November 2023 | Negative Declaration

49TH STREET ELEMENTARY SCHOOL

Major Modernization Project

Prepared for:

Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, California 90017
Contact: Bryan Ramos Fernandez, AICP, CEQA Project Manager
(213) 241-4210
cp-bryan.fernandez@lausd.net

Prepared by:

PlaceWorks
3 MacArthur Place, Suite 1100
Santa Ana, California 92707

Los Angeles Unified School District

Office of Environmental Health and Safety

ALBERTO M. CARVALHO
Superintendent of Schools

KARLA V. ESTRADA
Deputy Superintendent

CARLOS A. TORRES
Director, Environmental Health and Safety

JENNIFER FLORES
Deputy Director, Environmental Health and Safety

NEGATIVE DECLARATION

Pursuant to the California Environmental Quality Act (CEQA) (California Public Resources Code (PRC) Sections 2100 et seq.) and the State CEQA Guidelines (California Code of Regulations (CCR) Sections 15000 et seq.), the Los Angeles Unified School District (LAUSD or District) has completed this Negative Declaration (ND) for the project described below based on the assessment presented in the attached Initial Study.

LEAD AGENCY: Los Angeles Unified School District

PROJECT TITLE: 49th Street Elementary School Major Modernization Project

PROJECT LOCATION: The Project site is at the 49th Street Elementary School Campus (49th Street ES or Campus) at 750 East 49th Street (Assessor's Parcel Numbers [APN] 5108-011-909 and -910), within the South Park neighborhood, in the City of Los Angeles, County of Los Angeles. The proposed Project would occur on approximately on 4.3 acres of the 5.73-acre 49th Street ES Campus (Project site).

PROJECT DESCRIPTION: The District proposes to complete a major modernization project at the 49th Street ES Campus to provide facilities that are safe, secure, and aligned with the instructional program (proposed Project or Project). The Project would demolish three permanent buildings (West Classroom Building, Cafeteria/Lunch Pavilion, and Auditorium Building), and remove of three sheltered corridors. To replace the core facilities and instructional spaces, the Project would construct a one-story Kindergarten Classroom Building with four Kindergarten classrooms and associated support spaces; a one-story Multi-Purpose Room/Food Services/Library Building; lunch shelter; covered eating area for faculty; two shade structures; and new sheltered corridors. Additionally, the Project would include exterior painting of all existing building and structures to remain, as well as minor interior improvements to convert one existing classroom and the existing library into administrative workrooms. The Project would also include the installation of interim facilities to allow the school to remain operational during construction, including relocatable kitchen/scramble building and a relocatable restroom building. The proposed Project maintains the school's current capacity and total number of standard size classrooms.

EXISTING CONDITIONS: The existing Campus is located on 5.73 acres and contains seven permanent buildings: Main Classroom Building, West Classroom Building, South Classroom Building, Auditorium, Administration/Library/Classroom Building, Classroom Building, and Cafeteria. The buildings were constructed between 1923 and 1969. The existing Campus also includes 43 standard classrooms, support spaces for instruction, administrative staff, and maintenance and operations, hardcourt playgrounds, and two parking lots: one along East 49th Street with 41 parking stalls and the other along East 50th Street with seven parking

ALBERTO M. CARVALHO
Superintendent of Schools

KARLA V. ESTRADA
Deputy Superintendent

CARLOS A. TORRES
Director, Environmental Health and Safety

JENNIFER FLORES
Deputy Director, Environmental Health and Safety

stalls. The Campus does not contain any relocatable buildings. The 49th Street ES has an enrollment of 568 students in Pre-K through 5th grade in the 2022–2023 school year[1].

DOCUMENT AVAILABILITY: The ND and supporting Initial Study for 49th Street Elementary School Project are available for review at the following locations:

- Los Angeles Unified School District, Office of Environmental Health and Safety, 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017 (by appointment, call (213) 241-3199)
- 49th Street Elementary School (main office), 750 East 49th Street, Los Angeles, CA 90011
- LAUSD OEHS website: http://www.lausd.org/CEQA

SUMMARY OF IMPACTS: The attached Initial Study was prepared to identify the potential effects on the environment from the construction and operation of the modernized Campus and to evaluate the significance of those effects. Based on the environmental analysis, the proposed Project would have no impacts or less-than-significant environmental impacts related to the following topics:

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

Findings. It is hereby determined that, based on the information contained in the attached Initial Study, the proposed Project would not result in any Potentially Significant environmental impacts, and no mitigation measures would be required.

[1] California Department of Education. 2023. Data Quest. https://dq.cde.ca.gov/dataquest/dqcensus/EnrEthGrd.aspx?cds=19647336017149&agglevel=school&year=2022-23

November 2023 | Initial Study

49TH STREET ELEMENTARY SCHOOL

Major Modernization Project

Prepared for:

Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, California 90017
Contact: Bryan Ramos Fernandez, AICP, CEQA Project Manager
(213) 241-4210
cp-bryan.fernandez@lausd.net

Prepared by:

PlaceWorks
3 MacArthur Place, Suite 1100
Santa Ana, California 92707

Table of Contents

Section **Page**

1. INTRODUCTION 1
1.1 Overview 1
1.2 Background 1
1.3 California Environmental Quality Act 2
1.3.1 Initial Study 2
1.3.2 Negative Declaration 2
1.3.3 Tiering 3
1.3.4 Project Plan and Building Design 3
1.4 Impact Terminology 5
1.5 Organization of the Initial Study 5

2. ENVIRONMENTAL SETTING 7
2.1 Project location 7
2.2 Surrounding Land Use 7
2.3 Sensitive Receptors 8
2.4 Campus History 9
2.4.1 Potential Historic District 10
2.5 Existing Conditions 10
2.5.1 Existing Buildings and Site Improvements 11
2.5.2 Existing 49th Street Campus Uses 12
2.6 Existing General Plan and Zoning 13

3. PROJECT DESCRIPTION 25
3.1 Background 25
3.2 Proposed Project 25
3.2.1 Demolition and Removal 26
3.2.2 Interim Structures 26
3.2.3 Proposed Buildings 27
3.2.4 Playgrounds and Outdoor Learning Areas 31
3.2.5 Sheltered Corridors 31
3.2.6 Landscaping 31
3.2.7 Site Access, Circulation, and Parking 32
3.2.8 Construction 34
3.2.9 Removal Action Work Plan 35
3.3 Agency Reviews and Approvals 35
3.3.1 Responsible Agencies 35
3.3.2 Trustee Agencies 36
3.3.3 Other Reviewing Agency Actions and Approvals 36

4. ENVIRONMENTAL CHECKLIST AND ANALYSIS 37
4.1 Project Information 37
4.2 Evaluation of Environmental Impacts 40
4.3 LAUSD Standard Conditions 41
4.4 Environmental Checklist and Analysis 42

5. LIST OF PREPARERS 153
5.1 Lead Agency 153
5.2 CEQA Consultant 153

Table of Contents

APPENDICES

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

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

B. 49th Street Elementary School Tree Inventory Report, Carlberg Associates

C. 49th Street Elementary School Historical Resources Evaluation Report, Historic Resources Group

D. 49th Street Elementary School Historic Resources Technical Report, Historic Resources Group

E. Preliminary Geotechnical Investigation – Proposed Major Modernization Project – 49th Street Elementary School, Geotechnical Professionals Inc.

F. Phase I Environmental Site Assessment 49th Street Elementary School, Tetra Tech

G. Preliminary Environmental Assessment Equivalent Report - 49th Street Elementary School – Major Modernization Project, Ninyo & Moore Geotechnical & Environmental Sciences Consultants

H. 49th Street Elementary School Removal Action Workplan – Major Modernization, Ninyo & Moore Geotechnical & Environmental Sciences Consultants

I. Noise and Vibration Background and Modeling Data, PlaceWorks

Table of Contents

List of Figures

Figure		Page
Figure 1	Regional Location	14
Figure 2	Local Vicinity	15
Figure 3	Aerial Map	16
Figure 4	Location of Sensitive Receptors	17
Figure 5	49th Street Elementary School Potential Historic District	18
Figure 6	Existing 49th Street Elementary School Campus	19
Figure 7a	Photograph Location and Direction	20
Figure 7b	Project Site Photographs	21
Figure 8a	Existing Zoning and General Plan Land Use Designations	22
Figure 8b	Existing Zoning and General Plan Land Use Designations	23
Figure 9	Structures to be Removed	29
Figure 10	Conceptual Project Site Plan	30
Figure 11	Acoustical Noise	116

Table of Contents

List of Tables

Table		Page
Table 1	Sensitive Receptors within 50 feet of the Campus	8
Table 2	Existing School Campus	10
Table 3	Proposed Project (Demolition, Minor Interior Improvements, and Construction)	27
Table 4	Maximum Daily Regional Construction Emissions	53
Table 5	Maximum Daily Regional Operational Emissions	55
Table 6	Localized Construction Emissions	56
Table 7	Potential Historic District	70
Table 8	Net Increase in Electricity [a, b, c]	77
Table 9	Project-Related Net GHG Emissions	88
Table 10	Construction Equipment Noise Levels	113
Table 11	Project-Related Construction Noise Levels	117
Table 12	Construction Equipment Vibration Levels	119
Table 13	Construction Equipment Vibration Annoyance	120
Table 14	Construction Equipment Vibration Damage	122
Table 15	LAFD Response Metrics for 2023	130

Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ACM	asbestos-containing material
ACCM	asbestos-containing construction material
ADT	average daily trips
AQMP	air quality management plan
BMP	best management practices
BOE	Board of Education (LAUSD)
CA FID UST	California Facility Inventory Database for Underground Storage Tanks
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CARB	California Air Resources Board
CCR	California Code of Regulations
C&D	construction and demolition
CDE	California Department of Education
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CHMIRS	California Hazardous Material Incident Report System
CHPS	Collaborative for High Performance Schools
CNEL	Community Noise Equivalent Level
CMP	Los Angeles County Congestion Management Program
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
dB	decibel
dBA	A-Weighted Decibel
dBA L_{eq}	equivalent continuous sound level, in decibels
DPM	diesel particulate matter
DSA	Division of the State Architect (under the California Department of General Services)
ECHO	Enforcement and Compliance History Online
EDR	Environmental Data Resources
EIR	environmental impact report
EPA	US Environmental Protection Agency

Abbreviations and Acronyms

ESA	Environmental Site Assessment
FETU	Facilities Environmental Technical Unit
FINDS	Facility Index System
FTA	Federal Transit Administration
GHG	greenhouse gases
HVAC	heating, ventilation and air conditioning
IPCC	Intergovernmental Panel on Climate Change
LADOT	Los Angeles Department of Transportation
LAFD	City of Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAUSD	Los Angeles Unified School District
L_{dn} or DNL	Day-Night Noise Level
Leq	Equivalent Continuous Noise Level
LID	low-impact development
LST	localized significance thresholds
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
MEP	Maximum Extent Practicable
Metro	Los Angeles County Metropolitan Transportation Authority
MPH	mile per hour
$MTCO_2e$	metric ton of CO_2e
MW	Materials and Waste Management
ND	negative declaration
NPDES	National Pollutant Discharge Elimination System
OEC	other environmental conditions
OEHHA	Office of Environmental Health Hazard Assessment
O_3	ozone
OITC	outdoor-indoor transmission class
PCSD	Pacific Charter School Development
PDF	project design features
PEA	Preliminary Environmental Assessment
PF	Public Facility
PM	particulate matter

Abbreviations and Acronyms

PRC	Public Resources Code
PPV	peak particle velocity
RCRA-LQG	Resource Conservation and Recovery Act - Large Quantity Generators
REC	recognized environmental condition
RTP	Regional Transportation Plan
RWQCB	regional water quality control board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCS	Sustainable Communities Strategy
SO_2	sulfur dioxide
SoCAB	South Coast Air Basin
SRA	Source Receptor Area
STC	sound transmission class
SUP	School Upgrade Program
SUSMP	standard urban stormwater mitigation plan
SWEEPS UST	Statewide Environmental Evaluation and Planning System
SWPPP	stormwater pollution prevention plan
ULSD	ultra-low sulfur diesel
UST	underground storage tank
VdB	vibration decibel
VMT	vehicle miles traveled
VOC	volatile organic compounds

Abbreviations and Acronyms

This page intentionally left blank.

1. Introduction

1.1 OVERVIEW

The Los Angeles Unified School District (LAUSD or District) proposes to implement a major modernization project (proposed Project) of 49th Street Elementary School (49th Street ES or Campus), located at 750 East 49th Street in the South Park neighborhood in the City of Los Angeles. The proposed Project will address the most critical physical conditions and essential safety issues on the Campus to provide a safe and healthy environment that promotes learning. The proposed Project would occur on approximately 4.3 acres of the 5.73-acre 49th Street ES Campus (Project site). The proposed Project is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). The proposed discretionary action (i.e., approval of the proposed Project) by LAUSD constitutes a "project" because approval of the Project would result in a direct physical change in the environment.

1.2 BACKGROUND

In January 2014, the School Upgrade Program (SUP) was created to develop projects that modernize, build, and upgrade school facilities to improve student health, safety and educational quality. Over the course of the last several years, new sources of funds were allocated to SUP by the Board of Education as new requirements and priorities emerged and facilities needs continued to grow. These additional funds allowed further improvements to ADA accessibility, air conditioning, technology infrastructure and systems, new and expanded wellness centers, as well as other pressing school facilities needs related to safety, compliance, and instructional requirements.[1] In November 2015, the District-wide SUP project was analyzed in compliance with CEQA in the Program Environmental Impact Report (Program EIR).[2] On November 10, 2015, the BOE certified the Program EIR and adopted a Mitigation Monitoring Reporting Program (MMRP).[3]

Voters approved local bond Measure RR on November 3, 2020, providing $7 billion to upgrade and modernize campuses for 21st century learning and COVID-19 safety standards, address inequities in public school facilities, and improve accessibility, environmental efficiency, safety, and security. On August 24, 2021, the Board adopted an update to the SUP to integrate Measure RR funding and priorities into its operational framework and approved the Measure RR Implementation Plan (Implementation Plan) to help guide the identification of sites and development of project proposals (Board Report No. 027-21/22). The

[1] Facilities Division Strategic Execution Plan. https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/261//SEP/2022%20Facilities%20Services%20Division%20SEP.pdf

[2] LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." http://achieve.lausd.net/ceqa. Adopted by the Board of Education on November 10, 2015.

Implementation Plan included, among other things, the development of seven major modernization projects, one in each Board District. The 49th Street ES campus is in Board District 7.

On October 12, 2021, the Board approved project definitions for the due diligence, planning, and feasibility activities necessary to propose scope recommendations, budgets, and schedules for major modernization projects at 49th Street Elementary School (Board Report No. 085-21/22). On November 15, 2022, the Board approved the project definition for 49th Street ES (Board Report No. 074-22/23).

1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT

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

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

1.3.1 Initial Study

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. The purpose of the Initial Study is to 1) provide the lead agency with information to use as the basis for deciding the proper type of CEQA document to prepare; 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 in 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 findings in an negative declaration; 6) eliminate unnecessary EIRs; and 7) determine if the project is covered under a previously prepared EIR.

1.3.2 Negative Declaration

When an Initial Study identifies the potential for immitigable significant environmental impacts, the lead agency must prepare an EIR; however, if all impacts are found to be less than significant or can be mitigated to less than significant, the lead agency can prepare an ND or MND that incorporates mitigation measures into the project. The ND or MND includes information necessary for agencies to meet statutory responsibilities related to the proposed Project. State and local agencies will use the ND or MND when considering any permit or

[4] California Public Resources Code, § 21000 et seq (1970).
[5] California Code of Regulations, Title 14, Division 6, Chapter 3, § 15000 et seq.

other approvals necessary to implement the project. A list of the environmental topics that have been identified for study in the MND is provided in the Initial Study Checklist (Chapter 4).

1.3.3 Tiering

The proposed Project is a type of project that was analyzed in the LAUSD SUP Program EIR that was certified by the LAUSD Board of Education on November 10, 2015.[6] December, 13, 2023, the Board is expected to certify the Final Subsequent Program Environmental Impact Report (SPEIR), which addresses the environmental effects associated with the implementation of the LAUSD's School Upgrade Program (SUP). [7] The SPEIR was prepared according to CEQA 14 CCR Section 15162(a) due to substantial changes in the goals and funding for the SUP from what was evaluated in the 2015 EIR, and the implementation of Measure RR within the LAUSD SUP.

No mitigation measures are required by the Program EIR and SPEIR. The Board certified and adopted the Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects (Standard Conditions; SCs) to be applied to future projects and are uniformly applied development standards. The SCs provide sufficient performance standards for future projects to reduce environmental impacts. Preparation of an Environmental Monitoring and Reporting Program will commit the District to compliance tracking and follow-up on future SUP-related projects.

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://www.lausd.org/CEQA and at the LAUSD Office of Environmental Health and Safety, 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017.

1.3.4 Project Plan and Building Design

The proposed Project is subject to the California Department of Education (CDE) design and siting requirements, and the school architectural designs are subject to review and approval by the California Division of the State Architect (DSA). The proposed Project, along with all other SUP-related projects, is required to comply with specific design standards and sustainable building practices. Certain standards assist in reducing environmental impacts, such as the California Green Building Code (CALGreen Code),[8] LAUSD Standard Conditions of Approval (SC),[9] and the Collaborative for High-Performance Schools (CHPS) criteria.[10]

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,

[6] Program EIR for the School Upgrade Program. Report. 2015. http://achieve.lausd.net/ceqa.
[7] Program EIR for the School Upgrade Program. Report. 2023. http://achieve.lausd.net/ceqa.
[8] California Green Building Standards Code, Title 24, Part 11.
[9] LAUSD OEHS, "Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects." Update adopted by the Board of Education on February 19, 2019. http://achieve.lausd.net/ceqa.
[10] 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

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 and used by the OEHS CEQA team to offset potential environmental impacts. The SCs were largely compiled from established LAUSD design guidelines and standards, best management practices, and regulatory requirements. For each SC, applicability is triggered by factors such as the project type and existing conditions. These SCs are implemented during the planning, construction, and/or operational phases of the projects. The Board of Education adopted a previous version of the SCs on November 10, 2015 (Board Report Number 159-15/16) as part of the Program Environmental Impact Report (Program EIR) for the School Upgrade Program. It is anticipated that the BOE will adopt updates to the SCs as part of the Subsequent Program EIR for the School Upgrade Program, which is being prepared concurrently to this document. It is expected that the Subsequent Program EIR will be certified prior to the adoption of this ND; therefore, all SCs referenced in this document reflect those contained in the upcoming Subsequent Program EIR.

Collaborative for High-Performance Schools (CHPS). 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. The proposed Project would comply with CHPS and LAUSD sustainability guidelines. The design team would be responsible for incorporating sustainability features for the proposed Project consistent with the sixth edition of the California CHPS Criteria (CA-CHPS), including onsite treatment of stormwater runoff, "cool roof" building materials, lighting that reduces light pollution, water and energy-efficient design, water-wise landscaping, collection of recyclables, and sustainable and/or recycled-content building materials.

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

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

- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation.

- Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- Compensating for the impact by replacing or providing substitute resources or environments.

Mitigation measures must further reduce significant environmental impacts above and beyond compliance with federal, state, and local laws and regulations; PDFs; and SCs. The specific CHPS prerequisite criteria and LAUSD SCs are identified in the tables under each CEQA topic.[11] 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.

1.4 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.

1.5 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. This report has the following sections:

Chapter 1, ***Introduction*** identifies the purpose and scope of the MND 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.

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

1. Introduction

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

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

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

Appendices contain data supporting the analysis in this CEQA Initial Study.

2. Environmental Setting

2.1 PROJECT LOCATION

The 5.73-acre District-owned property is located at 750 East 49th Street (Assessor's Parcel Number [APN] 5108-011-909 and -910), within the South Park neighborhood in the City of Los Angeles, County of Los Angeles. The Campus is approximately 3 miles south of Downtown Los Angeles and approximately 1 mile east of Interstate 110 (I-110) and 2.3 miles south of Interstate 10 (I-10) (see Figure 1, *Regional Location*).

The Campus is bounded by East 49th Street to the north, McKinley Avenue to the east, East 50th Street to the south, and residential properties to the west (see Figure 2, *Local Vicinity* and Figure 3, *Aerial Map*). The Campus's main public entrance is located along East 49th Street.

