical needs of the building and grounds at the Campus through building replacement, renovation, modernization, and reconfiguration. The proposed Reseda HS Comprehensive Modernization Project (Project) includes the demolition of various relocatable (portable) and permanent buildings that are outdated, structurally unsound, and/or otherwise inadequate in maintaining the school's ability to provide a healthy and successful learning environment. In place of the removed buildings, new classrooms and support spaces will be constructed to improve the safety and educational quality of Reseda HS, and even classrooms not undergoing modernization will receive minor interior improvements to help promote learning. The Project also includes upgrading and replacing aging infrastructure, improving access in compliance with the American Disabilities Act (ADA), and providing new landscaping and hardscaping.

The proposed Project is designed to address the most critical physical concerns of the buildings and grounds at the Campus. This is in line with the primary intent of the comprehensive modernization projects, which is to address buildings and grounds in the greatest need of upgrade, with emphasis placed on seismic safety and aging building systems and components. The projects are comprehensive in nature, addressing not only the critical physical conditions of a building, but also improving the facilities to support the educational program. However, in order to maximize the available funding, the District prioritizes the most urgent items in its comprehensive modernization projects.[1]

Funding for this project has been made available through the LAUSD's voter-approved Bond Program. Approximately $171 million has been designated for the proposed modernization of Reseda HS. The proposed Project is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This Initial Study provides an evaluation of the potential environmental consequences associated with the Project. A detailed description of the proposed Project's components is provided in the "Project Description" section below.

[1] Los Angeles Unified School District, Board of Education Report. Amendment to the Facilities Services Division Strategic Execution Plan to Approve Project Definitions for 11 Comprehensive Modernization Projects. Report. LAUSD, 2016.

1.2 BACKGROUND

On July 31, 2008, the LAUSD Board of Education (BOE) adopted a Resolution Ordering an Election and Establishing Specifications of the Election Order for the purpose of placing Measure Q, a $7 billion bond measure, on the November election ballot to fund the renovation, modernization, construction, and expansion of school facilities. On November 4, 2008, the bond passed. The nationwide economic downturn in 2009 resulted in a decline in assessed valuation of real property, which restricted the District's ability to issue Measure Q bonds and the remaining unissued Measures R and Y funds. Once assessed valuation improved, the BOE could authorize the issuance of bond funds.[2]

On December 10, 2013, the District refined their School Upgrade Program (SUP) to reflect the intent and objectives of Measure Q as well as the updated needs of District school facilities and educational goals.[3] Between July 2013 and November 2015, the SUP was analyzed under CEQA criteria in a Program Environmental Impact Report (Program EIR). On November 10, 2015, the BOE certified the Final SUP Program EIR.[4]

In December 2016, the LAUSD Board defined Reseda HS, along with ten other schools, for the development of a "Comprehensive Modernization Project." Assessments of the school facilities, educational programming, and infrastructure were performed by industry professionals, as well as seismic and historic evaluations. The findings, coupled with input from community members, school users and stakeholders, called for improvements with an anticipated cost of over $1.4 billion.[5]

1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by the CEQA[6] and the State 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 (such as school districts and water districts).

LAUSD is the lead agency for this proposed Project, and is therefore required to conduct an environmental review to analyze the potential environmental effects associated with the proposed Project.

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2 LAUSD. Board of Education Report. Report. 13/14 ed. Vol. 143. Los Angeles, CA: LAUSD, 2013.
3 LAUSD. Board of Education Report. Report. 13/14 ed. Vol. 143. Los Angeles, CA: LAUSD, 2013.
4 LAUSD. LAUSD Board of Education Report- LAUSD Regular Meeting Stamped Order Of Business. Report. 15/16 ed. Vol. 159. Los Angeles, CA: LAUSD, 2015.
5 LAUSD. LAUSD Board of Education Report- Amendment to the Facilities Services Division Strategic Execution Plan to Approve Project Definitions for 11 Comprehensive Modernization Project. Report. 16/17 ed. Vol. 205. Los Angeles, CA: LAUSD, 2016.
6 California Public Resources Code, §21000 et seq (1970).
7 California Code of Regulations, Title 14, Division 6, Chapter 3, §15000 et seq.

California Public Resources Code (PRC) Section 21080(a) states that analysis of a project's environmental impact is required for any "discretionary projects proposed to be carried out or approved by public agencies…" In this case, LAUSD has determined that an initial study is required to determine whether there is substantial evidence that construction and operation of the proposed Project would result in environmental impacts. An initial study is a preliminary environmental analysis to determine whether an environmental impact report (EIR), a mitigated negative declaration (MND), or a negative declaration (ND) is required for a project.[8]

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

1.4.1 Initial Study

This Initial Study 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 Initial

[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.

1. Introduction

Study, as described in the State CEQA Guidelines Section 15063, are to 1) provide the lead agency with information to use as the basis for deciding whether to prepare an EIR or 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 ND that a project will not have a significant effect on the environment; 6) eliminate unnecessary EIRs; and 7) determine whether a previously prepared EIR could be used with the project. The findings in this Initial Study have determined that an MND is the appropriate level of environmental documentation for this project.

1.4.2 Mitigated Negative Declaration

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 MND is provided in the Initial Study Checklist (Chapter 4).

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

1.4.3 Tiering

This type of project is one of many that were analyzed in the LAUSD SUP Program EIR that was certified by the LAUSD BOE on November 10, 2015.[11] LAUSD's SUP Program EIR meets the criteria for a Program EIR under CEQA Guidelines Section 15168 (a)(4) as one "prepared on a series of actions that can be characterized as one large project and are related…[a]s individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

The Program EIR enables LAUSD to streamline future environmental compliance and reduces the need for repetitive environmental studies.[12] The Program EIR serves as the framework and baseline for CEQA analyses of later projects through a process known as "tiering." Under CEQA Guidelines Sections 15152(a)

[11] LAUSD. Program EIR for the School Upgrade Program. Report. 2015. http://achieve.lausd.net/ceqa.
[12] Ibid.

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

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

1.4.4 Project Plan and Building Design

The Project is subject to the California Department of Education (CDE) design and siting requirements, and the school architectural designs are subject to review and approval by the California Division of the State Architect (DSA). The proposed Project, along with all other SUP-related projects, is required to comply with specific design standards and sustainable building practices. Certain standards assist in reducing

[13] California Code of Regulations Title 14, § 3 Article 1-15152(a).
[14] Ibid, at 4-8.
[15] Ibid, at 1-7.

environmental impacts, such as the California Green Building Code (CALGreen Code)[16], LAUSD 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 GHG 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.

Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects. Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects (SCs) were adopted by the BOE on February 5, 2019 (Board Report Number 241-18/19). SCs are environmental standards that are applied to District construction, upgrade, and improvement projects during the environmental review process by the OEHS California Environmental Quality Act (CEQA) team to offset potential environmental impacts. The SCs were largely compiled from established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs. For each SC, applicability is triggered by factors such as the project type and existing conditions. These SCs are implemented during the planning, construction, and operational phases of the projects. The Board of Education adopted a previous version of the SCs on November 10, 2015 (Board Report Number 159-15/16). They were originally compiled as a supplement to the Program Environmental Impact Report (Program EIR) for the School Upgrade Program, which was certified by the BOE on November 10, 2015 (also Board Report No. 159-15/16). 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 Design Guidelines and Design Standards, which are routinely updated and are referenced throughout the Standard Conditions).

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

[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 CHPS (Collaborative for High Performance Schools) criteria to the extent possible.

1. Introduction

incorporating sustainability features for the proposed Project, including onsite treatment of stormwater runoff, "cool roof" building materials, lighting that reduces light pollution, water and energy-efficient design, water-wise landscaping, collection of recyclables, and sustainable and/or recycled-content building materials.

Sustainable Design Features. LAUSD is the first school district in the United States to adopt and implement the Collaborative for High Performance Schools (CHPS) Criteria.[18] The BOE adopted a Resolution on High Performance School Facilities requiring Phase II of the new school construction program and future phase schools to be certified according to CHPS.[19] These measures are considered beneficial to improving environmental quality, as well as the learning environment. LAUSD has incorporated these into the Project design and operation of projects as part of standard LAUSD practices. The CHPS criteria are assumed to be part of the District's projects as they may apply to specific projects and are not included as mitigation measures. CHPS recommends flexible standards to promote energy efficiency, water efficiency, efficient site planning, sustainable materials, and indoor environmental quality.

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

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

- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- Compensating for the impact by replacing or providing substitute resources or environments.

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

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[18] Los Angeles Unified School District. *Key OEHS Programs*. Available at: http://achieve.lausd.net/Page/3495

[19] Los Angeles Unified School District. 2003. *Board of Education Resolution, Sustainability and the Design and Construction of High Performance Schools*. October. Available at: http://www.laschools.org/documents/download/sustainability%2Fhealthy_schools%2FBoard_Resolution_on_CHPS.pdf

The specific CHPS prerequisite criteria and LAUSD SCs are identified in the tables under each CEQA topic.[20] Federal, state, regional, and local laws, regulations, plans, and guidelines; CHPS criteria; PDFs; and SCs are considered part of the Project and are included in the environmental analysis.

1.5 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.

1.6 ORGANIZATION OF THE INITIAL STUDY

The content and format of this report are designed to meet the requirements of CEQA and the State CEQA Guidelines. The conclusions in this Initial Study are that the proposed Project 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 ND and supporting Initial Study and the terminology used.

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

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, Standard Conditions of Approval, and mitigation measures, as applicable.

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

1. Introduction

Bibliographical references and individuals cited for information sources and technical data are footnoted throughout this CEQA Initial Study; therefore a stand-alone bibliography section is not required.

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

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

A. Air Quality and Greenhouse Gas Emissions Background and Modeling Data

B. Arborist Report

C. Historic Resource Evaluation Report

D. Petroleum Fuel Use Calculations

E. Preliminary Geotechnical Site Evaluation

F. Additional Geotechnical Analyses

G. Phase I Environmental Site Assessment

H. Draft Preliminary Endangerment Assessment – Equivalent Report

I. Supplemental Preliminary Endangerment Assessment Equivalent Report

J: Noise Background and Modeling Data

K: Site Circulation Report

L. Traffic Study

2. Environmental Setting

2.1 PROJECT LOCATION

The Project site is located at 18230 Kittridge Street (Assessor Parcel Numbers [APNs] 2124-001-904) in the Reseda-West Van Nuys Plan Area in the City of Los Angeles (the City). The 29.2-acre Project site is bounded by Kittridge Street to the north, Lindley Avenue to the east, Victory Boulevard to the south, the Los Angeles River Flood Control Channel to the southwest, and Etiwanda Avenue to the west (see **Figure 1, Regional Location**). The channelized Los Angeles River intersects the site from the west and cuts diagonally across the southwest corner of the lot, separating Reseda HS from the ONEgeneration Senior Enrichment Center.

The Project site is approximately 10.6 miles northeast of the Pacific Ocean in the Reseda neighborhood of the City's San Fernando Valley. Regional access to the Project site is provided by US-101, approximately 1.3 miles to the south; I-405, approximately 3.2 miles to the east; and CA-27, approximately 4.2 miles to the west. Local access is provided via Lindley Street along the eastern boundary of the site and Vanowen Street to the north.

2.2 SURROUNDING LAND USES

The land use surrounding the Project site is primarily single- and multi- family residential with grocery markets, eateries, schools, and recreation centers interspersed among the residences. Immediately west of the Project site, across Etiwanda Avenue, is Reseda Park, a large grassy park that includes a recreational center, athletic courts and fields, and a man-made lake. Like the Project site, Reseda Park is split by the Los Angeles River, which runs from the northwest corner diagonally across the park. The land uses that border the rest of the Project site are primarily multi- and single-family homes, with the exception of the Islamic Center of Reseda, located immediately south of Reseda HS across Victory Boulevard. As mentioned above, the Los Angeles River serves as a majority of the Project site's southern border, diagonally splitting the site from the ONEgeneration Senior Enrichment Center, located in the southwest corner. The river then dips beneath Victory Boulevard, which constitutes the remaining piece of the site's southern border.

Newcastle Elementary School is located approximately 0.14 miles east of the Project site. Sherman Oaks Center for Enriched Studies is located approximately 0.44 miles southwest of the Project site. Some commercial facilities in the area include a McDonald's, a Food 4 Less grocery outlet, rental car services, and auto body shops.

Sensitive receptors in the Project area are defined as residences, schools, and places of worship adjacent to the proposed Project. As such, single- and multi-family residences surrounding the Project site, as well as the ONEgeneration Senior Enrichment Center, Newcastle Elementary School, and the Islamic Center of Reseda, all constitute sensitive receptors. The Zane Grey Continuation School is located adjacent to the Reseda HS Campus and, while it is not a part of the proposed Project, is considered to be a sensitive receptor.

2.3 CAMPUS HISTORY

Reseda HS was originally constructed in 1955, the first complete high school to be built after World War II in the San Fernando Valley. When the school opened in the fall, it was comprised of 20 buildings and structures, including academic and science buildings, track and field, and industrial shops, including an automotive repair facility. Over time, the school expanded and new facilities continued to be added until as recently as 2005. The Campus now maintains 117 teaching stations in a total of 54 buildings: 24 permanent buildings, 27 portable buildings, and three (3) storage units, as well as three athletic fields, tennis courts, and hardscaped and landscaped areas. Despite its growth, the Campus still displays minimal elements of the Mid-Century Modern architectural style.

The Boys' and Girls' Gymnasium Buildings, Cafeteria Building, Industrial Arts Building (2), Homemaking Building, Assembly Building, Administrative Building, and Library Building are on the Assembly Bill (AB) 300 (Corbett) Seismic Safety Inventory of California Public Schools, Department of General Services Building List. The AB 300 list identifies school buildings that are of concrete tilt-up construction and those with non-wood frame walls that do not meet the minimum requirements of the 1976 Uniform Building Code (UBC). AB 300 identified 269 of the LAUSD's nearly 13,000 buildings for seismic evaluation. In 2006, upon further analysis by LAUSD staff, including site visits and field investigations, a total of 667 buildings were identified for seismic evaluation based upon AB 300 criteria and LAUSD's standards.[21] Since that time, seismic evaluations have been performed on school buildings identified to be the most seismically vulnerable, and projects have been developed to address the buildings determined to be in the greatest need of structural upgrades.[22]

2.4 EXISTING CONDITIONS

Reseda HS serves students from grades nine through twelve. As of the 2017-2018 school year, Reseda HS had approximately 108 faculty and staff members and 1,522 students, with a planning enrollment of 1,400 students. Reseda HS also houses one of three locations of the Phoenix Academy, a large special education program for qualifying students in grades 9-12, and 55 faculty and staff members are dedicated solely to these students. The Zane Grey Continuation School, which is located adjacent to the Reseda HS Campus, had 76 students in the 2017-2018 academic year.

Instruction at Reseda HS currently takes place in 117 teaching stations (classrooms) within the 115,385 square feet (sf) of Campus facilities. The Campus is comprised of 54 buildings: 24 permanent buildings, 27 portable buildings, and three (3) storage units (**Figure 3, Existing Buildings**). The majority of buildings are congregated on the western side of the Campus. The school's main entrance is located along Kittridge Street,

[21] LAUSD. AB-300 Criteria Building List. Web. <http://www.laschools.org/new-site/ab300/LAUSD-AB300-CRITERIA-BUILDING-LIST.pdf>

[22] LAUSD. Seismic Safety of School Buildings. Web. <http://www.laschools.org/new-site/ab300/?keyword=roosevelt&destination=ab300>

2. Environmental Setting

near the northwest corner of the Project site. The permanent Library, Administrative, and Academic buildings are clustered around the main entrance and are in close proximity to most of the other permanent buildings on site. The Auditorium Building, Student Store, Cafeteria Building, and North and South Gymnasiums are located further east, near the athletic fields, tennis courts, and parking lots that flank the eastern border of the Project site, along Lindley Avenue. Portable buildings are primarily located to the south of the Industrial Arts Building, along the site's southwestern boundary.

The Project site is also the location of high school programs that are not affiliated with Reseda HS, although some programs utilize Reseda HS facilities, such as the adult education program located in the Academic Building. The Beginning Teacher Growth and Development Induction (BTGDI) program, Accelerated College and Career Transition program (ACCT), and ARC after-school program are also present on Campus. The Zane Gray Continuation High School, comprised of five portable classrooms and one portable sanitary building, is located adjacent to the northeast portion of the Project site and is not included as part of the scope of the proposed Project.

Table 1, Summary of Existing Facilities shows the existing campus facilities.

Table 1
Summary of Existing Facilities

Building Number	Building Name	Classrooms	Building Square Footage	Building Type	Reseda HS Program (Y/N)	Year Built
1	Administrative Building	0	12,077	Permanent	Y	1955
2	Library Building	0	5,081	Permanent	Y	1955
3	Academic Building	24	41,654	Permanent	Y	1957
4	Science Building	22	38,939	Permanent	Y	1955
5	Auditorium Building	3	28,031	Permanent	Y	1955
6	Cafeteria	0	13,360	Permanent	Y	1955
7A/7B	Industrial Arts Building #2	4	9,412	Permanent	Y	1955
8	Art Building	4	6,008	Permanent	Y	1955
9	Industrial Arts Building #1	3	7,983	Permanent	Y	1955
10	Utility Building	0	5,757	Permanent	Y	1955
11	Student Store	0	845	Permanent	Y	1955
12	Storage Unit	0	360	Permanent Storage Unit		
13	Classroom Building	10	13,857	Permanent	N	1969
14	Homemaking Building	2	5,464	Permanent	Y	1955
15	Classroom Building B	1	2,292	Permanent	N	1955
16	Sanitary #3 Building	0	699	Permanent	Y	1955
17	Agriculture Building	1	1,343	Permanent	Y	1955
18	Chemistry Lab-Portable	1	1,453	Portable	N	Unknown
21	Sanitary #4 Building	0	729	Permanent	Y	1955
22	South Gymnasium	1	23,590	Permanent	Y	1955

Building Number	Building Name	Classrooms	Building Square Footage	Building Type	Reseda HS Program (Y/N)	Year Built
23	Storage Unit	0	360	Permanent Storage Unit	Y	1968
24	Sanitary Building #2	0	568	Permanent	Y	1955
25	Ticket Booth	0	43	Portable	Y	1955
26	Sanitary Building #1	0	888	Permanent	Y	1955
27	Ticket Booth	0	43	Portable	Y	Unknown
28	Bleachers	0	2,444	N/A	Y	1955
29	Bleachers	0	2,444	N/A	Y	1955
30	Bleachers	0	1,860	N/A	Y	1955
31	Bleachers	0	1,860	N/A	Y	1955
32	Announcement Booth	0	114	Permanent	Y	1955
33	North Gymnasium	1	14,206	Permanent	Y	1955
34	BTSA Portable Classroom	N/A	960	Portable	N	1986
35	BTSA Portable Classroom	N/A	960	Portable	N	1986
36	BTSA Portable Classroom	N/A	960	Portable	N	1986
37	Portable Classroom	1	960	Portable	Y	1986
38	Portable Classroom	1	960	Portable	Y	1986
39	ARC Portable Classroom	N/A	960	Portable	N	1986
40	Accelerated College ABD Career Transition	N/A	1,777	Portable	N	1970
41	Acct. Modular Building/ Bungalow	N/A	1,812	Portable	N	1970
42	Storage Unit	0	128	Portable Storage Unit	Y	1987
43	Parent Center Building	1	1,417	Permanent	Y	1957
44	Phoenix Academy- Portable Classroom/ Office	1	1,920	Portable	Y	2003
45	Phoenix Academy- Portable Classroom	2	1,920	Portable	Y	2003
46	Portable Classroom	2	1,920	Portable	Y	1999
47	Portable Classroom	2	1,920	Portable	Y	1999
48	Portable Classroom	2	1,920	Portable	Y	1999
49	Portable Classroom	2	1,920	Portable	Y	1999
50	ARC- Portable Classroom	2	1,920	Portable	N	1999
51	Portable Classroom	1	960	Portable	Y	1999
52	Portable Classroom	1	960	Portable	Y	2004
53	Portable Classroom	2	1,920	Portable	Y	1999
54	Portable Classroom	2	1,920	Portable	Y	2003
55	Portable Classroom	2	1,920	Portable	Y	2004
56	Concessions Building	0	220	Permanent	N	Unknown

Building Number	Building Name	Classrooms	Building Square Footage	Building Type	Reseda HS Program (Y/N)	Year Built
57	Portable Classroom	2	1,920	Portable	Y	Unknown
58	Portable Classroom	1	960	Portable	Y	Unknown
59	Portable Classroom	1	960	Portable	Y	Unknown
60	Portable Toilet Building	0	480	Portable	Y	2001
Campus Totals		**117**	**115,385**	--	--	--

Source: LAUSD, 2019

2.5 GENERAL PLAN AND EXISTING ZONING

The Project site is designated by the City of Los Angeles General Plan and the Southeast Los Angeles CPA as "Public Facilities". The existing zoning for the property is PF-1. PF is the designation for the use and development of publicly owned land, including public elementary and secondary schools.

The California legislature has 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 rendering all LAUSD school sites, including Reseda HS, exempt from local land use regulations (Bd. of Ed Rpt No. 256-18/19).

2.6 NECESSARY APPROVALS

It is anticipated that approval required for the proposed Project would include, but may not be limited to, 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 §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 (DSA). Plan review and construction oversight, including structural safety, fire and life safety, and access compliance
- California Department of Education, School Facilities Planning Division (CDE). If LAUSD is requesting modernization funds from the State Allocation Board (SAB) they must have the plans reviewed and approved by the CDE (Education Code Section 17070.50) prior to submitting a funding request. Approval of design for educational appropriateness
- California Department of Transportation. Transportation permit for oversized vehicles on State highways

- State Water Resources Control Board (SWRCB). Review of Notice of Intent (NOI) to obtain permit coverage; issuance of general permit for discharges of stormwater associated with construction activity; review of Storm Water Pollution Prevention Plan (SWPPP)
- Los Angeles Regional Water Quality Control Board (LARWQCB). Issue National Pollution Discharge Elimination System (NPDES) permit; Clean Water Act Section 401 Water Quality Certification
- City of Los Angeles, Public Works Department. Permit for curb, gutter, and other offsite improvements.
- City of Los Angeles, Fire Department. Approval of plans for emergency access and emergency evacuation.

Trustee Agencies

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

State

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

Regional

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

Local

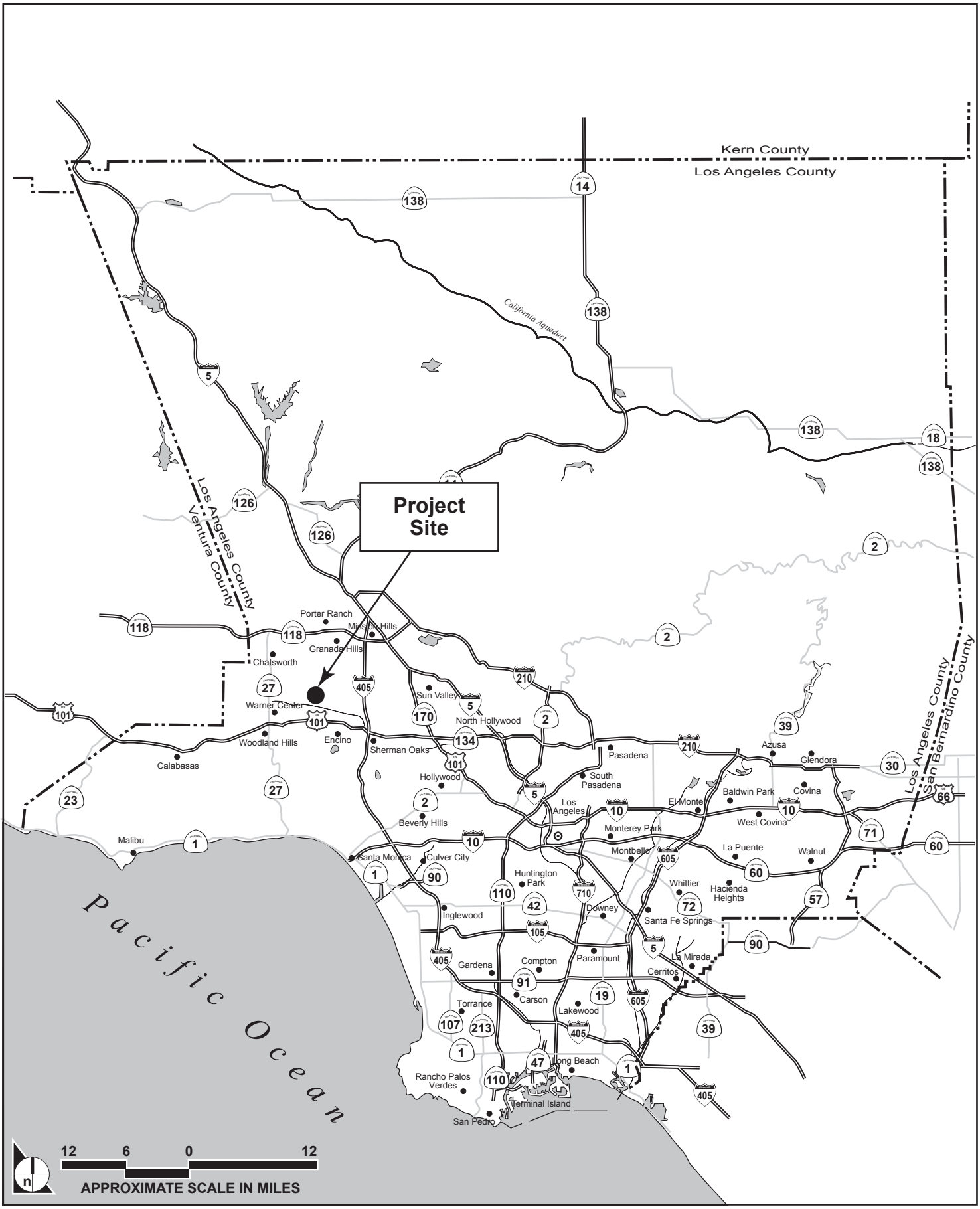
- City of Los Angeles Department of Planning
- City of Los Angeles Police Department
- City of Los Angeles Department of Water and Power
- City of Los Angeles Department of Recreation and Parks
- City of Los Angeles Department of Environmental Affairs

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

Two Native American Tribes, the Fernandeño Tataviam Band of Mission Indians and the Gabrieleno Band of Mission Indians-Kizh Nation have requested notification or consultation through the PRC Section 21080.3.1 process. Please see Chapter XIX. Tribal Cultural Resources for details on the consultation that was done for this Project with California Native American tribes.