Transit service to the Project site is provided by the Los Angeles County Metropolitan Authority (Metro), which operates Bus Line 51 along Avalon Boulevard and Bus Line 53 along Central Avenue, approximately 0.1 mile west and 0.25 mile east of the Campus, respectively. Regional service is provided by the Metro A Line, along Long Beach Avenue with the closest A Line rail stations to the Project site are Vernon, approximately 1.1 mile northeast and Slauson, approximately 1.2 mile southeast of the Campus.

The topography across the site is relatively flat, with ground surface elevations ranging from approximately 174 feet to 179 feet across the site. Within the vicinity of the site, the ground surface slopes down very gradually to the southwest (inclination of less than 1 percent).[12] The site is located outside an Alquist-Priolo Earthquake Fault Zone. The nearest active faults and related geologic structures to the site are the Puente Hills Blind Thrust and Newport-Inglewood Zone of deformation, both considered active fault zones. The site is not located in a seismic hazard zone for soil liquefaction. The Project site is not within any mapped flood hazard zone or designated floodplain. The Project site is not on any of the lists compiled under Government Code Section 65962.5.

2.2 SURROUNDING LAND USE

The Project site is predominantly surrounded by one- and two-story single- and multi-family residences except for 49th Street Park and McKinley Avenue Park. The 0.19-acre 49th Street Park owned and operated by the City of Los Angeles, abuts the Campus on a portion of the west property line. Across from the northeast corner of the Campus is the 0.11-acre McKinley Avenue Park.

[12] Preliminary Geotechnical Investigation

2.3 SENSITIVE RECEPTORS

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

In addition to students, there are sensitive receptors near the Campus, which include residences, parks, and places of worship. LAUSD has identified the nearest sensitive receptors to the Project site (see Figure 4, *Location of Sensitive Receptors*; Table 1, *Sensitive Receptors within 50 feet of the Campus*).

Table 1. Sensitive Receptors within 50 feet of the Campus

Address	Type
4825 McKinley Ave	Single Family Residence
4825 McKinley Ave	Single Family Residence
4916 McKinley Ave	Park
4920 McKinley Ave	Single Family Residence
5001 McKinley Ave	Multiple Family Residence
662 E 49th St	Multiple Family Residence
665 E 49th St	Multiple Family Residence
670 E 49th St	Park
670 E 50th St	Multiple Family Residence
671 E 49th St	Multiple Family Residence
673 E 50th St	Multiple Family Residence
674 E 50th St	Multiple Family Residence
677 E 49th St	Multiple Family Residence
683 E 49th St	Multiple Family Residence
684 E 50th St	Single Family Residence
687 E 49th St	Multiple Family Residence
690 E 50th St	Single Family Residence
695 E 49th St	Multiple Family Residence
700 E 50th St	Single Family Residence
701 E 49th St	Multiple Family Residence
708 E 50th St	Multiple Family Residence
709 E 49th St	Multiple Family Residence
715 E 49th St	Multiple Family Residence
716 E 50th St	Single Family Residence
721 E 49th St	Multiple Family Residence
724 E 50th St	Multiple Family Residence
727 E 49th St	Single Family Residence
730 E 50th St	Multiple Family Residence
733 E 49th St	Multiple Family Residence

Table 1. Sensitive Receptors within 50 feet of the Campus

Address	Type
739 E 49th St	Multiple Family Residence
740 E 50th St	Multiple Family Residence
745 E 49th St	Multiple Family Residence
748 E 50th St	Multiple Family Residence
751 E 49th St	Multiple Family Residence
755 E 49th St	Single Family Residence
758 E 50th St	Multiple Family Residence
762 E 50th St	Multiple Family Residence
763 E 49th St	Single Family Residence
771 E 49th St	Single Family Residence
772 E 50th St	Single Family Residence
773 E 49th St	Single Family Residence
775 E 49th St	Single Family Residence
775 E 51st St	Church
776 E 50th St	Single Family Residence
850 E 49th Pl	Multiple Family Residence
852 E 49th St	Multiple Family Residence
853 E 50th St	Multiple Family Residence
854 E 50th St	Multiple Family Residence

2.4 CAMPUS HISTORY

As described in the Historic Resources Evaluation Report (HRER) prepared for the proposed Project, construction of the 49th Street ES Campus was completed in the early 1910s, and the school was dedicated in 1914. The Campus initially consisted of one main building located near McKinley Avenue and two smaller classrooms near the west side of the Campus. In 1923, a two-story brick building (West Building) was also constructed on the Campus.

Following the Long Beach Earthquake of 1933, the District decided to modernize the 49th Street ES Campus, which resulted in demolition of the original main building and two smaller classrooms on the Campus. The West Building was the only building that was retained and retrofitted following the earthquake.

In 1935, 49th Street ES received funding for the construction of two new buildings (Main Building and South Building) and the reconstruction of a one-story school building (West Building). The Main Building and South Building are both single-story wood frame buildings with concrete foundations and cement plaster exteriors. Originally a two-story building, the West Building's second story was removed, and the building was reclad with cement plaster exteriors to match the design of the Main Building and South Building.

In 1936, the school's one-story Auditorium Building was constructed with reinforced concrete and steel construction, unlike the other new buildings on the Campus, which were of wood frame construction. The Administration, Library & Classroom Building was constructed in 1965; and in 1969, an addition was added to the west of the building (Classroom Building), and the new Cafeteria/Lunch Pavilion was constructed that same year. The Administration, Library & Classroom Building/Classroom Building comprise a single building, but where they are joined is visually distinctive from the interior[13].

2.4.1 Potential Historic District

As shown in Figure 5, *49th Street Elementary School Potential Historic District*, a single potential historic district was identified at 49th Street ES with a period of significance from 1935 to 1936. The potential historic district was found eligible for listing in the National Register and California Register, and for designation as a City of Los Angeles HCM under Criteria 1 and 3. As listed in Table 2, *Existing School Campus*, the potential historic district consists of four contributing buildings and three contributing sheltered corridors with a period of significance from 1935 to 1936. Two buildings located within the potential historic district boundary but constructed outside of the period of significance are considered non-contributing buildings to the potential historic district.

2.5 EXISTING CONDITIONS

The existing Campus encompasses approximately 5.73 acres (249,600 square feet). Student enrollment for the 2022-2023 school year is approximately 568 students in Pre-Kindergarten through 5th grade. The Campus includes seven permanent buildings (see Table 2) and a total of 43 standard classrooms. All existing buildings were constructed between 1923 and 1969. The existing Campus also includes support spaces for instruction, administrative staff, and maintenance and operations; a lunch pavilion, sheltered corridors, and hardcourt playgrounds, and two parking lots: one along East 49th Street with 41 parking stalls and the other along East 50th Street with 7 parking stalls. The Campus does not contain any relocatable buildings (see Figure 6, *Existing Campus*, Figure 7a, *Photograph Location and Direction*, and Figure 7b, *Project Site Photographs*). Three of the seven buildings, including the Administration/Library/Classroom Building, West Classroom Building, and Auditorium, are listed or eligible for listing on the Assembly Bill 300 (AB 300) 2002 Seismic Safety Inventory of California Public Schools Report.[14]

Table 2. Existing School Campus

Building Name	Approx. Square Footage	Classrooms	Year Built	Number of Stories	Historic District Status
Main Classroom Building	13,000	8	1935	1	Contributor
West Classroom Building	5,600	3	1923	1	Contributor
South Classroom Building	9,600	7	1935	1	Contributor
Auditorium	4,300	-	1936	1	Contributor

[13] Historic Resources Group. 2023. 49th Street Elementary School Historic Resources Evaluation Report.
[14] https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/261/ab300/108_SeismicSafetyInventory_CA.pdf

Table 2. Existing School Campus

Building Name	Approx. Square Footage	Classrooms	Year Built	Number of Stories	Historic District Status
Administration/Library/Classroom Building	24,800	14	1965	2	Non-Contributor
Classroom Building	15,200	10	1969	2	Non-Contributor
Cafeteria	1,800	-	1969	1	Non-Contributor
Lunch Pavilion	2,300	-	1969	-	Non-Contributor
Sheltered Corridor 1	600	-	1935	-	Contributor
Sheltered Corridor 2	300	-	1936	-	Contributor
Sheltered Corridor 3	200	-	1936	-	Contributor
Sheltered Corridor 4	200	-	1969	-	Non-Contributor
Total	**77,900**	**42**	**-**	**-**	**-**

Source: LAUSD 2023 and HRG 2023

2.5.1 Existing Buildings and Site Improvements

Main Classroom Building

The Main Building was constructed in 1935. It is a Public Works Administration (PWA) Moderne style one-story building with a rectangular plan. The primary entrance, which is now blocked, features some Neoclassical elements, and is located on the eastern portion of the building along McKinley Avenue. There is a secondary entrance on the northern and southern portions of the building. The interior of the Main Building features a central hallway that opens to classrooms.

West Classroom Building

The West Building was constructed in 1923 and altered in 1935. It is a one-story building with a roughly "L"-shaped plan, simple massing, and asymmetrical composition. The primary entrance is located on the northern portion of the building. The building also contains two secondary entrances on the southern portion of the building. The interior of the West Building is divided into several spaces, and most classrooms are accessible via a central hallway. A classroom and staff lounge are accessible via the concrete ramp along the primary facade.

South Classroom Building

The South Building was constructed in 1935. It is a one-story PWA Moderne style building with a rectangular plan, simple massing, and a flat roof with a low parapet and metal coping. The primary entrances to the building

are located along the eastern and western boundaries of the building. The interior of the South Building features a central hallway that opens to classrooms.

Auditorium Building

The Auditorium Building was constructed in 1936. It is a PWA Moderne style one-story building with a rectangular plan, simple massing, and symmetrical composition and a bow truss roof. Primary access to the Auditorium is provided via the south façade and consists of a pair of flush doors. The entrance is accessed by a concrete staircase. Secondary entrances on the east and west façades consist of flush doors with metal hoods, accessed by concrete steps with metal pipe guardrails. The interior of the Auditorium Building features an open auditorium space with a restroom set behind the stage.

Administration. Library. And Classroom Building and Classroom Building

The Administration, Library, and Classroom Building was constructed in 1965; an addition, known as the Classroom Building, was constructed in 1969. Together they form a two-story building with a rectangular plan and a one-story projection on the north façade. The primary entrance is located on the northern portion of the building.

Cafeteria and Lunch Pavilion

The Cafeteria/Lunch Pavilion was constructed in 1969. It is a one-story building with an irregular plan, complex massing and asymmetrical composition. It is composed of two distinct parts: a kitchen with an L-shaped plan, and an open-sided shelter wrapping the north and west sides of the kitchen.

Sheltered Corridors

There are four sheltered corridors on the Campus, which connect separate buildings. Two elevated sheltered corridors from the 1930s (Sheltered Corridor No. 1 and Sheltered Corridor No. 2) connect the Main Building to the West and South Buildings; a third sheltered corridor dating from the 1930s (Sheltered Corridor No. 3) connects the South Building to the Auditorium Building; and a fourth sheltered corridor (Sheltered Corridor No. 4) was constructed in the 1960s and connects the Auditorium Building to the Lunch Pavilion.

2.5.2 Existing 49th Street Campus Uses

School Operations. 49th Street ES is a two-semester, single-track elementary school that serves Pre-K through 5th grades. The District establishes that schools have a total of 183 instructional days (2023-2024) and school hours are 8:00 AM to 2:23 PM.

Student Pick Up/Drop Off. Vehicular and pedestrian access to 49th Street ES for student pick up/drop off currently occurs at the front of the Campus along East 49th Street, which occurs along East 49th Street near the main office entrance.

School-Related Events. The school has after-school programs for the students, such as special-interest clubs, and extracurricular activities that end approximately at 6:00 PM at the latest. There are also occasional nighttime

and weekend events during the school year. Some of these events are Campus-wide, such as school plays and open houses, while others are grade specific, such as commencement.

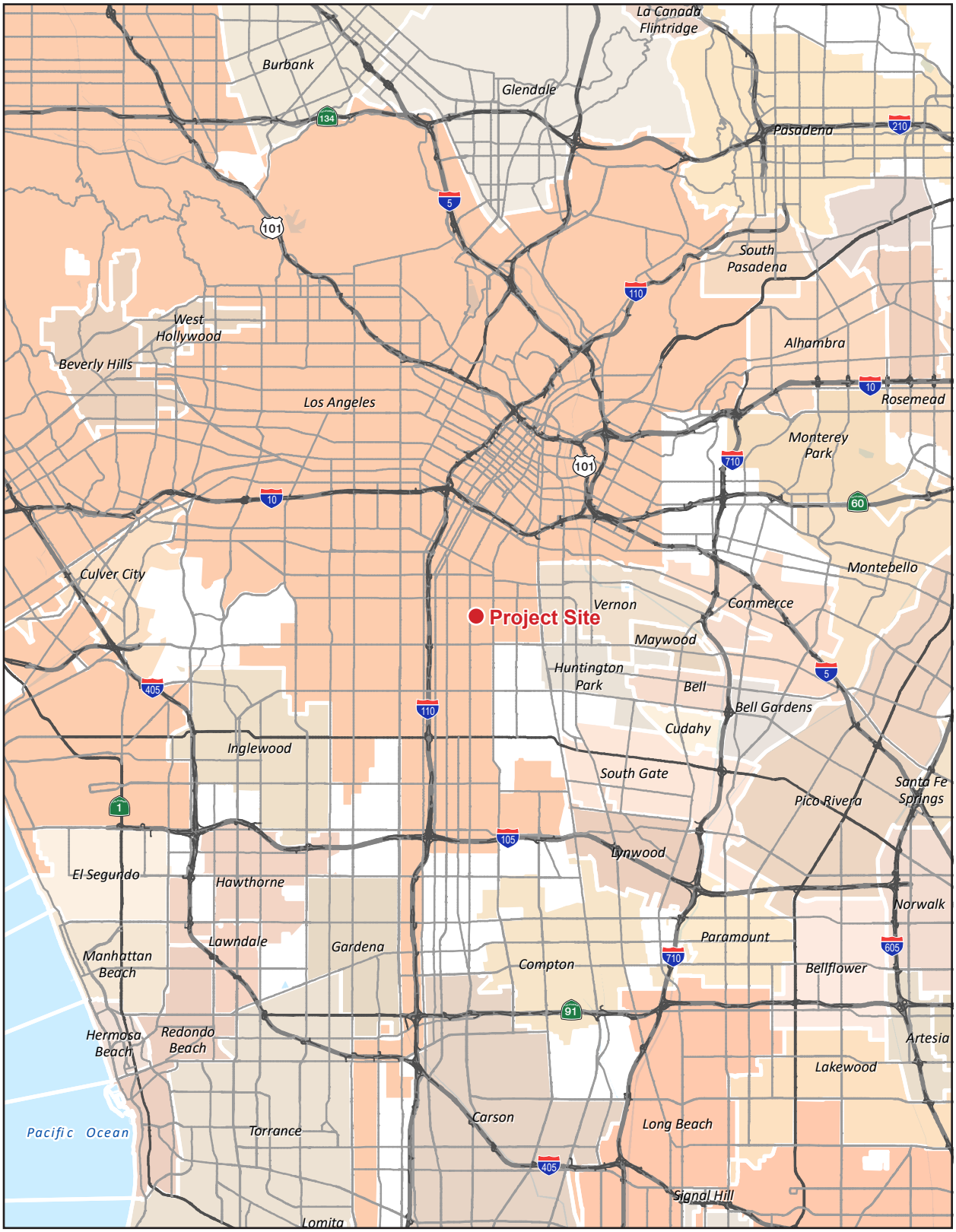
Community Use. In compliance with the Civic Center Act, (CA Education Code Sections 38130-38139), the Campus is available for community use at selected times when not in use by LAUSD.[15]

2.6 EXISTING GENERAL PLAN AND ZONING

The Campus and surrounding developments are within the Southeast Los Angeles Community Plan, which is one of the 35 community plans that comprises the Land Use Element of the General Plan of the City of Los Angeles and the Land Use designation for the school property is 'Public Facilities', which allows public schools. The Project site is zoned PF-1 (Public Facility) and designated PF (Public Facilities) in the Southeast Los Angeles Community Plan. Surrounding residential land uses are designated Low Medium I Residential and 49th Street Park is designated Open Space. Residential parcels surrounding the Project site are zoned R2-1 (Two-Family Zone) and R2-1-CPIO (Two-Family Zone with Community Plan Implementation Overlay) and 49th Street Park is zoned OS-1XL (Open Space) (see Figure 8a and 8b, *Existing Zoning and General Plan Land Use Designations*). On February 19, 2019, the LAUSD Board of Education Adopted a Resolution to exempt all LAUSD school sites from local land use regulations under Government Code Section 53094.[16] LAUSD school sites are exempt from all local ordinances, such as those pertaining to building height, parking, preservation and replacement of trees, construction permits (except those in the public right-of-way), recordation of parcel maps, signage, site plan review, and inspection.

[15] California Education Code Sections 38130–38139.
[16] Regular Meeting Stamped Order of Business, Board of Education Report No. 256-18/19. Los Angeles: LAUSD Board of Education, February 19, 2019

Figure 1 - Regional Location Map

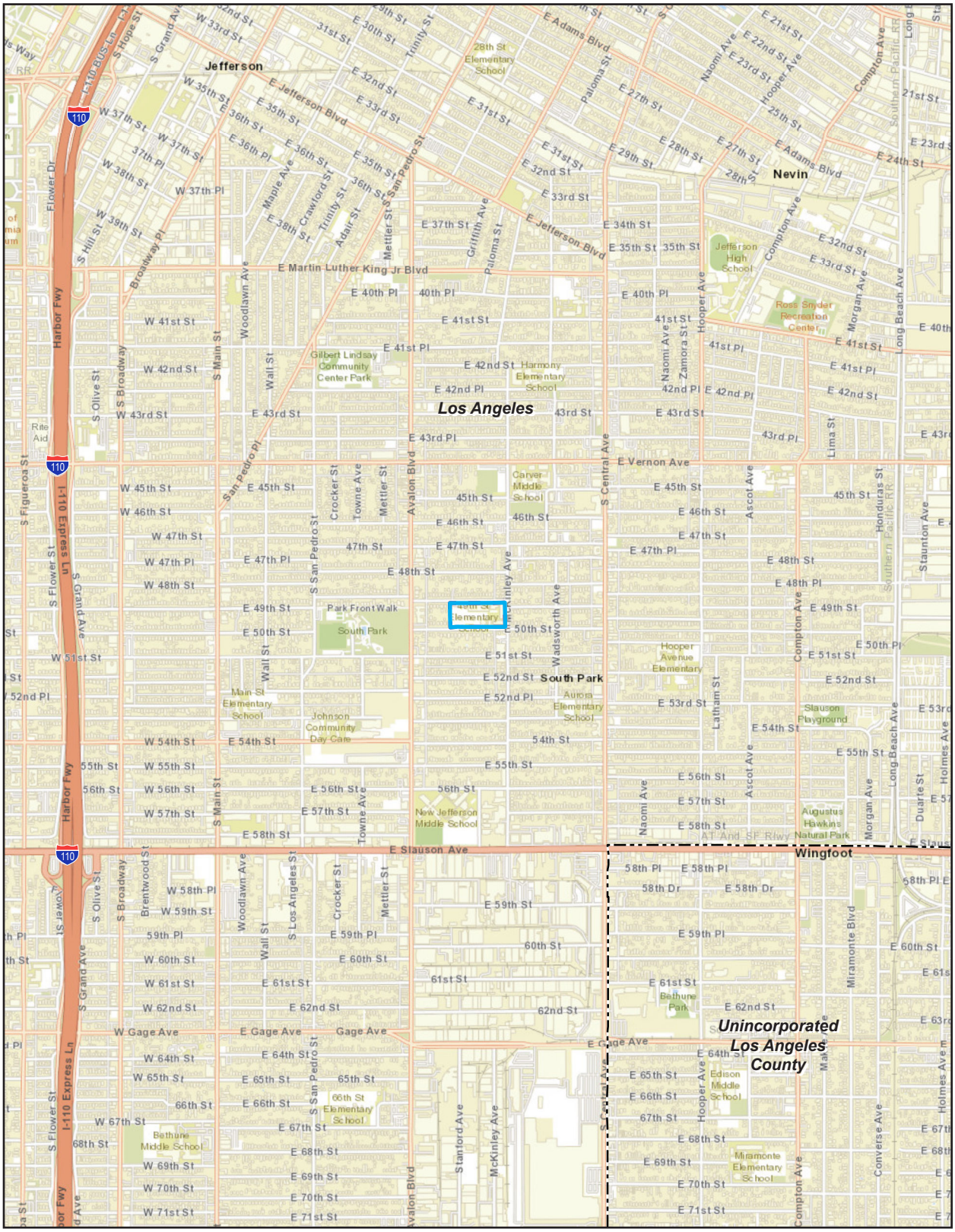


Note: Unincorporated county areas are shown in white.

Source: Generated using ArcMap 2023.

0 3
Scale (Miles)

Figure 2 - Local Vicinity



49th Street Elementary School Boundary

City Boundary

Source: Generated using ArcMap 2023.

Figure 3 - Aerial Photograph



49th Street Elementary School Boundary

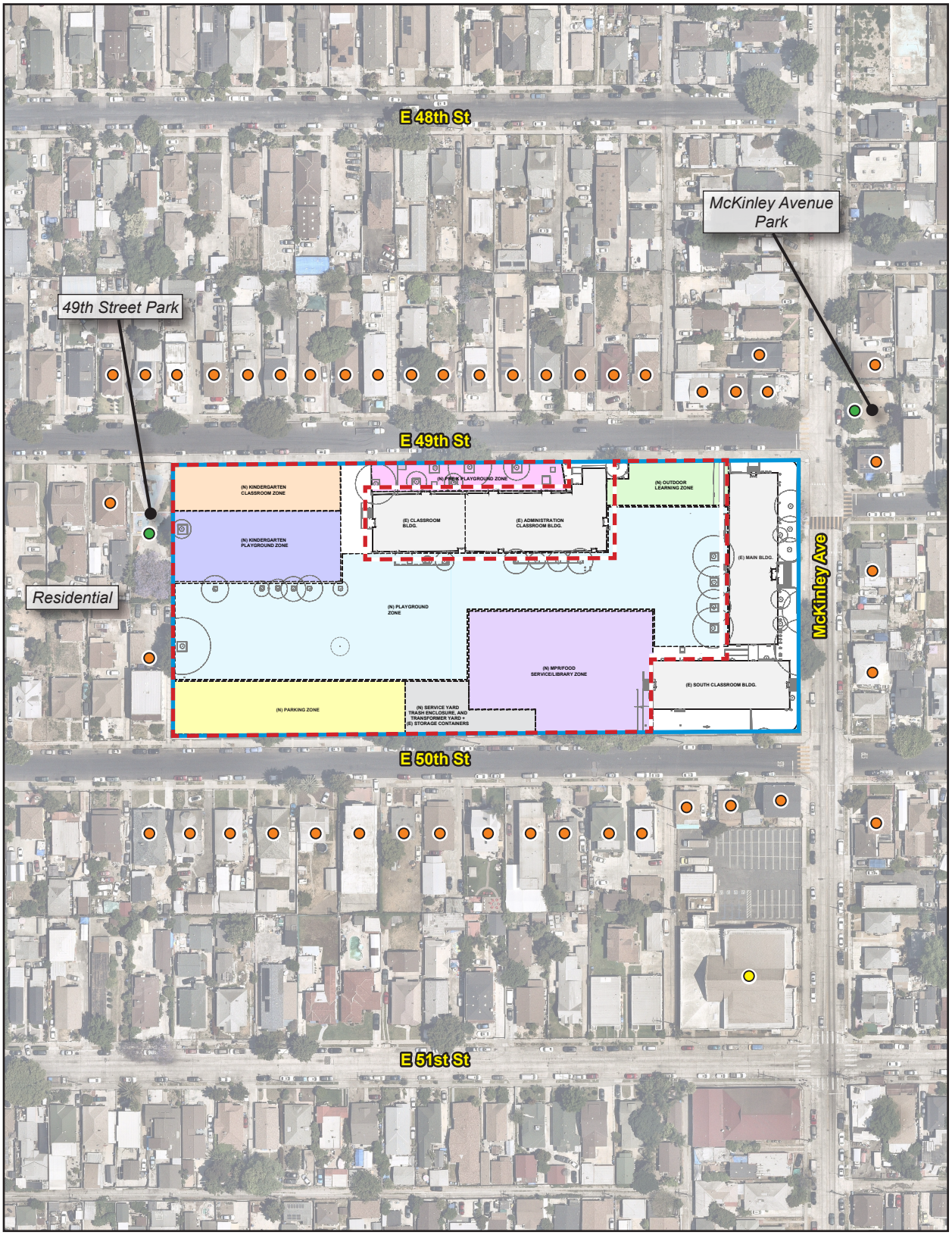
Development Area

0 175

Scale (Feet)

Source: Nearmap 2023.

Figure 4 - Location of Sensitive Receptors



Source: Nearmap 2023; DLR Group 2023.

Figure 5 - Potential Historic District



Source: Basemap: Nearmap 2023; Historic Resources Group.

Figure 6 - Existing 49th Street Elementary School Campus



Source: Base map: Nearmap 2023.

Figure 7a - Photograph Location and Direction



49th Street Elementary School Boundary

Photograph Location and Direction (8)

0 175
Scale (Feet)

Source: Nearmap 2023.

Figure 7b - Project Site Photographs



Photo A. View of West Building, Playground, Administration, and Classroom Building.



Photo B. View of Main Building exterior.



Photo C. View of primary Pick Up and Drop-Off Entrance.



Photo D. View of Main Building, South Building, and Auditorium.



Photo E. View of Auditorium and Sheltered Corridor No. 3.



Photo F. View of Sheltered Corridor No.1.



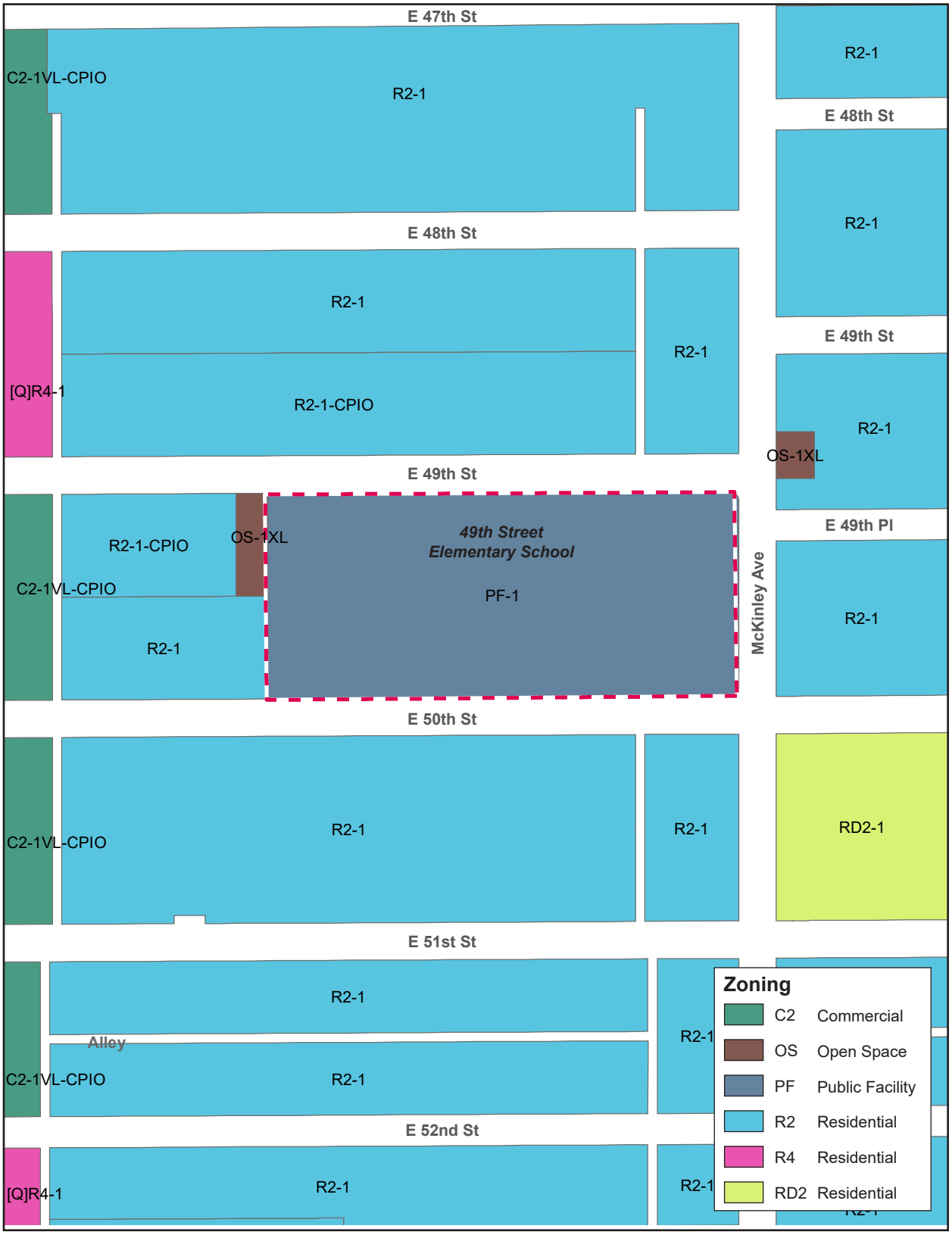
Photo G. View of Sheltered Corridor No.2.



Photo H. View of Cafeteria Building, Lunch Pavilion, and Shelter Corridor No. 4.

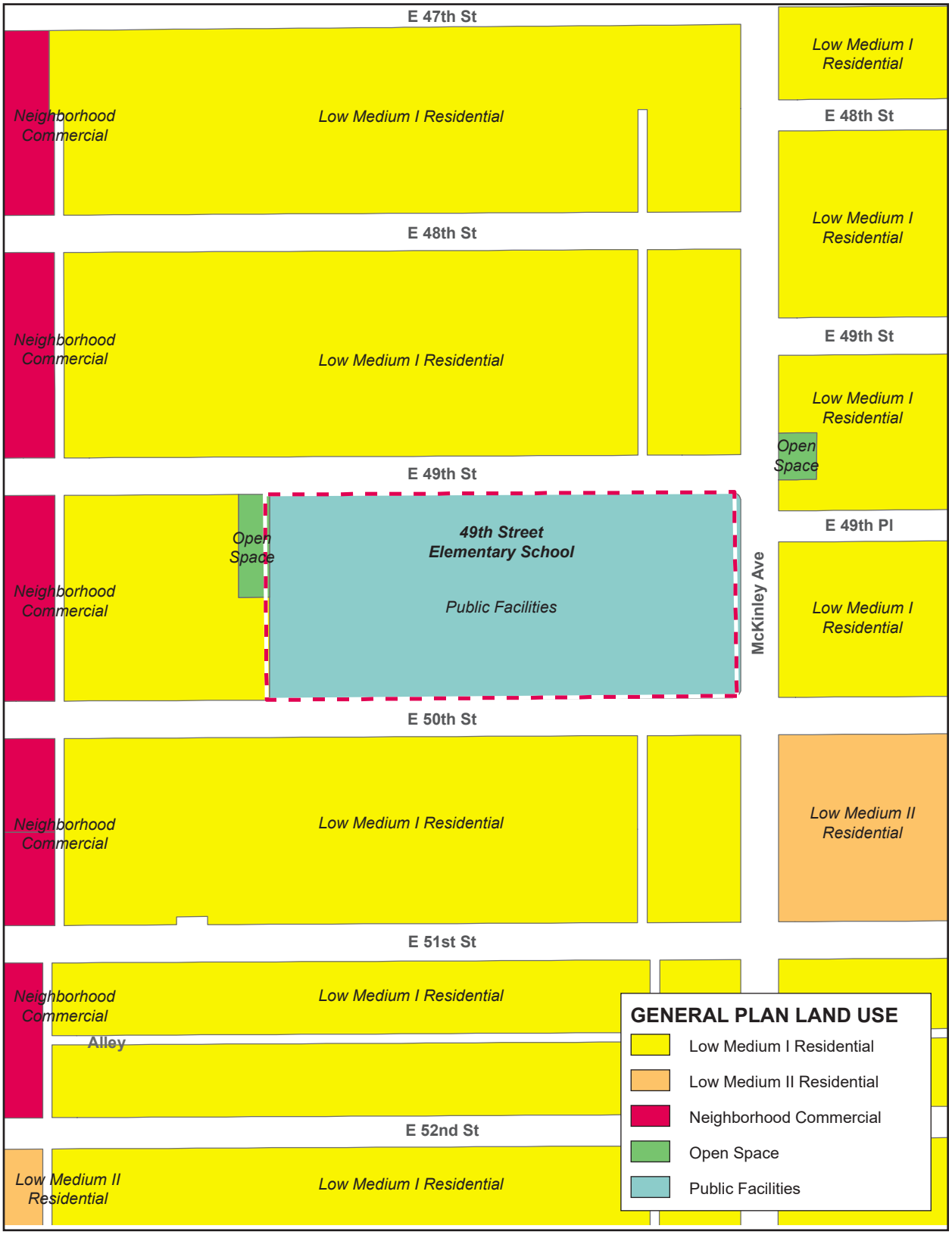
Source: PlaceWorks 2023.

Figure 8a - Zoning Designations



Source: City of Los Angeles 2023.

Figure 8b - General Plan Land Use Designations



Source: City of Los Angeles 2023.

2. Environmental Setting

This page intentionally left blank.

3. Project Description

3.1 BACKGROUND

The proposed Project would occur on approximately five acres of the 5.73-acre 49th Street Elementary Campus, located at 750 East 49th Street, in the South Park neighborhood of the City of Los Angeles. The proposed Project will use the "design-build" construction delivery method whereby the general locations for proposed buildings have been identified (within or immediately proximate to the existing structures to be removed).

3.2 PROPOSED PROJECT

The proposed Project consists of the demolition of approximately 15,100 square feet of existing building floor areas and 32,300 square feet of new construction (as shown in Table 3, *Proposed Project (Demolition, Minor Interior Improvements, and Construction)*). The proposed Project includes a major modernization at the 49th Street ES Campus to provide facilities that are safe, secure, and aligned with the instructional program. The proposed Project would demolish three buildings (West Classroom Building, Cafeteria/Lunch Pavilion, and Auditorium Building), and remove three sheltered corridors. To replace these core facilities and instructional space, the Project would construct a one-story Kindergarten Classroom Building with four Kindergarten classrooms and associated support spaces; one-story Multi-Purpose Room/Food Services/Library Building; lunch shelter; covered eating area for faculty; two shade structures; and new sheltered corridors. The Project also includes utility upgrades; new playgrounds, including play equipment/furnishings, striping, natural grass fields with irrigation, cool coating asphalt, and two play structures; new outdoor learning environments; a new parking lot with photovoltaic panels; landscaping and irrigation; hardscaping; and installation of a new trash enclosure, service yard, loading zone, and transformer yard; and fencing, gates, site furnishings, and accessories. Additionally, the Project would include exterior painting of all existing buildings and structures to remain, as well as minor interior improvements to convert one existing classroom and the existing library into administrative workrooms. The Project would also include the installation of interim facilities to allow the school to remain operational during construction, including a relocatable kitchen/scramble building and a relocatable restroom building. The proposed Project maintains the school's current capacity and total number of standard size classrooms.

Demolition and Removal

- West Classroom Building
- Auditorium Building
- Cafeteria Building
- Lunch Pavilion

3. Project Description

- Sheltered Corridors (No. 1, 3, and 4)
- Storage containers

Construction of New Buildings/Structures

- One-Story Kindergarten Classroom Building with four classrooms and associated support spaces
- One-Story Multi-Purpose Room/Food Services/Library Building
- Lunch shelter
- Two shade structures
- Sheltered corridors

Other Improvements

- Convert the existing library and one classroom into administrative workrooms
- Exterior painting of all existing buildings and structures to remain

Site Improvements

- Utilities upgrades
- Outdoor learning environments, landscaping, irrigation, and hardscaping
- New service yard, loading zone, trash enclosure, and transformer yard
- New parking lot with photovoltaic panels
- New playgrounds for Pre-Kindergarten, Kindergarten, and Grades 1-5, including play equipment/furnishings, striping, natural grass fields with irrigation, cool coating asphalt, and two play structures
- New fencing, gates, site furnishings, and accessories

3.2.1 Demolition and Removal

The proposed Project involves the demolition of three permanent buildings (West Classroom Building, Auditorium, Cafeteria), the lunch pavilion, and removal of three sheltered corridors (No. 1, 3 and 4), which adds up to approximately 15,100 square feet of existing building space (see Figure 9, *Structures to be Removed*).

3.2.2 Interim Structures

Construction of the proposed Project would require the implementation of a fully electric interim relocatable kitchen/scramble building and one interim relocatable restroom building on the Campus during construction activities.

3.2.3 Proposed Buildings

The proposed Project would result in the approximately 32,300 square feet of new construction, including a one-story Kindergarten Classroom Building with four classrooms and associated support spaces; a one-story Multi-Purpose Room/Food Services/Library Building; a new lunch shelter, two shade structures; and new sheltered corridors. The proposed Project's also includes minor interior improvements to convert the existing library and one classroom into administrative workrooms and exterior painting for all remaining buildings and structures on the Campus (see Table 3)(see Figure 10, *Conceptual Project Site Plan)*. At completion of the proposed Project, the 49th Street ES Campus would contain 43 standard sized classrooms, which matches the current number of standard classrooms. No change to school's capacity or total number of classrooms are proposed as part of the Project.

Table 3. Proposed Project (Demolition, Minor Interior Improvements, and Construction)

Building/Structure Name	Demolition (SF)	Minor Interior Improvements (SF)	Existing Square Footage to Remain (SF)
Existing Building/Structure			
West Classroom Building	5,600	-	-
Auditorium	4,300	-	-
Cafeteria	1,900	-	-
Lunch Pavilion	2,300	-	-
Sheltered Corridor 1	600	-	-
Sheltered Corridor 3	200	-	-
Sheltered Corridor 4	200	-	-
Administration/Library/Classroom Building	-	800	24,900
Classroom Building	-	900	15,200
Main Classroom Building	-	-	13,000
South Classroom Building	-	-	10,000
Sheltered Corridor 2	-	-	300
Total	**15,100**	**1,700**	**63,400**

Building/Structure Name	New Construction (SF)
New Building/Structure	
Kindergarten Classroom and Support Areas	8,500
Library	2,600
Food Services	4,500
Covered Outdoor Eating Area	3,300
Multi-Purpose Room	6,200
Kindergarten Shade Structure	1,500
Shade Structure	2,400

3. Project Description

Table 3. Proposed Project (Demolition, Minor Interior Improvements, and Construction)

Additional Support Areas	200
Covered Walkway (Between existing Administration/ Classroom Building and existing Main Classroom Building)	1,500
Covered Walkway (Between the existing Classroom Building and New Kindergarten Building)	1,000
Covered Walkway (Between existing South Classroom Building and New MPR/Food Services/Library Building)	500
Campus Total* (does not include outdoor space)	**32,200**

Source: LAUSD 2023
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 49th Street Elementary School Major Modernization Project – Space Program. September 21, 2023.
Current total square footage = Existing + Renovation + Demolition (80,200). After Project square footage = Existing + Renovation + New (97,300). Increase in campus square footage = 17,100 sq ft

Kindergarten Classroom Building

The proposed Project would construct a new one-story Kindergarten Classroom Building at the northwest side of the Campus. It would include four new classrooms, storage areas, student restrooms faculty restroom, teachers' workroom, electrical room, intermediate distribution frame room (which is a distribution facility for communications and other low-voltage distribution systems downstream from the main distribution frame), custodial rooms, teacher material storage/bike storage.