2. Environmental Setting

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



SOURCE: Impact Sciences, 2019

FIGURE **1**

Regional Location

IMPACT SCIENCES

0695.020•06/19

2. Environmental Setting

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SOURCE: Johnson Fain, 2019

FIGURE **2**

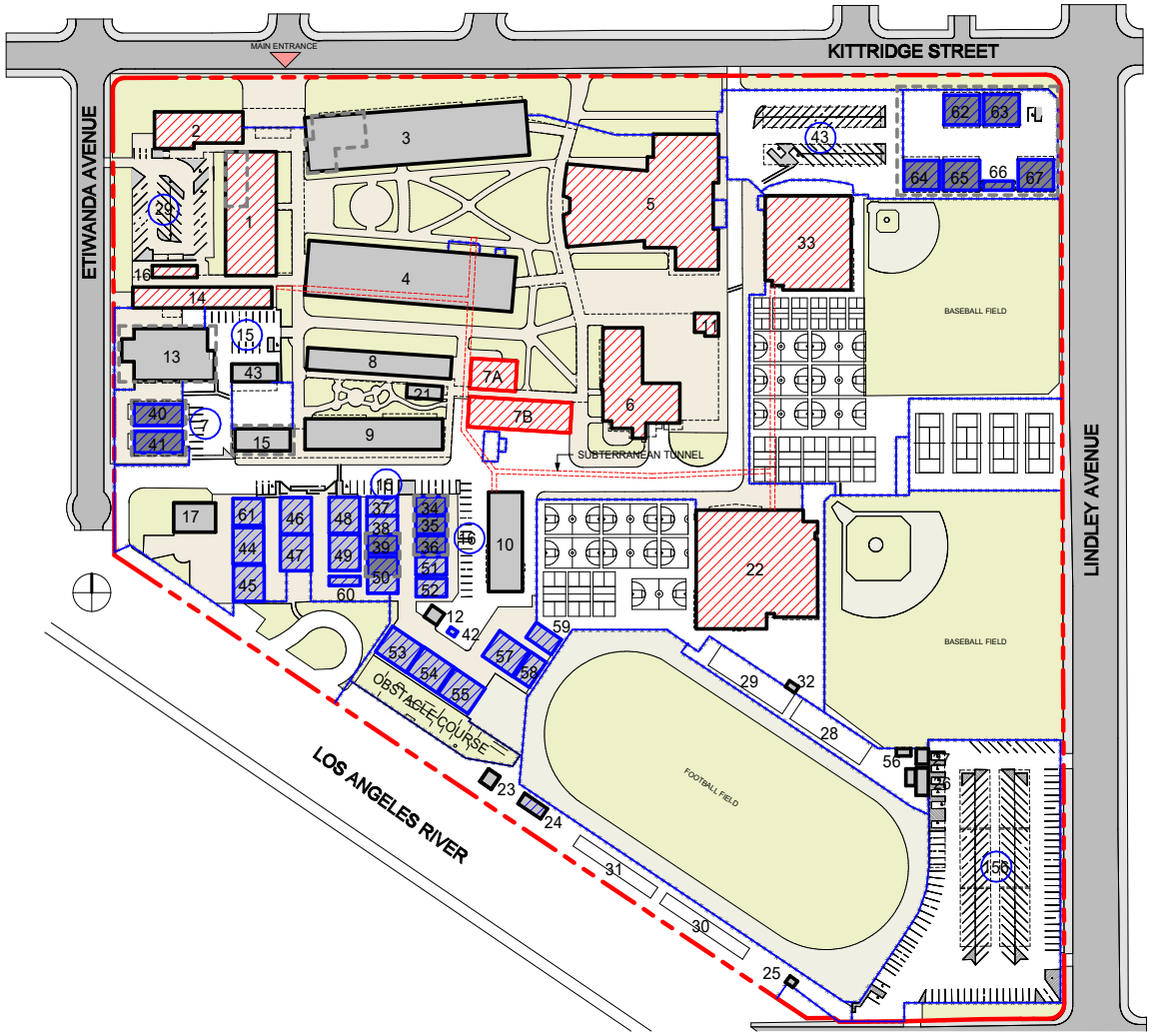
IMPACT SCIENCES

Existing Campus - Aerial View

0695.020•06/19

2. Environmental Setting

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RESEDA HIGH SCHOOL PROGRAMS

#	BUILDING NAME
1	ADMINISTRATIVE BUILDING*
2	LIBRARY BUILDING*
3	ACADEMIC BUILDING
4	SCIENCE BUILDING*
5	AUDITORIUM BUILDING*
6	CAFETERIA*
7A	INDUSTRIAL ARTS BUILDING #2*, VACANT
7B	INDUSTRIAL ARTS BUILDING #2*, VACANT
8	ART BUILDING
9	INDUSTRAL ARTS BUILDING #1
10	UTILITY BUILDING
11	STUDENT STORE*
14	HOMEMAKING BUILDING*
16	SANITARY #3 BUILDING*
17	PHOENIX ACADEMY - BUILDING
21	SANITARY #3 BUILDING*
22	SOUTH GYMNASIUM*
33	NORTH GYMNASIUM*
37	PORTABLE CLASSROOM
38	PORTABLE CLASSROOM
43	PARENT CENTER BUILDING
44	PHOENIX ACADEMY - PORTABLE CLASSROOM/OFFICE
45	PHENIX ACADEMY - PORTABLE CLASSROOM
46	PORTABLE CLASSROOM
47	PORTABLE CLASSROOM
48	PORTABLE CLASSROOM
49	PORTABLE CLASSROOM/OFFICE
51	PORTABLE CLASSROOM
52	PORTABLE CLASSROOM
53	PORTABLE CLASSROOM
54	PORTABLE CLASSROOM
55	PORTABLE CLASSROOM
57	PORTABLE CLASSROOM
58	PORTABLE CLASSROOM
59	PORTABLE CLASSROOM
60	PORTABLE CLASSROOM
61	PORTABLE LAB

NON-RESEDA HIGH SCHOOL PROGRAMS

#	BUILDING NAME
3	ADULT EDUCATION (ROOMS A1 & A15)
13	MAGNOLIA CHARTER SCHOOL
15	MAGNOLIA CHARTER SCHOOL
34	BTSA - PORTABLE CLASSROOM
35	BTSA - PORTABLE CLASSROOM
36	BTSA - PORTABLE CLASSROOM
39	ARC - PORTABLE CLASSROOM
40	ACCELERATED COLLEGE ABD CAREER TRANSITION
41	ACCT MODULAR BUILDING / BUNGLOW
50	ARC - PORTABLE CLASSROOM
62	ZANE GREY PORTABLE CLASSROOM
63	ZANE GREY PORTABLE CLASSROOM
64	ZANE GREY PORTABLE CLASSROOM
65	ZANE GREY PORTABLE CLASSROOM
66	ZANE GREY PORTABLE SANITARY BUILDING
67	ZANE GREY PORTABLE CLASSROOM

*AB300 SEISMIC EVALUATION BUILDINGS SHOWN IN RED

PARKING

EXISTING 281 STALLS, (16 ADA)

PERMANENT BUILDING. BLACK OUTLINE

VACANT BUILDING. RED OUTLINE

PORTABLE BUILDINGS. BLUE OUTLINE

PROGRAMS OUTSIDE OF RHS. GREY DASH OUTLINE

PORTABLE BUILDINGS, CERTIFIED. BLUE OUTLINE WITH HATCH

AB300 SEISMIC EVALUATION BUILDING, RED HATCH

PROGRAMS OUTSIDE OF RESEDA HIGH SCHOOL. DARK GREY FILL

SOURCE: Johnson Fain, 2019

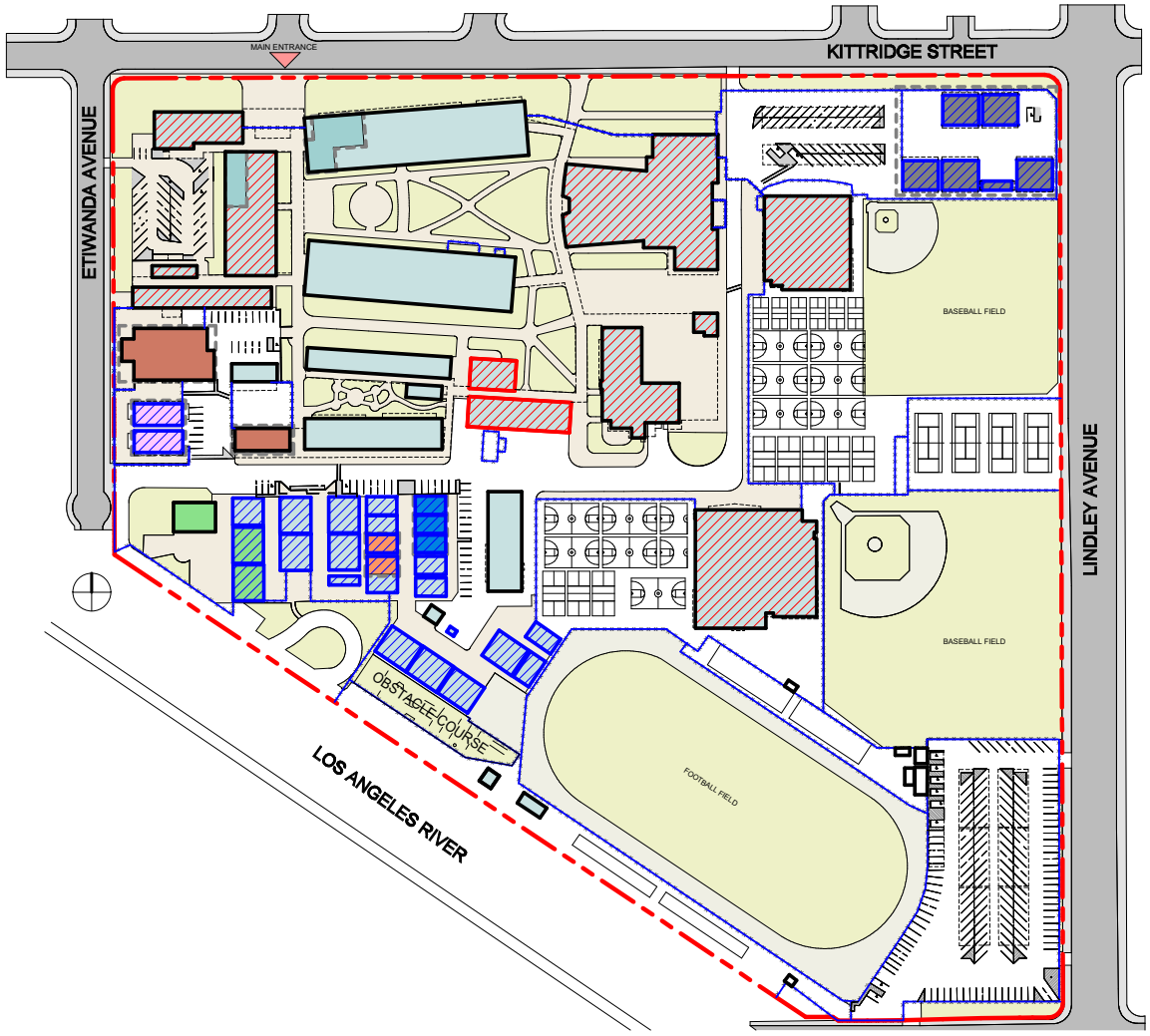
FIGURE 3

IMPACT SCIENCES

Existing Campus Buildings

2. Environmental Setting

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RESEDA HIGH SCHOOL PROGRAMS TO REMAIN

- RESEDA HIGH SCHOOL
- PHOENIX ACADEMY

PROGRAMS OUTSIDE OF RESEDA HIGH SCHOOL TO REMAIN

- ADULT EDUCATION
- ACCELERATED COLLEGE AND CAREER TRANSITION PROGRAM (ACCT)
- ZANE GREY CONTINUATION HIGH SCHOOL

PROGRAMS OUTSIDE OF RESEDA HIGH SCHOOL TO BE REMOVED

- MAGNOLIA CHARTER SCHOOL
- BTSA
- ARC

- PERMANENT BUILDING. BLACK OUTLINE
- VACANT BUILDING. RED OUTLINE
- PORTABLE BUILDINGS. BLUE OUTLINE
- PROGRAMS OUTSIDE OF RHS. GREY DASH OUTLINE
- PORTABLE BUILDINGS, CERTIFIED. BLUE OUTLINE WITH HATCH
- AB300 SEISMIC EVALUATION BUILDING, RED HATCH

SOURCE: Johnson Fain, 2019

FIGURE **4**

IMPACT SCIENCES

Existing School On-Site Programs

2. Environmental Setting

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3. Project Description

3.1 BACKGROUND

The proposed Project has been developed under the Los Angeles Board of Education's (LAUSD) School Upgrade Program (SUP) to improve student health, safety, and education through the modernization of school facilities.

The core principles of comprehensive modernization project scoping are as follows:

1. The buildings identified to be seismically vulnerable must be addressed. These buildings will be retrofitted, modernized, and/or demolished and replaced depending on the level of effort required to address the seismic vulnerabilities, the historic context the building/site, 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 should be addressed. The broken or failing systems, infrastructure, and/or components in these buildings will be repaired and/or replaced. The comprehensive modernization project will not significantly modernize and update the building as a whole, nor will the project demolish and replace with a new building with a few exceptions. The exceptions to this principle are ancillary buildings such as, but not limited to, lunch shelters, storage units, maintenance and operations (M&O) buildings, and outdated and inaccessible federal buildings.

3. The District school's reliance on relocatable buildings, especially for K-12 instruction, should be significantly reduced.

4. Necessary and prioritized upgrades must be made throughout the school site in order to comply with the program accessibility requirements of the ADA Title II Regulations, and the provisions of the Modified Consent Decree.

5. The exterior conditions of the school site will be addressed to improve the visual appearance including landscape, hardscape, and painting.

6. The interior of classrooms and adjacent interior corridors that would otherwise not be addressed will be improved. Improvements may include new interior paint, improvements to flooring systems, and upgraded permanent classroom fixtures such as window treatments/blinds and whiteboards.

3.2 PROPOSED PROJECT

The proposed Project consists of the modernization the 29.2-acre Reseda HS Campus to facilitate a safe and secure campus that better aligns with the current instructional program and meets current DSA educational specifications. Inadequate and/or structurally unsound buildings will be demolished and removed, while new construction will allow for improved educational quality and safety for students. The proposed Project also includes essential infrastructure upgrades, new exterior and interior paint, Internet Protocol (IP) convergence, the removal of barriers and other accessibility upgrades, and various landscape and hardscape improvements. Upon completion of the proposed Project, the number of classrooms on Campus will shrink from 117 (existing) to 72, which reflects the district-wide trend of declining student populations across LAUSD. The components of the proposed Project are discussed in detail below and shown in **Figure 5, Development Opportunities Program.**

Demolition and Removal

The proposed Project includes the demolition and/or removal of existing covered walkways on Campus, as well as 48 classrooms, 10 permanent buildings and 23 portable buildings. Buildings to be demolished include: Administration Building #1, Library Building #2, Classroom Building #13, Homemaking Building #14, Sanitary Building #16, Industrial Arts Building #7 (a and b), Cafeteria/Lunch Shelter Building #6, Student Store Building #11, Parents' Center Building #43, Auditorium Building #5. In addition, 23 portable buildings (Buildings #18, 34, 35, 36, 37, 38, 39, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 57, 58, 59, and 60) and three (3) storage units will be demolished and removed. Total building demolition is estimated at 123,744 sf.

New Construction

To further improve the Campus and replace the buildings to be demolished or removed, the proposed Project includes the construction of an Administration Building, a Library Building, and a Classroom Building(s), associated support spaces, and specialty classroom suites for the Phoenix Academy, to the Campus. The new construction would also include a new Cafeteria/Lunch Shelter and a Multipurpose Building. New construction would include 15 teaching stations.

Other site upgrades under the proposed Project may include the following:

- Site-wide infrastructure upgrades and replacement, including stormwater/sewer lines; gas lines; water lines; electrical; and IP convergence systems;
- Applicable circulation for all new buildings;
- Seismic Upgrades and Modernization (North and South Gym Buildings);
- Improved safety conditions, such as site lighting and/or CCTV systems;

- Landscape and hardscape improvements. New trees would be an appropriate size and species selected from the LAUSD Approved Plant List;[23]
- Exterior and interior classroom paint and finishes for all existing buildings to remain;
- Site-wide upgrades to remove identified and prioritized barriers to program accessibility Limited barrier removal upgrades; and
- Improvements as required by the Americans with Disabilities Act (ADA), Division of the State Architect (DSA), California Environmental Quality Act (CEQA), Department of Toxic Substances Control (DTSC), and any other required improvements or mitigations to ensure compliance with local, state, and/or federal facilities and traffic requirements.

The Project will be subject to local, state, and/or federal facilities requirements of the ADA, DSA, and CDE, as well as all District Standards and Specifications; including those provided in LAUSD's SUP Program Environmental Impact Report (Program EIR).[24] Any needed improvements to ensure compliance with such legislation will be incorporated within the Project.

3.2.1 Campus Buildings

Specifically, the proposed Project would include the changes to the Campus Buildings shown in **Table 2, Proposed Project (Demolition, Remodel, and Construction)**, and **Figure 3, Proposed Project Site Plan**.

Table 2
Proposed Project (Demolition, Remodel, and Construction)

Bldg. No.	Building	Demolition	Remodel/ Modernization	New Construction	Existing to Remain
1	Administrative Building	12,077			0
2	Library Building	5,081			0
3	Academic Building	0			41,654
4	Science Building	0			38,939
5	Auditorium Building	28,031			0
6	Cafeteria	13,360			0
7A/7B	Industrial Arts Building #7	9,412			0
8	Art Building	0			6,008
9	Industrial Arts Building #1	0			7,983
10	Utility Building	0			5,757

[23] LAUSD. LAUSD Approved Plants List. Web. 2012. http://www.laschools.org/documents/download/sustainability%2Fwater_conservation%2FCopy_of_Updated_Plant_List_2012.pdf

[24] LAUSD. School Upgrade Program Final Environmental Impact Report. Report. 2015.

3. Project Description

Table 2
Proposed Project (Demolition, Remodel, and Construction)

Bldg. No.	Building	Demolition	Remodel/ Modernization	New Construction	Existing to Remain
11	Student Store	845			0
12	Storage Unit	360			0
13	Classroom Building	13,857			0
14	Homemaking Building	5,464			0
15	Classroom Building B	0			2,292
16	Sanitary#3 Building	699			0
17	Phoenix Academy Building	0			1,343
18	Chemistry Lab-Portable	1,453			0
21	Sanitary #3 Building	0			729
22	South Gymnasium	0	23,590		0
23	Storage Building	360			0
24	Toilet Building	0			568
25	Ticket Booth	0			43
26	Toilet Building	0			888
27	Ticket Booth	0			43
28	Bleachers	0			2,444
29	Bleachers	0			2,444
30	Bleachers	0			1,860
31	Bleachers	0			1,860
32	Announcement Booth	0			114
33	North Gymnasium	0	14,206		0
34	BTGDI Portable Classroom	960			0
35	BTGDI Portable Classroom	960			0
36	BTGDI Portable Classroom	960			0
37	Portable Classroom	960			0
38	Portable Classroom	960			0
39	ARC Portable Classroom	960			0
40	Accelerated College ABD Career Transition	0			1,777
41	Acct. Modular Building/ Bungalow	0			1,812

Table 2
Proposed Project (Demolition, Remodel, and Construction)

Bldg. No.	Building	Demolition	Remodel/ Modernization	New Construction	Existing to Remain
42	Storage Unit	128			0
43	Parent Center Building	1,417			0
44	Phoenix Academy- Portable Classroom/ Office	1,920			0
45	Phoenix Academy- Portable Classroom	1,920			0
46	Portable Classroom	1,920			0
47	Portable Classroom	1,920			0
48	Portable Classroom	1,920			0
49	Portable Classroom	1,920			0
50	ARC- Portable Classroom	1,920			0
51	Portable Classroom	960			0
52	Portable Classroom	960			0
53	Portable Classroom	1,920			0
54	Portable Classroom	1,920			0
55	Portable Classroom	1,920			0
56	Concessions Building	0			220
57	Portable Classroom	1,920			0
58	Portable Classroom	960			0
59	Portable Classroom	960			0
60	Portable Classroom	480			0
New Construction					
	Classrooms			TBD	
	Administration			TBD	
	Multi-Purpose Building			TBD	
	Library			TBD	

Table 2
Proposed Project (Demolition, Remodel, and Construction)

Bldg. No.	Building	Demolition	Remodel/ Modernization	New Construction	Existing to Remain
	Cafeteria/Student Store/Lunch Shelter			TBD	
	Support Facilities			TBD	
	Shared Educational Spaces			TBD	
	Shared Support Areas			TBD	
	Campus Total* (does not include outdoor space)	**123,744**	**37,796**	**95,000**	

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

* Square footage totals may not add up exactly due to rounding and the way usable space is calculated. All numbers are based on LAUSD Reseda Charter High School Comprehensive Modernization Project – Space Program, March 19, 2019.

3.2.2 Site Access, Circulation, and Parking

The main entrance to the Reseda HS Campus is located on Kittridge Street, between Nestle Avenue and Wynne Avenue. There are no designated student pick-up/ drop-off areas around Reseda HS, however, a Site Circulation Report conducted by LIN Consulting in October 2018 (See **Appendix K**) found that pick-up and drop-off usually occurs along Etiwanda Avenue and Kittridge Street.

During the morning bell period, queues of approximately 125 feet to 375 feet occur at the intersection of Etiwanda Avenue and Kittridge Street and Lindley Avenue and Kittridge Street in all directions. Students were also observed being dropped-off on neighboring streets, north of Kittridge Street. School buses travel to Kittridge Street from eastbound Kittridge Street and southbound Etiwanda Street, joining parents in dropping students on the south side of Kittridge Street.

During the afternoon bell period, high volumes of vehicles exiting parking lots create delays to the vehicle flow on Kittridge Street and conflict with pedestrians, especially for the main faculty and staff lot. Parents waiting to pick up students form queues on Kittridge Street, extending from Etiwanda Avenue to Wynne Avenue, and on Etiwanda Avenue, extending from the end of the cul-de-sac to Kittridge Street. At the intersection of Kittridge Street and Etiwanda Avenue, queues stretch approximately 125 feet to 350 feet in all directions. Congestion is primarily caused by a high number of vehicles in the area, but is worsened by parents double-parking, vehicles exiting curb parking, and student pedestrians crossing mid-block. Vehicles park along the cul-de-sac, making it difficult for other vehicles to make U-turns and deteriorating traffic movement on Etiwanda Avenue. Some vehicles were found to use Chimineas Avenue to cut north to Vanowen Street, in an attempt to avoid longer delays at the intersections of Kittridge Street and Lindley Avenue.

School administration indicated that most vehicles approach Kittridge Street from the north, via Wilbur Avenue, Reseda Boulevard, or Lindley Avenue. For access to the US 101 Freeway, drivers tend to use Lindley Avenue to White Oak Avenue, while drivers utilize Sherman Way or Vanowen Street to get to the I-405 Freeway, avoiding congestion along Victory Boulevard.

There are a total of five parking lots at the Reseda HS Campus. The main faculty and administration parking lot is accessible from Kittridge Street and is located in the northeast corner of the school Campus. It contains 53 marked spaces with one accessible and one van-accessible space. There are three smaller faculty and administration lots accessible via Etiwanda Avenue. The northwest lot contains 30 spaces with one accessible and two van-accessible spaces. The southwest lot contains 23 marked spaces with one van-accessible space. Another lot is located on the south side of Campus and contains 33 marked spaces with two van-accessible spaces.

There is a student parking lot in the southeast corner of the Campus that can be accessed through two gated entrances on Lindley Avenue and a gated entrance on Victory Boulevard. The lot contains 154 marked spaces with four accessible and two van-accessible spaces. School administration stated that very few students drive to or from Campus, and only 25% to 50% of the lot is utilized. The existing 281 parking stalls, 16 of which are ADA compliant, on Campus currently meet the District Standards of 180 stalls, 7 of which must be ADA compliant. Parking on Campus after development of the proposed Project is expected to decrease to 267 stalls, 13 of which would be ADA compliant. While the proposed Project includes the resurfacing and restriping of existing lots, no new spaces are expected to be developed.

3.2.3 Landscaping

The proposed Project includes various site-wide improvements to landscaping and hardscaping on Campus. Currently, landscaping at the Project site is primarily located at the northwest corner, near the main entrance. Strips of grassy areas border Kittridge Street to the north and some of Etiwanda Avenue to the west, while larger quad-like areas exist between the Academic and Science Buildings, as well as between the Science Building, Art Building, and Cafeteria/ Lunch Pavilion. Grassy areas also exist along the Los Angeles River, south of the portables and shrubs and trees are scattered throughout the Campus.