New Multi-Purpose Room/Food Services/Library Building

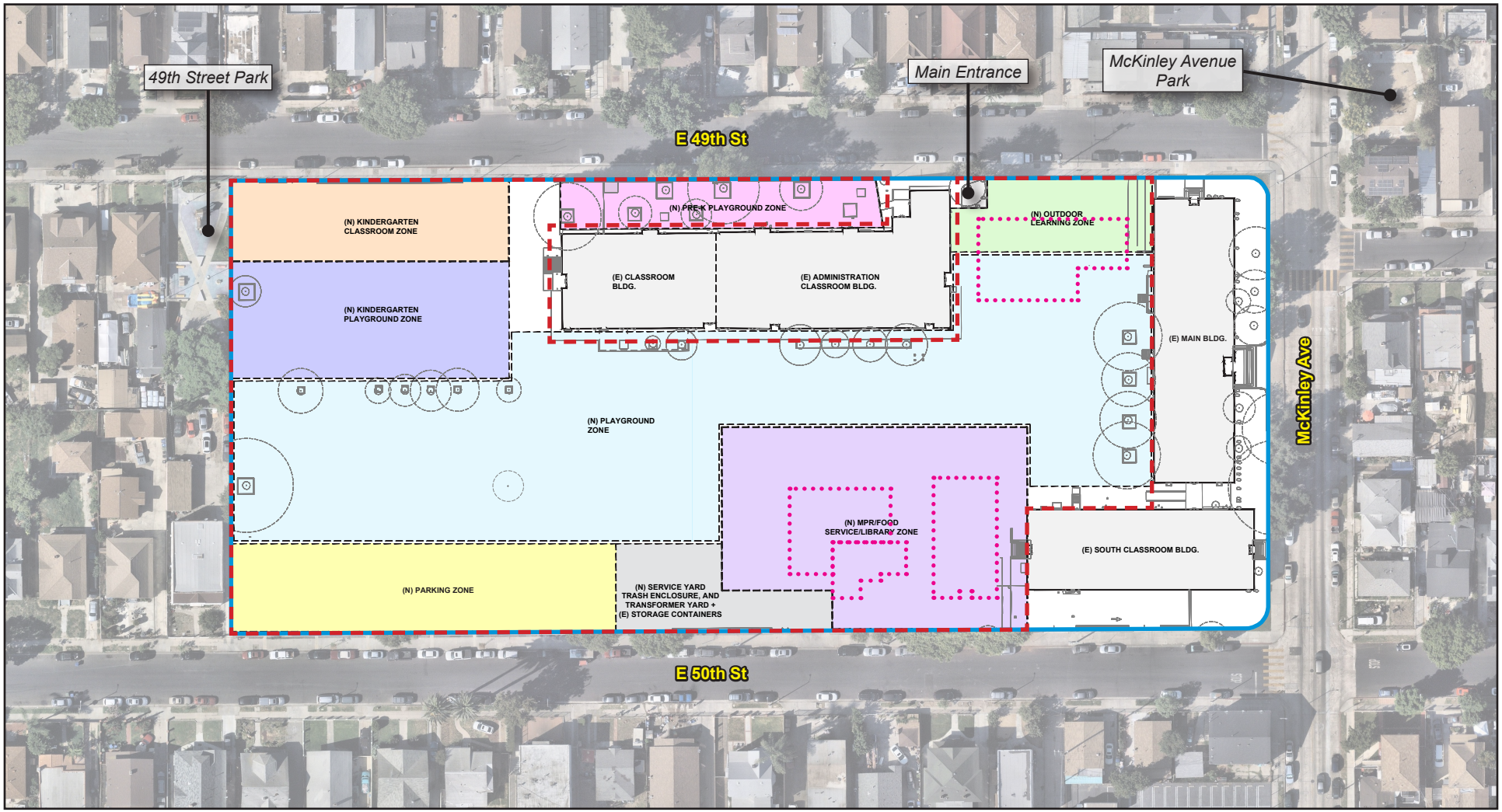
The proposed Multi-Purpose Room/Food Services/Library Building would be designed as a single-story structure and located on the southern boundary of the Project site in the same location as the existing Auditorium. It would include a food service area, a multi-purpose room, covered outdoor eating area, and a new library.

Figure 9 - Structures to be Removed



Source: Basemap: Nearmap 2023; Historic Resources Group.

Figure 10 - Conceptual Site Plan



49th Street Elementary School Boundary
Development Area
Building Structures to be Demolished

0 110
Scale (Feet)

Source: Basemap: Nearmap 2023; DLR Group 2023.

3.2.4 Playgrounds and Outdoor Learning Areas

The proposed Project would provide approximately 114,500 square feet of playgrounds and outdoor learning areas. The proposed Project would provide new playgrounds for all students, including cool coating asphalt, striped games, two play structures with protective surfacing, natural grass fields, basketball courts, volleyball courts, tetherball courts, handball courts, and backstops.

The proposed Project also includes new outdoor learning environments that are in the following areas: adjacent to the new Kindergarten classrooms, between the existing Administration/Classroom Building and Main Classroom Building, and adjacent to the new library.

The proposed Project would include a new Kindergarten playground (minimum 14,000 square feet) that is directly accessible to and from the new kindergarten classrooms. The new Kindergarten playground would include striped hardcourt areas, an inclusive play structure and mat, and a natural grass playfield that is a minimum of 20-foot by 20-foot. Additionally, the proposed Project would implement a minimum 1,000-square-foot Kindergarten outdoor learning area, adjacent to the new Kindergarten classrooms. The Project would also provide new cool coating asphalt and striped games for the Pre-Kindergarten playground, which is approximately 7,500 square feet.

The proposed Project would provide a new main playground for Grades 1 through 5 that is a minimum of 87,000 square feet. The new main playground would include play equipment/furnishings, an inclusive play structure and mat, striped games, a natural grass field with irrigation that is a minimum of 100-foot x 140-foot, running track, basketball courts, volleyball court, tetherball courts, handball courts, cool coating asphalt, primary diamond, and backstops.

A new outdoor learning area that is a minimum of 4,000 square feet would be developed between the existing Administration/Classroom Building and Main Classroom Building, in the place of the existing West Classroom Building. The proposed Project also includes a new reading garden that is a minimum of 1,000 square feet directly adjacent to the new library.

3.2.5 Sheltered Corridors

The proposed Project would include the construction of three new sheltered corridors to provide a contiguous covered walkway between existing and new buildings. The proposed sheltered corridors would be approximately 1,500 square feet, 1,000 square feet, and 500 square feet in size, for a total of 3,000 square feet.

3.2.6 Landscaping

Vegetation on-site consists of 57 trees, all of which are located within the 49th Street ES Campus on District-owned property and are not in the public right-of-way or considered trees within the jurisdiction of the City of Los Angeles[17]. The Project site contains seven coast live oak trees, which are protected species by the City of

[17] Carlberg Associates. 2022, July, City of Los Angeles Tree Report – 49th Street Elementary School. Carlberg Associates. Included as Appendix C to this Initial Study.

3. Project Description

Los Angeles' Tree Preservation Ordinance No. 186873. Protected trees and shrubs as set forth in the Ordinance are coast live oak, western sycamore, Southern California black walnut, California bay laurel, Mexican elderberry and toyon with trunk diameters (measured at 4.5 feet above grade) of 4 inches or greater. Additionally, the Project site contains 37 private property trees which are considered 'significant' as defined by the City's Planning Division. "Significant" trees are defined by the City's Planning Division as trees that have a trunk diameter size of eight inches and greater[18].

While as many existing trees would be preserved as possible, the removal of approximately 27 trees would be required to accommodate implementation of the proposed Project. None of the trees to be removed are considered protected trees by the City of Los Angeles. [19] Any necessary tree removal activities would follow the procedures outlined in the LAUSD Tree Trimming and Removal Procedure (Tree Procedure)[20]. As described in Section IV, *Biological Resources*, the Tree Procedure requires that all tree trimming, and removal will be avoided during the avian breeding and nesting season (February 1st through August 31st) when feasible. This policy ensures the management of District trees while ensuring that District activities will not conflict with locally adopted tree preservation policies and ordinances.[21] Final design of the proposed Project would include a landscape plan that would identify the number, location, and type of replacement trees to be provided. New canopy and accent trees would be installed to increase canopy coverage and provide shade while complimenting the aesthetics of hardscape areas throughout the Campus.

3.2.7 Site Access, Circulation, and Parking

3.2.7.1 EXISTING CONDITIONS

Roadways

Existing roadways in the Project study area are described below[22].

- **East 49th Street** is an east-west roadway north of the school classified as a Collector street. There is one travel lane in each direction.
- **McKinley Avenue** is north-south roadway east of the school classified as a Collector street. There is one travel lane in each direction.
- **East 50th Street** is an east-west roadway south of the school classified as a Local/Other street. There is one travel lane in each direction.

[18] Carlberg Associates, 2022, July, City of Los Angeles Tree Report – 49th Street Elementary School. Carlberg Associates. Included as Appendix C to this Initial Study.

[20] LAUSD OEHS Tree Trimming & Removal Procedure. https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/LAUSD_Tree_Protection.pdf

[21] LAUSD Tree Trimming and Removal Procedure. https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/LAUSD_Tree_Protection.pdf

[22] City of Los Angeles General Plan. Mobility Element. 2016. https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf

- **Avalon Boulevard** is a north-south roadway approximately 0.1 mile west of the school and is classified as an Avenue II. The roadway consists of one travel lane and a Class II (striped) bicycle lane in each direction and a two-way median turn lane.

Intersections

- East 49th Street at McKinley Avenue: 4-way stop
- East 50th Street at McKinley Avenue: 4-way stop
- McKinley Avenue and East 49th Place: 3-way stop

Bicycle and Pedestrian Facilities

The nearest designated bikeways are Class II (striped) bicycle lanes on each side of Avalon Boulevard. Sidewalks are present on each side of all roadways surrounding the school. There are three yellow school-crossing continental crosswalks, two stop signs, and two signed school crossing signs present on the northeast portion of the campus, at the intersections of Avalon Boulevard/East 49th Street and Avalon Boulevard/East 49th Place. Pedestrian and other non-vehicular access to the Campus is currently provided via a nine-foot wide public sidewalk along the streets bordering the Project site.

Transit Service

Transit service to the Project site is provided by the Los Angeles County Metropolitan Authority (Metro), which operates Bus Line 51 along Avalon Boulevard and Bus Line 53 along Central Avenue, approximately 0.1 mile west and 0.25 east of the Project site, respectively. Passenger rail service is provided by the Metro A Line, along Long Beach Avenue. The closest Metro stations to the Project site are Vernon Station, approximately 1.1 mile northeast and the Slauson Station, approximately 1.2 mile southeast of the Project site.

3.2.7.2 PROPOSED PROJECT

Vehicular Access

Student pick-up and drop-off would continue to occur curbside along East 49th Street. Vehicular access to the Campus is currently provided via one driveway along East 49th Street, located on the northwestern portion of the Project. Additional vehicular access entrances are located along East 50th Street, which forms the Project site's southern boundary at the existing parking lot located near the intersection of East 50th Street and McKinley Avenue, and one delivery gate located behind the existing cafeteria. The proposed Project would relocate the existing parking lot from the northwestern portion of the Campus on East 49th Street to the southwestern portion of the Campus on East 50th Street. Vehicular access to the Project site would be provided via two new driveways along East 50th Street.

Pedestrian Access

Pedestrian access to the Campus is currently provided via a public sidewalk along East 49th Street which forms the Project site's northern boundary, near the existing staff parking lot, the main entrance within Administration/Library/Classroom Building, and one additional entrance near the intersection of 49th Street

and McKinley Avenue. Additional pedestrian access entrances are located along East 50th Street, which forms the Project site's southern boundary at the existing Auditorium. Under the proposed Project, the main entrance to the school would remain in its current location within the Administration/Library/Classroom Building located on the northern portion of the Campus.

Parking

The proposed Project would maintain a minimum of 45 parking spaces and relocate the existing staff and visitor parking lot to the southwestern portion of the Campus. Ingress and egress for the parking lot would be from East 50th Street. The proposed parking lot would encompass approximately 16,400 square feet and would include a minimum of 45 parking spaces, including Americans with Disabilities Act (ADA) and two Electric Vehicle (EV) parking spaces. The existing parking lot located at the southeastern portion of the Campus with seven parking stalls would remain.

3.2.8 Construction

Project construction is anticipated to start in the second quarter of 2025 and is expected to take 42 months to complete, with varying levels of intensity of construction activities, which are described below.

- **Site Preparation.** Removal of approximately 27 trees located on the hardscape area in the center of the Campus**.**
- **Demolition.** Three existing buildings, lunch pavilion, and three sheltered corridors would be demolished.
- **Excavation.** Total excavation would be approximately 1,568 cubic yards (CY) (or 2,195 tons) from the Project site[23]. Any soil that is exported or imported must be chemically tested in accordance with specific written procedures, as outlined in LAUSD Specifications Section 01 4524, "Environmental Import/Export Materials Testing".
- **Utility Trenching.** Utility trenches would be excavated. Underground utilities for water and wastewater to the restroom building would connect to existing lines along East 49th Street.
- **Building Construction.** Building construction for the two new buildings.
- **Modernization of existing buildings.** Enhancements to modernize and repair school facilities to improve student health, safety, and educational quality, which would include associated landscape; hardscape; playground and parking improvements; and infrastructure upgrades, to ensure compliance with the Americans with Disabilities Act (ADA), Division of the State Architect (DSA), CEQA, Department of Toxic Substances Control (DTSC), or other local, state, and federal requirements.
- **Architectural Coating.** Painting new and existing buildings.

[23] Ninyo & Moore Geotechnical and Environmental Associates. 2023, August. "Removal Action Work Plan".

- **Asphalt paving and Off-Site Street Work.** Demolition of asphalt play yards and new asphalt for play yard, and parking lot and play yard striping.
- **Finishing and Landscaping.** Finishing and new natural grass playfields.
- Project close out and occupation is anticipated in the second quarter of 2029.

3.2.9 Removal Action Work Plan

A Removal Action Work (RAW) Plan[24] has been prepared for the proposed Project to address the removal of arsenic, lead, and total petroleum hydrocarbon (TPH) impacted soil located within the 49th Street ES. The RAW summarizes the results and recommendations of the Preliminary Environmental Assessment – Equivalent (PEA-E) investigation; provides estimates the surface area and volumes of soil impacted with chemicals of concern; and proposes measures to remove the arsenic, lead, and TPH concentrations in the affected areas of the site to levels below regulatory screening levels for the protection of human health and the environment. The recommendations and removal actions described in the RAW would be implemented during construction activities as part of the proposed Project. The RAW is included in Appendix H of this Initial Study, and further analyzed in Section IX, *Hazards and Hazardous Materials*.

3.3 AGENCY REVIEWS AND APPROVALS

It is anticipated that approval required for the proposed Project would include the review and approval of the agencies listed below as Responsible and Trustee agencies.

3.3.1 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 (Caltrans).** Transportation permit for oversized vehicles on State highways.

[24] Ninyo & Moore Geotechnical and Environmental Associates. 2023, August. "Removal Action Work Plan".

- **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).

- **South Coast Air Quality Management District.** Review and file submittals for Rule 403, Fugitive Dust; Rule 1403, Asbestos Emissions from Demolition/Renovation Activities; Rule 201, Permit to Construct; Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil, and site-specific soil mitigation plan; and site monitoring.

- **City of Los Angeles, Public Works Department.** Permit for curb, gutter, and utility connection offsite improvements.

- **City of Los Angeles, Fire Department.** Approval of plans for emergency access and emergency evacuation. DSA approval of the fire/life safety portion of a Project requires local fire authority (LFA) review of: elevator/stair access for emergency rescue and patient transport; access roads, fire lane markings, pavers, and gate entrances; fire hydrant location and distribution; and fire flow (location of post indicator valve, fire department connection, and detector check valve assembly).

3.3.2 Trustee Agencies

"Trustee Agencies" include state agencies that that has jurisdiction by law over natural resources affected by a Project, that are held in trust for the people of the State of California. Potential Trustee Agencies for individual projects to be implemented under the SUP may include the following:

State

- California Office of Historic Preservation
- Native American Heritage Commission

3.3.3 Other Reviewing Agency Actions and Approvals

The following agencies would have ministerial review and approvals over the proposed Project:

Regional

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

Local

- City of Los Angeles

4. Environmental Checklist and Analysis

4.1 PROJECT INFORMATION

1. **Project Title:** 49th Street Elementary School Major Modernization Project

2. **Lead Agency Name and Address:**
   Los Angeles Unified School District, Office of Environmental Health and Safety
   333 South Beaudry Avenue, 21st Floor
   Los Angeles, CA 90017

3. **Contact Person and Phone Number:**
   Bryan Ramos Fernandez, AICP, CEQA Project Manager
   (213) 241-1000 ext. 14210

4. **Project Location:** The 5.73-acre District-owned property is at 750 East 49th Street (Assessor's Parcel Number [APN] 5108-011-909 and -910), within the South Park neighborhood, in the City of Los Angeles, County of Los Angeles, California. The Project site is approximately three miles south of Downtown Los Angeles and approximately 1 mile east of Interstate (I-) 110 and 2.3 miles south of I-10.

   The Project site is bounded by East 49th Street to the north, McKinley Avenue to the east, East 50th Street to the south, and residential uses and the 49th Street Park to the west. The Campus's main public entrance is located along East 49th Street.

5. **Project Sponsor's Name and Address:**
   Los Angeles Unified School District
   Office of Environmental Health and Safety
   333 South Beaudry Avenue, 21st Floor
   Los Angeles, CA 90017

6. **General Plan Designation:** Southeast Community Plan, PF (Public Facilities)

7. **Zoning:** PF-1 (Public Facilities), ZI-1231 Specific Plan: South Los Angeles Alcohol Sales, ZI-2374 State Enterprise Zone: Los Angeles, and ZI-2452 Transit Priority Area in the City of Los Angeles

8. **Description of Project:** The District proposes to complete a major modernization project at the 49th Street ES Campus to provide facilities that are safe, secure, and aligned with the instructional program (proposed Project or Project). The Project would demolish three permanent buildings (West Classroom Building, Cafeteria/Lunch Pavilion, and Auditorium), and remove of three sheltered corridors. To replace the structures, the Project would construct a one-story Kindergarten Classroom Building with four Kindergarten classrooms and associated support spaces; a one-story Multi-Purpose Room/Food Services/Library Building; lunch shelter; covered eating area for faculty; two shade structures; and new sheltered corridors. Additionally, the Project would in exterior painting of all existing buildings and

structures to remain, as well as minor interior improvements to convert one existing classroom and the existing library into administrative workrooms. The Project would also include the installation of interim facilities to allow the school to remain operational during construction, including a relocatable kitchen/scramble building and a relocatable restroom building. No change to the school's capacity or total number of classrooms is proposed as part of the Project.

9. Surrounding Land Uses and Setting:
The Campus is predominantly surrounded by single- and multi-family residences. Two public parks owned by the City of Los Angeles, 49th Street Park and McKinley Avenue Park, are adjacent to the Campus.

10. Other Public Agencies Whose Approval Is Required (e.g., permits, financing approval, or participating agreement):

- California Division of the State Architect (DSA);
- City of Los Angeles: Public Works Department
- Fire Department

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Pursuant to Assembly Bill (AB) 52, Los Angeles Unified School District (LAUSD or District) notified the Native American Tribes/Tribal representatives that are traditionally and culturally affiliated with the Project area. No Native American Tribes have requested consultation with LAUSD, pursuant to Public Resources Code Section 21080.3.1. The LAUSD Office of Environmental Health and Safety sent Project notification on August 25, 2023 to all tribes affiliated within the area as provided by the Native American Heritage Commission.

No requests for consultation were received within the 30-day request period. However, as part of the Program EIR, the LAUSD Board of Education adopted Standard Conditions of Approval (SC-TCR-1 and SC-TCR-2) to protect potential unanticipated discoveries associated with Tribal Cultural Resources.

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 Public Resources Code [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) has provisions specific to confidentiality.

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

☐ 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

11/8/2023
Date

Carlos A. Torres
Print Name

CEQA Officer for LAUSD
Title

4.2 EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

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

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

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

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

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

4.3 LAUSD STANDARD CONDITIONS

The LAUSD Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects (SCs) are uniformly applied development standards. The SCs are compiled from established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs, as well as typically applied mitigation measures. The SCs are divided into the LAUSD CEQA environmental topics. For each SC, compliance is triggered by factors such as the project type, existing conditions, and type of environmental impact. Only those SCs that are applicable to the proposed Project area provided in each environmental section below. Compliance with every condition is not required. The LAUSD School Design Guidelines and Design Standards referenced in the SCs are routinely updated, and the most recently adopted version would apply to future projects.