A tree survey was conducted for the Project site by Carlberg Associates in March 2018 (see **Appendix B**). The survey inventoried 132 trees on Campus, four of which are listed as Protected Trees under the LAUSD OEHS Tree Trimming and Removal Procedure of 2018.[25] While as many existing trees will be preserved as possible, it is probable that some will need to be removed to accommodate new construction and circulation.

[25] All tree trimming and removal conducted on District property is required to adhere to the procedures described in the *LAUSD OEHS Tree Trimming and Removal Procedure*. Compliance with this Procedure will ensure that District activities will not conflict with any tree preservation policies while ensuring the protection of breeding and nesting habitat of protected birds. Written approval from the Director of OEHS, Director of Maintenance & Operations, Local District Superintendent, and School Principal is required before any protected tree is relocated or removed. For more information, please contact OEHS at (213) 241-3199 or the District Arborist at (213) 745-1422. Further information may be accessed on LAUSD's website: https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/135/LAUSD%20Tree%20Trimming%20Removal%20Procedure.pdf.

However, replacement trees will be planted at the appropriate size at maturity for the space in accordance with the LAUSD Tree Procedures, and will be selected from the LAUSD Approved Plant List.[26] A landscape plan will be included in the proposed Project to guide landscape design and ensure that any loss of trees shall be offset with replacements.

3.2.5 Construction Phasing and Equipment

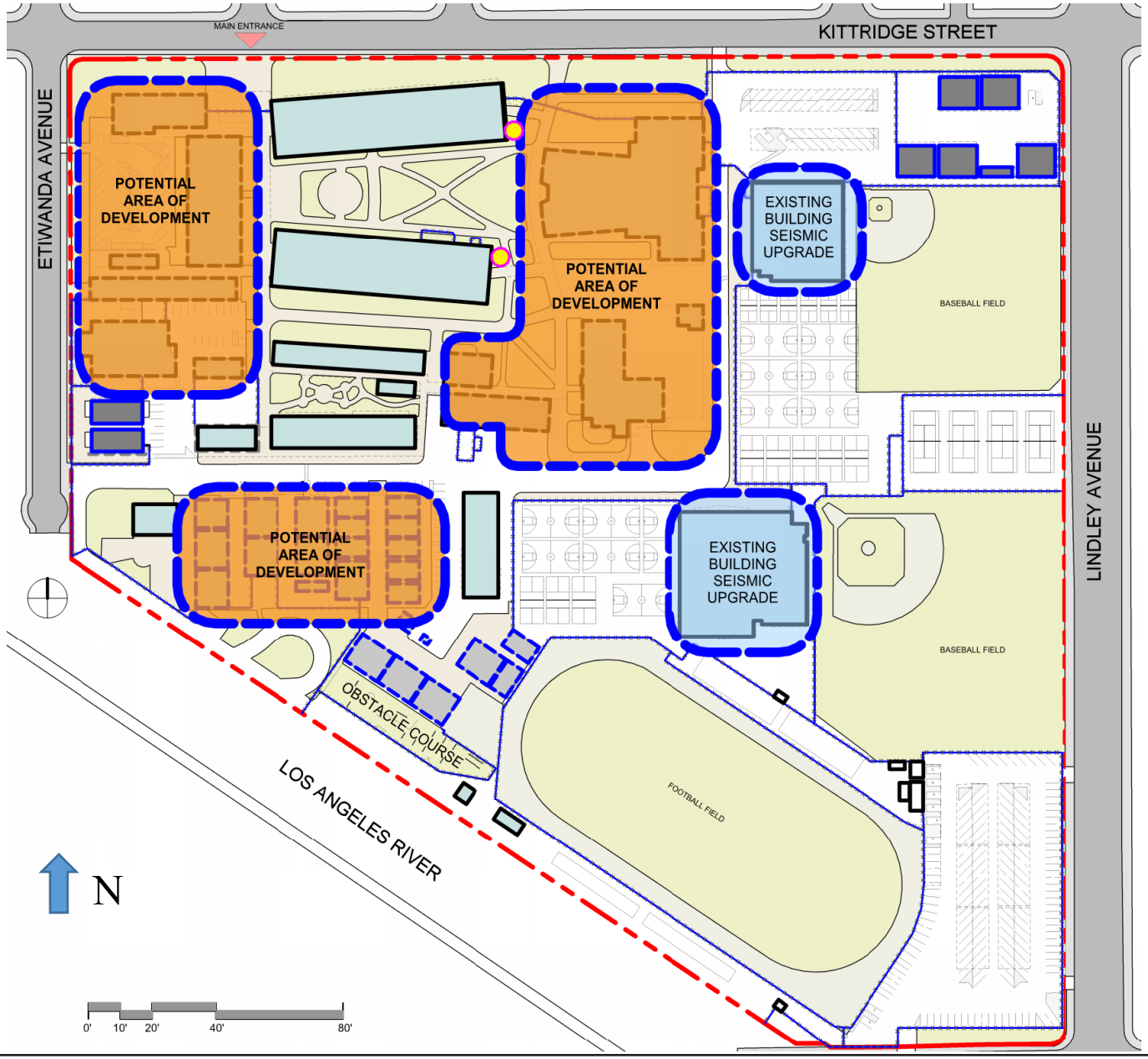
Construction is expected to last approximately 50 months, extending from the first quarter of 2022 to the first quarter of 2026, though site/utility/interim housing may begin in advance of this work. Multiple phases of construction are anticipated and relocatable buildings will be utilized to ensure the school remains operational during construction.

Table 3, Construction Schedule and Equipment, summarizes the proposed construction activities and schedule for implementation of the proposed Project.

[26] LAUSD. LAUSD Approved Plants List. Web. 2012. http://www.laschools.org/documents/download/sustainability%2Fwater_conservation%2FCopy_of_Updated_Plant_List_2012.pdf.

Table 3
Construction Schedule and Equipment

Phase	Schedule	Equipment	Number
Demolition	*2022* *January to March*	Concrete/Industrial Saws	1
		Excavators	3
		Rubber Tired Dozers	2
		Building Debris haul trips	493
Site Preparation	*2022* *March to April*	Rubber Tired Dozers	1
		Tractors/Loaders/Backhoes	1
Grading	*2022* *April to August*	Excavator	1
		Grader	1
		Rubber Tired Dozers	1
		Tractors/Loaders/Backhoes	3
Building Construction	*2022-2025* *August* (*2022*) to *May (2025)*	Cranes	1
		Forklifts	3
		Generator Sets	1
		Tractors/Loaders/Backhoes	3
		Welders	1
		Vendor/Supplier Delivery Trips	22
Paving	*2025* *May to August*	Cement and Mortar Mixers	2
		Pavers	1
		Paving Equipment	2
		Rollers	2
		Tractors/Loaders/Backhoes	1
Architectural Coating	*2025* *August* to *November*	Air Compressors	1



SOURCE: Los Angeles Unified School District, October 2019

FIGURE 5

IMPACT SCIENCES

Development Opportunities Diagram

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4. Environmental Checklist and Analysis

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

4. Environmental Checklist and Analysis

☐ 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

10/24/19
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, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

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

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

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4. Environmental Checklist and Analysis

ENVIRONMENTAL IMPACTS

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

Explanation:

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

LAUSD Standard Conditions of Approval	
SC-AE-3	*LAUSD shall assess a proposed project's consistency with the general character of the surrounding neighborhood, including any proposed changes to the density, height, bulk, and setback of new buildings, (including stadium), addition, or renovation. Where feasible, LAUSD shall make appropriate design changes to reduce, or eliminate, viewshed obstruction and degradation of neighborhood character. Such design changes could include, but are not limited to, changes to campus layout, height of buildings, landscaping, and/or the architectural style of buildings.*
SC-AE-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 views are typically defined as those that provide expansive views of a highly valued landscape for the benefit of the general public. The Project site is located in a predominantly residential area in the Reseda neighborhood of the San Fernando Valley in the City of Los Angeles.

The proposed Project consists of new buildings that are expected to have a maximum height of two stories, but may have additional stories. As existing views are intermittent and no expansive vistas are available, construction of the proposed Project would not have a substantial effect on a scenic vista. Although the proposed Project would change existing views by adding new structures and demolishing old ones, no existing scenic vistas would be affected, since there are none. In addition, if there were to be any viewshed obstruction, the proposed Project would be subject to SC-AE-3 included in the LAUSD SC and listed above. Thus, since there are no scenic vistas and the proposed Project would also be subject to SC-AE-3, effects related to scenic views/vistas would have no impact.

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

No Impact. There are no designated state scenic highways that are within, or adjacent to, the Project site. The nearest designated state scenic highway to the Project site, the Angeles Crest Highway (Route 2), is approximately 19.5 miles east of the Project site. Due to intervening buildings and topography, the Project site cannot be viewed from this section of the highway. As such, no impact would occur.

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. Visual quality is a measure of the overall impression or appeal of an area as determined by the particular landscape's characteristics and scenic resources (e.g., Santa Monica Mountains, Pacific Ocean, etc.). It is possible for new structures to be compatible with the existing setting if they replicate existing forms, lines, colors, and textures of the surrounding environment and if the new structures do not appreciably change the balance of natural elements. In summary, visual quality is concerned with the overall attractiveness of an area and the ability to preserve this attractiveness when new features are introduced.

The visual setting of the area is generally urbanized. Surrounding visual elements include single-family homes, multi-family homes, some commercial properties, street trees, the Los Angeles River, and Reseda Park. The site in its current condition contains 24 permanent and 31 portable buildings and structures. The majority of buildings are congregated on the western side of the Campus, with portable structures largely located south of the permanent buildings. Athletic fields and courts and parking lots dominate the site's eastern half, with the exception of the Zane Grey Continuation School, located adjacent to the in the northeast portion of the Campus. Landscaping is sparse and largely limited to thin lawns and mature trees located between the permanent buildings and along Campus boundaries. The remaining groundcover is primarily asphalt.

4. Environmental Checklist and Analysis

Construction

During demolition and construction, it is expected that grading, contouring, and excavation activities would occur. Evaluation of construction impacts focuses on the short-term visual impacts resulting from the demolition and removal of current buildings, construction of the proposed Project, the presence of equipment and material storage, as well as the grading and earthmoving activities in the existing landscape. In a visual sense, construction impacts from the proposed Project could be obtrusive or out of character with the surrounding landscape. Construction equipment and materials, exposed dirt and unfinished buildings will temporarily impact the visual character of the site. Motorists traveling on any of the roads bordering the site, as well as the immediate neighbors to Reseda HS, will be able to view the site. However, as construction is short-term, the impact on visual character or quality would be less than significant.

Operation

Once construction is completed, the site will be visually similar to pre-project conditions. The buildings that are being demolished will be replaced with buildings of similar size and massing. The remaining structures will be painted for uniformity and will receive minor interior upgrades to help promote teaching and learning. New construction will include a new Administration Building, a Library Building, and a Classroom Building, a Cafeteria/Lunch Shelter, and an Auditorium/Performing Arts Building. The school upgrades, which also include fresh landscaping, hardscaping, and fresh paint, will provide beneficial long-term impacts to the area. The changes at the site would substantially improve the visual appearance of Reseda HS and would not substantially degrade the visual character or quality of the site or introduce any aesthetic elements that do not match the surrounding land uses. Thus, impacts would be less than significant.

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

Less than Significant. Light impacts are typically associated with the use of artificial light during the evening and nighttime hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as a window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions. The proposed Project would not create a substantial source of new light or glare.

The land use on the Project site will remain the same and new lighting at the site will replace the interior, architectural, accent, and security lighting removed by the demolition of the old buildings and will therefore not create new impacts.

The Project site is located in a residential environment with streetlights and moderate nighttime illumination from existing dwellings. Thus, uses surrounding the Project site that are sensitive to light levels and glare include residences immediately surrounding the school. All new outdoor lighting being added as part of the proposed Project would be subject to SC-AE-5 and SC-AE-6 included in the updated LAUSD SC and listed above.

All lighting of outdoor areas will be directed onto the Project site to avoid any light impacts from lighting fixtures included in the proposed Project. Additionally, the Project would be constructed in accordance with the Collaborative for High Performance Schools (CHPS) Criteria SS5.1: Light Pollution Reduction, with the stated goal of minimizing outdoor lighting.

In accordance with the 2019 School Design Guide, all luminaries or lighting sources in connection with school construction projects shall be installed in such a manner as to minimize glare for pedestrians and drivers and to minimize light spilling onto adjacent properties. Implementation of these SCs and adherence to the requirements set by CHPS would ensure impacts related to light and glare remain less than significant.

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?	☐	☐	☐	☒

Explanation:

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. Prime Farmland, Unique Farmland, and Farmland of Statewide Importance are all categorized by the California Department of Conservation, Division of Land Protection as "Important Farmland." As the Project site is in an urbanized area, it is not located within an area designated as Important Farmland, nor does it contain any prime or unique farmland. No impact on farmland or agricultural resources would occur.[27]

[27] California Division of Land Resources Protection. Farmland Mapping and Monitoring Program. Web. 2019. http://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx

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

No Impact. The Project site is located within the Reseda-West Van Nuys Community Plan Area (CPA) of the City and zoned Public Facilities (PF). No agricultural use is permitted within these zoning designations and no conversion of Farmland would result from the proposed Project. Only land located within an agricultural preserve is eligible for enrollment under a Williamson Act contract. Accordingly, the Project site does not contain any lands covered by a Williamson Act Contract. Therefore, the proposed Project would have no impact on agricultural zoning, Williamson Act contracts, and/or conversion of Farmland. No impact would occur.[28]

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. There are no forest lands or timberlands on the Project site. Consequently there is no conflict with rezoning of forest or timberlands. No impact would occur.

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

No Impact. Refer to Threshold c) above.

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. Refer to Threshold b) above.

[28] City of Los Angeles. LA Zoning and Property Information. Web. 2019. zimas.lacity.org

4. Environmental Checklist and Analysis

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

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

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

Would the project:

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

Explanation:

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

LAUSD Standard Conditions of Approval	
SC-AQ-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 slow speeds with all vehicles.* ▪ *Load impacted soil directly into transportation trucks to minimize soil handling.* ▪ *Water/mist soil as it is being excavated and loaded onto the transportation trucks.* ▪ *Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site.* ▪ *Minimize soil drop height into transportation trucks or stockpiles during dumping.* ▪ *During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks.* ▪ *Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed.* ▪ *Place stockpiled soil on polyethylene sheeting and cover with similar material.* ▪ *Place stockpiled soil in areas shielded from prevailing winds.*
SC-AQ-4	*LAUSD shall analyze air quality impacts:* *If site-specific review or monitoring data of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds. Construction bid contracts shall include protocols that reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. The Construction Contractor shall be responsible for documenting compliance with the identified protocols. Specific air emission reduction protocols include, but are not limited to, the following.* *Exhaust Emissions* ▪ *Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and*

		3:00 PM). ▪ *Consolidate truck deliveries and limit the number of haul trips per day.* ▪ *Route construction trucks off congested streets, as permitted by local jurisdiction haul routes.* ▪ *Employ high pressure fuel injection systems or engine timing retardation.* ▪ *Use ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment.* ▪ *Use construction equipment rated by the United States Environmental Protection Agency as having at least Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower.* ▪ *Restrict non-essential diesel engine idle time, to not more than five consecutive minutes.* ▪ *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.* ▪ *Pave unimproved construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles.* ▪ *Pave all unimproved construction access roads for at least 100 feet from the main road to the Project site.* ▪ *Enclose, cover, water twice daily, or apply non-toxic soil binders according to manufacturers' specifications to exposed piles (i.e., gravel, dirt, and sand) with a 5% or greater silt content.* ▪ *Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph).* ▪ *Water disturbed areas of the active construction and unpaved road surfaces at least three times daily, except during periods of rainfall.* ▪ *Limit traffic speeds on unpaved roads to 15 mph or less.* ▪ *Prohibit fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD.* ▪ *Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.* ▪ *Limit the amount of daily soil and/or demolition debris loaded and hauled per day.* *<u>General Construction</u>* a) *Use ultra-low VOC or zero-VOC surface coatings.* b) *Phase construction activities to minimize maximum daily emissions.* c) *Configure construction parking to minimize traffic interference.* d) *Provide temporary traffic control during construction activities to improve traffic flow (e.g., flag person).* e) *Prepare and implement a trip reduction plan for construction employees.* f) *Implement a shuttle service to and from retail services and food establishments during lunch hours.* g) *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

4. Environmental Checklist and Analysis

South Coast Air Quality Management District (SCAQMD), is designated nonattainment for O_3, and $PM_{2.5}$ under the California and National AAQS, nonattainment for PM_{10} under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS.[29]

Air quality regulatory setting, meteorological conditions, existing ambient air quality in the project vicinity, and air quality modeling is included as **Appendix A** to this Initial Study.

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

Less than Significant. A project would have a significant impact if it conflicts with or delays implementation of the applicable air quality management plan (AQMP). A project is consistent with the AQMP if it meets the following indicators:

1. The Project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

2. The Project will not exceed the assumptions in the AQMP in 2018 or increments based on the year of Project completion.

As discussed later in this section (see **Table 4, Estimated Project Construction Emissions**), the Project would not exceed the significance thresholds for construction or operational emissions. In addition, the Project would not exceed the screening criteria for the localized significance thresholds. Therefore, since the Project would not exceed the thresholds, it would not increase the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP. Accordingly, the Project complies with the first consistency criterion.

Consistency with the assumptions in the AQMP is established by demonstrating that the Project is consistent with the land use plan that was used to generate the growth forecast. The *2016 Air Quality Management Plan*[30] based its assumptions on growth forecasts contained in the Southern California Association of Governments (SCAG) *2016 Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS).[31] The 2016 RTP/SCS is based on growth assumptions through 2040 developed by each of the cities and counties in the SCAG region. The Project is the modernization of an existing school site and does not include any growth from either increased student population or vehicle trips. Therefore, the proposed Project is considered to be consistent with growth assumptions included in the AQMP. Accordingly, the proposed Project also complies with the second consistency criterion. Therefore, this impact would be less than significant.

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[29] California Air Resources Control Board. Area Designations Maps / State and National. Web. 2014. http://www.arb.ca.gov/desig/adm/adm.htm.
[30] South Coast Air Quality Management District. Final 2016 Air Quality Management Plan. Report. 2017.
[31] Southern California Association of Governments, Final 2016 RTP/SCS). Report. 2016.

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 SoCAB is in nonattainment of state and federal standards for ozone, PM_{10}, and $PM_{2.5}$, and in non-attainment of state standards for nitrogen oxides (NOx). Los Angeles County is also in nonattainment for lead; however, this is due to exceedances from a small number of facilities, the nearest of which are located in the cities of Industry and Vernon. Ozone is formed in the atmosphere via chemical reactions of reactive organic gases (ROG) and NO_X in sunlight. Emissions of ROG are generated from combustion engines, such as those used in motor vehicles and construction equipment, and from architectural coatings and the use of solvents and cleaners. Emissions of NO_X are generated principally from combustion engines such as those used in motor vehicles and construction equipment. Emissions of PM_{10} are generated by both construction activities, such as grading, as well as by motor vehicles traveling over paved and unpaved surfaces.

Construction Emissions

Construction activities would result in emissions of air pollutants. These emissions were modeled using CalEEMod, a land use and construction model used to calculate emissions generated from construction and operation of new development projects. Project-specific data was used where available. Where Project specific information was not available, model default values provided by CalEEMod were used. Additionally, the SCs were incorporated into the modeling assumptions where applicable.

Estimated maximum air pollutant emission rates for construction activities in the South Coast Air Basin (SoCAB) are shown in Table 4, *Estimated Project Construction Emissions – South Coast Air Basin.* Emission rates for respirable particulate matter (PM_{10}) and fine particulate matter ($PM_{2.5}$) include both vehicle exhaust and fugitive dust emissions. The values for PM_{10} and $PM_{2.5}$ were modeled using the expectation that the required practice of watering the construction area (as required by the SCAQMD Rule 403) was incorporated (per SC-AQ-3). Diesel exhaust emissions reflect LAUSD requirement of Tier 3 diesel engines (SC-AQ-4).

Table 4
Estimated Project Construction Emissions

Construction Year	Maximum Emissions in Pounds per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2022	2	30	37	0	9	5
2023	1	16	20	0	2	1
2024	1	16	20	0	2	1
2025	22	16	20	0	2	1
Maximum Regional Emissions	22	30	37	<1	9	5
SCAQMD Threshold:	75	100	550	150	150	55
Exceeds Threshold?	NO	NO	NO	NO	NO	NO
Maximum Localized Emissions	22	30	37	<1	9	5
SCAQMD Localized Thresholds	--	221	1,158	--	11	6
Exceeds Thresholds?	N/A	NO	NO	N/A	NO	NO

Source: Impact Sciences, Inc. 2019 Emissions calculations are provided in Appendix A.
Note: Localized thresholds based on Source Receptor Area 6 (West San Fernando Valley); maximum 5 acres daily disturbance; 25

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Construction Year	Maximum Emissions in Pounds per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
receptor distance.						

The Project will demolish and remove existing buildings and structures from the Campus and replace them with updated facilities. The proposed Project will require grading and excavation. Specifically the site will be rough graded once removed of existing buildings and then fine graded to accommodate the building pads. The proposed Project does not include features (such as underground parking) that would require large amounts of excavation. Nonetheless, excavation would be necessary to replace existing utilities which will be upgraded as part of the proposed Project.

The Project will be required to implement dust control measures consistent with SCAQMD Rule 403 (Fugitive Dust) during demolition and construction activities. The following actions are based upon the SCAQMD's Rule 403 and are incorporated into the Project for the implementation of Rule 403. These recommendations have been quantified by the SCAQMD as being able to reduce dust generation between 30 and 61 percent depending on the dust generation source:

- Apply water and/or approved nontoxic chemical soil stabilizers according to manufacturer's specification to all inactive construction areas (previously graded areas that have been inactive for 10 or more days).
- Replace ground cover in disturbed areas (such as planters) as quickly as possible
- Enclose, cover, water twice daily, or apply approved chemical soil binders to exposed piles (of debris and materials).
- Suspend all construction operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour over a 30-minute period.
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least 2 feet of freeboard (i.e., minimum vertical distance between top of the load and the top of the trailer), in accordance with Section 23114 of the California Vehicle Code.
- Sweep streets at the end of the day if visible soil material is carried over to adjacent roads.
- Install wheel washers or gravel construction entrances where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the sites each trip.
- Post and enforce traffic speed limits of 15 miles per hour or less on onsite and on construction roads.

In addition to SCAQMD Rule 403, LAUSD Standard Condition of Approval SC-AQ-2 through SC-AQ-4 as detailed above, would be implemented during project construction.

As shown in Table 4 above, emissions related to construction activities on the Project site would not exceed any of the SCAQMD significance thresholds for air quality emissions during construction. Therefore, impacts during Project construction would be less than significant.

Operation

The proposed Project will not increase capacity at the Campus. As such, the proposed Project would not increase vehicle trips associated with the site after modernization. Projects that generate emissions below the regional thresholds of significance would not be considered to contribute a substantial amount of air pollutants. Therefore, there would be no regional operation emissions from the proposed Project and no impact would occur.

Since there are no planned increases in operational uses, the proposed Project would not result in additional air pollutant emissions, and the proposed Project would not hinder, disrupt, or delay the implementation of any air quality control measures. Therefore, operation of the proposed Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation and no impact would occur. The SCAQMD CEQA Guidelines state that SCAQMD emissions thresholds were developed such that emissions from an individual project that exceed the threshold would be cumulatively considerable. As emissions from the Project are below the threshold for all pollutants during construction, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality. As a result, a less than significant impact would occur from the proposed Project.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact.

Toxic Air Contaminants (TACs)

Sensitive receptors in the Project area are defined as residences, schools, and places of worship adjacent to the proposed Project. During construction, sensitive receptors could be exposed to a variety of emissions including those from construction equipment. However, due to the limited scale and the short duration of construction activities, the proposed Project would not expose sensitive receptors to substantial pollutant concentrations during construction. Additionally, the localized impacts summarized in Table 4 reflect work done by the SCAQMD to provide conservative screening levels for potential health impacts for sensitive receptors near proposed projects. That is, the thresholds shown in Table 4 are considered by the SCAQMD to be minimum levels at which it is possible health impacts might occur given worst-case conditions for receptors within 25 meters of a 5-acre project in the project area. Emissions below those levels would not cause impacts to sensitive receptors, including students and neighboring residences, even in worst-case conditions. The emissions shown in Table 4 for NOx and CO are well below the thresholds. Emissions of PM_{10} and $PM_{2.5}$ for the proposed Project are also below the thresholds. SCAQMD Rule 403 provides for basic dust control at all construction sites, including watering during demolition and grading. Rule 403 would be followed at all times during construction, thus significantly reducing dust and other air pollutant generation at the Project site.

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The proposed Project would not include any sources of risk to sensitive receptors during operation as no change in operation activities are planned for the site. Consequently, continued operation of the proposed Project site as a school would not cause sensitive receptors to be exposed to substantial pollutant concentrations. As a result, this impact is considered less than significant.