4.4 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[25] 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 nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

EXPLANATION:

LAUSD applies Standard Conditions of Approval (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-AE1	LAUSD shall review all designs to ensure that demolition of existing buildings or construction of new buildings on its historic campuses are designed to ensure compatibility with the existing campus. The School Design Guide shall be used as a reference to guide the design. **School Design Guide[19]** This document outlines measures for re-use rather than destruction of historical resources. It requires the consideration of architectural appearance/consistency and other aesthetic factors during the preliminary design review for a proposed school upgrade project. Architectural quality must consider compatibility with the surrounding community.

[25] PRC Section 21099(d) (1) Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.
(2) (A) This subdivision does not affect, change, or modify the authority of a lead agency to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers provided by other laws or policies.
(2)(B) For the purposes of this subdivision, aesthetic impacts do not include impacts on historical or cultural resources

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

Would the proposed Project:

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

No Impact. Vistas provide visual access or panoramic views to a large geographic area. The field of view from a vista location can be wide and extend into the distance. Panoramic views are usually associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies.[26]

[26] City of Los Angeles, 2006, *LA CEQA Thresholds Guide*, Chapter A. http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf

4. Environmental Checklist and Analysis

The Project site and surrounding area are flat and developed with urban land uses, including residential, educational, and recreational uses. The existing Campus includes five one-story and one two-story buildings, surface parking, hardcourts, student gathering areas, trees, and landscaping. Although the proposed Project would include the construction of new buildings on the Campus, there are no protected or designated scenic vistas or views in the vicinity of the Project site. Thus, development of the proposed Project would not obscure any scenic vistas. Therefore, no impact would occur and no further analysis is required.

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

No Impact. There are two officially designated State scenic highways in Los Angeles County: State Route (SR-2), the Angeles Crest Highway, part of the Angeles Crest Scenic Byway, from near La Cañada-Flintridge north to the San Bernardino County line approximately 15 miles north, and a portion of State Route (SR-27), the Topanga Canyon Highway, approximately 18 miles west of the Project site.[27] The new buildings would not be visible from SR-2 or SR-27. Additionally, the Project site is not visible from other eligible roadways in Los Angeles County (including the Arroyo Seco Historic Parkway, SR-1, and SR-210).[28] Thus, proposed Project would not result in impacts to scenic resources within a designated State scenic highway. Therefore, no impact would occur and no further analysis is required.

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

No Impact. The Project site is in a fully developed area and surrounded by adjacent residential, recreational, and institutional uses. The Project site is zoned PF-1 (Public Facilities), which allows the use and development of publicly owned land, including public elementary and secondary schools, and no applicable zoning regulations govern scenic quality that affect the Project site. The Project includes demolition of three one-story buildings, and construction of two one-story buildings, along with other Project site and building improvements. The proposed Project would not conflict with regulations governing scenic quality. Additionally, the California Legislature granted school districts the authority to exempt school properties from local zoning requirements, provided the school district complies with the terms of Government Code Section 53094[29]. On February 19, 2019 the LAUSD Board of Exemption Adopted a Resolution to exempt all LAUSD school sites from local land use regulations under Government Code Section 53094[30].

The District would implement SC-AE-1 to ensure that demolition of existing buildings or construction of new buildings on its historic campuses are designed to ensure compatibility with the existing campus; SC-AE-2 to

[27] California Department of Transportation, 2023, California State Scenic Highway System Map. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa.
[28] California Department of Transportation, 2023, California State Scenic Highway System Map. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa.
[29] Government Code Section 53094. https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=53094.
[30] Regular Meeting Stamped Order of Business, Board of Education Report No. 256-18/19. Los Angeles: LAUSD Board of Education, February 19, 2019.

ensure that methods from the current School Design Guide are incorporated throughout the planning, design, construction, and operation of the Project to limit aesthetic impacts; and SC-AE-3 to assess the proposed Project's consistency with the general character of the surrounding neighborhood. Therefore, no impacts to the scenic quality would occur and no further analysis is required.

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

Less than Significant Impact. The two major causes of light pollution in this urban setting are spill light and glare. Spill light is caused by misdirected light that illuminates areas outside the area intended to be lit. Glare occurs when a bright object is against (or reflects off) a dark background or shiny surface. The Project site is fully developed and in an urban setting. The existing school generates nighttime light from security and parking lot lights and building lights (interior and exterior). Existing sources of significant light come from surrounding land uses and from street lights, vehicle lights, parking lot lights, and building lights.

In compliance with Los Angeles Municipal Code (LAMC) Section 41.40, construction of the proposed Project would occur during daytime hours. Thus, construction of the proposed Project would not require portable nighttime lighting on the Campus during construction activities. Therefore, light and glare impacts during construction of the Proposed Project would be less than significant.

The proposed Project would not significantly increase nighttime lighting on the Project site because the new buildings would replace existing buildings, and the proposed Project would not change the school's current operating hours from 8:00 AM to 2:23 PM, with after-school program uses until 6:00 PM. Furthermore, the proposed Project does not include any new sources of high-intensity nighttime lighting, such as stadium lights. All lights on new buildings and any new site lighting would be focused and directed to reduce spill light and glare off the Project site. The District would implement SC-AE-5, which requires review of all designs and testing of new lights following installation to ensure that adverse light trespass and glare impacts are avoided; and SC-AE-6, which requires the District to use the International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) lighting standards that reduce glare, light trespass, and skyglow. Consequently, new lighting from the proposed Project would not result in adverse nighttime views in the area and the Proposed Project is not anticipated to introduce a new substantial source of glare to the Campus that would adversely affect daytime views in the area. Therefore, light and glare impacts would be less than significant and no further analysis is required.

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) 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:

There are no agriculture and forestry resources LAUSD SCs.

Would the proposed 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?

No Impact. The proposed Project would be developed on an existing elementary school campus. The Campus is identified as Urban Built-Up Land by the California Department of Conservation's (DOC's) Important Farmland Finder and is not identified as an area of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[31] The Project site is surrounded by residential properties on all four sides and there is

[31] California Important Farmland Finder, 2023, https://maps.conservation.ca.gov/dlrp/ciff/.

no agricultural or farm use on or in the vicinity of the Project site; thus, no Project-related farmland conversion would occur. Therefore, no impact would occur and no further analysis is required.

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

No Impact. Williamson Act contracts restrict the use of privately owned land to agriculture and compatible open space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. The Project site is not subject to a Williamson Act contract, and the existing zoning is PF-1 (Public Facilities),[32] which allows the use and development of publicly owned land, including public elementary and secondary schools. The Project site is eligible to enter into an Urban Agriculture Incentive Zone (UAIZ) contract with the City of Los Angeles under the adopted Urban Agriculture Incentive Zone (UAIZ) Ordinance to implement a local program citywide in accordance with Assembly Bill (AB) 551. The Ordinance allows landowners to enter into a voluntary contract with the City of Los Angeles to use properties for active agricultural purposes in exchange for a potential property tax reduction[33]. However, implementation of the proposed Project would not include agricultural use to the Campus. Thus, the proposed Project would not conflict with agricultural zoning or a Williamson Act contract. Therefore, no impact would occur and no further analysis is required.

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

No Impact. The proposed Project's development would not conflict with existing zoning for forest land, timberland, or timberland production. Forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits."[34] Timberland is defined as "land….which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees."[35] The Project site is zoned PF-1, for the use and development of public facilities, including schools, and is not zoned for forest land or timberland use.[36] Therefore, no impact would occur and no further analysis is required.

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

No Impact. The proposed Project would include the modernization of an existing elementary school Campus within a built-out area, and no significant forest land uses are present on-site nor in the immediate vicinity. No vegetation on-site is cultivated for forest resources, and any existing vegetation is limited to ornamental trees and shrubs. Construction of the proposed Project would not require any changes to the existing environment

[32] City of Los Angeles. Zoning Map. http://zimas.lacity.org/.
[33] City of Los Angeles. Urban Agricultural Incentive Zone (UAIZ) fact sheet. https://planning.lacity.org/odocument/8ad42004-12d8-4338-95d4-d6d41434cc13/FAQ.pdf
[34] California PRC Section 12220(g).
[35] California PRC Section 4526.
[36] City of Los Angeles. Zoning Map. http://zimas.lacity.org/.

that could result in the loss or conversion of forest land to non-forest use. Therefore, no impact would occur and no further analysis is required.

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

No Impact. The Project site is completely within a built-out and urbanized area of the City of Los Angeles, and no significant agricultural uses or forest land uses are present on-site nor in the immediate vicinity. There is no mapped important farmland or forest land on or near the Project site, and Project development would not indirectly cause conversion of such land to nonagricultural or non-forest use. Therefore, no impact would occur and no further analysis is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district 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?	☐	☐	☒	☐

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

EXPLANATION:

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

LAUSD Standard Conditions of Approval	
SC-AQ1	LAUSD shall complete a Health Risk Assessment for new campus locations that would place classrooms or play areas within close proximity (less than 0.25 mile) of existing sources of adverse emissions. LAUSD shall identify all permitted and non-permitted stationary sources, freeways and other busy traffic corridors, railyards, and large agricultural operations within 0.25 mile of the project. Once identified, make a determination about the need for qualitative evaluation, screening level evaluation in accordance with air district specific guidance and tools, or a refined evaluation with air dispersion modeling, to determine the if risks constitute an actual or potential endangerment of public health to persons who would attend or be employed at the school. For freeways and other busy traffic corridors within 500 feet, air dispersion modeling must be used to make the health risk determination (no screening, no qualitative discussion, etc.). The Health Risk Assessment shall comply with 'Air Toxics Health Risk Assessment (HRA)'. This document includes guidance on HRA protocols for permitted, non-permitted, and mobile sources that might reasonably be anticipated to emit hazardous air emissions and result in potential long-term and short-term health impacts to student and staff at the school site.

4. Environmental Checklist and Analysis

	The HRA must find that health risks are below criteria thresholds. If health risks which exceed air district criteria thresholds are identified, the school campus shall be redesigned or relocated to a site farther from the emissions generator.
SC-AQ 2	Construction Contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.
SC-AQ 3	Construction Contractor shall: • Maintain speeds of 15 miles per hour (mph) or less with all vehicles. • Load impacted soil directly into transportation trucks to minimize soil handling. • Water/mist soil as it is being excavated and loaded onto the transportation trucks. • Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site. • Minimize soil drop height into haul trucks or stockpiles during dumping. • During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks. • Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed. • Place stockpiled soil on polyethylene sheeting and cover with similar material. • Place stockpiled soil in areas shielded from prevailing winds.
SC-AQ4	LAUSD shall analyze air quality impacts: If site-specific review or monitoring data of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds. Construction bid contracts shall include protocols that reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. The Construction Contractor shall be responsible for documenting compliance with the identified protocols. Specific air emission reduction protocols include, but are not limited to, the following. <u>Exhaust Emissions</u> • Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM). • Consolidate truck deliveries and limit the number of haul trips per day. • Route construction trucks off congested streets, as permitted by local jurisdiction haul routes. • Employ high pressure fuel injection systems or engine timing retardation. • Use ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment. • Use construction equipment rated by the United States Environmental Protection Agency as having at least Tier 4 (model year 2008 or newest available model) emission limits for engines between 50 and 750 horsepower. • Restrict non-essential diesel engine idle time, to not more than five consecutive minutes. • Use electrical power rather than internal combustion engine power generators.

	• Use electric or alternatively fueled equipment, as feasible. • Use construction equipment with the minimum practical engine size. • Use low-emission on-road construction fleet vehicles. • Ensure construction equipment is properly serviced and maintained to the manufacturer's standards. <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> • Use ultra-low VOC or zero-VOC surface coatings. • Phase construction activities to minimize maximum daily emissions. • Configure construction parking to minimize traffic interference. • Provide temporary traffic control during construction activities to improve traffic flow (e.g., flag person). • Prepare and implement a trip reduction plan for construction employees. • Implement a shuttle service to and from retail services and food establishments during lunch hours. • Increase distance between emission sources to reduce near-field emission impacts.

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O_3), carbon monoxide (CO), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate

matter ($PM_{2.5}$), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), and lead (Pb). Areas are classified under the federal and California Clean Air Act as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the South Coast Air Quality Management District (South Coast AQMD), 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.[37]

Furthermore, the South Coast AQMD has identified regional thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including VOC, CO, NO_x, SO_X, PM_{10}, and $PM_{2.5}$. Development projects below the regional significance thresholds are not expected to generate sufficient criteria pollutant emissions to violate any air quality standard or contribute substantially to an existing or projected air quality violation. Where available, the significance criteria established by the South Coast AQMD may be relied upon to make the following determinations.

Would the proposed Project:

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

Less than Significant Impact. The South Coast AQMD adopted the 2022 Air Quality Management Plan (AQMP) on December 2, 2022.[38] Regional growth projections used by South Coast AQMD to forecast future emission levels in the SoCAB are provided by the Southern California Association of Governments (SCAG) and are partially based on land use designations included in city/county general plans.

The proposed Project would redevelop the existing elementary school Campus and would not increase student capacity. Thus, the Project would not substantially affect housing, employment, or population projections within the region. Due to the nature of the Project, it would not result in new long-term employment. Construction activities associated with the Project would result in short-term employment only and would end on completion.

Additionally, as demonstrated in Section III(b), the regional emissions that would be generated by the operational phase of the Project would be less than the South Coast AQMD emissions thresholds and would therefore not be considered by South Coast AQMD to be a substantial source of air pollutant emissions that would have the potential to affect the attainment designations in the SoCAB. Therefore, the Project would not affect the regional emissions inventory or conflict with strategies in the AQMP. Impacts would be less than significant, and no further analysis is required.

[37] California Air Resources Board, 2023, June 16 (accessed), Area Designations Maps/State and National. https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations.

[38] South Coast Air Quality Management District, 2022, December. *2022 Air Quality Management Plan.* http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=10.

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

Less than Significant Impact. The following describes Project-related impacts from regional short-term construction activities and regional long-term operation of the Project.

Regional Short-Term Construction Impacts

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

Construction activities associated with the redevelopment of the exiting elementary school are anticipated to disturb 4.3 acres[39] on the Project site. The Project would involve building and asphalt demolition and debris hauling, site preparation, fine grading, building construction, paving, and architectural coating. Construction is anticipated to start in the second quarter of 2025 and would occur intermittently until the second quarter of 2029. Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), Version 2022.1.1.16[40], and are based on the preliminary construction duration provided by the District. Where specific information regarding Project-related construction activities was not available, construction assumptions were based on CalEEMod defaults. Construction emissions modeling is shown in Table 4, *Maximum Daily Regional Construction Emissions*, and shows maximum daily emissions for VOC, NO_x, CO, SO_2, PM_{10}, and $PM_{2.5}$ from construction-related activities would be less than their respective South Coast AQMD regional significance threshold values. Therefore, air quality impacts from Project-related construction activities would be less than significant. No further analysis is required.

Table 4. Maximum Daily Regional Construction Emissions

Construction Activity	Criteria Air Pollutants (lbs./day) [a,b,c,d]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Demolition (2025)	2	23	21	<1	2	1
Demolition (2026)	2	22	20	<1	2	1
Site Preparation (2026)	3	30	30	<1	10	5
Grading (2026)	2	16	19	<1	5	2
Building Construction (2026)	1	10	14	<1	1	<1
Building Construction (2027)	1	10	14	<1	<1	<1
Building Construction (2028)	1	9	13	<1	<1	<1
Building Construction (2029)	1	9	13	<1	<1	<1

[39] While the disturbed area on the Project site is 4.3 acres, modeling used the total Project site acreage of 5.73 acres for the most conservative emissions estimates.

[40] California Air Pollution Control Officers Association (CAPCOA), 2022, California Emissions Estimator Model (CalEEMod). Version 2022.1.1.14. Developed by: ICF in collaboration with the Sacramento Metropolitan Air Quality Management District

4. Environmental Checklist and Analysis

Table 4. Maximum Daily Regional Construction Emissions

Construction Activity	Criteria Air Pollutants (lbs./day) [a,b,c,d]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Building Construction (2029), Paving, and Architectural Coating	6	16	25	<1	1	1
Maximum Daily Emissions	6	30	30	<1	10	5
South Coast AQMD Regional Threshold	75	100	550	150	150	55
Exceeds Regional Threshold?	No	No	No	No	No	No

Source: CalEEMod, Version 2022.1.1.16

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

[b] Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, and LAUSD SC-AQ-3, which involves reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers. Modeling also includes implementation of LAUSD SC-AQ-4, which requires utilization of equipment that meets the United States Environmental Protection Agency (USEPA) Tier 3 emissions standards at minimum.

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

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

Long-Term Air Quality

Typical long-term air pollutant emissions are generated by area sources (e.g., landscape fuel use, aerosols, architectural coatings, and asphalt pavement), energy use (natural gas), and mobile sources (i.e., on-road vehicles). The Project would not result in an increase in planned enrollment capacity or staffing and therefore, the Project would not result in an increase in emissions from mobile sources. Therefore, criteria air pollutant emissions from the Project would only come from area and energy sources. As shown in Table 5, *Maximum Daily Regional Operational Emissions*, the Project would not generate emissions that exceed the South Coast AQMD regional significance thresholds. Projects that do not exceed the South Coast AQMD regional significance thresholds would not result in an incremental increase in health impacts in the SoCAB from Project-related increases in criteria air pollutants. In addition, emissions from building energy use would be minimized because the buildings proposed to be demolished were constructed prior to modern building energy codes and would be replaced with newer, more energy-efficient buildings that meet the current California Building and Energy Efficiency Standards. Therefore, impacts on the regional air quality associated with operation of the Project would be less than significant, and no further analysis is required.

Table 5. Maximum Daily Regional Operational Emissions

Source	Criteria Air Pollutants (lbs./day) [a,b,c,d]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Area	1	<1	1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Maximum Daily Emissions	1	<1	1	<1	<1	<1
South Coast AQMD Regional Threshold	75	100	550	150	150	55
Exceeds Regional Threshold?	No	No	No	No	No	No

Source: CalEEMod, Version 2022.1.1.16

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

[b] Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, and LAUSD SC-AQ-3, which involves reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers.

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

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

c) Expose sensitive receptors to substantial pollutant concentrations?

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

Construction Localized Significance Thresholds

Localized significance thresholds (LSTs) are based on the California AAQS, which are the most stringent AAQS to provide a margin of safety in the protection of public health and welfare.[41,42] They are designated to protect sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise. The screening-level construction LSTs are based on the size of the Project site, distance to the nearest sensitive receptor, and Source Receptor Area (SRA) 1 – Central Los Angeles. In addition to on-site sensitive receptors, which include students and staff, the nearest off-site sensitive receptors are the single-family residences along East 49th Street to the north and west, McKinley Avenue to the east, and East 50th Street to the south of the Project site (see Figure 4).

Air pollutant emissions generated by construction activities would cause temporary increases in air pollutant concentrations. Table 6, *Localized Construction Emissions*, shows the maximum daily construction emissions (pounds per day) generated during on-site construction activities compared with the South Coast AQMD's screening-level LSTs, for sensitive receptors within 82 feet (25 meters). As shown in the table, construction of

[41] South Coast Air Quality Management District (South Coast AQMD). 2008, June. Final Localized Significance Threshold Methodology. http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

[42] South Coast AQM7D. 2011. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf.

4. Environmental Checklist and Analysis

the Project would not generate construction-related on-site emissions that would exceed the screening-level LSTs. Thus, Project-related construction activities would not have the potential to expose sensitive receptors to substantial pollutant concentrations. Localized air quality impacts from construction activities would be less than significant. No further analysis is required.

Table 6. Localized Construction Emissions

Construction Activity	Pollutants (lbs./day) [a,b,c,d]			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Demolition (2025)	22	20	1.70	0.94
Demolition (2026)	21	19	1.62	0.88
South Coast AQMD ≤1.00-acre LST	74	680	5.00	3.00
Exceeds LST?	No	No	No	No
Building Construction (2026)	10	13	0.38	0.35
Building Construction (2027)	9	13	0.34	0.31
Building Construction (2028)	9	13	0.30	0.28
Building Construction (2029)	9	13	0.28	0.25
Building Construction (2029), Paving, and Architectural Coating	16	24	0.53	0.48
South Coast AQMD 1.31-acre LST	85	795	5.93	3.62
Exceeds LST?	No	No	No	No
Grading (2026)	15	17	4.18	2.01
South Coast AQMD 2.50-acre LST	117	1,183	9.33	5.50
Exceeds LST?	No	No	No	No
Site Preparation (2026)	29	29	9.98	5.19
South Coast AQMD 3.50-acre LST	135	1,454	11.99	6.50
Exceeds LST?	No	No	No	No

Source: CalEEMod Version 2022.1.1.16.