CO Hotspots

Motor vehicles are a primary source of pollutants within the Project vicinity. Traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). Localized areas where ambient concentrations exceed state and/or federal standards are termed CO "hotspots." Such hotspots are defined as locations where the ambient CO concentrations exceed the state or federal ambient air quality standards. CO is produced in greatest quantities from vehicle combustion and is usually concentrated at or near ground level because it does not readily disperse into the atmosphere. As a result, potential air quality impacts to sensitive receptors are assessed through an analysis of localized CO concentrations. Areas of vehicle congestion have the potential to create CO hotspots that exceed the state ambient air quality 1-hour standard of 20 ppm or the 8-hour standard of 9.0 ppm. The federal levels are less stringent than the state standards and are based on 1- and 8-hour standards of 35 and 9 ppm, respectively. Thus, an exceedance condition would occur based on the state standards prior to exceedance of the federal standard.

As noted above, construction of the proposed Project would not increase traffic or vehicle trips due to the fact that facility operations would not increase as compared to existing conditions. Additionally, the Project would not exceed any localized significance thresholds including localized CO emissions. Because traffic impacts would not worsen and CO emissions would not significantly increase, the Project would not create a potential CO hotspot at any of the study intersection. Therefore, there would be no increased emissions of CO from the proposed Project and therefore this impact would be considered less than significant.

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

Less than Significant Impact.

Construction

Potential sources that may emit odors during the construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the Project site. Development of the proposed Project would utilize typical construction techniques, and the odors will be typical of most construction sites. Additionally, the odors would be temporary, and construction activity will be required to comply with SC-AQ-2 through SC-AQ-4 (listed above), and SCAQMD Rules 402 and 1113.[32]

[32] SCAQMD Rule 402 states the following "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a

A less than significant impact related to odor nuisance would occur during construction associated with the proposed Project.

Operation

Land uses primarily associated with odorous emissions include waste transfer and recycling stations, wastewater treatment plants, landfills, composting operations, petroleum operations, food and byproduct processes, factories, and agricultural activities, such as livestock operations. The proposed Project does not include any of these types of land uses. In addition, the proposed Project would not be sited near any of these recognized sources of odors. Therefore, operation of the proposed Project would have no impact with respect to odors. As a result, no impact would occur.

natural tendency to cause, injury or damage to business or property. The purpose of SCAQMD Rule 1113 is to limit the VOC content of architectural coatings used in the SCAQMD.

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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?	☐	☐	☐	☒

Explanation:

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

LAUSD Standard Conditions of Approval	
SC-BIO-1	*An LAUSD-qualified nesting bird Surveyor or Biologist shall identify plant and animal species and habitat within and near the Project site. LAUSD will conduct a literature search, which shall consider a one-mile radius beyond the project construction site and shall be performed by a qualified nesting bird Surveyor or Biologist with knowledge of local biological conditions as well as the use and interpretation of the data sources identified below. Where appropriate, in the opinion of the Biologist, the literature search shall be supplemented with a site visit and/or aerial photo analysis. Resources and information that shall be investigated for each site should include, but not be limited to:* ▪ *United States Fish and Wildlife Service (USFWS)* ▪ *National Marine Fisheries Services (NMFS)* ▪ *California Department of Fish and Wildlife (CDFW)* ▪ *California Native Plant Society (CNPS)* ▪ *County and/or city planning or environmental offices for sensitive species, habitat, and/or heritage trees that may not exist on published*

databases.

- *California Natural Diversity Data Base (CNDDB) California Native Plant Society (CNPS) Rare Plant Inventory*
- *Local Audubon Society*
- *Los Angeles County Department of Regional Planning for information on Significant Ecological Areas*
- *California Digital Conservation Atlas for District-wide location of reserves, plan areas, and land trusts that may overlap with Project sites.*

Biological Resources Report

If a report is necessary and the LAUSD qualified nesting bird Surveyor or Biologist determines that a school construction project will affect an identified sensitive plant, animal, or habitat, a biological resources report shall be prepared. To provide a complete assessment of the flora and fauna within and adjacent to a site-specific project impact area, with particular emphasis on identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats, the biological resources report shall include the following.

- *Information on regional setting that is critical to the assessment of rare or unique resources.*
- *A thorough, recent floristic-based assessment of special status plans and natural communities, following the CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. CDFW recommends that floristic, alliance- and/or association-based mapping and vegetation impact assessments be conducted at the Project site and neighboring vicinity. The Manual of California Vegetation (Sawyer et al.) should also be used to inform this mapping and assessment. Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.*
- *A current inventory of the biological resources associated with each habitat type onsite and within the area of potential effect. CDFW's California Natural Diversity Data Base (CNDDB) should be contacted to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.*
- *An inventory of rare, threatened, and endangered, and other sensitive species onsite and within the area of potential effect. Species to be addressed should include all those identified in CEQA Guidelines Section 15380, including sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at appropriate time of year and time of day when sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the CDFW and USFWS.*
- *A discussion of the potential adverse impacts from light, noise, human activity, exotic species, and drainage. Drainage analysis should address project-related changes on drainage patterns on and downstream from the site; the volume, velocity, and frequency of existing and post- project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the Project site.*
- *Discussions about direct and indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, wetland and riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas.*
- *Mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Measures should emphasize avoidance and reduction of biological impacts. For unavoidable impacts, onsite*

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	habitat restoration or enhancement should be outlined. If onsite measures are not feasible or would not be biologically viable, offsite measures through habitat creation and/or acquisition and preservation in perpetuity should occur. This measure should address restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc. ▪ *Plans for restoration and vegetation shall be prepared by qualified nesting bird Surveyor or Biologist with expertise in southern California ecosystems and native plant vegetation techniques. Plans shall include, at a minimum:* o *Location of the mitigation site.* o *Plant species to be used, container sizes, and seeding rates.* o *Schematic depicting the mitigation area.* o *Planting schedule.* o *Irrigation method.* o *Measures to control exotic vegetation.* o *Specific success criteria.* o *Detailed monitoring program.* o *Contingency measures should the success criteria not be met.* o *Identification of the party responsible for meeting the success criteria and providing for conservation of the site in perpetuity.* *LAUSD shall consult with the U.S. Army Corps of Engineers, USFWS and/or the CDFW and comply with any permit conditions or directives from those agencies regarding the protection, relocation, creation, and/or compensation of sensitive species and/or habitats.*
SC-BIO-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 nonnative vegetation, structures, and substrates) should occur outside of nesting season to avoid take of birds, bats, or their eggs.* *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.* ▪ *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 LAUSD Office of Environmental Health and Safety (OEHS) CEQA Project Manager.* ▪ *If an active bird nest is observed, the Surveyor/Biologist shall determine the appropriate buffer around the nest. Buffers are determined on species-specific requirements and nest location.* ▪ *The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager.* ▪ *No construction activity shall occur within the buffer zone until nest is vacated, juveniles have fledged, and there is no evidence of a second attempt at nesting.* *Bat Surveys* ▪ *Bat species inventories and habitat use studies shall be completed for demolition or new construction projects in native habitat as well as projects that require the removal of mature conifer, cottonwood, sycamore or oak trees or abandoned buildings.* ▪ *Bat surveys must be conducted by a qualified bat Surveyor or Biologist (Surveyor/Biologist). The Surveyor/Biologist shall use the appropriate combination of structure inspection, sampling, exit counts, and acoustic monitors to survey an area that may be affected by the project.*

	▪ *If bats are found, the Surveyor/Biologist shall identify the species and evaluate the colony to determine potential impacts.* ▪ *Mitigation measures shall be determined on a project-specific basis and may include:* o *Avoidance.* o *Humane exclusion prior to demolition-* • *Bats should not be evicted from roost sites during the reproductive period (May-September), or during winter hibernating periods to avoid direct mortality.* • *Bats should be flushed from trees prior to felling or trimming.* ▪ *Off-site habitat improvements shall be conducted in coordination with the California Department of Fish and Wildlife.*
SC-BIO-4	*LAUSD shall comply with the following conditions if a new school would be located in an area containing native habitat or if a protected tree would be removed from an existing campus:* ***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.*

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

No Impact. The Project site is located in a residential neighborhood within the Reseda-West Van Nuys CPA. No known threatened, endangered, or rare species or their habitats, locally designated species, locally designated natural communities, riparian or wetland habitats exist on this Project site. While the Los Angeles River serves as the Campus's southwestern boundary, that particular portion of the river is channelized and fully paved and thus does not constitute as wetlands or valuable habitat. The site is not within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or similar plan. The site is neither within nor proximate to any Significant Ecological Area, Land Trust, or Conservation Plan.[33] No impact would occur.

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. Refer to Threshold a) above.

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. Refer to Threshold a) above.

[33] Los Angeles County Department of Regional Planning. Figure 9.3, Significant Ecological Areas and Coastal Resource Areas Policy Map. Web. 2015. http://planning.lacounty.gov/sea/information

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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 Los Angeles River serves as the southwest boundary for the Project site, running diagonally across the block on which the Campus is located. Although the river is technically a watercourse, it is channelized and does not represent wetlands, habitat, or a significant wildlife corridor. However, some trees that are located on the Project site will likely be removed due to limited space onsite. These trees have the potential to be nesting sites for birds.

The Migratory Bird Treaty Act of 1918 (MBTA) implements the United States' commitment to four treaties with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. The US Fish and Wildlife Service administers permits to take migratory birds in accordance with the MBTA. Provisions of the MBTA are met by compliance with LAUSD SC **SC-BIO-3** (detailed above), which would ensure that if construction occurs during the breeding season, appropriate measures would be taken to avoid impacts to any nesting birds if found. With adherence to **SC-BIO-3**, impacts would be less than significant.

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

Less than Significant Impact. Implementation of the proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

LAUSD has a Tree Trimming and Removal Procedure. Consistent with the Los Angeles Municipal Code (LAMC), LAUSD's Tree Trimming and Removal Procedures includes four species of trees as Protected Trees. A Protected Tree is any of the following Southern California native tree species that measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree: oak trees (including Valley Oak and California Live Oak, or any other tree of the oak genus indigenous to California but excluding the Scrub Oak), Southern California Black Walnut, Western Sycamore, and California Bay. These trees are subject to the provisions of the LAUSD Tree Trimming and Removal Procedure that regulate relocation, removal, and replacement for Protected Trees.

The proposed Project site contains 132 trees of various species, four of which are designated as Protected trees. It is likely that some trees will have to be removed due to limited space, potentially including one blue gum (*Eucalyptus globulus*), one Deodar cedar (*Cedrus deodara*), two Brisbane box (*Lophostemon conferta*), and two London plane trees (*Platanus acerifolia*). In accordance with LAUSD's Tree Trimming and Removal Procedure, LAUSD will avoid impacting healthy protected trees if feasible. If any protected trees are removed, the protected tree or trees will be replaced at a four to one ratio with protected trees. Further, the Project would include a landscape plan with specifications for new trees to be planted on the Project site. New trees will be planted at the appropriate size at maturity for the space, and will be selected from the LAUSD Approved

Plant List.[34] Therefore, impacts conflicting with local policies and ordinances, including tree protection ordinances, would be less than significant.

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. Refer to Threshold a) above.

[34] LAUSD. LAUSD Approved Plants List. Web. 2012. http://www.laschools.org/documents/download/sustainability%2Fwater_conservation%2FCopy_of_Updated_Plant_List_2012.pdf.

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

Explanation:

The analysis below is based on the Historical Resources Evaluation Report (HRER)[35] prepared for the proposed Project (**Appendix C**).

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-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*

[35] Rincon Consulting, Inc. Reseda High School Historical Resources Evaluation Report. Report. Prepared for Los Angeles Unified School District. 2018.

	○ *Location of areas to be monitored* ○ *Types of artifacts anticipated* ○ *Procedures for temporary stop and redirection of work to permit sampling, including anticipated radius of suspension of ground disturbances around discoveries and duration of evaluation of discovery to determine whether they are classified as unique or historical resources* ○ *Procedures for maintenance of monitoring logs, recovery, analysis, treatment, and curation of significant resources* ○ *Procedures for archaeological resources sensitivity training for all construction workers involved in moving soil or working near soil disturbance, including types of archaeological resources that might be found, along with laws for the protection of resources. The sensitivity training program shall also be included in a worker's environmental awareness program that is prepared by LAUSD with input from the Archaeologist, as needed.* ○ *Accommodation and procedures for Native American monitors, if required.* ○ *Procedures for discovery of Native American cultural resources.* ▪ *The construction manager shall adhere to the stipulations of the Archaeological Monitoring Plan.*
SC-CUL-8	*Cultural resources sensitivity training shall be conducted for all construction workers involved in ground-disturbing activities. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources and shall be included in a worker's environmental awareness program that is prepared by LAUSD with input from a qualified Archaeologist, as needed.*
SC-CUL-9	*LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. If feasible, the Archaeologist shall prepare a Phase III Data Recovery/Mitigation Program to outline procedures to recover a statistically valid sample of the archaeological remains and to document the site and reduce impacts to be less than significant. All documentation shall be prepared in the standard format of the ARMR Guidelines, as prepared by the OHP. Once a Phase III Data Recovery/Mitigation Program is completed, an Archaeological Monitor shall be present to oversee the ground-disturbing activities to ensure that construction proceeds in accordance with the Program.*
SC-CUL-10	*All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.*

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

No Impact. A project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. Section 15064.5 of the State CEQA Guidelines defines a historical resource as (1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or (3) an object, building, structure, site, area, place, record or manuscript that a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record.

A Historical Resources Evaluation Report (HRER) (See **Appendix C**) was completed by Rincon Consulting, Inc. in June 2018. This evaluation was prepared to inform future planning efforts and to facilitate compliance with LAUSD's cultural resource policies and CEQA. The HRER was completed in accordance with recognized professional standards, following the Secretary of the Interior's Standards for Preservation Planning, Identification, Evaluation and Registration; California Office of Historic Preservation; and National Park Service professional standards and guidelines. Applicable national, state, and local level criteria were considered, as were the context-driven methods and framework used in the *LAUSD Historic Context Statement* and other applicable historic context statements, including SurveyLA, the citywide historic resources survey conducted by the Los Angeles Office of Historic Resources.

4. Environmental Checklist and Analysis

Based on the current study, Reseda HS and its buildings are recommended ineligible for federal, state, or local designation under any applicable criteria. While the Campus has not undergone any extensive alterations since its original development in 1955, it lacks characteristics of LAUSD postwar era design principles. Additionally, the Campus lacks various character-defining features required of eligible campuses, such as easily identifiable indoor-outdoor spaces, a unified campus plan with buildings oriented towards courtyards, or buildings that display a distinctively Modernist design idiom. As such, the Campus does not appear eligible for federal, state, or local designation under any applicable criteria and is not considered a historical resource for the purposes of CEQA. Therefore, implementation of the proposed Project would not cause a substantial adverse change in the significance of a historical resource as defined in §15064.5. No impact would occur.

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

Less than Significant Impact. Section 15064.5 of the *State CEQA Guidelines* defines significant archaeological resources as resources that meet the criteria for historical resources, as discussed above, or resources that constitute unique archaeological resources.

The Project site has been in use as a school facility since 1955 and has been subjected to past subsurface disturbance associated with excavation and grading activities associated with the construction of foundations for the existing school buildings; therefore, it is unlikely that undisturbed unique archeological resources exist on the Project site. Nevertheless, the unanticipated discovery of unique archeological resources is possible during earth moving and grading activities. However, based on the lack of previous resources on the site, the probability that archeological resources will be discovered is low. In addition, compliance with SC-CUL-6, SC-CUL-7, SC-CUL-8, SC-CUL-9, and SC-CUL-10, listed above, would require that upon discovery of an archeological resource: (1) construction activities in the immediate area of the find shall cease and LAUSD shall retain a qualified archaeologist to determine the significance of the find; (2) LAUSD shall determine if a Phase III Data Recovery/Mitigation Program is necessary; and (3) if the archaeological resource is a Native American resource, work shall stop within a 30-foot radius of the discovery.

The Project would be subject to the provisions Section 21084.1 of the Public Resources Code to consider the effects of a proposed Project on potentially buried cultural resources if an archeological site is determined to be a historical resource. If the archaeological site is determined to be a "unique" resource the site shall be treated in accordance with the provisions of section 21083.2. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies. They provide guidance concerning analytical techniques and approaches to defining compliance measures where potentially significant impacts may occur, such that in the event that archaeological resources are uncovered on the Project site during grading, or other construction activities, the District must be notified immediately and work must stop within a 30-foot radius until a qualified archeologist to be approved by the District, has evaluated the find. Construction activity may continue unimpeded on other portions of the Project site. If the find is determined by the qualified archeologist to be a unique archeological resource, as defined by Section 21083.2 of the Public Resources Code, the Project site shall be treated in accordance with the provisions of Section 21083.2 of the Public Resources Code. If the find is determined not to be a unique archeological resource, no further action is necessary and construction may continue.

Implementation of these SCs as well compliance with the federal, State, and local regulations would ensure impacts to archaeological resources remain less than significant.

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

Less than Significant Impact. No formal cemetery exists on the Project site, or in the vicinity of the proposed Project. As the Project site has been subject to past subsurface disturbance associated with grading and foundations, it is unlikely that intact human remains are present beneath the site. However, the unanticipated discovery of intact human remains is possible. In the event of an unexpected disturbance, significant impacts to archaeological resources and human remains could occur. Implementation of SC-CUL-10, listed above, would reduce potentially significant impacts to less than significant levels.

4. Environmental Checklist and Analysis

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

Explanation:

LAUSD has SCs for minimizing impacts to energy. Applicable SCs related to energy impacts associated with the proposed 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-4	*LAUSD shall analyze air quality impacts:* *If site-specific review or monitoring data of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds.* *Construction bid contracts shall include protocols that reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. The Construction Contractor shall be responsible for documenting compliance with the identified protocols. Specific air emission reduction protocols include, but are not limited to, the following.* *Exhaust Emissions* ▪ *Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM).* ▪ *Consolidate truck deliveries and limit the number of haul trips per day.* ▪ *Route construction trucks off congested streets, as permitted by local jurisdiction haul routes.* ▪ *Employ high pressure fuel injection systems or engine timing retardation.* ▪ *Use ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment.* ▪ *Use construction equipment rated by the United States Environmental Protection Agency as having at least Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower.* ▪ *Restrict non-essential diesel engine idle time, to not more than five consecutive minutes.* ▪ *Use electrical power rather than internal combustion engine power generators.* ▪ *Use electric or alternatively fueled equipment, as feasible.* ▪ *Use construction equipment with the minimum practical engine size.* ▪ *Use low-emission on-road construction fleet vehicles.* ▪ *Ensure construction equipment is properly serviced and maintained to the manufacturer's standards.* *Fugitive Dust* ▪ *Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for 10 days or more).* ▪ *Replace ground cover in disturbed areas as quickly as possible.* ▪ *Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).* ▪ *Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and*

	any equipment leaving the site each trip. ▪ *Pave unimproved construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles.* ▪ *Pave all unimproved construction access roads for at least 100 feet from the main road to the Project site.* ▪ *Enclose, cover, water twice daily, or apply non-toxic soil binders according to manufacturers' specifications to exposed piles (i.e., gravel, dirt, and sand) with a 5% or greater silt content.* ▪ *Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph).* ▪ *Water disturbed areas of the active construction and unpaved road surfaces at least three times daily, except during periods of rainfall.* ▪ *Limit traffic speeds on unpaved roads to 15 mph or less.* ▪ *Prohibit fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD.* ▪ *Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.* ▪ *Limit the amount of daily soil and/or demolition debris loaded and hauled per day.* *<u>General Construction</u>* ▪ *Use ultra-low VOC or zero-VOC surface coatings.* ▪ *Phase construction activities to minimize maximum daily emissions.* ▪ *Configure construction parking to minimize traffic interference.* ▪ *Provide temporary traffic control during construction activities to improve traffic flow (e.g., flag person).* ▪ *Prepare and implement a trip reduction plan for construction employees.* ▪ *Implement a shuttle service to and from retail services and food establishments during lunch hours.* ▪ *Increase distance between emission sources to reduce near-field emission impacts.*
SC-AQ-5	*LAUSD shall encourage ride-sharing programs for students and teachers as well as maintain fleet vehicles such as school buses, maintenance vehicles, and other service fleet vehicles in good condition in order to prevent significant increases in air pollutant emissions created by operation of a new school.*
SC-GHG-1	*During school operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.*
SC-GHG-2	*LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.*
SC-GHG-3	*LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.*
SC-GHG-4	*LAUSD shall develop a water budget for landscape (both non-recreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources.*
SC-GHG-5	*LAUSD shall ensure that the designed time dependent valued energy shall be at least 10%, with a goal of 20% less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the Division of the State Architect.*
SC-USS-1	*Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities:* ***School Design Guide.*** *Establishes a minimum non-hazardous construction and demolition (C&D) debris recycling requirements of 75% by weight. Construction and demolition waste shall be recycled to the maximum extent feasible.* ***Construction & Demolition Waste Management.*** *This document outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of non-hazardous waste materials generated during demolition and/or new construction to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling, salvaging and/or reusing a minimum of 75% of the C&D waste generated by weight.*

4. Environmental Checklist and Analysis

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.

Existing Conditions

Electricity Supply

The Los Angeles Department of Water and Power (LADWP) provides electricity service to the Project site. The LADWP is the nation's largest municipal electric utility, and serves a 465-square-mile area in Los Angeles and much of the Owens Valley. The Power System supplies more than a 26 million megawatt-hours (MWh) of electricity a year for the City of Los Angeles' 1.5 million residential and business customers.[36] Electrical service provided by the LADWP is divided into two planning districts: Valley and Metropolitan. The Valley Planning District includes the LADWP service area north of Mulholland Drive, and the Metropolitan Planning District includes the LADWP service area south of Mulholland Drive. The Project site is located within the LADWP Valley Planning District.

In total, LADWP operates 21 receiving stations, 160 distribution stations, and 10 switching stations to provide electricity to LADWP customers, with additional facilities to be acquired as their load increases. Power supply sources include: 31% from natural gas, 30% from renewal able energy, 18% from coal, 10% from nuclear, 4% from large hydroelectric, and 7% from unspecified purchased power. Typical residential energy use per customer is about 500 kilowatt-hours (kWh) per month. Business and industry consume about 70% of the electricity in Los Angeles, but residents constitute the largest number of customers.[37] Projected future demand growth for LADWP is less than 1 percent per year.

LADWP has a maximum plant capacity of 7,800 megawatts (MW). Historically, Los Angeles peak demand was 6,502 MW reached on August 31, 2017.[38]

Power lines are located along the streets surrounding the Project site, including Lindley Avenue, Kittridge Street, and Victory Boulevard, as well as along the Los Angeles River. The proposed Project would receive power by connecting to the existing easements and power lines surrounding the site.

Natural Gas

Natural gas is provided and distributed to residents and businesses in the City of Los Angeles by the Southern California Gas Company (SoCalGas). According to the 2018 California Gas Report, SoCalGas is expected to

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[36] LADWP. Power Strategic Long-Term Resource Plan. Report. 2017.
[37] LADWP. Facts and Figures. Web. 2018. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_afrLoop=72707476398062&_afrWindowMode=0&_afrWindowId=kevuhc117_1#%40%3F_afrWindowId%3Dkevuhc117_1%26_afrLoop%3D72707476398062%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dkevuhc117_29
[38] LADWP. Briefing Book 2017-2018. Report. 2018.

provide an average of 2,519,000 thousand British Thermal Unit (kBtu) per day by 2022.[39] In addition, due to modest economic growth, energy efficiency standards and programs, renewable electricity goals and the decline in commercial and industrial demand, starting in 2018 and continuing through 2035, natural gas demands are projected to decline at an annual rate of 0.74 percent throughout the SoCalGas service area.[40]

SoCalGas purchases gas supplies on a daily, monthly, and longer-term basis from producers and marketers in California, Canada, the Rockies, and elsewhere in the U.S. Southwest. In 2012[41], natural gas was used in California to produce electricity (45.6 percent), in residential uses (20.8 percent), in industrial uses (14.5 percent), oil and gas industry operations (9.4 percent), in commercial uses and for transportation (8.6 percent), for agriculture (0.5 percent), and other unspecified uses (0.6 percent). The total natural gas usage in 2012 was 23,323 million therms.[42]

Petroleum Based Fuel

According to the California Energy Commission, transportation accounts for nearly 37 percent of California's total energy consumption. In 2017, it is estimated that 15.5 billion gallons of gasoline (non-diesel)[43] and 3.1 billion gallons of diesel fuel[44] were sold statewide. The estimated 2015 gasoline sales for Los Angeles County[45] were approximately 3.47 billion gallons, and 313 million gallons of diesel fuel.[46]

The existing Reseda HS Campus generates transportation energy demand from vehicles traveling to and from the Site. Transportation fuels, primarily gasoline and diesel, would be provided by local, or regional, suppliers and vendors. According to the California Air Resources Board on-road vehicle emissions factor (EMFAC2014) model, the average fuel economy for the fleet-wide mix of vehicles operating in the South Coast Air Basin region is approximately 20.17 miles per gallon for gasoline-fueled vehicles and approximately 7.81 miles per gallon for diesel-fueled vehicles. Gasoline-fueled vehicles account for approximately 96 percent of the total vehicles and diesel-fueled vehicles account for approximately 3.6 percent of the total vehicles. Electric vehicles account for approximately 0.3 percent of the total vehicles.

The vehicles miles traveled (VMT) for the school was not estimated as part of the air quality and greenhouse gas (GHG) assessment conducted for the Project because the existing vehicle miles traveled would not change with the upgrade and modernization of the Campus.

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39 California Gas Report. 2018 California Gas Report. Report. 2018. https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf

40 Ibid.

41 *Note: 2012 figures are the most recent available.*

42 California Energy Commission. Energy Almanac, Overview of Natural Gas in California, Natural Gas Supply. Web. 2017. http://energyalmanac.ca.gov/naturalgas/overview.html

43 California Department of Tax and Fee Administration (CDTFA). Net Taxable Gasoline Gallons. Web. 2018. http://www.cdtfa.ca.gov/taxes-and-fees/MVF_10_Year_Report.pdf

44 CDTFA. Taxable Diesel Gallons 10 Year Report. Web. 2018. http://www.cdtfa.ca.gov/taxes-and-fees/Diesel_10_Year_Report.pdf

45 *Note: 2015 figures are the most recent available.*

46 California Energy Commission. California Annual Retail Fuel Outlet Report Results (CEC-A15) Spreadsheets. Web. 2017. http://www.energy.ca.gov/almanac/transportation_data/gasoline/2015_A15_Results.xlsx

4. Environmental Checklist and Analysis

Construction Impacts

Project construction would require demolition, grading, utility installation, foundation construction, building construction, paving, and landscaping installation. All construction would be typical for the region and building type. During construction, energy would be consumed in the form of petroleum-based fuels (i.e., gasoline and diesel) used to power off-road construction vehicles and equipment on the Project site, for construction worker travel to and from the Project site, as well as for delivery truck trips; and to operate generators to provide temporary power for lighting and electronic equipment. The manufacturing of construction materials used by the proposed Project would also involve energy use. Due to the large number of materials and manufacturers involved in the production of construction materials (including manufacturers in other states and countries), upstream energy use cannot be reasonably estimated. However, it is reasonable to assume that manufacturers of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business. Furthermore, neither the City nor the District has control over or the ability to influence energy resource use by the manufacturers of construction materials. Therefore, this analysis does not evaluate upstream energy use.

The average annual and total consumption of gasoline and diesel fuel during Project construction was estimated using the same assumptions and factors from CalEEMod that were used in estimating construction air emissions in Section III., Air Quality. As shown in **Table 5, Construction Period Petroleum Fuel Consumption**, a total of approximately 257,640 gallons of diesel fuel, and 33,987 gallons of gasoline would be consumed over the Project's construction horizon, or approximately 64,410 gallons of diesel fuel, and 8,496 gallons of gasoline annually (see **Appendix D** for detailed breakdown).

Table 5
Construction Period Petroleum Fuel Consumption

Diesel Fuel (in gallons)[a]	Gasoline (in gallons)[b]
257,640	33,987

Source: CalEEMod Model Data; Impact Sciences 2019
Note:
a. Includes consumption from off-road construction equipment, vendor trips, and hauling trips.
b. Includes consumptions from worker trips.

The estimated amounts of energy resources reported in **Table 5** would be consumed over a period of 50 months and would represent a small percentage of the total energy used in the state. More importantly, for reasons presented below, this consumption would not represent a wasteful and inefficient use of energy resources.

There is growing recognition among developers and retailers that sustainable construction is not any more expensive than "business as usual" construction methods, and further, that there are long-term significant cost-savings potential in utilizing green building practices and materials. In addition, the proposed Project

would feature a sustainable design to comply with CALGreen and CHPS, which would result in the use of sustainable materials and recycled content that would reduce energy consumption during Project construction. Construction materials would include recycled materials and products originating from nearby sources to the extent feasible in order to comply with CALGreen and to reduce costs of transportation.

Worker trips, included in the estimates in **Table 5** above, are expected to vary by phase; however, trips would be temporary and would occur over the approximately 50 month timeframe of construction activity. As these trips would be temporary, they would not be wasteful or inefficient use of energy. As discussed in Section III, Air Quality, CARB has adopted Title 13 Section 2485, an Airborne Toxic Control Measure (ATCM), to limit diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other toxic air contaminants. All diesel-fueled commercial heavy- and medium-duty vehicles are required to comply with these measures. The ATCM requires that construction idling times shall be minimized either by shutting equipment off when not in use or limiting the maximum idling time to five minutes. It also requires that all construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications and that all equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. SC-AQ-4 and SC-AQ-5 require that construction equipment be selected to minimize emissions and that all diesel-powered off-road equipment larger than 50 horsepower and operating on the site for more than two days continuously shall, at a minimum, meet US EPA particulate matter emissions standards for Tier 3 engines or equivalent. Idling restrictions and the use of newer engines and properly maintained equipment would result in less fuel combustion and energy consumption. Furthermore, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction.

Construction activities would not consume measurable amounts of electricity or natural gas. Although construction would consume fuel energy resources, construction activities would be temporary and would cease at the end of construction. Therefore, there would be no long-term energy impacts associated with construction activities.

For the reasons listed above, the proposed Project would not involve the inefficient, wasteful, and unnecessary use of energy during construction and the construction-phase impact related to energy consumption would be less than significant.

Operational Impacts

There are currently approximately 1,522 students enrolled in grades 9 through 12 at Reseda HS. The proposed Project consists of improvements to the existing school. There would be no increase in capacity with the Project, and the planning enrollment of 1,400 students anticipates a decline in the Campus population. As such, there would be no net increase in vehicular trips in the future. The proposed Project includes infrastructure improvements but would not change existing operations at the school. The school would continue to house the existing school programs after Project completion. No changes to operations, including school-related events or community use would occur as the result of this Project. The levels of traffic that would be generated by the school and the geographical distribution of the school traffic on the public street network would remain unchanged compared to existing conditions and no Project-related impact would occur.

4. Environmental Checklist and Analysis

The proposed Project would reduce the fuel and energy consumption on Campus by incorporating the current building codes. The new buildings are required to comply with California Code of Regulations (CCR) Title 24, which establishes Building Energy Efficiency Standards (Part 6) and CALGreen (Part 11). Compliance with these standards ensures a 35 percent increase in building energy efficiency compared to 2008 standards. SCs that would be incorporated into the proposed Project are listed at the beginning of this section.

Therefore, replacement of older buildings with new buildings that comply with CCR Title 24, CHPS criteria, and LAUSD Standard Conditions of Approval would reduce long-term energy use on the Campus, which would have a beneficial impact on the environment.

For the reasons listed above, the proposed Project would not involve the inefficient, wasteful, and unnecessary use of energy during operation and the operation-phase energy impact would be less than significant.

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

Less than Significant. The Proposed project would comply with Title 24. Title 24 represents the state policy on building energy efficiency. The goals of the Title 24 standards are to improve energy efficiency of residential and non-residential buildings, minimize impacts during peak energy-usage periods, and reduce impacts on state energy needs. The proposed Project is required to comply with Title 24, and therefore would be consistent with the state's plan for energy efficiency. Furthermore, the proposed Project would include features to minimize energy consumption overall, many of which are mandated by the CALGreen and CHPS. These features would further reduce the amount of electricity and natural gas consumed as a result of the proposed Project. Because the proposed Project would be consistent with Title 24, this impact would be less than significant.

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

Explanation:

The analysis below is based on the Geotechnical Evaluation[47] and additional analyses[48] prepared for the proposed Project (**Appendices E and 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:

[47] Gorian and Associates, Inc.. Preliminary Geotechnical Site Evaluation for Reseda High School. Report. Prepared for Los Angeles Unified School District. 2017.

[48] Gorian and Associates, Inc.. Additional Analyses, Reseda High School. Report. Prepared for Los Angeles Unified School District. 2018.

4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval	
SC-CUL-11	*LAUSD shall retain a Paleontological Monitor to oversee specific ground-disturbing activities as determined by the scope of work and final grading plan. The Monitor shall provide the construction crew(s) with a brief summary of the sensitivity, the rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources.* *If paleontological resources are uncovered, the Construction Contractor shall halt construction activities within a 30 foot radius of the find and shall notify the LAUSD.* ▪ *Ground-disturbing activities shall not continue until the discovery has been assessed by the Paleontologist.* ▪ *The paleontologist shall have the authority to halt construction activities to allow a reasonable amount of time to identify potential resources.* ▪ *Significant resources found shall be curated as determined necessary by the Paleontologist.*
SC-GEO-1	*LAUSD shall prepare a Geohazard Assessment for the construction of any new school or applicable school addition.*
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.*

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

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

No Impact. The proposed Project is the renovation of an existing school site and does not include any activities that would exacerbate any existing conditions related to faults, fault rupture, ground shaking or landslides that would directly expose people, or structures, to the risk of loss, injury, or death due to rupture of a known earthquake fault. Fault rupture is the displacement that occurs along the surface of a fault during an earthquake. The closest known active fault to the site is the Northridge Blind Thrust, approximately 6.9 miles to the northeast. The Project site is not located within an Alquist-Priolo Fault-Rupture Hazard Zone.[49] As the proposed Project would not exacerbate any of these existing conditions, no impact would occur.

ii. Strong seismic ground shaking?

Less than Significant Impact. Southern California is a highly active seismological area and it is probable that the Project site would experience moderate to strong ground motion due to earthquakes. The Northridge Blind Thrust, located about 6.9 miles northeast of Reseda HS, is the closest active fault. Of the eight buildings on Campus that are identified as requiring seismic upgrades, six will be demolished under the proposed Project and two will be seismically retrofitted and modernized. The new buildings that will replace the demolished buildings will be constructed in accordance with California Building Code (CBC) and

[49] City of Los Angeles. LA Zoning and Property Information. Web. 2019. zimas.lacity.org

Division of State Architect (DSA) standards. The planned construction of the site will also take recommendations and incorporate project design features from the Geotechnical Report[50] and additional analyses upon completion. As a public school, Reseda HS will have to comply with the California Code of Regulations Title 24 requirements and the California Geological Survey Checklist for Review of Geologic/Seismic Reports. As the new and retrofitted buildings will comply with all of the aforementioned regulations, the proposed Project will improve upon Reseda HS's ability to withstand strong seismic ground shaking. Therefore, the impacts of the Project related to strong seismic ground shaking significantly impacting the site is considered less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Liquefaction is a phenomenon in which saturated cohesion-less soils undergo 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.[51]

A review of the State of California Seismic Hazard Zone Map for the Canoga Park Quadrangle indicates that the site is located in an area that has the potential for liquefaction.[52]

As indicated in the Program EIR, project construction will adhere to all current standard of practice, as outlined in the "Recommended Procedures for Implementation of DMG Special Publication 117, Guidelines for Analyzing and Mitigating Liquefaction in California" and "Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California." Furthermore, the geotechnical report prepared for the project found that the effects of liquefaction could be reduced with proper design and construction in accordance with current engineering practices.[53]

Therefore, compliance with existing building codes and engineering practice would ensure impacts related to liquefaction would be less than significant.

iv. Landslides?

No Impact. Landslides and other types of slope failures, such as lateral spreading, can result in areas with varying topography in the event of an earthquake. The site is not located within an area identified as having a potential for slope instability, nor in an area having a potential for seismic slope instability.[54] The site and

[50] Gorian and Associates, Inc. Preliminary Geotechnical Site Evaluation, Reseda High School. Report. Prepared for Los Angeles Unified School District. 2017.
[51] Ibid.
[52] Ibid.
[53] Ibid.
[54] Gorian and Associates, Inc. Preliminary Geotechnical Site Evaluation, Reseda High School. Report. Prepared for Los Angeles Unified School District. 2017.

surrounding vicinity is generally flat. Therefore, the likelihood of seismically induced landslides affecting the Project site is considered to be very low and there would be no impact.

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

Less than Significant Impact. Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion in the vicinity of the Project area include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not used.

The Project site is located in a developed, residential area of the City of Los Angeles, with the site and surrounding vicinity being generally flat. No major slopes or bluffs are on or adjacent to the Project site. The proposed Project is an educational facility that will include landscaped and hardscaped area, and will not contain large amounts of exposed soil. Following the completion of construction of the proposed Project, the potential for soil erosion or the loss of topsoil is expected to be extremely low.

Construction of the proposed Project would involve soil disturbance activities including grading and demolition that will leave soil on the Project site exposed. Common means of soil erosion include water, wind, and being tracked off-site by vehicles. These activities could result in soil erosion. However, the proposed Project would be subject to local and state codes and requirements for erosion control and grading during construction. Including, but not limited to, grading permits and haul routes established in a Construction Worksite Traffic Control Plan submitted to OEHS, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, the proposed Project would be required to comply with standard regulations, including South Coast Air Quality Management District Rule 402, which will reduce construction erosion impacts. Rule 402 requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance off-site.

Additionally, the Construction General Permit (CGP) issued by the State Water Resources Control Board (SWRCB), effective July 1, 2010, regulates construction activities to minimize water pollution, including sediment. The proposed Project would be subject to National Pollution Discharge Elimination System (NPDES) permitting regulations, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). Construction contractors would be required to prepare and implement a SWPPP and associated best management practices (BMPs). Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from project related grading and construction activities. In addition, the proposed Project would be subject to SC-HWQ-2 Compliance Checklist for Stormwater Requirements at a Construction Site, as detailed above.

Therefore, soil erosion impacts from grading and construction activities associated with construction and operation of the proposed Project would not occur and soil erosion impacts would be less than significant.

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. Potential impacts with regard to liquefaction and landslide potential are evaluated above. Building improvements founded on collapsible soils may be damaged by sudden and often

induced settlement when these soils are saturated after construction. Collapsible soils are typified by low values of dry unit weight and natural water content. The amount of settlement depends on the applied vertical stresses and the extent of wetting and available water. In the area of the site, the marine deposits are overlain by approximately 30 feet of Holocene alluvium, which consist of silty clay, clayey sands, and silty sands.[55] However, as previously discussed, as the Project would be designed and constructed in accordance with current engineering practices, the impacts would be less than significant.

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 shrink or swell as the moisture content decreases or increases; the shrinking or swelling can shift, crack, or break structures built on such soils. Published geologic maps of the area indicated that the site is underlain by Holocene- age alluvium consisting of poorly consolidated silty clay and clayey and silty sand.[56] As stated above in S**ection VI (c),** all potential impact from soil quality would be reduced through compliance with proper design and construction practices. Therefore, impacts would be less than significant.

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 connect to the existing sewer system instead of septic tanks or alternative wastewater systems and would therefore have no impact regarding the ability of the soil to support septic tanks.

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

Less than Significant Impact. As discussed above, the Project site has been previously disturbed and, therefore, it is unlikely that undisturbed paleontological resources exist on the Project site. Any surficial paleontological resources, which may have existed at one time, have likely been unearthed or disturbed to accommodate building foundations, and shallow excavation, or surface grading, is unlikely to uncover any paleontological resources. Earth moving and grading activities could potentially exceed the depth of prior grading activities and therefore, unanticipated discovery of unique paleontological resources is possible. With implementation of SC-CUL-11 listed above, the potential impacts from the proposed Project on paleontological resources would be less than significant.

[55] Gorian and Associates, Inc. Preliminary Geotechnical Site Evaluation, Reseda High School. Report. Prepared for Los Angeles Unified School District. 2017.
[56] Ibid.

4. Environmental Checklist and Analysis

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

Explanation:

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

LAUSD Standard Conditions of Approval	
SC-GHG-1	*During school operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.*
SC-GHG-2	*LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.*
SC-GHG-3	*LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.*
SC-GHG-4	*LAUSD shall develop a water budget for landscape (both non-recreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources.*
SC-GHG-5	*LAUSD shall ensure that the time dependent valued energy of the proposed project design is at least 10 percent, with a goal of 20 percent less than a standard design that is a 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.*

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

Less than Significant Impact. The proposed Project would not generate direct GHG emissions from new vehicle trips and onsite area sources. Additionally, no indirect emissions from offsite energy production required for onsite activities, water use, and waste disposal would be generated. Implementation of the proposed Project would not increase the school capacity or result in any new sources of GHG emissions once construction of the Project is complete**;** therefore, there is no operational impact of the proposed Project related to GHG emissions. In addition, it is not anticipated that construction would generate GHG emissions that would exceed the SCAQMD significance thresholds. The actual emissions associated with the proposed Project would only include amortized construction emissions, which were calculated in the Program

EIR for a comparable project (refer to **Table 6**) as being approximately 30 $MTCO_2e$/year,[57] which is considerably lower than the SCAQMD threshold of 3,000 $MTCO_2e$/year.[58]

Table 6
GHG Emissions of an LAUSD School

Central Los Angeles High School No. 12[1]		
Source	**MTCO2e/Year**	**Percent of Project Total**
Area	0	0%
Energy	241	17%
Transportation	938	64%
Waste	227	16%
Water	39	1%
Amortized Construction Emissions[2]	30	2%
Total	**1,475**	**100%**
Proposed SCAQMD Bright-Line Screening Threshold	3,000 MTCO2e	N/A
Exceeds Proposed Bright-Line Screening Threshold?	**No**	**N/A**
Source: LAUSD School Upgrade Program EIR, June 2014, Table 5.7-4 Note: The sum of the emissions does not equal 100 percent of the total emissions due to rounding. 1= Based on 55,361 building square feet of school facilities, capacity of 500 high school students, and 855 average daily trips generated 2= As construction emissions are short-term, they are amortized over 30 years per SCAQMD methodology[59]		

In addition, the proposed Project would be subject to the GHG SCs. SC-GHG-1 through SC-GHG-5 (detailed above), would require water and energy efficient features and measures be included prior to operation of the proposed Project. As such, the impact relating to the generation of GHGs would be less than significant.

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

Less than Significant Impact. In response to concern regarding GHGs and global climate change, the state passed Assembly Bill 32 (AB 32) also known as the California Global Warming Solutions Act of 2006. AB 32 (Health and Safety Code Section 38500 et. seq.) mandated a reduction in the state's GHG levels. AB 32 is the basis for reduction of GHG emissions in California. Local agencies such as the SCAQMD base their planning

[57] LAUSD. Program EIR for the School Upgrade Program. Report. 2015. http://achieve.lausd.net/ceqa. (Table 5.7-4.)
[58] LAUSD. Program EIR for the School Upgrade Program. Report. 2015. http://achieve.lausd.net/ceqa.
[59] SCAQMD. 2020 GHG CEQA Significance Thresholds Working Group Meeting 15.Report. 2010.

and regulations on the requirements included in AB 32, which include a reduction of GHG emissions to 1990 rates by 2020. The SCAQMD adopted the GHG significance thresholds specifically to meet AB 32 requirements within its jurisdiction, and so plans and projects that meet those thresholds can be assumed to meet the requirements of AB 32.

Senate Bill 32 (SB 32) was signed into law on August 31, 2016. This bill requires CARB to adopt rules and regulations to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030.

The Project site is within the jurisdiction of the SCAQMD. As the net emissions associated with the proposed Project would be well below the SCAQMD thresholds, the proposed Project would not conflict with plans, policies, or regulations for reducing GHG emissions. As a result, the proposed Project would not conflict with the state's ability to meet its GHG goals under AB 32 and SB 32.

In addition, Senate Bill 375 (SB 375) passed by the State of California in 2009, requires metropolitan regions to adopt transportation plans and sustainable communities strategy that reduce vehicle miles traveled. In accordance with SB 375, SCAG prepared and adopted the 2016 RTP/SCS with the primary goal of enhancing sustainability by increasing multi-modal transportation options and identifying land use strategies that focus new housing and job growth in areas served by public transit. Additionally, the 2016 RTP/SCS reaffirms the 2008 Advisory Land Use Policies that were incorporated into the 2012 RTP/SCS. Development of the proposed Project would fill the educational needs of Local District Northwest (i.e., accommodate the existing interest of performing and visual arts fields from the residents of the area) and would not conflict with any plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Impacts would be less than significant.

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

Explanation:

The analysis below is based on the Phase I Environmental Site Assessment[60] prepared for the proposed Project (**Appendix G**).

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-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.*

[60] Ninyo and Moore. Phase I Environmental Site Assessment, Reseda High School. Report. Prepared for Los Angeles Unified School District. 2017.

	▪ *California Air Resources Board 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-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) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?

Less than Significant Impact. A significant impact would occur if the proposed Project would create a significant hazard though the routine transfer, use, or disposal of hazardous materials. Construction of the proposed Project would involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. However, the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing such activities.

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

The design and operation of the proposed Project would satisfy all legal requirements by providing for and maintaining appropriate storage areas for hazardous materials, installing or affixing appropriate warning signs and labels, using commercial services that specialize in the recycling of used hazardous substances (i.e., collecting hazardous materials on a regular basis to minimize the quantity stored on Campus), installing emergency wash areas for flushing irritating substances from eyes and exposed skin areas should such contact occur, providing well-ventilated areas in which to use paints and solvents, and maintaining adult supervision during student's use of hazardous materials. All hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations, and would not pose significant hazards to the public or the environment. Therefore, operational impacts related to the transport, use, or disposal of hazardous materials use would be less than significant.

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. A significant impact would occur if the proposed project created a significant hazard to the public or environment due to a reasonably foreseeable release of hazardous

materials. Construction of the proposed Project would involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. However, the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing such activities. Therefore, impacts would be less than significant, and no further analysis is required.

The proposed Project would not create a hazard through upset or accident conditions involving hazardous materials. As discussed in Threshold (a) above, the use of hazardous materials and substances at school facilities during operations would be minimal and in small quantities. Additionally, all materials and substances would be subject to applicable health and safety requirements stipulated by LAUSD OEHS including Chemical Hygiene, Safe School Inspections, and Environmental Compliance Programs.[61] This would include affixing appropriate warning signs and labels, installing emergency wash areas, providing well-ventilated areas and special plumbing, and maintaining adult supervision. Compliance with existing regulations would result in no reasonably foreseeable upset or accident conditions that would create a significant hazard to the public due to the release of hazardous materials. Potential operation impacts related to hazardous materials would be less than significant.

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. The land use surrounding the Project site is primarily residential with some mixed-uses. The Zane Gray Continuation High School is located adjacent to the northeast portion of the Reseda HS Campus. Newcastle Elementary School is the only other school within 0.25 miles of the Project site. Other schools in the vicinity of Reseda HS include: Newcastle Elementary School, The Magic Years Nursery School, Sherman Oaks Center for Enriched Studies, and Child's World School, all of which are within 0.5 miles of the Campus.

As discussed in Threshold (a) above, construction of the proposed Project would involve the use of those hazardous materials that are typically necessary for construction of educational facilities (i.e., paints, building materials, cleaners, fuel for construction equipment, etc.). There is the potential for accidental release of these materials during construction or during demolition of the remaining buildings on the Project site.

As the proposed Project is a school, impacts could occur if hazardous materials were released on the Project site during operation. As the proposed Project will not change the use of the site, there would be no expected change in the use of hazardous materials onsite compared with existing conditions. Consistent with existing conditions, operation of the proposed Project may require a limited quantity of hazardous materials (e.g., for landscaping, custodial, and educational purposes) be stored on the Project site. Examples of such materials could include but are not limited to cleaning solvents, pesticides and herbicides for landscaping, and painting supplies. All potentially hazardous materials transported, stored, or used on site for daily upkeep will be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with

[61] Refer to OEHS Chemical Evaluation and Chemical Safety Coordinator programs online at http://achieve.lausd.net/Page/2562

applicable regulations set forth by LAUSD OEHS including Chemical Hygiene, Safe School Inspections, and Environmental Compliance Programs.[62]

Further, procedures for the systematic evacuation of students from classrooms and other school facilities are established and practiced by the LAUSD at all schools. Each school's Safe School Plan describes procedures to be followed in the event of a biological or chemical release.

Compliance with applicable laws, regulations, and standard LAUSD policies and practices during Project construction and operation would ensure that impacts associated with upset or accidental conditions which could cause a release of hazardous materials are less than significant.

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. The proposed Project is not located on a site that is included on a list of hazardous materials pursuant to Government Code 65962.5, which is the Hazardous Waste and Substances (Cortese) List.[63] A review of the Cortese List compiled on the Department of Toxic Substances Control, the State Water Board, and CAL EPA showed that the site is not identified on any of these database lists.[64] Historically, the Project site was undeveloped up until at least 1952 and has only been occupied by Reseda HS. No impact would occur.

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

No Impact. The proposed Project would not result in safety hazards regarding airports and airplanes. The Project site is not located within an airport safety zone. The nearest airport is the Van Nuys Airport, approximately 2.2 miles northeast; the Whiteman Airport and Bob Hope Airport are located 8.2 miles northeast and 9.7 miles east, respectively. Despite its close proximity to the Van Nuys Airport, the proposed Project would not generate a safety hazard or excessive noise as construction equipment and operation would be routine and would comply with applicable rules and regulations regarding airport-related hazards. No impact would occur.

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62 Refer to OEHS Chemical Evaluation and Chemical Safety Coordinator programs online at http://achieve.lausd.net/Page/2562

63 California State Water Resources Control Board. 2019. *Geotracker*. Web. 2019. https://geotracker.waterboards.ca.gov/map/

64 California Department of Toxic Substances Control. *EnviroStor*. 2019. Web. https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=18230+Kittridge+Street+Los+Angeles%2C+CA+91335

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

Less than Significant Impact. The Project is not anticipated to interfere with an emergency response plan or evacuation plan. As stated within the LAUSD SUP Program EIR[65], district schools are required to comply with the California Education Code Sections 32281-32289 dealing with the preparation of "Safe School Plans." These plans help develop an emergency response protocol during an emergency on a District site, including renovation, modification work, and contracted work. As required by SC-T-4 (included above), a Construction Traffic Plan would be submitted to OEHS for review and approval prior to construction.

The Construction Traffic Plan would detail haul routes, potential lane closures and construction hours. Advance notice of the construction timing and phasing will allow LAUSD to appropriately coordinate with the City to plan for lane closures, etc. Implementation of SC-T-4 would ensure impacts related to emergency response would be less than significant.

LAUSD has developed a district-wide Emergency Operation Plan (EOP) that addresses the District's responsibilities in emergencies such as natural disaster, human-caused emergencies, and technological incidents.[66] The EOP provides a framework for coordination of response and recovery efforts within the District in coordination with local, state, and federal agencies. The EOP meets the requirements of Los Angeles County's policies on emergency response and planning and the Standardized Emergency Management System (SEMS) operations area response. Based on LAUSD's standard plans and procedures related to emergency response, impacts to existing emergency response plans and/or evacuation plans/routes would be less than significant.