Notes: The LST Methodology uses lookup tables based on site acreage to determine emissions for CEQA purposes. The acreage disturbed is the maximum daily disturbed acreage determined using the equipment mix for the different construction activities for this project. In accordance with South Coast AQMD methodology, only on-site stationary sources and mobile equipment occurring on the construction site are included in the analysis. LSTs are based on receptors within 82 feet (25 meters) of the school in Source Receptor Area (SRA) 1.

a The construction schedule is based on preliminary information provided or confirmed by the District. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast AQMD.

b Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, and LAUSD SC-AQ-3, which involves reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers. Modeling also includes implementation of LAUSD SC-AQ-4, which requires utilization of equipment that at least meets the United States Environmental Protection Agency (USEPA) Tier 3 emissions standards at minimum.

c Includes implementation of LAUSD Standard Conditions of Approval SC-AQ-2, which requires ensuring that construction equipment is properly tuned and maintained. This requirement would further contribute in minimizing generation of criteria air pollutant emissions during construction.

d Includes compliance with South Coast AQMD Rule 1113 that requires the use of architectural coatings with VOC content of 50 grams/liter or less for all interior paints.

Construction Emission Health Risk

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

Toxic Air Contaminants (TACs)

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

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

Due to the limited scale and the short duration of construction activities, the proposed Project would not expose sensitive receptors to substantial pollutant concentrations during construction. Thus, construction emissions would not pose a health risk to onsite and offsite receptors, and project-related construction health impacts would be less than significant.

Operation

Localized Significance Thresholds

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

Carbon Monoxide Hotspots

Vehicle congestion has the potential to create pockets of CO called hotspots. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles are backed-up and idle for longer periods and are subject to reduced speeds. These pockets could exceed the State one-hour standard of 20 parts per

million (ppm) or the eight-hour standard of 9.0 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to ambient air quality standards is typically demonstrated through an analysis of localized CO concentrations.

The SoCAB has been designated attainment under both the national and California AAQS for CO. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection to more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—to generate a significant CO impact.[43] As the Project would not result in an increase in student capacity, the Project would not generate additional peak-hour trips. Therefore, implementation of the Project would not have the potential to substantially increase CO hotspots at intersections in the vicinity of the Project site. Operational impacts would be less than significant, and no further analysis is required.

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

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

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

[43] Bay Area Air Quality Management District (BAAQMD), 2023, May, *California Environmental Quality Act Air Quality Guidelines*. https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines.

	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, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

The analysis in this section is based in part on the *49th Street Elementary School Tree Report* prepared by Carlberg Associates, dated July 29, 2022. A complete copy of this report is included as Appendix C to this Initial Study.[44]

EXPLANATION:

LAUSD applies 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 3	LAUSD shall comply with the following specifications related to bird and bat nesting sites. Project activities (including, but not limited to, staging and disturbances to native and non-native vegetation, structures, and substrates[21]) should occur outside of nesting season to avoid take of birds, bats, or their eggs.[22]

[44] Carlberg Associates, 2022, July, *City of Los Angeles Tree Report – 49th Street Elementary School*. Included as Appendix C to this Initial Study.

4. Environmental Checklist and Analysis

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

	• If an active bird nest is observed, the Surveyor/Biologist shall determine the appropriate buffer around the nest. Buffers are determined on species-specific requirements and nest location. • 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: • 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.

Would the proposed Project:

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

No Impact. Sensitive biological resources are habitats or species that have been recognized by federal, State, and/or local agencies as endangered, threatened, rare, or in decline throughout all or part of their historical distribution. The Project site is fully developed with an active elementary school and is surrounded by urban development uses. Vegetation on the Project site is limited to ornamental school trees and shrubs. There is no native habitat and no suitable habitat for threatened, endangered, or rare species on or near the site.[45,46] Therefore, no impact would occur and no further analysis is required.

[45] California Department of Fish and Wildlife Lands Viewer, 2023, https://apps.wildlife.ca.gov/lands/

[46] U.S. Fish and Wildlife Critical Habitat Map, 2023, https://www.arcgis.com/apps/mapviewer/index.html?layers=794de45b9d774d21aed3bf9b5313ee24

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

No Impact. The Project site is fully developed, consisting of an operational existing elementary school. The U.S. Fish and Wildlife Service (USFWS) manages the National Wetlands Inventory (NWI), a digital Wetlands Mapper with vetted data to represent current information on wetlands, riparian, and deep-water habitats.[47] The Project site is not within an adopted habitat conservation plan, natural community conservation plan, or similar plan. the Project site is not within a significant ecological area, land trust, or conservation plan.[48] There is no present riparian habitat present in or near the Project site.[49] Therefore, no impact would occur and no further analysis is required.

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

No Impact. Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as swamps, marshes, and bogs. According to the USFWS's NWI, there are no wetlands near or within the Project site. The nearest wetland to the Project site is the Los Angeles River, which is a 333.26-acre Riverine habitat approximately 2.5 miles northeast of the Project site.[50] The proposed Project would not impact any protected wetland areas. No impact would occur and no further analysis is required.

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

Less than Significant Impact. The Project site is surrounded by fencing and developed with buildings, asphalt, concrete surfaces, and small landscaped areas. The Project site does not have any native habitat and is not available for overland animal movement as a wildlife corridor. However, according to the Tree Inventory Report prepared for the proposed Project (see Appendix C), 57 trees of various species, sizes, and maturity are spread throughout the Project site,[51] which may provide nesting sites for resident or migratory birds. The Project would require the removal of approximately 27 trees as part of the Project demolition phase. Project construction near trees and structures may result in disturbances to birds during nesting season. Migratory

47 U.S. Fish and Wildlife Services (USFWS), 2023. National Wetlands Inventory. https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/
48 Los Angeles County Department of Regional Planning, Significant Ecological Area GIS Map, 2023, https://egis-lacounty.hub.arcgis.com/datasets/lacounty::significant-ecological-area-sea/about
49 California Department of Fish and Wildlife, 2023, https://gis.data.ca.gov/datasets/d0b55ff0c29a48b2b615852c40322d5b/explore?location=34.005978%2C-118.218320%2C13.23
50 U.S. Fish and Wildlife Services (USFWS), 2023. National Wetlands Inventory. https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/
51 Carlberg Associates, 2022, July, *City of Los Angeles Tree Report – 49th Street Elementary School.* Included as Appendix C to this Initial Study.

nongame native bird species are protected by the California Fish and Game Code, Sections 3503, 3503.5, and 3513, which prohibits the take of all birds and their active nests, including raptors and other migratory nongame birds.

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

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

Less than Significant Impact. The Project site is within an entirely developed area surrounded by residential and recreational developments within the City of Los Angeles. According to the Tree Inventory Report prepared for the proposed Project, there are 57 trees on the Project site, all of which are located within the 49th Street ES Campus on District-owned property and are not in the public right-of-way or considered trees within the jurisdiction of the City of Los Angeles[52]. The Project site contains seven coast live oak trees, which are protected species by the City of Los Angeles' Tree Preservation Ordinance No. 186873. Protected trees and shrubs as set forth in the Ordinance are coast live oak, western sycamore, Southern California black walnut, California bay laurel, Mexican elderberry and toyon with trunk diameters (measured at 4.5 feet above grade) of 4 inches or greater. The Project site contains 37 private property trees considered 'significant', which is defined in the Ordinance as a tree trunk with a diameter size of eight inches and greater[53].

Although the proposed Project would not require the removal of any protected trees on the Project site, construction would require the implementation of SC-BIO-4 for the removal of approximately 27 total trees. SC-BIO-4 requires that all tree trimming and removal conducted on District property adhere to the procedures described in the LAUSD OEHS Tree Trimming and Removal Policy. This policy ensures the management of District trees while ensuring that District activities will not conflict with locally adopted tree preservation policies and ordinances.[54] Final design of the proposed Project would include a landscape plan that would identify the number, location, and type of replacement trees to be provided. New canopy and accent trees would be installed to increase canopy coverage and provide shade while complimenting the aesthetics of hardscape areas throughout the Campus.

Additionally, the California Legislature granted school districts the authority to exempt school properties from local zoning requirements, provided the school district complies with the terms of Government Code Section 53094[55]. On February 19, 2019 the LAUSD Board of Exemption Adopted a Resolution to exempt all LAUSD

[52] Carlberg Associates. 2022, July, City of Los Angeles Tree Report – 49th Street Elementary School. Carlberg Associates. Included as Appendix C to this Initial Study.
[53] Carlberg Associates, 2022, July, City of Los Angeles Tree Report – 49th Street Elementary School. Carlberg Associates. Included as Appendix C to this Initial Study.
[54] LAUSD Tree Trimming and Removal Procedure. https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/LAUSD_Tree_Protection.pdf
[55] Government Code Section 53094. https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=53094.

school sites from local land use regulations under Government Code Section 53094[56]. Therefore, the proposed Project would not conflict with local policies or ordinances protecting biological resources, and impacts would be less than significant. No mitigation or further study is required.

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

No Impact. The Project site is not within an adopted habitat conservation plan (HCP), natural community conservation plan (NCCP), or similar plan.[57] The closest area protected by an HCP or NCCP is the Rancho Palos Verdes NCCP/HCP, which is 15.5 miles southwest of the Project site.[58] Therefore, no impact would occur and no further analysis is required.

[56] Regular Meeting Stamped Order of Business, Board of Education Report No. 256-18/19. Los Angeles: LAUSD Board of Education, February 19, 2019.
[57] California Department of Fish and Wildlife (CDFW), 2023, https://wildlife.ca.gov/Conservation/Planning/NCCP/Plans
[58] CDFW, 2023, CCP Plan Summary – Rancho Palos Verdes NCCP/HCP, https://wildlife.ca.gov/Conservation/Planning/NCCP/Plans/Rancho-Palos-Verdes

	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 significance of a historical resource pursuant to CEQA Guidelines, Section 15064.5?	☐	☐	☒	☐
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to CEQA Guidelines, Section 15064.5?	☐	☐	☒	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

The analysis in this section is based on the *Historic Resource Evaluation Report (HRER) for 49th Street Elementary School*, prepared by Historic Resources Group, dated June 2022. A complete copy of these reports are included as Appendix D to this Initial Study.[59, 60]

EXPLANATION:

LAUSD applies 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-CUL1	**Historic Architect** For projects involving structural upgrades to historic resources, the Design Team shall include a qualified Historic Architect with demonstrated project-level experience in historic projects. For campuses with qualifying historical resources under CEQA, the Design Team shall include a LAUSD-qualified Historic Architect. The Historic Architect/s shall meet the Secretary of the Interior's Professional Qualifications Standards and the standards described on page 8 of the LAUSD Design Guidelines and Treatment Approaches for Historic Schools. Throughout the project design progress the Historic Architect shall provide input to ensure compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD requirements and guidelines for the treatment of historical resources. Role of the Historic Architect The tasks of the Historic Architect on the Design Team shall include, but are not limited to: • The Historic Architect shall work with the Design Team (including the Structural Engineer) and LAUSD to ensure that project components, including new construction and modernization of existing facilities, comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The Historic Architect shall work with the Design Team and LAUSD throughout the design process to

[59] Historic Resources Group, 2022, June. *Historic Resource Evaluation Report (HRER) for 49th Street Elementary School.*
[60] Historic Resources Group, 2023, August. *49th Street Elementary School Historic Resources Technical Report.*

	develop project options that facilitate compliance with the applicable historic preservation standards. • For new construction, the Historic Architect shall work with the Design Team and LAUSD to identify options and opportunities for: (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors, and (2) ensuring that new construction is designed and sited in such a way that reinforces and strengthens, as much as feasible, character-defining site plan features, landscaping, and circulation corridors throughout campus. • For modernization and upgrade projects involving contributing (significant) buildings or features, the Historic Architect shall work with the Design Team and LAUSD to ensure that specifications for design and implementation of projects comply with the applicable historic preservation standards. • The Historic Architect shall participate in Design Team meetings during all phases of the project through 100% construction drawings, pre-construction, and construction phases, as applicable. • The Historic Architect shall prepare a memo at the 50% and at the 100% construction drawings stages, demonstrating how principal project components and treatment approaches comply with applicable historic preservation standards, including the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The memos shall be submitted to LAUSD OEHS for review. • The Historic Architect shall participate in pre-construction and construction monitoring activities, as appropriate, to ensure continuing conformance with Secretary's Standards and/or avoidance of a material impairment of the historical resources. • The Historic Architect shall provide specifications for architectural features or materials requiring restoration or removal, maintaining and protecting relevant features in place, or on-site storage. Specifications shall include detailed drawings or instructions where historic features may be impacted. • The Design Team and Historic Architect shall be responsible for incorporating LAUSD's recommended updates and revisions during the design development and review process.
SC-CUL2	LAUSD shall follow the guidelines outlined in these documents to the maximum extent practicable when planning and implementing projects and adjacent new construction involving historical resources. The Design Team, Historic Architect, and Construction Contractor shall apply LAUSD School Design Guide and LAUSD Design Guidelines and Treatment Approaches for Historic Schools and the Secretary's Standards for all new construction and modernization projects. In keeping with the District's adopted policies and goals, historical resources shall be reused rather than destroyed, where feasible. General guidelines include: • Retain and preserve the character of historic resources. • Repair rather than remove, replace, or destroy character-defining features; if replacement is necessary, replace in-kind to match materials, dimensions, and appearance. • Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity. • Where practical, conceal reinforcement required for structural stability or the installation of life safety or mechanical systems.

	Where necessary to halt deterioration and after the preparation of a condition assessment, undertake surface cleaning, preparation of surfaces, and other projects involving character-defining features using the least invasive, gentlest means possible. Avoid using any abrasive materials or methods including sandblasting and chemical treatments.
SC-CUL4	Prior to significant alteration or demolition of a historical resource, LAUSD shall retain an Architectural Photographer and/or a Historian or Architectural Historian who meet the Secretary of the Interior's Professional Qualifications Standards and who shall prepare a HABS-like Historic Documentation Package (Package). The Package shall include photographs and descriptive narrative. Documentation will draw upon primary- and secondary-source research including available studies prepared for the property (measured drawings are not required). The specifications for the Package include: • **Photographs:** Photographic documentation shall focus on the historical resources/features proposed to be significantly altered or demolished, with overview and context photographs for the campus and adjacent setting. A professional-quality camera will be used to take photographs of interior and exterior features of the buildings. Photographs will include context views, elevations/exteriors, architectural details, overall interiors, and interior details (if warranted). Digital photographs will be in black and white (as well as in color or as requested by the District) and provided in an electronic format. • **Descriptive and Historic Narrative:** The Historian or Architectural Historian shall prepare descriptive and historic narrative of the historical resources/features. Physical descriptions will detail each resource, elevation by elevation, with accompanying photographs and information on how the resource fits within the broader campus during its period of significance. The historic narrative will include available information on the campus design, history, architect/contractor/designer as appropriate, history of the area, and historic context. In addition, the narrative will include a methodology section specifying the name of researcher, date of research, and sources/archives visited, as well as a bibliography. Within the written history, statements shall be footnoted as to their sources, where appropriate. • **Historic Documentation Package Submittal:** Upon completion of the descriptive and historic narrative, all materials will be compiled in electronic format and presented to LAUSD for review and comment. Upon approval, one electronic copy and one hard copy shall be submitted to LAUSD OEHS. Photographs will be individually labeled and provided to LAUSD in electronic format.
SC-CUL8	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-CUL9	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.

4. Environmental Checklist and Analysis

SC-CUL10	All work shall stop within a 30foot 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.

Would the proposed Project:

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

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

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

> The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and:
>
> A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
>
> B. That are associated with the lives of persons significant in our past; or
>
> C. That embody distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
>
> D. That have yielded, or may be likely to yield, information important in prehistory or history (36 Code of Federal Regulations [CFR] Section part 63).

State. Section 5024.1(c), Title 14 of the California Code of Regulations (CCR), Section 4852 of the California Public Resources Code defines the criteria to be considered eligible for listing in the California Register of Historical Resources (California Register):

> A resource may be listed as an historical resource in the California Register if it meets any of the following [National Register] criteria:
>
> 1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
>
> 2. Is associated with the lives of persons important in our past;

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

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

Local. Historic-Cultural Monument - Section 22.171.7 of the City Cultural Heritage Ordinance defines a Historic-Cultural Monument (HCM):

> For purposes of this article, a Historic-Cultural Monument (HCM) is any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles. A proposed Monument may be designated by the City Council upon the recommendation of the Commission if it meets at least one of the following criteria:
>
> 1. Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic, or social history of the nation, state, city or community;
>
> 2. Is associated with the lives of historic personages important to national, state, city, or local history; or
>
> 3. Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

The 49th Street Elementary School Campus was constructed in the early 1910s, and the school was dedicated in 1914. The Campus initially consisted of one main building near McKinley Avenue and two smaller classrooms near the west side of the Campus. In 1923, a two-story brick building (West Building) was also constructed on the Campus (altered in 1935). Following the 1933 Long Beach Earthquake, the District decided to modernize 49th Street ES, which resulted in the demolition of the original main building on the Campus. In 1935, the construction of two new buildings (Main Building and South Building) was completed and the reconstruction of a one-story school building (West Building) was completed. In 1936, the school's one-story Auditorium Building was developed. The Administration, Library, and Classroom building was constructed in 1965, and in 1969, an addition was added to the west of the building (Classroom Building), and the new Cafeteria/Lunch Pavilion was constructed that same year.

As shown in Figure 5, *49th Street Elementary School Potential Historic District*, a single potential historic district was identified at 49th Street Elementary School with a period of significance from 1935 to 1936. The potential historic district was found eligible for listing in the National Register (Criteria A and C) and California Register (Criteria 1 and 3), and for designation as a City of Los Angeles HCM under Criteria 1 and 3. The potential historic district consists of four contributing buildings and three contributing sheltered corridors with a period of significance from 1935 to 1936, which include the following:

- Main Building (constructed 1935)
- West Building (constructed 1923)
- South Building (constructed 1935)

- Auditorium Building (constructed 1936)
- The sheltered corridors connecting the Main Building and the West Building (sheltered corridor No. 1); the Main Building and the South Building (sheltered corridor No. 2); and the South Building and the Auditorium (sheltered corridor No. 3) are also considered contributors to the potential historic district.

The potential historic district is historically significant as a grouping of school buildings representative of post-Long Beach earthquake school planning and requirements as well as representing the PWA Moderne architectural style. Table 7, *Potential Historic District*, and Figure 5 in Section 2 indicate each building on the Project site, the year of construction, building integrity (ability to convey its historical significance), and its relation to the potential historic district. No buildings on the Project site are individually eligible historic resources.

Table 7. Potential Historic District

Feature Name	Year Built	Integrity	Status
Buildings			
West Building	1923	Good	Contributor
Main Building	1935	Good	Contributor
South Building	1935	Good	Contributor
Auditorium Building	1936	Good	Contributor
Administration, Library, and Classroom Building	1965/1969	N/A	Non-Contributor
Classroom Building	1969	N/A	Non-Contributor
Cafeteria/Lunch Pavilion	1969	N/A	Non-Contributor
Site Features			
Sheltered Corridor 1	1935-1936	Good	Contributor
Sheltered Corridor 2	1935-1936	Good	Contributor
Sheltered Corridor 3	1935-1936	Good	Contributor
Sheltered Corridor 4	1969	Good	Non-Contributor

Source: Historic Resources Group 2022, included as Appendix D

The proposed Project would remove the West Building and Auditorium Building, and sheltered corridors (1 and 3), as shown in Table 7, sheltered corridors 1 and 3 are contributors to the potential historic district, and sheltered corridor 4 is a non-contributor (see Figure 5). In addition, the proposed Project would remove the non-contributing Cafeteria/Lunch Shelter building and sheltered corridor 4. The Main Building, South Building, and sheltered corridor 2, which are contributors to the potential historic district would remain intact and in their original locations. Two new buildings (a classroom building and a Multipurpose Room/Food Services/Library Building) would be developed on the Project site. Other site improvements and modernization would occur to buildings that would remain. The following activities would have the potential to adversely impact the potential historic district:

- Removal of one non-contributing building, the Cafeteria/Lunch Shelter.
- Removal of the contributing West Building.