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

Less than Significant Impact. The proposed Project would not expose people or structures to a substantial risk of wildland fires. The Project site is located in a developed, residential area of the City of Los Angeles and is not within a Very High Fire Hazard Severity Zone.[67]

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[65] The LAUSD SUP Program EIR was certified by the BOE on November 10, 2015. *Program EIR for the School Upgrade Program. Report.* 2015. http://achieve.lausd.net/ceqa.

[66] LAUSD. Emergency Operations Plan. Report. 2016.

[67] California Department of Forestry and Fire Protection (CAL FIRE). Very High Fire Hazard Severity Zones in LRA Map. http://frap.fire.ca.gov/webdata/maps/los_angeles/LosAngelesCounty.pdf. 2012.

4. Environmental Checklist and Analysis

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

Explanation:

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

LAUSD Standard Conditions of Approval	
SC-HWQ-1	*LAUSD shall design and construct the project to meet or exceed the current and applicable stormwater guidelines.* ***Stormwater Technical Manual*** *This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). These guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) and the mandated post-construction element of the NPDES program requirements.*
SC-HWQ-2	*LAUSD shall implement the applicable stormwater requirements during construction activities.* ***Compliance Checklist for Storm Water Requirements at Construction Sites*** *This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.*
SC-HWQ-3	*LAUSD shall implement the following programs and procedures, as applicable:* ▪ *Environmental Training Curriculum – a qualified environmental Monitor shall provide a worker's environmental awareness program that is prepared by LAUSD for the project.*

	▪ *Hazardous Waste Management Program (Environmental Compliance/Hazardous Waste).* ▪ *Medical Waste Management Program.* ▪ *Environmental Compliance Inspections.* ▪ *Safe School Inspection Program.* ▪ *Integrated Pest Management Program.* ▪ *Fats Oil and Grease Management Program.* ▪ *Solid Waste Management Program.*

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

Less than Significant Impact. As part of Section 402 of the Clean Water Act, the United States Environmental Protection Agency (EPA) has established regulations under the National Pollution Discharge Elimination System (NPDES) program to control direct storm water discharges. In California, the State Water Resources Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the Regional Water Quality Control Board (RWQCB) to preserve, protect, enhance, and restore water quality.

A project would normally have a significant impact on surface water quality if discharges associated with a project will create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if a project will discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts will also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the SWRCB. These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

As required under the NPDES, the proposed Project would be responsible for the preparation of a SWPPP and implementation of BMPs to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. The proposed Project would also be subject to the SC-HWQ-1 and SC-HWQ-2, as detailed above.

Implementation of a SWPPP and compliance with NPDES and the applicable SCs will ensure that the construction of the proposed Project would not violate any water quality standards and discharge requirements, or otherwise substantially degrade water quality. Thus, construction related ground disturbance activities as well as operation activities would not result in significant impacts to water quality. Therefore, water quality 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. A significant impact would occur if the proposed Project substantially depleted groundwater or interfered with groundwater recharge.

4. Environmental Checklist and Analysis

The proposed Project includes the demolition and removal of existing permanent and relocatable buildings, construction of new buildings, and landscape and access improvements throughout the Campus. The Project site is currently developed with 54 buildings, surface parking and blacktop and includes very little permeable surface. Build out of the proposed Project would not create substantially more impermeable surfaces that would disrupt groundwater recharge more than what currently exists. Furthermore, groundwater levels in the City are maintained through the City and specific recharge basins. The site is not identified as an opportunity for groundwater recharge activities.[68] Additionally, no groundwater production wells are located in the vicinity of the Project site, nor is the proposed Project growth inducing. Therefore, impacts related to groundwater recharge would be less than significant.

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

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

Less than Significant Impact. A significant impact would occur if the proposed Project substantially alters the drainage pattern of the site or an existing stream or river, so that substantial erosion or siltation would result on- or off-site. No stream or river is present on the Project site, but the Los Angeles River Flood Control Channel serves as a majority of the Campus's southern border and could be impacted by Project construction. The topography of the Project site is relatively level. Development of the proposed Project would slightly change the site configuration; however, the Project site drainage would remain similar to existing conditions.

During construction, erosion and siltation from the Project site could increase as a result of soil disturbance from surface grading and limited excavation. Construction-related activities that expose soils to potential mobilization by rainfall/runoff and wind are primarily responsible for sediment releases. Such activities include removal of vegetation, grading and trenching of the site. Environmental factors that affect erosion include topographic, soil, and rainfall characteristics. Unless adequate erosion controls are installed and maintained at the site during construction, significant quantities of sediment may be delivered from the concrete channel and discharged into the Pacific Ocean. As required by SC-HWQ-2 detailed above, the construction contractor would be required to prepare a SWPPP and implement BMPs to prevent sediment flows from entering storm drainage systems by constructing temporary filter inlets around existing storm drain inlets prior to the stabilization of the construction site area. Specific BMPs will be detailed in the SWPPP. As such, impacts would be less than significant.

[68] Environmental Protection Agency (EPA). Pacific Southwest Region 9, Designated Sole Source Aquifers. 2015. Web. https://archive.epa.gov/region9/water/archive/web/html/ssa.html

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

Less than Significant Impact. As mentioned above, a significant impact would occur if the proposed project substantially altered the drainage pattern of an existing stream or river so that flooding would result. As aforementioned, while no streams or rivers exist on the Project site, the Los Angeles River Flood Control Channel makes up a large portion of the site's southern boundary and has the potential to be impacted by the construction phases of the proposed Project.

As required by SC-HWQ-1 detailed above, an NPDES storm water permit application shall be submitted and the effluent quality criteria shall be specified in the permit, as determined by the Los Angeles RWQCB based on water guidelines. Monitoring of the outflow from the collection system may be required in the permit to ensure that the requirements and water quality criteria specified by the permit are achieved. The contractor shall use reclaimed water during the construction process, specifically for dust control, soil compaction, and concrete mixing to the extent feasible. In addition, the project would comply with LAUSD SC-HWQ-2 and SC-HWQ-3, as detailed above.

Compliance with SC-HWQ-1 through SC-HWQ-3 would ensure alteration of existing drainage patterns resulting in flooding would not occur. Impacts would be less than significant.

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

Less than Significant Impact. A significant impact would occur if runoff water exceeded the capacity of existing or planned storm drain systems serving the Project site. A project-related significant impact would also occur if the project would substantially increase the probability that polluted runoff would reach the storm drain system.

There are three general sources of potential short-term construction-related stormwater pollution associated with the proposed Project.

1) The handling, storage, and disposal of construction materials containing pollutants. Generally, routine safety precautions for handling and storing construction materials effectively mitigate the potential pollution of stormwater by these materials. These same types of common sense, "good housekeeping" procedures, or BMPs, can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes.

2) The maintenance and operation of construction equipment. Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze or other fluids on the construction site are also common sources of stormwater pollution and soil contamination.

3) Ground-disturbing activities (e.g., grading, excavation, etc.) which when not controlled, may generate soil erosion and/or loss of top soil via storm runoff or mechanical equipment. Grading activities can greatly increase erosion processes. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration

of pollutants. During construction, the District shall be required to implement all applicable and mandatory BMPs in accordance with the SWPPP as required by SC-HQW-2. When properly designed and implemented, these "good-housekeeping" practices are expected to reduce short-term construction-related impacts to a less than significant level.

Activities associated with operation of the proposed Project would generate substances that could degrade the quality of water runoff. The deposition of certain chemicals by cars in the surface parking lot could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system.

However, as mentioned in IX a) and b), impacts to water quality would be reduced since the proposed Project must comply with water quality standards and wastewater discharge BMPs set forth by the SWRCB and through the LAUSD SCs SC-HQW-1 through SC-HQW-3. In addition, LAUSD's construction contractor would prevent sediment flows and other pollutants from entering storm drain systems through trapping particles in temporary filter drain inlets. Storm drain improvements onsite shall provide capacity to carry 25-year peak runoff rates in case of additional stormwater. Compliance with existing regulations would reduce the potential for the proposed Project to exceed the capacity existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff impacts to a less than significant level. Impacts would be less than significant.

i) Impede or redirect flood flows?

Less than Significant Impact. The Federal Emergency Management Agency (FEMA) prepares and maintains Flood Insurance Rate Maps (FIRMs), which show the extent of Special Flood Hazard Areas (SFHAs) and other thematic features related to flood risk. The Project site is located in an area of minimal flood risk (Zone X) and is not located within a 100-year flood zone, as mapped by FEMA.[69] Despite the site's proximity to the Los Angeles River, which is s "regulatory floodway" (Zone AE), any flood hazard would be contained in the channel. Furthermore, the proposed Project does not include an increase in impervious surfaces or new construction that would impede or redirect flood flows more than what currently occurs at the Project site. As such, the impact would be less than significant.

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

Less than Significant Impact. A significant impact would occur if the proposed project exposed persons or structures to an area susceptible to inundation by flooding, seiche, or tsunami. The Federal Emergency Management Agency (FEMA) prepares and maintains Flood Insurance Rate Maps (FIRMs), which show the extent of Special Flood Hazard Areas (SFHAs) and other thematic features related to flood risk. The Project site is located in an area of minimal flood risk (Zone X) and is not located within a 100-year flood zone, as mapped by FEMA. Despite the site's proximity to the Los Angeles River, which is s "regulatory floodway" (Zone AE), any flood hazard would be contained in the channel. Furthermore, the proposed Project does not

[69] FEMA. Flood Map Service Center, Panel 06037C1785G. 2018. Web. https://msc.fema.gov/portal/search

include an increase in impervious surfaces or new construction that would impede or redirect flood flows more than what currently occurs at the Project site.

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, or lake. A tsunami is a great sea wave produced by a significant undersea disturbance. The Project site lies 11 miles northeast of the Pacific Ocean and is not mapped within a tsunami hazard zone.[70] Similarly, damage to the Project site due to a seiche is not likely because no substantial bodies of water are present near the site. As the Los Angeles River is thin and channelized near the Project site and is highly controlled, it does not present a potential threat relating to seiches. Therefore, impacts related to inundation by flooding, seiche, or tsunami would be less than significant.

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

Less than Significant Impact. The Water Quality Control Plan for the Los Angeles River Basin was developed by the Los Angeles Regional Water Quality Control Board in 1995 (as amended) to regulate activities that may affect surface water and/or groundwater quality. The proposed Project would adhere to all applicable rules and regulations regarding water quality set by the SWRCB. The proposed Project would not increase capacity, or resulting demand, on the Project site. As such, additional extraction or procurement would not be necessary. As described above, the District will be required to develop a SWPPP and implement all applicable BMPs. Such action would be performed in accordance with applicable water plans. As such impacts related to conflict with existing water plans would be less than significant.

[70] LA Department of City Planning, 1996.

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

Explanation:

a) Physically divide an established community?

No Impact. The Project site is located in the Reseda neighborhood of the City, a primarily residential area, within the Reseda-West Van Nuys Community Plan Area (CPA) on a site that is already developed as a school. The proposed Project would involve the demolition of buildings and the construction of their replacements. The new buildings will be structurally similar to those before them and there will be no change to the current land use at the site. As such, a community will not be divided and there would be no impact.

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

No Impact. The 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 rendering all LAUSD school sites, including Reseda HS, exempt from local land use regulations (Bd. Of Ed Rpt No. 256-18/19).

Even if it were not exempt, the City of Los Angeles General Plan use designation for the Project site is "Public Facilities." Furthermore, the Reseda-West Van Nuys CPA Land Use Designation for the Project site is also "Public Facilities." The LAMC Zoning Plan has designated the proposed Project site as PF-1. PF (Public Facilities) is a zone for the use and development of publicly owned land, including public elementary and secondary schools. The 1 in the zoning designation is for Height District No. 1. As previously discussed, LAUSD has rendered the local City of Los Angeles Zoning Ordinance inapplicable to the proposed Project; therefore, no height restrictions will apply to the Project. Therefore, the proposed Project would not conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project site as it is zoned for public facility use and would be developed as a public facility use. No impact would occur.

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

Explanation:

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

No Impact. The Project site is located in a residential area of the Reseda-West Van Nuys CPA in the City of Los Angeles. There are no identified mineral resources within the Project site as designated by the City General Plan.[71] Therefore, no impact associated with mineral resources would occur.

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. Refer to Threshold a) above.

[71] City of Los Angeles General Plan. Conservation Element, Exhibit A Mineral Resources. 2001. Report. http://planning.lacity.org/cwd/gnlpln/ConsvElt.pdf, accessed 05/31/2019

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

Explanation:

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

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

SC-N-8	*Projects within 500 feet of a non-LAUSD sensitive receptor, such as a residence, shall be reviewed by OEHS to determine what, if any, feasible project specific noise reduction measures are needed.* *The Construction Contractor shall implement project specific noise reduction measures identified by OEHS. Noise reduction measures may include, but are not limited to, the following:* *Source Controls* ▪ *Time Constraints – prohibiting work during sensitive nighttime hours.* ▪ *Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential: only between 7:00 AM and 7:00 PM)* ▪ *Equipment Restrictions – restricting the type of equipment used.* ▪ *Substitute Methods – using quieter methods and/or equipment.* ▪ *Exhaust Mufflers – ensuring equipment has quality mufflers installed.* ▪ *Lubrication & Maintenance – well maintained equipment is quieter.* ▪ *Reduced Power Operation – use only necessary size and power.* ▪ *Limit Equipment On-Site – only have necessary equipment on-site.* ▪ *Noise Compliance Monitoring – technician on site to ensure compliance.* ▪ *Quieter Backup Alarms – manually-adjustable or ambient sensitive types.* *Path Controls* ▪ *Noise Barriers – semi-permanent or portable wooden or concrete barriers.* ▪ *Noise Curtains – flexible intervening curtain systems hung from supports.* ▪ *Enclosures – encasing localized and stationary noise sources.* ▪ *Increased Distance – perform noisy activities farther away from receptors, including operation of portable equipment, storage and maintenance of equipment.* *Receptor Controls* ▪ *Window Treatments – reinforcing the building's noise reduction ability.* ▪ *Community Participation – open dialog to involve affected residents.* ▪ *Noise Complaint Process – ability to log and respond to noise complaints. Advance notice of the start of construction shall be delivered to all noise sensitive receptors adjacent to the project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the Construction Contractor and the District. In the event of noise complaints noise shall be monitored from the construction activity to ensure that construction noise is not obtrusive.*
SC-N-9	*Construction Contractor shall ensure that LAUSD interior classroom noise and exterior noise standards are met to the maximum extent feasible, or that construction noise is not disruptive to the school environment, through implementation of noise control measures, as necessary.5 Noise control measures may include, but are not limited to:* *Path Controls* ▪ *Noise Attenuation Barriers6 – 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 un-mitigatable cases, students shall be moved to temporary classrooms / facilities away from the construction activity.*

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Characteristics of Noise

Noise is usually defined as unwanted sound that is an undesirable byproduct of society's normal day-to-day activities. Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm, and/or when it has adverse effects on health. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). The human ear does not respond uniformly to sounds at all frequencies; for example, it is less sensitive to low and high frequencies than medium frequencies, which more closely correspond with human speech. In response to the sensitivity of the human ear to different frequencies, the A-weighted noise level (or scale), which corresponds better with people's subjective judgment of sound levels, has been developed. This A-weighted sound level, referenced in units of dB(A), is measured on a logarithmic scale such that a doubling of sound energy results in a 3 dB(A) increase in noise level. In general, changes in a community noise level of less than 3 dB(A) are not typically noticed by the human ear.[72] Changes from 3 to 5 dB(A) may be noticed by some individuals who are extremely sensitive to changes in noise. A greater than 5 dB(A) increase is readily noticeable, while the human ear perceives a 10 dB(A) increase in sound level to be a doubling of sound. On A-weighted scale, the range of human hearing extends from approximately 3 to 140 dB(A).

Equivalent Noise Level (Leq) is the sound level corresponding to a steady-state A-weighted sound level containing the same total energy as several single event noise exposure level events during a given sample period. Leq is the "acoustic energy" average noise level during the period of the sample. It is based on the observation that the potential for noise annoyance is dependent on the total acoustical energy content of the noise. The equivalent noise level is expressed in units of dB(A). Leq can be measured for any period, but is typically measured for 15 minutes, 1 hour, or 24-hours. Leq for a 1-hour period is used by the Federal Highway Administration (FHWA) for assessing highway noise impacts. Leq for 1-hour is referred to as the Hourly Noise Level (HNL) in the California Airport Noise Regulations and is used to develop Community Noise Equivalent Level values for aircraft operations. Construction noise levels and ambient noise measurements in this section use the Leq scale.

Effects of Noise

Noise is known to have several adverse effects on humans, which has led to laws and standards being set to protect public health and safety, and to ensure compatibility between land uses and activities. Adverse effects of noise on people include hearing loss, communication interference, sleep interference, physiological responses, and annoyance. Each of these potential noise impacts on people is briefly discussed in the following narrative.

Hearing loss is generally not a community noise concern, even near a major airport or a major freeway. The potential for noise induced hearing loss is more commonly associated with occupational noise exposures in heavy industry, very noisy work environments with long term exposure, or certain very loud recreational activities, such as target shooting, motorcycle or car racing, etc. The Occupational Safety and Health Administration (OSHA) identifies a noise exposure limit of 90 dB(A) for 8 hours per day to protect from

[72] California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Report. 2013.

hearing loss (higher limits are allowed for shorter duration exposures). Noise levels in neighborhoods, even in very noisy neighborhoods, are not sufficiently loud to cause hearing loss.

Communication interference is one of the primary concerns in environmental noise problems. Communication interference includes speech interference and interference with activities such as watching television. Noise can also interfere with communications within school classrooms, as well as classroom activities. Normal conversational speech is in the range of 60 to 65 dB(A) and any noise in this range or louder may interfere with speech.

Noise can make it difficult to fall asleep, create momentary disturbances of natural sleep patterns by causing shifts from deep to lighter stages, and cause awakening. Noise may even cause awakening that a person may or may not be able to recall.

Physiological responses are those measurable effects of noise on people that are realized as changes in pulse rate, blood pressure, etc. Studies to determine whether exposure to high noise levels can adversely affect human health have concluded that, while a relationship between noise and health effects seems plausible, there is no empirical evidence of the relationship.

Annoyance is the most difficult of all noise responses to describe. Annoyance is a very individual characteristic and can vary widely from person to person. Noise that one person considers tolerable can be unbearable to another of equal hearing capability. The level of annoyance depends both on the characteristics of the noise (including loudness, frequency, time, and duration), and how much activity interference (such as speech interference and sleep interference) results from the noise. However, the level of annoyance is also a function of the attitude of the receiver. Personal sensitivity to noise varies widely. It has been estimated that 2 to 10 percent of the population is highly susceptible to annoyance from any noise not of their own making, while approximately 20 percent are unaffected by noise.[73] Attitudes may also be affected by the relationship between the person affected and the source of noise, and whether attempts have been made to abate the noise.

Applicable Noise Regulations

State

The State of California's 2017 General Plan Guidelines establish guidelines for acceptable exterior noise levels for each county and city. The California Department of Health Services established these guidelines for acceptable exterior noise levels for each county and city. These standards and criteria are incorporated into the land use planning process to reduce future noise and land use incompatibilities. **Table 7** illustrates State guidelines that allow the District to consider the compatibility between land uses and outdoor noise.

State interior noise standards were established in 1974, when the California Commission on Housing and Community Development adopted noise insulation standards for residential buildings (Title 24, Part 2,

[73] Wayne County Airport Authority. Background Information on Noise & its Measurement. Report. 2009

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California Code of Regulations). Title 24 establishes standards for interior room noise attributable to outside noise sources. Title 24 also specifies that acoustical studies should be prepared whenever a residential building or structure is proposed to be located in areas with exterior noise levels of 60 dB Day-Night Average Noise Level (Ldn) or greater. The acoustical analysis must show that the building has been designed to limit intruding noise to an interior level not exceeding 45 dB Ldn for any habitable room.

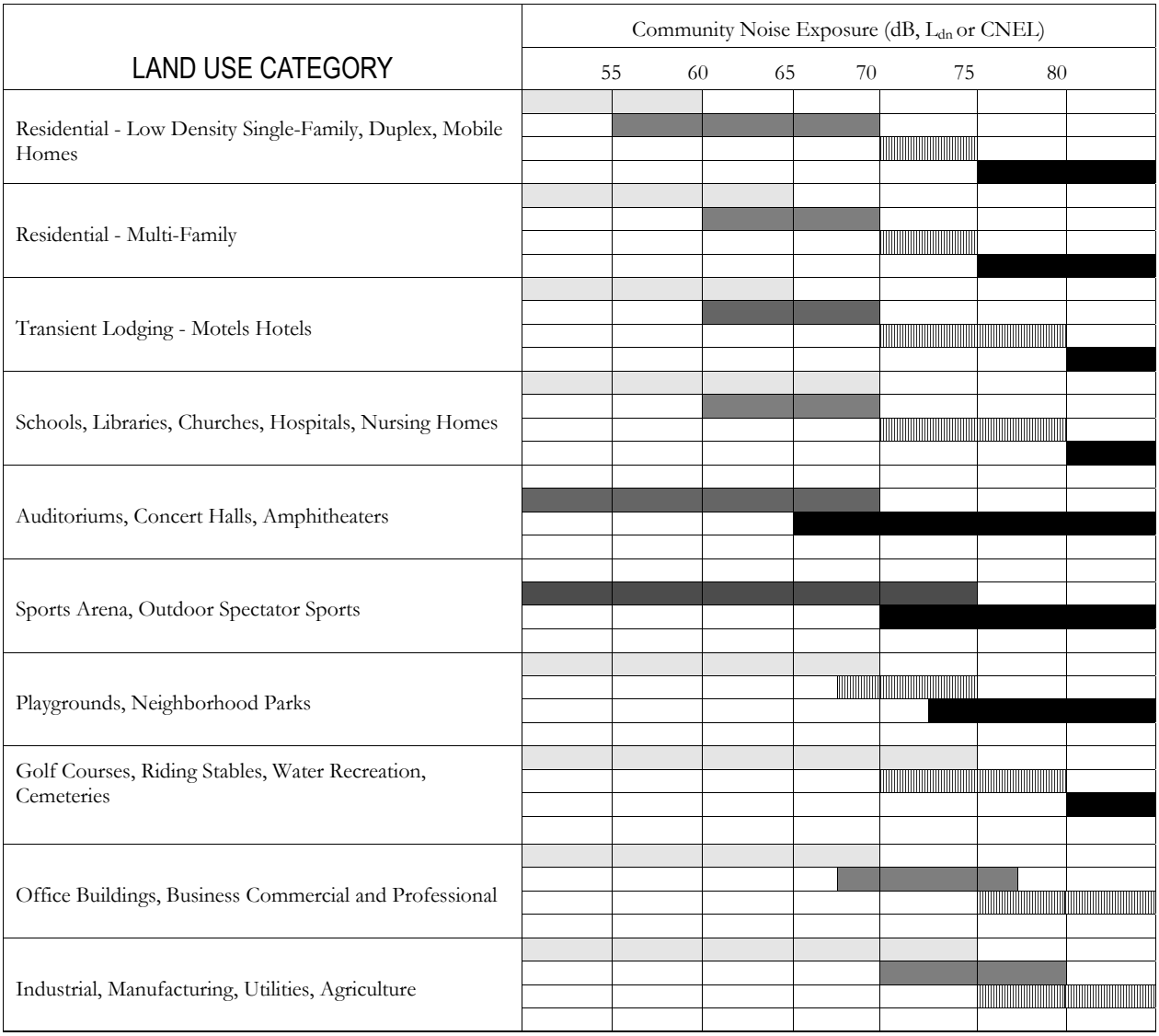
Local

In 2006, the City released the L.A. CEQA Thresholds Guide to provide further guidance for the determination of significant construction and operational noise impacts. According to the Guide, a project would, under normal circumstances, have a significant impact if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;
- Construction activities lasting more than 10 days in a three month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or
- Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 P.M. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00p.m. on Saturday, or at any time on Sunday.
- For a project's operational impacts:
- The ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category…
- Any 5 dBA or greater noise increase.

These "normally unacceptable" and "clearly unacceptable" categories refer to those outlined by the State's noise and land-use compatibility chart, shown in **Table 7**.

Table 7
Land Use Compatibility for Community Noise Environments



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

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

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

Clearly Unacceptable - New construction or development should generally not be undertaken.

Source: California Office of Planning and Research "General Plan Guidelines, Noise Element Guidelines (Appendix D)", 2017.

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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 with Mitigation

On-Site Construction Noise Impacts

For purposes of assessing noise impacts on sensitive populations, the following sensitive receptors to the Project site were identified for analysis:

- Reseda Park located approximately 100 feet west of the Project site.
- Single-family residences located to the north of the Project site. These residences are approximately 160 feet from the Project site.
- Single-family residences located east of the Project site. These residences are approximately 380 feet from the Project site.
- Islamic Center of Reseda located approximately 500 feet south of the Project site.
- Newcastle Elementary School located approximately 940 feet east of the Project site.
- Universal Church located approximately 1,200 feet northwest of the Project site
- Carousel Kids Daycare located approximately 1,300 feet south of the Project site
- The Magic Years Nursery School located approximately 2,100 feet southwest of the Project site.
- Sherman Oaks Center for Enriched Studies located approximately 2,150 feet southwest of the Project site.

To ascertain the ambient noise levels at these sensitive receptors, short-term, 15-minute noise readings were conducted in the project area on April 25, 2019 using a Larson Davis LxT Class 1 Sound Level Meter. When predicting maximum construction noise levels at sensitive receptors, a 6 dBA attenuation for doubling of distance was given for hard ground surface, and 3 dBA reduction was given for the first row of buildings intervening between the construction site and sensitive receptors (1.5 dBA for subsequent intervening structures), as recommended by the Caltrans Technical Noise Supplement. As shown in Tables 7 and 8, ambient noise levels were relatively uniform in this residential neighborhood, ranging from 54.8 dBA Leq at Reseda Park, the west of the Project site, to 72.6 dBA Leq at the Islamic Center of Reseda and the Sherman Oaks Center for Enriched Studies, south and southwest of the Project site, respectively.

Table 8
Construction Noise Levels – Unmitigated

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, Leq)	New Ambient (dBA, Leq)	Increase
Reseda Park	100	78.0	54.8	78.0	23.2
Residences to the North of Project Site	160	73.9	58.6	74.0	15.4
Residences to the East of Project Site	380	66.4	70.0	71.6	1.6
Islamic Center of Reseda	500	64.0	72.6	73.2	0.6
Newcastle Elementary School	940	55.5	58.6	60.3	1.7
Universal Church	1,200	53.4	58.6	59.7	1.1
Carousel Child Development	1,300	52.7	70.0	70.1	0.1
The Magic Years Nursery School	2,100	48.5	70.0	70.0	0.0
Sherman Oaks Center for Enriched Studies	2,150	48.3	72.6	72.6	0.0

Source: Impact Sciences, 2019.
Existing ambient noise levels are from the nearest worst-case (lowest) sound measurement location.

Construction activities would occur between 7:00 AM and 9:00 PM in accordance with the LAMC. The construction process was estimated to begin in the first quarter of 2022 and includes demolition of existing structures, site preparation, minimal soil work (grading), construction of new facilities, paving, and architectural coating. Each phase would include equipment that could generate a maximum noise level of approximately 90 dBA L_{eq} at 50 feet.

Table 8, Construction Noise Levels – Unmitigated summarizes projected noise levels at nearby sensitive receptors during construction activities. Land uses on the properties surrounding the Project site include single -family residential, recreational, religious, and school/daycare uses. As noted above, peak construction activities produce a cumulative reference noise level of 90 dBA at 50 feet of distance.[74] This would generate maximum off-site noise levels of up to 78.0 dBA at Reseda Park, an increase of up to 23.2 dBA. This would increase ambient noise levels above 75 dBA and represent increases of more than 5 dBA at two of the adjacent off-site receptors, Reseda Park and residences to the north. Because ambient sound levels would

[74] Federal Transit Administration. Transit Noise and Vibration Impact Assessment Manual. Report. 2018.

exceed the City of Los Angeles thresholds, the proposed Project would result in significant but mitigatable construction noise impacts.

As shown in Table 9 below**,** *Construction Noise Levels – Mitigated***,** the maximum exterior noise level during construction, after implementation of Mitigation Measures NOI-1 through NOI-4 (below), would be 72.9 dBA Leq, which is below the City's 75 dBA threshold. A maximum noise increase of 4.9 dBA would occur at Reseda Park, which is below the City's 5 dBA threshold. As a result, construction related impacts would be less than significant with mitigation incorporated.

Table 9
Construction Noise Levels – Mitigated

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, Leq)	New Ambient (dBA, Leq)	Increase
Reseda Park	100	58.0	54.8	59.7	4.9
Residences to the North of Project Site	160	58.9	58.6	61.8	3.2
Residences to the East of Project Site	380	63.4	70.0	70.9	0.9
Islamic Center of Reseda	500	61.0	72.6	72.9	0.3
Newcastle Elementary School	940	52.5	58.6	59.6	1.0
Universal Church	1,200	50.4	58.6	59.2	0.6
Carousel Child Development	1,300	49.7	70.0	70.0	0.0
The Magic Years Nursery School	2,100	45.5	70.0	70.0	0.0
Sherman Oaks Center for Enriched Studies	2,150	45.3	72.6	72.6	0.0

Source: Impact Sciences, 2019.
Existing ambient noise levels are from the nearest worst-case (lowest) sound measurement location.

In addition to the nearby sensitive receptors identified above, noise associated with construction activity has the potential to disrupt classroom activity at Reseda High School. It is anticipated that construction equipment would come as near as 50 feet to existing facilities. As such, exterior noise levels would have the potential to reach the construction reference noise level (90 dBA). Mitigation measures NOI-1 through NOI-4 are recommended to reduce the impact of construction noise to on-site sensitive receptors to the extent feasible.

Off-Site Construction Noise Impacts

With regard to off-site construction-related noise impacts, demolition activities would necessitate haul trips to export materials. While this vehicle activity would increase ambient noise levels along the haul route, ambient noise levels would not be expected to significantly increase ambient noise levels by 5 dBA or greater at any

noise sensitive land use. According to the L.A. CEQA Thresholds Guide, a 3 dBA increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming that travel speeds and fleet mix remain constant. Though the addition of haul trucks would alter the fleet mix of the anticipated haul route, their addition to local roadways would not double those roads' traffic volumes, let alone increase their traffic to levels capable of producing 5 dBA ambient noise increases. However, trucks accessing the proposed Project site, while not significantly increasing ambient noise levels, have the potential to instantaneously increase noise levels as each truck passes nearby sensitive receptors. These temporary instantaneous noise level increases may reach a maximum range of approximately 76 to 88 dBA at 50 feet from the source.[75,76] Mitigation measure MM-NOI-5 would reduce these impacts to the furthest extent technically feasible. As a result, off-site construction noise impacts related to haul trips would be considered less than significant with mitigation incorporated.

Regulatory Compliance Measure

RCM-NOI-1 The project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178,048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

Mitigation Measures

MM-NOI-1 Consistent with SC-N-8, prior to issuance of a grading permit, the construction contractor or its designees shall install temporary noise barriers along west side of the Project site which are at least 10 feet in height and capable of attenuating on-site construction noises by at least 17 dBA (e.g., 1" plywood with acoustical blankets), and install temporary noise barriers along the north side of the Project site capable of attenuating on-site construction noises by at least 12 dBA. Additionally, temporary portable sound barriers shall be used to shield construction equipment from on-site permanent classroom structures, where feasible. These noise barriers shall be maintained throughout the entire duration of construction.

MM-NOI-2 Construction activities shall be scheduled so as to avoid, to the extent feasible, simultaneously operating several pieces of equipment that cause high noise levels. This specification shall be written on all construction documents.

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75 Federal Highway Administration. Highway Construction Noise Handbook. Report. 2006.
76 Federal Transit Administration. Transit Noise and Vibration Impact Assessment Manual. Report. 2018.

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MM-NOI-3 The Project contractor shall use power construction equipment with noise shielding and muffling devices capable of attenuating sound by 3 dBA or more. This specification shall be written on all construction documents.

MM-NOI-4 During Project construction, the construction contractor shall ensure that construction equipment shall be staged near the center of the Project site, approximately 50 feet or further from permanent school buildings located on the west side of the Project site, and at least 500 feet from adjacent residential land uses, as feasible. This specification shall be written on all construction documents.

MM-NOI-5 All construction truck traffic shall avoid residential areas and other sensitive receptors to the extent feasible. It is recommended that haul trucks access the site off of Lindley Avenue near the intersection of Lindley Avenue and Victory Boulevard to most avoid sensitive receptors, as feasible.

In addition to the mitigation measures listed above, LAUSD SC SC-N-4 through SC-N-9 (detailed above) would be implemented during project construction:

Following the implementation of RCM-NOI-1, MM-NOI-1 through MM-NOI-5, and SC-N-4 through SC-N-9, impacts would be less than significant.

Operations Noise Impacts

No substantially different operational uses are proposed at the Project site post-construction. There would be no change in pick-up or drop-off areas and the capacity of the school would not be increased as a result of the proposed Project. As such, there would be no changes in operational traffic patterns that could increase noise levels. Further, the site would remain in operation as a school, and would be expected to generate the similar noise levels. Therefore, the Project would not result in any operational noise impacts. No operational impact would occur from the proposed Project.

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

Less than Significant Impact.

Characteristics of Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, and acceleration. Unlike noise, vibration is not a common environmental problem, as it is unusual for vibration from vehicular sources to be perceptible. Common sources of vibration include trains, buses, and construction activities.

Vibration Definitions

Peak particle velocity (PPV) can be used to describe vibration impacts to both buildings and humans. PPV represents the maximum instantaneous peak of a vibration signal, and it is usually measured in inches per second.[77]

Root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on land uses. RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (VdB) is commonly used to measure RMS. The decibel notation acts to compress the range of numbers required to describe vibration.[78]

Effects of Vibration

High levels of vibration may cause physical personal injury or damage to buildings. However, ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that can affect concentration or disturb sleep. Ground-borne vibration can also interfere with certain types of highly sensitive equipment or machines, such as imaging devices used in medical laboratories.

Perceptible Vibration Changes

Unlike noise, ground-borne vibration is not an environmental issue that most people experience every day. Background vibration levels in residential areas are usually well below the threshold of perception for humans, which is around 0.01 inches per second.[79] Perceptible indoor vibrations are most often caused by sources within buildings themselves, such as slamming doors. Typical outdoor sources of ground-borne vibration include construction equipment, trains, and traffic on rough roads. Traffic vibration from smooth and well-maintained roads is typically not perceptible.

Applicable Vibration Regulations

Federal

Vibration

The FTA has published guidelines for assessing the impacts of ground borne vibration associated with construction activities, which have been applied by other jurisdictions to other types of projects. According to FTA guidelines, the vibration threshold of architectural damage for non-engineered timber and mason buildings (e.g., residential units) is 0.2 in/sec PPV and 0.5 in/sec PPV for reinforced concrete, steel, or timber buildings. For institutional land uses such as schools, churches, and offices experiencing occasional events of ground-borne vibration or noise from transient sources, the FTA has established a threshold of 78 VdB.[80]

[77] California Department of Transportation. Transportation and Construction Vibration Guidance Manual. 2013.
[78] Federal Transit Administration. Transit Noise and Vibration Impact Assessment Manual. 2018.
[79] Ibid.
[80] Ibid.

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For recording and TV studio land uses, the threshold is 65 VdB for all events.[81] There are no FHWA standards for traffic-related vibrations.[82] The vibration threshold of perception is 0.01 inch/second PPV, which is approximately equal to 94 vibration decibels (VdB).[83] The FTA has also set standards that address the effect of long-term vibration on human annoyance. Ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that may affect concentration or disturb sleep.

Table 10, Land Use Disruption Vibration Thresholds summarizes FTA vibration thresholds for land use disruption from vibration impacts.

Table 10
Land Use Disruption Vibration Thresholds

Building Category	Significance Thresholds (VdB)		
	Frequent Events	Occasional Events	Infrequent Events
Buildings where vibration would interfere with interior operations.	65	65	65
Residences and buildings where people normally sleep.	72	75	80
Institutional land uses with primarily daytime use	75	78	83
Concert halls, TV studios, and recording studios	65	65	65
Auditoriums and theaters	72	80	80
Source: FTA, 2006.			

State

Vibration

To counter the effects of ground-borne vibration, the California Department of Transportation (Caltrans) has published guidance relating to structural vibration impacts, as well as human annoyance impacts. According to Caltrans, modern industrial/commercial buildings and new residential structures can be exposed to continuous ground-borne vibration levels of 0.5 inches per second without experiencing structural damage.[84]

Table 11, Building Damage Vibration Thresholds (PPV), summarizes Caltrans' vibration thresholds for building and structural damage.

81 Ibid.
82 Ibid.
83 Ibid.
84 California Department of Transportation. Transportation and Construction Vibration Guidance Manual. 2013. Report.

Table 11
Building Damage Vibration Thresholds (PPV)

Structure and Condition	Significance Thresholds (in/sec PPV)	
	Transient Sources	Continuous/Frequent/ Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5
Source: California Department of Transportation. Transportation and Construction Vibration Guidance Manual. 2013.		

Table 12, Human Annoyance Vibration Thresholds (PPV), summarizes Caltrans' vibration thresholds for human annoyance.

Table 12
Human Annoyance Vibration Thresholds (PPV)

Human Response	Significance Thresholds (in/sec PPV)	
	Transient Sources	Continuous/Frequent/ Intermittent Sources
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.9	0.1
Severe	2.0	0.4
Source: California Department of Transportation. Transportation and Construction Vibration Guidance Manual. 2013.		

Local

LAUSD Standard Conditions of Approval

As detailed above, SC-N-5 and SC-N-6 specifically address potential impacts from vibration.

Construction Vibration Impacts

Groundborne vibration generated by construction activities associated with the proposed Project would primarily affect the off-site sensitive uses located in close proximity to the Project site. The closest receptors are the residential buildings to the north and east of the Project site, and Reseda Park to the west. As shown in **Table 13, Vibration Source Levels for Construction Equipment** vibration velocities could potentially range from 0.003 to 0.089 inch/sec peak particle velocity (PPV) at 25 feet from the source activity, with corresponding vibration levels (VdB) ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use.

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The vibration velocities predicted to occur at the off-site sensitive receptors would be a maximum of approximately 0.011 PPV at the closest adjacent receptors located approximate 100 feet from the Project site. While these are non-engineered timber and masonry buildings considered to be "fragile," no residences would experience a PPV groundborne vibration level that exceeds 0.2 inch per second. Thus, vibration impacts associated with building damage due to construction activities at the Project site would be less than significant and no mitigation measures are required.

Table 13
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018

In terms of human annoyance, the vibration levels experienced by off-site sensitive receptors would be a maximum of approximately 69 VdB at the nearest residential receptors. The vibration levels experienced at off-site sensitive receptors would not exceed the FTA's 80 VdB threshold for residential uses. Therefore, impacts related to construction vibration would be less than significant.

Operational Phase Vibration Impacts

After construction of the Project site, there would be no additional on-site operations which are in any greater magnitude than existing conditions. There would be no operational vibration impact. Therefore, the Project would not result in any operational vibration impacts.

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

No Impact. The Project site is not in the vicinity of a private airstrip and does not include any new increased demand on air travel following construction of the Project which would adversely increase air traffic noise. Likewise, the Project site is not located within an airport land use plan or within two miles of a public airport or public use airport and does not include any new increased demand on air travel following construction of the Project which would adversely increase air traffic noise. As such, the Project would not expose employees, students, or nearby sensitive receptors to excessive airport-related noise levels. No impacts would occur from the proposed Project.

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

Explanation:

The analysis below is based on the Site Circulation Report[85] prepared for the proposed Project **(Appendix K).**

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-2	*LAUSD shall implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program.* ***OEHS Traffic and Pedestrian Safety Program*** *LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for: student drop-off areas, vehicle access, and pedestrian routes to school. School traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.*
SC-PED-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.*

[85] LIN Consulting, Inc. Site Circulation Report, LAUSD School Modernization Project- Reseda Charter High School. Prepared for Los Angeles Unified School District. 2018.

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

Less than Significant Impact. The proposed Project would continue to use the existing network of regional and local roadways that serve the area. Current conceptual plans for the renovated Campus would reconfigure the on-campus parking lot along the eastern side of Etiwanda Avenue and add a new faculty/staff parking lot on the interior of the Campus at the southwest corner of the Project site. Parking lots along Kittridge Street (used by Zane Grey Academy) and Lindley Avenue would be unchanged. The uses on the Project site would remain the same, and therefore no new incompatible use would be introduced on the Campus. Any changes in the design features that can affect pedestrian safety are subject to SC-PED-2, SC-PED-4, SC-PED-5, and SC-T-3 as detailed above.

Design of the site includes the use of standard design and engineering practices, such as standard driveway widths and turning radii and provision of adequate line of sight to avoid design elements that could result in hazards. Implementation of LAUSD OEHS CEQA Specification Manual, Appendix C, Traffic and Pedestrian Safety Requirements for New Schools and the School Design Guide, require that bus loading areas do not overlap with car loading areas, which would reduce the potential for conflicts between cars and buses arriving and departing, especially during peak periods.

Under the Design Guide, Section 2.3 LAUSD will:

- Ensure adequate and safe access for students, staff and visitors walking, entering and circulating on the campus. Vehicle traffic patterns shall not interfere with major pedestrian traffic patterns. Foot traffic shall not pass through entrance driveways.
- Provide safe and clearly indicated student drop-off and pick-up provisions by car and bus.
- Delivery and utility vehicles shall have direct access from the street without crossing playgrounds or fields.

As such, implementation of standard LAUSD conditions regarding pick-up and drop-off operations would reduce potential safety hazards regarding buses. Since the Project does not expect growth from either increased student population or operational uses, and would adhere to the LAUSD regulations and SCs described above related to pedestrian safety, impacts would be less than significant.

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

Less than Significant Impact. Refer to Threshold a) above.

g) 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 proposed Project is located on a site that is not adjacent to a major arterial roadway. Victory Boulevard and Lindley Avenue are considered arterial streets, while Kittridge Street is classified as a Collector street and Etiwanda is a Local street. All are primarily residential corridors. The closest major arterials are Sherman Way and US-101, each located approximately one mile to the north and south, respectively. Appendix D of the Site Circulation Report by LIN Consulting, Inc., shows recommended crossing points to Reseda HS established by the City.

During construction, construction vehicles would need to access the Project site. The majority of construction equipment would be staged on the site, limiting the amount of equipment that would access the site on a daily basis and trips would cease once construction is complete. The limited number of construction vehicles accessing the site would therefore not result in substantially increasing pedestrian safety hazards due to incompatible uses. Furthermore, in accordance with SC-T-4, construction-related trucks would be required to access the site during off-peak commute periods to the extent feasible.

Therefore, implementation of the proposed Project would not cause a significant impact to pedestrian safety associated with an arterial roadway or freeway.

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?	☐	☐	☐	☒

Explanation:

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

No Impact. The proposed Project would not directly induce substantial unplanned growth to the area. The proposed Project would maintain the use of the Project site as a high school and there would be no increase in the school's capacity as a result of the proposed Project. In addition, the proposed Project does not include any features such as new homes or businesses that may induce growth. The proposed Project also would not indirectly induce growth through the extension of roads or other infrastructure as no new infrastructure or roads are proposed. As such, there will be no impact.

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

No Impact. The Project site is the Reseda HS Campus and is not used for housing. Therefore, the proposed Project would not result in the displacement of existing housing or displace a substantial number of people resulting in the construction of replacement housing elsewhere. No impact would occur.

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

Explanation:

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

LAUSD Standard Conditions of Approval	
SC-PS-1	*If necessary, LAUSD shall: 1. Have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval. Provide a full site plan for the local review, including all buildings, both existing and proposed; fences; drive gates; retaining walls; and other construction affecting emergency vehicle access, with unobstructed fire lanes for access indicated.*

a) Fire protection?

Less than Significant. The Project site is currently served by the Los Angeles Fire Department Fire Station 73, located approximately 1.3 miles to the northwest of the site, and Station 100, located approximately 1.5 miles to the east of the site. Implementation of the proposed Project would not make any meaningful changes to emergency access to the Campus from Kittridge Street or Lindley Avenue. In addition, with implementation of SC-PS-1 impacts would be less than significant. Further, as the Project is not expected to substantially increase the population or size of the site, current government facilities would remain able to properly serve the Campus. Therefore, the Project would have a less than significant impact on these public services.

b) Police protection?

Less than Significant Impact. Reseda HS is under the jurisdiction of the Los Angeles School Police Department (LASPD). The LASPD provides general law enforcement services for all LAUSD campuses, however the everyday Campus activities would be under the supervision of the principal, vice principal, teachers, and other staff members. Los Angeles Police Department (LAPD) would provide additional police protection services to the Project site. The nearest LAPD station is the West Valley LAPD Station, approximately 0.9 miles northwest of the site. As explained above, the changes to Campus access and circulation would be less than significant after the implementation of SC-PS-1. Further, as the Project is not expected to increase student capacity or size of the site, current government facilities would be sufficient to

properly serve the Campus. Therefore, the Project would have a less than significant impact on these public services.

c) Schools?

No Impact. Development of the proposed Project would improve Reseda HS for its current and future students. The environmental effects of the construction and operation of the Project is considered throughout the environmental analysis in this Initial Study. The proposed Project would not include any residential component and would not directly and/or indirectly result in population growth. The proposed Project would not warrant additional schools in the area. No impact would occur.

d) Parks?

No Impact. The City of Los Angeles Parks and Recreation Department manages park facilities and provides recreation programs to local residents. Reseda Park, Randal D. Simmons Park, the Los Angeles River and Aliso Creek Confluence Park, Jesse Owens Park, and the Sepulveda Basin Off-Leash Dog Park are all within a one-mile radius of the site. The proposed Project would not include any residential uses that would result in a permanent population increase, resulting in a need for new or expanded park facilities. No impact would occur.

e) Other public facilities?

No Impact. The closest library to the proposed Project site is the West Valley Regional Branch Library, located at 19026 Vanowen Street, Reseda, CA 91335, approximately 1.0 mile from the Project site. The proposed Project would not include any residential uses that would result in a permanent population increase, resulting in a need for new or expanded library facilities. Therefore, there is no projected increase in use of public libraries and there would be no impact.

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

Explanation:

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

No Impact. Reseda Park is the closest park to the Project site, located immediately adjacent, across Etiwanda Avenue. The proposed Project would not alter the Campus population and would therefore not increase the use of Reseda Park or any other parks or recreational facilities. As such, no impact would occur.

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 Project includes roof replacements to the gymnasiums and other minor improvements. The environmental effects of the construction and operation of the Project is considered throughout the environmental analysis in this Initial Study. The proposed Project would not require the construction or expansion of additional recreational facilities, as the Campus population would not change. Therefore, there would be no impact related to requiring construction or expansion of recreational facilities.

4. Environmental Checklist and Analysis

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

Explanation:

The analysis below is based on the Traffic Study[86] prepared by KOA Corporation for the proposed Project (**Appendix L**).

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.* ▪ *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*

[86] KOA Corporation. Traffic Study, LAUSD School Modernization Project- Reseda Charter High School. Prepared for Los Angeles Unified School District. 2019.

	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.

Existing Conditions

Area Streets and Intersections

The Reseda HS Campus is generally bounded by Victory Boulevard to the south, Lindley Avenue to the east, Kittridge Street to the north, and Etiwanda Avenue to the west. The front entrance Campus gates are located on Kittridge Street between Nestle Avenue and Wynne Avenue, with the main faculty and administration parking lot accessible from Kittridge Street and two other smaller faculty and administration parking lots accessible from Etiwanda Avenue. The student parking lot is accessible via two gated entrances on Lindley Avenue and a gated entrance on Victory Boulevard. Roadway characteristics, including roadway classification identified in the City of Los Angeles *Mobility Plan 2035*,[87] for study area roadways are provided below.

Study Area Roadways

Victory Boulevard is an east-west roadway classified as a Boulevard II with three travel lanes in each direction. The posted speed limit is 45 mph within the school zone, which is defined as a roadway segment adjacent to or surrounding school grounds, and 25 mph when children are present in accordance with Section 22352 of the California Vehicle Code. Speed feedback signs are provided for both eastbound and westbound traffic. No stopping or parking is permitted any time on both sides of the street.

Lindley Avenue is a north-south roadway classified as an Avenue II with two travel lanes in each direction. The posted speed limit is 35 mph within the school zone, and 25 mph when children are present in accordance with Section 22352 of the California Vehicle Code. There is no parking on Mondays between 8:00 am to 11:00 am for street sweeping on the east side of the street and between 7:00 am to 5:00 pm during school days, with the exception of school buses, on the west side of the street.

[87] *Los Angeles Department of City Planning. Mobility Plan 2035 (California: Los Angeles, 2016)*

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Kittridge Street is an east-west roadway classified as a Collector street with one travel lane in each direction. The posted speed limit is 30 mph within the school zone, and 25 mph when children are present in accordance with Section 22352 of the California Vehicle Code. There is no parking on Mondays between 8:00 am to 11:00 am for street cleaning on the north side of the street and between 7:00 am to 5:00 pm during school days on the south side of the street.

Etiwanda Avenue is a north-south roadway classified as a Local street with one travel lane in each direction. Etiwanda Avenue dead-ends in a cul-de-sac south of Kittridge Street at the Los Angeles River. There is no posted speed limit, but a school sign is posted approximately 200 feet north of Kittridge Street in accordance with Section 22352 of the California Vehicle Code. There is no parking between 4:00 am and 6:30 am Monday through Friday on both sides of the street. There is no parking (red curb) at the end of the cul-de-sac.

Study Area Intersections

Lindley Avenue and Victory Boulevard is a signalized intersection operating under semi-actuated signal phasing with Victory Boulevard as the coordinated street. The intersection has permissive left turns for all approaches. Pedestrian phase recall occurs along both streets, with all approaches having marked crosswalks.

Lindley Avenue and Kittridge Street is a signalized intersection operating under semi-actuated signal phasing with Lindley Avenue as the coordinated street. The intersection has permissive left turns for all approaches. Pedestrian phase recall occurs along Kittridge Street, with all approaches having crosswalks, including a high-visibility crosswalk (i.e., ladder striping) on the north leg.

Chimineas Avenue and Kittridge Street is an unsignalized intersection with stop control on Chimineas Avenue.

Wynne Avenue and Kittridge Street is an unsignalized intersection with stop control on all movements.

Nestle Avenue and Kittridge Street is an unsignalized intersection with stop control on Nestle Avenue.

Etiwanda Avenue and Kittridge Street is an unsignalized intersection with stop control on all movements. All approaches have marked crosswalks. Specific characteristics of each intersection, including lane configurations, can be found in ***Appendix A***.