- Removal of the contributing Auditorium Building.
- Removal of Two contributing Sheltered Corridors (1 and 3)
- Construction of new buildings and three new sheltered corridors adjacent to the potential historic district contributors.

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

Potential Impacts from Proposed Building Removal

The proposed Project would remove two of the four contributing buildings and two contributing sheltered corridors (1 and 3), or 50 percent of the contributing buildings overall. In total, the four contributing buildings encompass approximately 32,400 square feet of building space, and the sheltered corridors encompass an additional 1,100 square feet; for a total of 33,400 square feet. The two contributing buildings that would be removed (West Building and Auditorium), are much smaller in comparison to the two contributing buildings (Main Building and South Building) that would be retained. Demolition of the West Building (5,600 square feet) and the Auditorium (4,300 square feet) would result in the removal of approximately 9,900 square feet of building space, or 30 percent of the total square footage of contributing buildings to the potential historic district. The remaining Main Building (13,000 square feet) and South Building (9,600 square feet) together contain 22,500 square feet of building space, or approximately 70 percent of the contributing square footage to the potential historic district. As such, a substantial majority of contributing buildings, in terms of built structure and historic fabric, would remain intact after removal of the West Building and Auditorium.

Together, the Main Building and South Building, which would remain, contain all the exterior character-defining features identified as important in conveying the historic significance of the potential historic district that are also repeated on the West Building and Auditorium to be removed. The Main Building and South Building together also represent the important public-facing aspects of the school Campus as it is their primary east-facing façades that contain the historic main entrance (Main Building) and secondary entrance (South Building) to the school. The two contributing buildings to be removed, the West Building and Auditorium, are smaller buildings with a secondary public presence in comparison to the Main Building and South Building. Although they are representative of functions characteristic of schools constructed in the 1930s, these buildings are not critical to understanding the historic significance of the potential historic district and the integration of the remaining contributing buildings would continue to convey the potential historic significance of the Campus. Furthermore, the proposed removal of the buildings addresses the most critical physical conditions and essential safety issues assessed for the buildings of 49th Street ES. These issues include: addressing earthquake safety (seismic retrofit, seismic modernization and/or building replacement); providing 21st century general and specialty classrooms; upgrading accessibility; addressing failed or failing building systems and grounds; landscape upgrades; physical security upgrades; and improvements to interior classroom spaces.

Thus, the proposed removal of two contributing buildings would not reduce the integrity of the potential historic district such that it can no longer convey its historic significance. Therefore, removal of contributing buildings by the proposed Project would result in less-than-significant impacts to historical resources.

Potential Impacts from Proposed New Construction

Construction of the proposed Project would not interrupt the important spatial relationships between the two remaining contributing buildings. The proposed new construction would include new Kindergarten classrooms, a library, a multi-purpose room, and food services facilities, all of which currently exist on the Project site and are in keeping with the historic uses on the 49th Street Elementary School Campus. New construction would be contemporary versions of building types and uses historically common to elementary school campuses.

New buildings would be limited to one-story, which is consistent with the existing one-story and two-story buildings on the Project site, including contributing buildings to the potential historic district. The construction of two one-story buildings would not substantially alter the historic significance or integrity of the potential historic district such that its ability to convey its historic significance would be materially impaired. Additionally, SC-CUL-1, -2, and -3, which require involvement of a Historic Architect through the entire design process and development of a Temporary Protection Plan for those buildings to remain would be implemented. Therefore, construction of the new buildings by the proposed Project would result in less-than-significant impacts to potential historical resources.

After implementation of the proposed Project, the potential historic district would retain integrity of location, design, setting, workmanship, and association from the identified period of significance. Therefore, the 49th Street Elementary School Campus would continue to convey its significance as a post-1933 Long Beach Earthquake school plant, and as an excellent example of a PWA Moderne Campus.

Additionally, implementation of the proposed Project would include input from a qualified historic architect pursuant to SC-CUL-1. Project design, materials, and implementation would comply with historic preservation standards—including the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools—as set forth in SC CUL-2 and CUL-3. Therefore, impacts to historical resources would be less than significant and no further analysis is required.

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

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

> … 'unique archaeological resources' means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

(1) Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.

(2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.

(3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

According to the United States Geological Survey (USGS) Inglewood Quadrangle Map, dated 2015, the site is at an elevation of approximately 180 feet above mean sea level. The site slopes gently to the southwest.[61] .

Since the Project site has been highly disturbed and is covered by fill soils, discovery of archaeological resources during shallow excavation activities is unlikely. In compliance with SC-CUL-4 and SC-CUL-5, LAUSD would comply with Design Specification 01 3591, Historic Treatment Procedures, as applicable, and retain an Architectural Photographer and/or a Historian or Architectural Historian who meet the Secretary of the Interior's Professional Qualifications Standards to prepare a HABS-like Historic Documentation Package. Additionally, LAUSD would implement SC-CUL-6 to retain a qualified Archaeologist to be available on call 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 part of the proposed Project, SC-CUL-7 through SC-CUL-10 require that if historical or unique archaeological resources are discovered during construction activities, all work shall stop within a 30-foot radius of the discovery. LAUSD will retain a qualified archaeologist to make an evaluation of significance of the resource. If it is determined to be historical or a unique archaeological resource or if the discovery is not historical or unique but the archaeologist determines the possibility of further discoveries, a monitoring program will be prepared and implemented for the remainder of the earthwork activities.

As part of the archaeological monitoring program required under SC-CUL-7, scheduling details for participation by a Native American monitor, if required, would be included. If archaeological or Native American resources are discovered, SC-CUL-10 would be implemented for handling and recovery. Therefore, impacts would be less than significant and no further analysis is required.

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

Less than Significant Impact. During construction of the previous development and again during construction of the school, extensive earthwork (excavation and grading) occurred. Therefore, human remains are not anticipated. In the unlikely event that human remains are uncovered during Project demolition, grading, or excavation, California Government Code Sections 27460 et seq. mandate that there shall be no further excavation or soil disturbance until the Los Angeles County Coroner has determined that the remains are not subject to the provisions of Section 27491 of the California Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of death, and the required

[61] United States Geological Survey (USGS), 2015, Inglewood Quadrangle Map.

recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in PRC Section 5097.98.

Pursuant to California Health and Safety Code Section 7050.5, the coroner shall make his or her determination within two working days of notification of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe that they are those of a Native American, he or she shall contact the Native American Heritage Commission within 24 hours. Compliance with existing regulations would ensure that impacts to human remains would be less than significant and no further analysis is required.

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

EXPLANATION:

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

LAUSD Standard Conditions of Approval	
SC-GHG5	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.

Would the proposed Project:

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

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

Short-Term Construction

Electrical Energy

Construction of the Project would not require electricity to power most construction equipment. Electricity use during construction would vary during different phases of construction. Most of the construction equipment would be gas- or diesel-powered, and electricity would not be used to power most of the construction equipment. Later construction phases could result in the use of electricity-powered equipment for interior construction and architectural coatings. It is anticipated that most of the electric-powered construction equipment would be hand tools (e.g., power drills, table saws) and lighting, which would result in minimal electricity usage during construction activities. Electrical energy would be available for use during construction from existing connections, precluding the use of less-efficient generators. Therefore, Project-related construction activities would not result in wasteful or unnecessary electricity demands, and impacts would be less than significant and no further analysis is required.

4. Environmental Checklist and Analysis

Natural Gas Energy

It is not anticipated that construction equipment used for the Project would be powered by natural gas, and no natural gas demand is anticipated during construction. Therefore, impacts would be less than significant with respect to natural gas usage and no further analysis is required.

Transportation Energy

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

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

Long-Term Operation

The operation of the Project would generate demand for electricity on the Project site. During the operation of the Project, energy is used for heating, cooling, and ventilation of buildings; water heating; equipment; appliances; and indoor, outdoor, perimeter, and parking lot lighting; security systems. Table 8, *Net Increase in Electricity*, shows the net increase in electricity demand from these additional uses from the elementary school.

Table 8. Net Increase in Electricity [a, b, c]

	Net Increase SQFT	Title 24-Compliant Electricity (kWh/yr.)	Non-Title 24 Compliant Electricity (kWh/yr.)	Total Electricity Consumption (kWh/yr.)
Electricity				
Elementary School	17,132[c]	34,084	10,661	44,745
Parking Lot	16,400	14,366	0	14,366
TOTAL				**59,111**

Source: CalEEMod Version 2022.1.1.16.
Notes: KBTU: kilo British Thermal Units; kWh: kilowatt-hour; SQFT = square feet
[an] Electricity consumption have been calculated using the elementary school and parking lot energy rates from CalEEMod Appendix G, *Default Data Tables*, from EDFZ 16.
[b] Calculations for energy use only consider the net increase in building square feet of 6,692 square feet, based on the preliminary information provided by the District. Parking lot energy use is assumed to be entirely new for the most conservative estimates. As CalEEMod Version 2022.1.1.16 does not include historical energy rates, it is assumed that existing buildings and new buildings will have the same energy rate.
[c] Net increase in square feet excludes the two proposed sheltered corridors which would not consume electricity

New electrical service to the Project site will be provided by Los Angeles Department of Water and Power (LADWP) through a new transformer and connections to off-site electrical infrastructure. The Project would add approximately 17,132 square feet of building area to the Project site. As shown in Table 8, the net new electricity demand from the increase in total building square footage would total 59,111 kilowatt-hours per year. While the Project would generate additional energy demand at the site, it would comply with SC-GHG-5. The new buildings would not exceed the Building Energy Efficiency Standards and the California Green Building Standards Code (CALGreen) and would be more energy efficient than the existing elementary school. These features would comply with the goals outlined in Appendix F of the CEQA Guidelines, as the Project would promote the use of renewable energy and decrease reliance on fossil fuels to meet the electricity demands of the Project site. Because the Project would comply with these regulations and would provide features to decrease energy use by the Project site, it would not result in wasteful, inefficient, or unnecessary electricity demands. Therefore, operation of the Project would result in a less-than-significant impact related to electricity and no further analysis is required.

The operation of the Project would result in the consumption of transportation energy during operation from the use of motor vehicles. The efficiency of the motor vehicles in use (average miles per gallon) is unknown and highly variable. Thus, estimates of transportation energy use are based on the overall VMT and related transportation energy use. The Project-related VMT would primarily come from students and staff. However, because student capacity and staffing would not increase or change after buildout of the three construction phases, implementation of the Project would not result in additional trips or an increase in VMT and would not result in additional reliance on fossil fuel consumption. The Project would include two electric vehicle spaces, which would promote the use of alternative fuels, thereby reducing reliance on fossil fuels. Therefore, there would be no impact with respect to operation-related fuel usage. No impacts would occur and no further analysis is required.

4. Environmental Checklist and Analysis

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

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

The statewide RPS requirements do not directly apply to individual development projects, but to utilities and energy providers such as SCE, whose compliance with RPS requirements would contribute to the State's objective of transitioning to renewable energy. The elementary school land uses accommodated by the Project would not change and would comply with the current and future iterations of the Building Energy Efficiency Standards and CALGreen.

Also, in compliance with SC-GHG-5, the new buildings would not exceed the Building Energy Efficiency Standards and the California Green Building Standards Code (CALGreen) and would be more energy efficient than the existing elementary school. The Project would be reviewed by the Division of the State Architect (DSA) for compliance with design and construction and energy regulations, and by LAUSD for compliance with standard conditions. The Project would not conflict with State or local plans for renewable energy or energy efficiency. No impacts would occur and no further analysis is required.

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

The analysis in this section is based in part on *Preliminary Geotechnical Investigation Proposed Major Modernization 49th Street Elementary School*, prepared by Geotechnical Professionals Inc., dated January 28, 2022. A complete copy of this report is included as Appendix F to this Initial Study.

EXPLANATION:

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

LAUSD Standard Conditions of Approval	
SC-GEO1	LAUSD shall prepare a Geohazard Assessment for the construction of any new school or applicable school addition.

4. Environmental Checklist and Analysis

Would the proposed 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 Division of Mines and Geology Special Publication 42.

Less than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazards of surface faulting and fault rupture on habitable buildings. Fault rupture generally occurs within 50 feet of an active fault line and is limited to the immediate area where the fault breaks along the surface. Active earthquake faults are faults where surface rupture has occurred within the last 11,000 years. The Project site is not within or immediately adjacent to (i.e., within a few hundred feet) of an Alquist-Priolo Earthquake Fault Zone (surface fault rupture only). The nearest Alquist-Priolo Earthquake Fault Zone is the Puente Hills Blind Thrust and Newport-Inglewood Zone of deformation, which are approximately 0.4 and 4.9 miles from the Project site, respectively.[62] The potential for tectonic fault rupture at the site is considered negligible. Therefore, fault rupture impacts would be less than significant and no further analysis is required.

ii) Strong seismic ground shaking?

Less than Significant Impact. Southern California is a seismically-active region. Impacts from ground shaking could occur many miles from an earthquake epicenter. The potential severity of ground shaking depends on many factors, including the distance from the originating fault, the earthquake magnitude, and the nature of the earth materials beneath a given site. There are several known faults in the Los Angeles region; the nearest mapped faults are the Puente Hills Blind Thrust and Newport-Inglewood Zone of deformation, which are approximately 0.4 and 4.9 miles from the Project site, respectively.[63] Moderate to strong ground shaking can be anticipated, as with current conditions. Because of the proximity to known faults and because the entire southern California region is considered seismically active, there is a potential for people and structures to experience strong ground shaking in the future from local and regional faults. However, the site is not on or within 1,500 feet of a known active fault or geologically hazardous area.

In compliance with SC-GEO-1, LAUSD would prepare a Geohazard Assessment for the construction of the new structures on the Project site. The new buildings would be designed in compliance with the California Building Code guidelines for evaluating and mitigating seismic hazards in California and the California Geological Survey "Checklist for the Review of Geologic/Seismic Reports for California

[62] Geotechnical Professionals Inc. 2022, January 28. *Preliminary Geotechnical Investigation Proposed Major Modernization Project Report. 49th Street Elementary School.*

[63] Geotechnical Professionals Inc. 2022, January 28. *Preliminary Geotechnical Investigation Proposed Major Modernization Project Report. 49th Street Elementary School.*

Schools, Hospitals, and Essential Services Buildings."[64] The proposed Project also requires review from the DSA for compliance with design and construction and accessibility standards and codes, including seismic requirements. LAUSD, with oversight from DSA, would comply with these requirements in the design and construction of the new school buildings. Therefore, seismic ground shaking impacts would be less than significant and no further analysis is required.

iii) Seismic-related ground failure, including liquefaction?

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

According to the City and County of Los Angeles Seismic Safety Elements, the Project site is not in a seismic hazard zone for soil liquefaction or in a zone of required investigation for liquefaction.[65] Groundwater was not encountered in subsurface explorations to 81.5 feet below existing grade during the geotechnical investigation for the proposed Project; however, historical high groundwater levels provided by the California Geological Survey (CGS) indicate a shallowest groundwater table of approximately 45 to 50 feet below existing grades. Thus, due to the lack of shallow groundwater and density of the subsurface soils, the Project site is excluded from a liquefaction hazard zone. The proposed Project would not expose people or the new school buildings to adverse effects from liquefaction. Therefore, there would be no impact and no further analysis is required.

iv) Landslides?

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

The relatively flat-lying topography at the school precludes both stability problems and the potential for lurching. According to the County of Los Angeles Safety Element[66] and the City of Los Angeles Safety Element,[67] the Project site is not within an area identified as having a potential for slope instability. There are no known landslides near the site, nor is the school in the path of any known or potential landslides or

[64] California Geological Survey (CGS), 2022, November. Note 48 "Checklist for the Review of Geologic/Seismic Reports for California Public Schools, Hospitals, and Essential Services Buildings." https://www.conservation.ca.gov/cgs/Documents/Publications/CGS-Notes/CGS-Note-48-a11y.pdf

[65] Geotechnical Professionals Inc. 2022, January 28. *Preliminary Geotechnical Investigation Proposed Major Modernization Project Report. 49th Street Elementary School.*

[66] Los Angeles County General Plan. Adopted October 6, 2015. Chapter 12: Safety Element. http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch12.pdf

[67] City of Los Angeles, Department of City Planning. General Plan Safety Element. Adopted November 26, 1996. https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf

seismic slope instability. The proposed Project would not expose people or the new school buildings to adverse effects from landslides. Therefore, there would be no impacts and no further analysis is required.

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

Less than Significant Impact.

Construction

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

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

Project-related construction activities would expose soil through excavation, grading, and trenching, and thus could cause erosion during heavy winds or rainstorms. Construction projects of one acre or more are regulated under the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) issued by the State Water Resources Control Board. LAUSD would obtain coverage by preparing and implementing a Stormwater Pollution Prevention Plan (SWPPP), estimating sediment risk from construction activities to receiving waters, and specifying best management practices (BMPs) that would be incorporated into the construction plan to minimize stormwater pollution. The proposed Project would occur on approximately 4.3 acres of the 5.73-acre 49th Street ES Campus (Project site); thus, construction would be subject to the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP. This is also required under LAUSD SC-HWQ-2. Therefore, construction-phase soil erosion impacts would be less than significant and no further analysis is required.

Operation

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

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

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

Less than Significant Impact. Hazards arising from liquefaction and landslides would be less than significant, as discussed previously in Sections a.(iii) and (iv).

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

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

Seismically Induced Settlement. Seismically-induced settlement occurs in dry sands, in contrast to liquefaction, which occurs in saturated sand or gravel, and is often caused by loose to medium-dense granular soils densified during ground shaking. A potential total dry seismic settlement (above the groundwater table) of 1 to 1.75 inches, with differential seismic settlement estimated to be between 0.5- and 1-inch across a span of 40 feet. The majority of the dry seismic settlement was found to occur in the upper 4 to 10 feet[68]. The resulting estimated total dry seismic settlements beneath new buildings would be between 0.25- and 0.5-inch (with differential settlements estimated to be less than 0.25-inch across a 40-foot span). The above settlement estimates are based on the assumption that the earthwork recommended in the Geotechnical Investigation would be performed, that the footings would be sized accordingly, and additional structural load information would be provided when it is available, to evaluate the settlement. Therefore, impacts would be less than significant, and no further analysis is required.

[68] Geotechnical Professionals Inc. 2022, January 28. *Preliminary Geotechnical Investigation Proposed Major Modernization Project Report. 49th Street Elementary School.*

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

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

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

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

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

No Impact. The existing Campus does not use septic tanks or other alternative wastewater disposal systems, and the proposed Project would not require it. Therefore, no impact would occur and no further analysis is required.

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

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

Los Angeles is rich in paleontological sites. Fossils have been found mostly in sedimentary rock that has been uplifted, eroded, or otherwise exposed. Since the Project site has been highly disturbed and is covered by fill soils, discovery of paleontological resources during shallow excavation activities is unlikely. Additionally, neither the school nor the surrounding area has been identified as having a high paleontological sensitivity.[69]. As a result, impacts to paleontological resources would be less than significant and no further analysis is required.

[69] City of Los Angeles, 2001, *Citywide General Plan Framework Final Environmental Impact Report*. Certified August 8, 2001. Appendix C - Vertebrate Paleontological Resources.https://planning.lacity.org/odocument/6aa45676-e431-43ab-8621-dd493e64d2ea/FrameworkFEIR.pdf

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?	☐	☐	☒	☐

Greenhouse gas (GHG) emission regulatory setting and modeling data can be found in Appendix A to this Initial Study.

EXPLANATION:

LAUSD applies 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-GHG1	During operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
SC-GHG2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.
SC-GHG3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.
SC-GHG4	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-GHG5	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-USS1	Implementation of SC-USS-1.

The primary source of GHG is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO_2), methane (CH_4), and ozone (O_3)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHG identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.[70]

[70] Water vapor (H2O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.

Information on manufacture of cement, steel, and other "life cycle" emissions that would occur as a result of the Project are not applicable and are not included in the analysis.[71] Black carbon emissions are not included in the GHG analysis because the California Air Resources Board (CARB) does not include this pollutant in the state's Senate Bill 32 (SB 32) and Assembly Bill 1279 (SB 1279) inventory and treats this short-lived climate pollutant separately.[72] A background discussion on the GHG regulatory setting and GHG modeling can be found in Appendix A to this Initial Study.