Transit

County of Los Angeles Metropolitan Transit Authority (Metro) is the only transit operator that provides public transit access to Reseda HS. Metro bus lines provided within the vicinity of Reseda HS are as follows:

- Victory Boulevard
  - Northwest corner of Lindley Avenue and Victory Boulevard
    - Metro 164 (westbound)
  - Southwest corner of Lindley Avenue and Victory Boulevard
    - Metro 164 (eastbound)

Metro Local Route 164 operates seven days a week between Burbank and West Hills via Victory Boulevard.

Construction and operation of the proposed Project would not alter the location of existing bus stops. LAUSD works with Metro to implement the Metro Transit Education Program which provides transit education to the public and schools along the Metro Rail Lines. It offers students the opportunity to ride the train and receive specific safety information, site specific presentations in the schools and a mobile theatre. The goal of the Transit Education Program is to increase public awareness and teach residents of the Los Angeles County how to live safely around trains and buses.[88]

There are no exclusive bicycle lanes located within the school zone, with bicyclists sharing the sidewalk with pedestrians, or the roadway with vehicles.

Sidewalks exist on both sides of Victory Boulevard, Lindley Avenue, Kittridge Street, and Etiwanda Avenue within the school zone. The concrete sidewalks on the east side of Lindley Avenue and north side of Kittridge Street are separated from vehicular traffic by a landscaped buffer, with regular gaps provided for tree planters. Per the City of Los Angeles, Mobility Plan 2035, Kittridge Street, Lindley Avenue, and Etiwanda Avenue are designated as part of the Neighborhood Enhanced Network.

A pedestrian bridge crossing the Los Angeles River at the south end of Etiwanda Avenue provides access between Reseda Park and the Reseda HS Campus. However, school administration noted that students avoid using this bridge due to personal safety concerns.

Bicycle racks and skateboard racks are provided near the main entrance gate of the Campus; during the field visit, the bicycle racks had an approximately 75% utilization rate while the skateboard racks had less than a 25% utilization rate. School administration stated that between 30 and 40 bicycles are parked on a daily basis at the racks in front of the school, and about 50 skateboards are either locked at the racks or checked in at the front desk every day.

Collected Data

Traffic counts were conducted at the following intersections on Wednesday May 29, 2019, and included vehicles, pedestrians, and bicyclists. The counts were conducted for all three volume categories during the 7:00 a.m. to 9:00 a.m. and 2:00 p.m. to 4:00 p.m. school activity peak timeframes:

- Reseda Blvd./Kittridge St.
- Etiwanda Ave./Kittridge St.
- Wynne Ave./ Kittridge St.
- Lindley Ave./Kittridge St.
- Reseda Blvd./Victory Blvd.
- Lindley Ave/Victory Blvd.

[88] LAUSD. OEHS. Traffic and Pedestrian Safety Program. Report. Available online at: https://achieve.lausd.net/Page/4238,

4. Environmental Checklist and Analysis

The peak-hour turning movement figures and other report figures are provided in **Appendix L**.

Analysis of Existing Level of Service

The traffic counts were conducted when the high school was in session, and the AM count period overlapped the inbound student travel timeframe to the school while the PM count period overlapped the outbound student travel timeframe. The vehicle volume counts, and existing approach lane configurations and traffic controls, at the signalized study intersections were applied to City of Los Angeles Department of Transportation (LADOT) Critical Movement Analysis (CMA) worksheets. For the two unsignalized study intersections, a Highway Capacity Manual analysis was applied. The existing level of service (LOS) output that resulted from this analysis is summarized in **Table 14, Existing Study Area Intersection Operations**.

Table 14
Existing Study Area Intersection Operations

	Study Intersections	AM Peak		PM Peak	
		V/C or Delay	LOS	V/C or Delay	LOS
1	Reseda Blvd. / Kittridge St.	0.443	A	0.516	A
2	Etiwanda Ave. / Kittridge St.	9.5	A	8.2	A
3	Wynne Ave. / Kittridge St.*	8.9	A	8.1	A
4	Lindley Ave. / Kittridge St.*	0.689	B	0.707	C
5	Lindley Ave. / Victory Blvd.	0.475	A	0.706	C
6	Reseda Blvd. / Victory Blvd.	0.587	A	0.670	B

** - All-way intersection, analysis was based on HCM methodology. Values denote delay per vehicle in seconds.*

All of the study intersections operate at good LOS values. The worst-case LOS values from the analysis were at the intersections of Lindley Avenue/Kittridge Street and Lindley Avenue/Victory Blvd., where the values were at C.

Analysis of Pedestrian and Bicycle Volumes

The highest AM period volumes occur at the intersection of Etiwanda Avenue/Kittridge Street, at the northwest corner of the high school Campus, where in the peak hour 442 pedestrians crossed at the south leg and 394 pedestrians crossed at the west leg. The second highest volumes occur at the intersection of Lindley Avenue/Kittridge Street, at the northeast corner of the Campus, where in the peak hour 106 pedestrians crossed at the south leg. The next highest volumes occurred at the intersection of Reseda Blvd./Victory Blvd., to the southwest of the school site.

The highest PM period volumes occurred in generally the same pattern as the AM volumes. The highest PM volumes occurred at the intersection of Etiwanda Avenue/Kittridge Street where in the peak hour 444 pedestrians crossed at the south leg and 343 pedestrians crossed at the west leg. The second highest volumes

occur at the intersection of Reseda Blvd./Victory Blvd., where in the peak hour 159 pedestrians crossed at the west leg. The next highest volumes occurred at the intersection of Lindley Avenue/Kittridge Street.

The bicycle volumes are generally low at the study intersections, with the highest turning volumes at six in the AM period at the southbound left-turn movement of the intersection of Etiwanda Avenue/Kittridge Street and at the southbound thru movement of the intersection of Reseda Blvd./Victory Blvd. PM-period volumes in the opposite travel direction are approximately the same.

Field Observations

This section provides a review of site access configurations and access issues, based on guidelines defined within the LAUSD policy document entitled Traffic and Pedestrian Requirements for New Schools. It is also based on the previous *Site Circulation Report* conducted for the Campus by LIN Consulting, Inc., dated October 17, 2018 (**Appendix K**.).

There would be no significant impacts in these areas, based on the analysis discussed here.

The site has a main entrance on the north side of Campus, but has emergency gates on other sides of the Campus, satisfying the guideline of providing multiple points of egress for emergencies.

There is no marked school bus drop off area, but rather a 'No Parking' area is signed for this purpose.

The 2018 *Site Circulation Report* identified a lack of marked crosswalks on Kittridge Street at Chimineas Avenue, Wynne Avenue, and Nestle Avenue, along the north side of the Campus. The intersection of Etiwanda Avenue and Kittridge Street, the intersection of Lindley Avenue and Kittridge Street at the northeast corner of the Campus, and the intersection of Lindley Avenue and Victory Boulevard at the southeast corner of the Campus have existing striped yellow crosswalks. The crosswalks do not have high-visibility striping but rather have single striped lines that denote the edges of the crosswalks. The intersection of Wynne Avenue and Kittridge Street is an all-way stop-sign controlled intersection at approximately the mid-point of the north frontage of the Campus. At this location, no crosswalk striping is provided.

There are uneven sidewalk surfaces on Kittridge Street and Lindley Avenue. On Lindley Avenue the sidewalk is broken in places on the east side of street and cracked with heavy weed growth on the west side. On Kittridge Street, the sidewalk is broken/cracked in places on both sides of the roadway.

Analysis of Construction Period Level of Service and Impacts

The peak of construction is expected to occur in the year 2022, when demolition is occurring and truck hauling trips would be high. The number of construction employees during this construction period was used as an input, as was the number of construction truck trips for hauling away construction debris. The construction employee number of 15 was applied, and inbound AM and outbound PM trips were assumed. The daily construction round truck trip number of 493 was multiplied by two for one-way trips and a passenger car equivalency factor of 2.5 to provide for the additional effects on capacity and lower operating speeds. Peak hour totals for trucks were calculated as being one-eighth of the daily total, assuming an eight-hour work day.

4. Environmental Checklist and Analysis

The construction-period trip generation calculations are provided in **Table 15, Project Construction Period Trip Generation**.

Table 15
Project Construction Period Trip Generation

Land Use	Average Daily trips	Am Peak			PM Peak		
		Total	In	Out	Total	In	Out
Field Personnel	30	15	15	0	15	0	15
Truck Trips	2,465	308	154	154	310	155	155
Total	**2,495**	**323**	**169**	**154**	**325**	**155**	**170**

The year-2019 traffic counts were factored upward to 2022 volumes based on a conservative annual growth rate of two percent, resulting in a total applied growth of six percent. This defined future no-project conditions. Project trip generation was added to define future with-project conditions. The construction-period intersection operations analysis is provided in **Table 16, Future With-Project Construction Study Area Intersection Operations.**

Table 16
Future With-Project Construction Study Area Intersection Operations

Study Intersection		Peak Hour	Future 2022 No Project		Future 2022 With Project		Change in V/C	Sig Impact?
			V/C	LOS	V/C	LOS		
1	Reseda Blvd. / Kittridge St.	AM	0.435	A	0.491	A	0.056	No
		PM	0..435	A	0.499	A	0.064	No
2	Etiwanda Ave. / Kittridge St.	AM	0.235	A	0.382	A	0.147	No
		PM	0.133	A	0.319	A	0.186	No
3	Wynne Ave. / Kittridge St.*	AM	0.123	A	0.173	A	0.050	No
		PM	0.080	A	0.109	A	0.029	No
4	Lindley Ave. / Kittridge St.*	AM	0.653	B	0.705	C	0.052	No
		PM	0.379	A	0.421	A	0.042	No
5	Lindley Ave. / Victory Blvd.	AM	0.849	D	0.895	D	0.046	No
		PM	0.836	D	0.883	D	0.047	No
6	Reseda Blvd. / Victory Blvd.	AM	0.818	D	0.886	D	0.068	No
		PM	0.673	B	0.691	B	0.018	No

** - All-way intersection, analysis was based on HCM methodology. Values denote delay per vehicle in seconds.*

The causing or worsening of LOS values of E or F at the study intersections due to project construction activities was considered for this analysis to be significant. Worst-case LOS values of D would occur at the intersections of Reseda Avenue/Victory Blvd. (AM and PM peak hours) and at the intersection of Lindley

Street/Reseda Avenue (AM peak hour). The LOS D conditions would be present in the future period, with or without the construction activities. LOS E conditions would not result, however.

Implementation of the proposed Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Implementation of the proposed Project would not conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks). Impacts related to alternative transportation would be less than significant.

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

Less than Significant Impact. The proposed Project would utilize the existing network of regional and local roadways that serve the Project area. There are no changes proposed to the design or configuration of roadways surrounding the Project site.

During construction, construction vehicles would need to access the Project site. The majority of construction equipment would be staged on the site, limiting the amount of equipment that would access the site on a daily basis and trips would cease once construction is complete.

Construction vehicle access to the Project site would be provided via Etiwanda Avenue on the west, Lindley Avenue on the east, Kittridge Street on the north, and Victory Boulevard on the south. Construction traffic would be restricted to truck routes submitted to OEHS in accordance with SC-T-4, which requires contractors to submit a construction worksite traffic control plan. In accordance with MM-NOI-5 construction traffic routes shall avoid residential areas and other sensitive receptors to the extent feasible. This would ensure travel in the surrounding residential neighborhoods is minimized and that construction vehicles travel along arterial roadways to access the Project site rather than through the neighborhoods or along pedestrian routes. Over the course of the proposed Project construction, truck operators should be directed by the construction manager to obey residential area speed limits, either as posted, or the prima facie speed limit of 25 mph, if not posted. The relatively low number of haul trips and worker trips over the length of the construction phase would not result in a significant increase to congestion at nearby roadways or intersections. Construction trips would be temporary and would result in a less than significant impact.

Construction loading areas would not overlap with the Reseda HS bus/vehicle loading areas. Areas of active construction would remain fenced and construction staging (i.e., storage of equipment and materials) would be contained on the Project site.

The Project is the modernization of an existing school site and does not include any growth or capacity increase from either increased student population or operational uses. Therefore, there would be no increase in vehicle trips associated with the site after the completion of the modernization and impacts would be less than significant.

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

No Impact. The proposed Project would utilize the existing network of regional and local roadways that serve the Project area. There are no changes proposed to the design or configuration of roadways surrounding the Project site. The proposed Project would not create new hazards due to design features or incompatible uses and there would be no impact.

d) Result in inadequate emergency access?

Less than Significant Impact. The Project is not anticipated to interfere with an emergency response plan or evacuation plan. Construction activities would not result in temporary partial obstruction of adjacent roadways and the District would comply with applicable regulations relating to access. Further, the proposed Project would implement SC-T-4 and would be developed in consultation with the City of Los Angeles Fire Department. Therefore, the impact would be less than significant.

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

XIX. TRIBAL CULTURAL RESOURCES.

Has a California Native American Tribe requested consultation in accordance with Public Resources Code section 21080.3.1(b)? ☒ Yes ☐ No

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

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	☐	☐	☒	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☐	☒	☐

Explanation:

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

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

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a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Less than Significant Impact. Assembly Bill 52 requires meaningful consultation with California Native American Tribes on potential impacts to Tribal cultural resources (TCRs), as defined in Public Resources Code Section 21074. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources.[89]

As part of the AB 52 process, Native American tribes must submit a written request to LAUSD (lead agency) to be notified of projects within their traditionally and culturally affiliated area. LAUSD must provide written, formal notification to those tribes within 14 days of deciding to undertake a project. The tribe must respond to LAUSD within 30 days of receiving this notification if they want to engage in consultation on the project, and LAUSD must begin the consultation process within 30 days of receiving the tribe's request. Consultation concludes when either 1) the parties agree to mitigation measures to avoid a significant effect on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached.

Pursuant to AB 52, LAUSD notified the Native American Tribes/Tribal representatives that are traditionally and culturally affiliated with the Project areas of the District's proposed Projects. These Projects included the eleven (11) Comprehensive Modernization Projects, including this Project, and one (1) Classroom Expansion Project as referenced in the District's notification letter dated January 8, 2019. Request for consultation on all twelve (12) District Projects was received from the Gabrieleno Band of Mission Indians – Kizh Nation on January 9, 2019. Two consultation dates were set for March 21, 2019 and May 21, 2019. As a result of the consultation, the Gabrieleno Band of Mission Indians – Kizh Nation provided the District with suggested mitigation measures for the Projects.

Following the meeting, the District sent a conclusion letter on June 19, 2019 determining that the Gabrieleno Band of Mission Indians – Kizh Nation have not provided sufficient evidence demonstrating that the Project site has TCRs as defined by Public Resources Code (PRC) 21074. Chairman Salas responded to this letter with a request for an additional meeting. At the requested meeting, held via conference call on August 15, 2019, Chairman Salas provided additional oral history and stated that because of the proximity to known TCRs, the Project may encounter resources. Following the meeting and the District's request for supporting evidence, Chairman Salas provided further tribal history and requested to have a Native American monitor present during all ground disturbances. Included with this request was a document describing the same suggested mitigation measures that were previously provided for TCRs. In addition, the following documents (titles are publicly available) were included in response to the District's request for supporting documentation:

1. The old Spanish and Mexican ranchos of Los Angeles County (Gerald 1937);
2. Kirkman-Harriman Pictorial and Historical Map of Los Angeles County 1860-1937 (Kirkman 1938);

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

3. Official map of the County of Los Angeles, California (Wright 1898);
4. Excerpt describing the location of a village
5. Excerpt describing habitations (Southwest Museum Leaflet)
6. Excerpt describing the number of huts in a rancheria

A review of these documents did not find substantial evidence of an existing TCR within the Project site. No supporting documents indicated why the Project site should be considered to have a high potential for containing TCRs; therefore, Native American monitoring for TCRs during all ground disturbances is not 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.

Request for consultation from the Fernandeño Tataviam Band of Mission Indians for this Project and two others was received on January 29, 2019. Consultation with Fernandeño Tataviam Band of Mission Indians was completed on April 2, 2019. The result of the consultation is to include SC-TCR-1 and SC-TCR-2 to ensure that there will be no impacts to Tribal Cultural Resources. In addition, as part of the consultation process LAUSD agreed to notify the Fernandeño Tataviam Band of Mission Indians in the event of a discovery of potential Tribal cultural resources during construction of the Project.

The school site has not been recommended for historic designation and is not identified on any of the historic resource lists/databases, including the National Register of Historic Places and the California State Historical Landmarks, Points of Historical Interest, and Register of Historic Places.[90] No Tribal cultural resources have been identified on the Project site and, as discussed in Section V, Cultural Resources (b) of this Initial Study, it is unlikely that any Tribal cultural resources will be encountered on the Project site due to previous development at the site. In the unlikely event that construction-related ground disturbance results in the discovery of potential Tribal cultural resources, compliance with SC-TCR-1 and SC-TCR-2 would ensure that potential impacts to Tribal cultural resources are avoided. Impacts to Tribal cultural resources would be less than significant.

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. See Response to Threshold (a) above.

[90] Rincon Consulting, Inc. Reseda High School Historical Resources Evaluation Report. Report. Prepared for Los Angeles Unified School District. 2018.

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	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 new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Explanation:

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

LAUSD Standard Conditions of Approval	
SC-HWQ-1	*LAUSD shall design and construct the project to meet or exceed the current and applicable stormwater guidelines.* ***Stormwater Technical Manual*** *This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). These guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) and the mandated post-construction element of the NPDES program requirements.*
SC-HWQ-2	*LAUSD shall implement the applicable stormwater requirements during construction activities.* ***Compliance Checklist for Storm Water Requirements at Construction Sites*** *This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.*
SC-USS-1	*Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities:* ***School Design Guide.*** *Establishes a minimum non-hazardous construction and demolition (C&D) debris recycling requirements of 75% by weight. Construction and demolition waste shall be recycled to the maximum extent feasible.* ***Construction & Demolition Waste Management.*** *This document outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of non-hazardous waste materials generated during*

	demolition and/or new construction to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling, salvaging and/or reusing a minimum of 75% of the C&D waste generated by weight.
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 multipurpose rooms.*

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 proposed Project is the modernization of an existing site that is served by water, wastewater, stormwater drainage, electric, natural gas, and telecommunication facilities. The proposed Project would not increase generated wastewater as staff and enrollment would not increase due to Project implementation. On the contrary, the proposed Project would reduce the number of classrooms from 117 to 72, in observation of the shrinking school-age population across LAUSD. With regards to stormwater, a significant impact would occur if the volume of stormwater water runoff would increase to a level exceeding the capacity of the storm drain system serving a project site, requiring the construction of new stormwater drainage facilities.

As described in the Project Description, the proposed Project does include the replacement and/or upgrade of existing utilities infrastructure on the Project site. This would be expected to include minor trenching to limited depths where existing utilities are located. However, as described in IX e), the proposed Project would not result in a significant increase in site runoff, or significant changes in the local drainage patterns. Similarly, discussion in VI a) indicates that current electrical service providers have the capacity to meet the demand of the proposed Project, which would connect to existing easements and power lines. Natural gas and telecommunication needs would mirror current demand at the Campus, and operation of the proposed Project would not necessitate the construction, relocation, or expansion of such facilities. Further, it is expected that the new buildings and site design would be more efficient and would likely reduce utilities demand on site as capacity would not change.

As there would not be substantial generation of wastewater or storm water by the proposed Project, nor a need for new or expanded electricity, natural gas, or telecommunication facilities, the impact would be less than significant.

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

Less than Significant Impact. Senate Bill 221 and Senate Bill 610 amended existing California law regarding land use planning and water supply availability by requiring more information and assurance of supply than is currently required in an Urban Water Management Plan (UWMP). As of January 1, 2002, California law requires water retail providers to demonstrate that sufficient and reliable supplies are available to serve large-scale developments (i.e., 500 dwelling units or 250,000 square feet of commercial space) prior to completion of the environmental review process and approval of such large-scale projects.

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Under SB 610, it is the responsibility of the water service provider to prepare a Water Supply Assessment (WSA) requested by a City or County for any "project" defined by Section 10912 of the Water Code that is subject to CEQA.

Section 10912 of the Water Code defines a "project" as

- a proposed residential development of more than 500 dwelling units;
- a proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- a proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- a proposed hotel or motel, or both, having more than 500 rooms;
- a proposed industrial, manufacturing or processing plant, or industrial park, planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor space;
- a proposed mixed-use project that includes one or more of the previously listed projects; or
- a proposed project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling-unit project.

The proposed Project is the modernization of an existing school site, and at buildout would not increase enrollment capacity or staffing, thus the proposed Project does not meet any of the criteria resulting in the need for a WSA; therefore, a WSA is not necessary.

During construction, water may be used on site for dust suppression or similar activities. The small amount of water necessary during construction of the proposed Project would not result in the need for new or expanded water entitlements. Construction of the proposed Project would not result in a significant impact to the City's existing water supply.

Buildout of the proposed Project would generate a demand on the City's water supplies similar to that of the current demand. Water supply to the Project site is provided by the LADWP. As the proposed Project would not increase the enrollment capacity of the Campus, the proposed Project would not increase demand on the City's water supplies.

Further, implementation of SC-USS-2 for water supply would also offset potential impacts associated with the proposed Project. With implementation of SC-USS-2, impacts would be less than significant.

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. Refer to Threshold a) above.

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. Construction of the proposed Project would generate construction debris. Waste materials generated during construction are expected to be typical construction debris, including concrete, stucco, asphalt, rocks, building materials, wood, paper, glass, plastic, metals, cardboard, and other inert wastes (i.e., wastes that are not likely to produce leachates of environmental concern), as well as green wastes. The District would be subject to the 2016 CAL Green Construction Waste Reduction Requirements that require 65 percent of the construction waste generated on the Project site be diverted from landfills.[91] Waste generated during demolition and construction that is not recycled would result in an incremental and intermittent increase in solid waste disposal at landfills; however, this increase in solid waste would be short-term and not exceed the available capacities of area landfills. In addition, the proposed Project would be subject to SC-USS-1 detailed above.

The Project would comply with all waste recycling/reuse requirements in California Green Building Code Section 5.408, and the LAUSD School Design Guide & Specification 01340, Construction & Demolition Waste Management, that requires the collection and separation of all construction and demolition waste materials on-site, reuse or recycling on site, transportation to approved recyclers, transportation to legally designated landfills, for the purpose of recycling, salvaging, and/or reusing 75% of the construction and demolition waste generated. Thus, construction impacts related to solid waste would be less than significant.

Operationally, the District contracts with private waste haulers to dispose of solid waste generated on school campuses. As the Project would not increase the enrollment capacity of the school, the proposed Project would not expand total solid waste generation within the District, and sufficient capacity exists to serve existing students. The proposed Project would comply with the recycling requirements in AB 341 and would adhere to SC-USS-3 for accessible collections of recycling material.

As operational solid waste generated by Reseda HS would not change as a result of the proposed Project and as the Project would adhere to all applicable laws and regulations regarding solid waste, the impact would be less than significant impact.

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

Less than Significant Impact. During construction and operation of the proposed Project, the District would comply with all applicable City, County, and state solid waste diversion, reduction, and recycling mandates. Additionally, the proposed Project would be subject to SC-USS-3. Compliance with SC-USS-3 would ensure Project compliance with statutes and regulations governing solid waste and the impact would be less than significant.

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[91] CalRecycle. Frequently Asked Questions. 2018. Web. https://www.calrecycle.ca.gov/lgcentral/library/canddmodel/instruction/faq#CALGreen

4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. 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?	☐	☐	☐	☒

Explanation:

No Impact. The proposed Project is located in a highly developed residential neighborhood in the City of Los Angeles, and is not within or near state responsibility areas or lands classified as high fire hazard severity zones. No impacts would occur related to wildfire risk.

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

Explanation:

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

Less than Significant with Mitigation. As discussed in Section IV, Biological Resources, the proposed Project would not significantly impact any known threatened, endangered, or rare species or their habitats, locally designated species, locally designated natural communities, riparian or wetland habitats. Further, because the site and surrounding area is already developed, implementation of the Project would not impact the habitat or population of the Project site and the surrounding area, the Project would not impact the habitat or population level of fish or wildlife species, nor would it threaten a plant or animal community, nor impact the range of a rare endangered plant or animal.

As discussed in Section V, Cultural Resources and Section VII, Geology and Soils, the Project would not impact historical resources and potential impacts related to archaeological and paleontological resources would be less than significant following the implementation of the regulatory compliance measures, and **SC-CUL-6, SC-CUL-9**, **SC-CUL-10, and SC-CUL-11**.

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 discussion, with implementation of the SCs, the mitigation measures included in this Initial Study, and compliance with existing regulations, the proposed Project would not result in any significant adverse impacts which could contribute to a cumulatively considerable impact.

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

Less than Significant with Mitigation. As discussed in the above analyses for the Project, with implementation of the SCs, the mitigation measures included in this Initial Study, and compliance with existing regulations, the proposed Project would not result in any unmitigated significant adverse impacts. Thus, the Project would not have the potential to result in substantial adverse effect on human beings.

5. List of Preparers

5.1 LEAD AGENCY

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5. List of Preparers

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Appendix

Appendices are on CD

A. Air Quality and Greenhouse Gas Emissions Background and Modeling Data
B. Arborist Report
C. Historic Resource Evaluation Report
D. Petroleum Fuel Use Calculations
E. Preliminary Geotechnical Site Evaluation
F. Additional Geotechnical Analyses
G. Phase I Environmental Site Assessment
H. Draft Preliminary Endangerment Assessment – Equivalent Report
I. Supplemental Preliminary Endangerment Assessment Equivalent Report
J: Noise Background and Modeling Data
K: Site Circulation Report
L. Traffic Study

Appendix

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