Would the proposed Project:

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

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

Project-related construction and operation-phase GHG emissions are shown in Table 9, *Project-Related Net GHG Emissions*. Implementation of the Project would result in the redevelopment of an elementary school on the Project site. However, because student capacity would not increase after buildout of the Project, operation of the Project would not result in an increase in trips, water demand, or solid waste generation. In addition, GHG emissions from building energy use would be minimized because the existing two buildings to be removed, which were constructed prior to modern building energy codes, would be replaced with newer, more energy-efficient buildings that meet the current California Building and Energy Efficiency Standards. Annual average construction emissions were amortized over 30 years and included in the emissions inventory to account for one-time GHG emissions from the construction phase of the project. Overall, construction and operation of the Project would not generate annual emissions that exceed the South Coast AQMD bright-line threshold of

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

[72] Particulate matter emissions, which include black carbon, are analyzed in Section III, Air Quality. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The state's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years (California Air Resources Board. 2017, March 14. Final proposed Short-Lived Climate Pollutant Reduction Strategy. https://www.arb.ca.gov/cc/shortlived/shortlived.htm).

3,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year.[73] Additionally, SC-GHG-1 through 6 and USS-1 would minimize operational GHG emissions through efficient irrigation, energy consumption, and waste generation. Therefore, the Project's cumulative contribution to GHG emissions would be less than significant and no further analysis is required.

Table 9. Project-Related Net GHG Emissions

Source	GHG Emissions ($MTCO_2e$ / Year)[a]	
	Project GHG Emissions (MTCO2e/Year)	Percent of Project Total
Area	<1	1 percent
Energy	26	37 percent
Water	<1	1 percent
Refrigerants	<1	<1 percent
Amortized Construction[b]	43	62 percent
Total	69	100 percent
South Coast AQMD Bright-Line Threshold	3,000 $MTCO_2e$/Yr.	NA
Exceeds Bright-Line Threshold	No	NA

Sources: CalEEMod Version 2022.1.1.16.
Note: Mtons = metric tons; $MTCO_2e$ = metric ton of carbon dioxide equivalent.
[a] Student capacity at buildout would not change from existing conditions. Therefore, mobile and solid waste emissions were not evaluated. The modeling also assumes that landscaping would be a new use and accounts for GHG emissions from outdoor water use.
[b] Total construction emission is amortized over 30 years per South Coast AQMD methodology.

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

Less than Significant Impact. Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan, the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). CARB's latest Climate Change Scoping Plan (2022)[74] outlines the State's strategies to reduce GHG emissions in accordance with the targets established under AB 32, SB 32, and AB 1279. The Scoping Plan is applicable to State agencies and is not directly applicable to cities/counties and individual projects. Nonetheless, the Scoping Plan has been the primary tool that is used to develop performance-based and efficiency-based CEQA criteria and GHG reduction targets for climate action planning efforts.

Statewide strategies to reduce GHG emissions include the low carbon fuel standards, California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the CAFE standards, and other early action measures as necessary to ensure the State is on target to achieve the GHG

[73] South Coast Air Quality Management District. 2010, September 28. Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15. http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf.

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

emissions reduction goals of AB 32, SB 32, and AB 1279. In addition, new developments are required to comply with the current Building Energy Efficiency Standards and CALGreen. The Project would comply with these GHG emissions reduction measures since they are statewide strategies. The Project's GHG emissions would be reduced from compliance with statewide measures that have been adopted since AB 32, SB 32, and AB 1279 were adopted. Therefore, impacts would be less than significant and no further analysis is required.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy

SCAG adopted the 2020-2045 RTP/SCS (Connect SoCal) in September 2020. Connect SoCal finds that land use strategies that focus on new housing and job growth in areas rich with destinations and mobility options would be consistent with a land use development pattern that supports and complements the proposed transportation network.

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

4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and 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?	☐	☐	☐	☒

The analysis in this section is based in part on "Phase I Environmental Site Assessment 49th Street Elementary School," prepared by Tetra Tech, dated March 22, 2022, the "Preliminary Environmental Assessment Equivalent Report" prepared by Ninyo & Moore, dated July 19, 2023, and the "Removal Action Work Plan" prepared by Ninyo & Moore, dated August 25, 2023. Copies these reports are included as Appendix F, G, and H, to this Initial Study.

EXPLANATION:

LAUSD applies 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.

	• 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-AQ1	Implementation of SC-AQ-1.

Would the proposed Project:

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.

Existing Hazardous Materials Present or Potentially Present on the Campus

Recognized Environmental Conditions

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

RECs identified by the Phase I Environmental Site Assessment include:

- Current and historical use of the boiler/incinerator room in the Main Building, including the potential use of petroleum fuels, the presence of an incinerator, and the presence of pink staining around a sump.

- The potential presence of lead-contaminated soils in the vicinity of the on-Site buildings (historical and current) associated with the potential use of lead-based paint (LBP) in the buildings.

- The potential presence of organochlorine pesticide (OCP)-contaminated soils in the vicinity of the on-Site buildings (historical and current) associated with the potential application of OCPs applied at wood building foundations for termite control.

- The potential presence of polychlorinated biphenyls (PCB)-contaminated soils beneath in the vicinity of the on-Site buildings (historical and current) due to the potential use of PCB-containing caulking and paints in the buildings.

- The potential presence of arsenic-contaminated soils beneath the Campus pavement due to LAUSD's former standard practice of applying herbicides containing arsenic prior to paving.

4. Environmental Checklist and Analysis

- The following features referenced on historical LAUSD drawings: a concrete incinerator, two oil tanks (unknown if the tanks are aboveground storage tanks (ASTs) and/or underground storage tanks (USTs)), and two additional former boiler rooms.

- No historical recognized environmental condition (HRECs) or potential environmental concerns (PECs) have been found in connection with the Site.

- The following business environmental risks (BERs) have been found in connection with the Site:

  - Untested suspect Asbestos-Containing Materials (ACMs) and LBP and other Lead-Containing Materials (LCMs).

  - The presence of a potentially PCB-containing transformer.

- No off-Site facilities are considered to be RECs to the Site at this time.

Areas of Concern

Based on the RECs and BERs identified in the Phase I Environmental Site Assessment, LAUSD and Ninyo and Moore established ten areas of concern on the Site which were targets for their sampling effort documented in the Preliminary Environmental Assessment-Equivalent (PEA-E) Report.

- **AOC1** – AOC1, which consists of shallow soil surrounding buildings planned for demolition (West Building, Auditorium, Cafeteria) was assessed for the presence of lead-based paint, arsenic-containing termiticides and chlorinated pesticides around building footprints, and PCBs in caulking of building materials. COPCs include lead, arsenic, OCPs, and PCBs. Title 22 Metals, Hexavalent chromium, asbestos, and polycyclic aromatic hydrocarbons (PAHs) were also assessed for SCAQMD Rule 1466 requirements.

- **AOC2** – AOC2, which consists of shallow soil underlying paved areas throughout the site, was assessed for the potential historical application of arsenic-containing herbicides and lead, PCBs, and asbestos from historical buildings that were demolished. Title 22 Metals, hexavalent chromium, and PAHs were also assessed for SCAQMD Rule 1466 requirements.

- **AOC3** – AOC3, which consists of shallow soil around an electrical transformer at the southern portion of the site, was assessed for the potential use and spillage of PCB-containing oil. COPCs include PCBs.

- **AOC4** – AOC4, which consists of four discrete locations placed adjacent to GPI geotechnical borings B-2 through B-5, was sampled to assess uncertified fill against native soil conditions in portions of the site that represents different time periods of site development. COPCs include Title 22 Metals, volatile organic compounds (VOCs), total petroleum hydrocarbons (TPH), and OCPs.

- **AOC5** – AOC5, which consists of the former location of a concrete incinerator south of the West Building, was assessed for potential contaminants associated with the historical use of a concrete gas-fired

incinerator. COPCs include Title 22 metals, VOCs, TPH, PAHs, dioxins & furans, and hexavalent chromium.

- **AOC6** – AOC6, which consists of the area around a potential former oil tank used for storing petroleum products (likely heating oil) and associated product pipeline identified in historical vault drawings, was assessed for potential spills and leaks associated with its use. COPCs include Title 22 Metals, VOCs in soil and soil vapor, TPH, and PCBs.

- **AOC7** – AOC7, located between the Main Building and the West Building, consists of a former oil tank and the associated product pipeline, the presence of which was indicated in historical vault drawings and the geophysical survey. AOC7 was assessed for potential impacts from leaks or spills associated with a former operation of heating oil tank. COPCs include Title 22 Metals, VOCs in soil and soil vapor, TPH, and PCBs.

- **AOC8** – AOC8, which consists of the area of a historical boiler room that was backfilled to the west of the Main Building, was assessed for contamination associated with the use of boiler room, including heating oils, gases, and other petroleum products. COPCs include Title 22 Metals, VOCs in soil and soil vapor, TPH, and PCBs.

- **AOC9** – AOC9, located near a hazardous materials storage shed in the southern portion of the site, was assessed for the historical use and potential spillage of hazardous materials including gasoline and motor oils. COPCs include Title 22 Metals, VOCs, and TPH.

- **AOC10** – AOC10, located in the asphalt-paved parking lot in the northwest portion of the site, was assessed for vehicle oil leaks and associated subsurface impacts. COPCs include Title 22 Metals, VOCs in soil and soil vapor, and TPH.

The results of the PEA-E investigation included elevated chemicals of concern above their respective screening level or regulatory threshold. The PEA-E report noted the following regarding the elevated chemicals of concern:

- Arsenic. Elevated arsenic concentration was reported in the north, northeast, and south portion of the Site. The arsenic-impacted soil is estimated to be 1,400 cubic yards (yd^3). Part of the arsenic-impacted soil is characterized to be federal- and state-regulated hazardous waste when excavated.
- Lead. Elevated lead concentrations were reported in the central portion of the Site covered under the asphalt pavement. The lead-impacted soil is estimated to be 10 yd^3 and is characterized to be state regulated hazardous waste when excavated.
- Abandoned fuel pipe. Approximately 100 feet of abandoned fuel pipeline leading from E. 49th Street to the former oil tank was identified at the northern portion of the Site using a geophysical investigation. In addition, petroleum hydrocarbon (diesel and motor) impacted soil was encountered in the parking area located northwest portion of the site. The impacted soil is estimated to be 4 yd^3.

4. Environmental Checklist and Analysis

The PEA-E recommended the preparation of a Removal Action Workplan (RAW), which was completed in August 2023. The RAW recommends the excavation and removal of approximately 1,568 cubic yards of soil impacted with arsenic, lead, and total petroleum hydrocarbons (TPH).

All other remaining chemicals of concern, including the ones listed under the South Coast Air Quality Monitoring District (SCAQMD) Rule 1466, were not reported above their respective screening level or above the 95 percent upper confidence limit of the arithmetic mean for the Site. Therefore, compliance with SCAQMD Rule 1466 is not required.

Asbestos

Based on the age of the Site buildings (1923 to 1969), it is likely that ACMs are present in the Campus buildings. Observed inferred suspect ACMs noted during site reconnaissance included ceramic floor tile mastic, vinyl flooring (tiles and sheeting) and mastic, vinyl cove base and associated mastic, drywall and associated joint compound, acoustic ceiling tile, stucco, and roofing materials. The suspect ACMs were generally in fair condition where observed. Untested suspect ACMs are considered to be a BER.

Lead-Based Paint and Other Lead-Containing Materials

Based on the age of the buildings (1923 to 1969), it is possible that LBP and other LCMs are present in buildings to be demolished. The painted surfaces appeared to be in fair to good condition, with no significant areas of damaged paint noted. Other possible LCMs, such as ceramic floor tile and wall tile, also appeared to be in fair to good condition. Untested suspect LBP and other LCMs are considered to be part of the BER.

Storage Tanks

Underground Storage Tanks (USTs)

Although no visual evidence (i.e., pipes, vents and dispensers) indicating historical or existing on-site USTs was observed during the Phase I site investigation, historical drawings provided by LAUSD indicated the presence of two oil tanks at the site A subsequent geophysical survey conducted in February, 2023 showed evidence of soil disturbance and an abandoned fuel line in the area of the former heating oil tank identified in the historical drawings and located between the main building and the west building. No evidence of a second oil tank was detected during the geophysical survey. The referenced oil tanks are considered to be a REC.

Aboveground Storage Tanks (ASTs)

No visual evidence (i.e., concrete foundation or containment walls, pedestals or steel support structures) indicating existing or historical on-site ASTs was observed. No information from site history research and review of records and/or databases maintained by federal, state, county and city agencies revealed the presence of existing or historical ASTs except as noted below.

Existing Hazardous Substances

Hazardous materials observed at the Project site on January 7, 2022, during site reconnaissance conducted for the Phase I site investigation included the following[75]:

- 15 gallons of gasoline/diesel and approximately 10 gallons of maintenance chemicals in an exterior storage container in the central south portion of the Project site.
- Two 5-gallon containers of corrosion control chemical in the boiler/incinerator room in the main building.
- Approximately 40 gallons of janitorial cleaners and 80 gallons of disinfectant in the janitorial storage room in the west building.
- Approximately 15 gallons of janitorial cleaners in the auditorium building.
- Approximately 10 gallons of cleaners in the kitchen in the cafeteria building.
- Minor amounts of janitorial supplies in the janitorial closets in the remaining Site buildings.

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

Other Site Hazard Considerations

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

Soil Import and Export

Any soil that is imported or exported must be chemically tested in accordance with specific written procedures as outlined in LAUSD Specifications, Section 01 4524, Environmental Import/Export Materials Testing.[76] This specification has the requirements for the sampling, testing, transporting, and certifying of imported fill materials or exported fill materials from school sites.

Demolition and Construction Activities

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

[75] Tetra Tech. 2022, March. Phase I Environmental Site Assessment 49th Street Elementary School
[76] LAUSD. 2011, October 1. LAUSD Asset Management, Guide Specifications: Division 01 General Requirements, Section 01 4524, Environmental Import/Export Materials Testing.

4. Environmental Checklist and Analysis

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

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

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

Operation Phase

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

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

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

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

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

Less than Significant Impact. In addition to the project being located on a school, several other schools are within 0.25 mile of the Project site:

- Dr. Maya Angelou Community High School
- George Washington Carver Middle School
- Sally Rider Elementary School
- Aurora Elementary School

Operation of construction equipment and heavy trucks would generate diesel emissions, which would result in the generation of air pollutants due to diesel-powered construction equipment, dust generated by construction activities, and off-gassing of volatile organic compounds (VOCs) from paints and asphalt. Construction emissions were estimated using the CalEEMod computer program with input based on the construction schedule and equipment mix. Results of the modeling effort are discussed in the Air Quality section of the MND. The results indicated that maximum daily emissions during the construction phase would be less than the South Coast AQMD's significance threshold values. Therefore, schools within 0.25 mile of the Project site would not be exposed to hazardous emissions during construction and impacts would be less than significant.

Also, the Project would not result in an increase in enrollment capacity and therefore the Project would not result in an increase in emissions from mobile sources. The Air Quality section of the MND provides the estimated maximum daily operational emissions, which are well below South Coast AQMD significance thresholds. Therefore, the operational phase of the Project would not expose sensitive receptors or nearby schools to hazardous emissions and operational impacts are also less than significant.

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

Less than Significant Impact. California Government Code Section 65962.5 requires that lists of hazardous materials sites be compiled and made available to the public. These lists include:

- Hazardous waste facilities subject to corrective action.
- Hazardous waste discharges for which the State Water Resources Control Board has issued certain types of orders.
- Public drinking water wells containing detectable levels of organic contaminants.
- Underground storage tanks with reported unauthorized releases.
- Solid waste disposal facilities from which hazardous waste has migrated.

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

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

No Impact. The nearest public airports to the school site are Compton/Woodley Airport, approximately 10.8 mile southwest, and Hawthorne Airport, approximately 12.5 miles southwest. The Project site is not within the airport influence areas or the airport land use planning areas of these airports[77]. Development of the proposed Project would not result in a new use that would interfere with air traffic patterns or increase traffic levels or change traffic patterns. New buildings would be a similar height to the existing buildings on the Campus and would not create a safety hazard or excessive noise. Therefore, no impact would occur and no further analysis is required.

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

No Impact. The emergency response plans in effect in the City of Los Angeles are the City's Emergency Operations Plan and the Los Angeles County Operational Area Emergency Response Plan (ERP). The City's Emergency Operations Plan provides guidance and structure to the City of Los Angeles Emergency Management Department, describes the overall citywide response functions and capabilities, and is to be used by each department identified within this Plan to develop their own standardized operating procedures (SOPs) specifically for their department to direct tactical operations.

The ERP identifies County agencies and other agencies that would be involved in emergency responses; threat summaries and assessments; and procedures for responding agencies that would be involved in coordinating and managing responses. The ERP is focused on emergencies beyond the scope of the daily functions of public safety agencies, such as emergencies requiring multi-agency and/or multi-jurisdictional responses.

[77] Airnav.com. 2023, October 16. https://airnav.com/cgi-bin/airport-search

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

Project site plans would be reviewed by the Los Angeles Fire Department for adequate fire access. The District would comply with SC-PS-1 which requires that the local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval and SC-PS-2 requires that LAUSD prepare an Emergency Preparedness Plan for the school with emergency preparedness and response procedures. The proposed Project construction and operation would not interfere with existing emergency response plans or emergency evacuation plans. Therefore, no impact would occur and no further analysis is required.

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

No Impact. The Project site is located in an urban and built-up area, which does not contain any wildlands in the immediate vicinity of the Campus. The Project site is generally flat without significant topography, and there are no steep slopes where high winds can exacerbate wildfire risks. Furthermore, CAL FIRE does not classify the Project site or any adjacent areas as being within a very high fire hazard safety zone (VHFHSZ)[78]. Project development would not place people or structures at risk from wildfire. Therefore, no impact would occur and no further analysis is required.

[78] California Department of Forestry and Fire Protection (CAL FIRE). 2023. https://egis.fire.ca.gov/FHSZ/

4. Environmental Checklist and Analysis

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

The analysis in this section is based in part on "Preliminary Geotechnical Investigation Proposed Major Modernization 49th Street Elementary School," prepared by Geotechnical Professionals Inc., dated January 28, 2022. A complete copy of this report is included as Appendix F to this Initial Study.

EXPLANATION:

LAUSD applies 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.

Would the proposed Project:

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

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

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

The proposed Project would be constructed in an area that is already developed and already produces nonpoint-source pollutants. There is a storm drain maintained by the City of Los Angeles located one block south of the Project site on 51st Street and another 0.1 mile on Avalon Boulevard, west of the Project site. [79]

Construction Phase

Construction projects of one acre or more are regulated under the NPDES Construction General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order WQ No. 2022-0057-DWQ) issued by the SWRCB. Project applicants obtain coverage by developing and implementing a SWPPP, estimating pollutants from construction activities to receiving waters, and specifying BMPs that would

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

be incorporated into the construction plan to minimize stormwater pollution. Prior to redevelopment, all applicable agencies would be contacted for requirements related to storm water run-off (including the SWRCB) and other development- and construction-related environmental requirements would be implemented (such as dust suppression). This would include the preparation and implementation of a SWPPP. This is also required under LAUSD Standard Condition of Approval SC-HWQ-2. Therefore, construction phase soil erosion and sedimentation would not degrade or violate water quality standards and impacts would be less than significant.

Operation Phase

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

LID stormwater management would be incorporated into the Project design. LAUSD would comply with existing regulations and SC-HWQ-1. Therefore, operational phase stormwater runoff would not degrade or violate water quality standards and impacts would be less than significant.

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

Less than Significant Impact. The Project site is over the Central Subbasin of the Coastal Plain of Los Angeles Groundwater Basin. The City of Los Angeles Department of Water and Power (DWP) supplies water to the Project site and the surrounding community. DWP water supplies consist of about 12 percent local groundwater, most of which is from the San Fernando Valley Groundwater Basin; 86 percent imported water from northern California via the State Water Project, from the eastern Sierra Nevada via the Los Angeles Aqueduct, and from the Colorado River via the Colorado River Aqueduct; and two percent recycled water. Groundwater was not encountered in subsurface explorations to 81.5 feet below existing grade during the geotechnical investigation of the site. Historical data provided by the California Geologic Survey (CGS) indicates historical high groundwater depth of approximately 45 to 50 feet below predominant site grades in the vicinity of the Project site. Construction and operation of the school improvements would not lower the groundwater table or deplete groundwater supplies. Furthermore, the 5.73-acre Project site does not provide intentional groundwater recharge. The proposed Project would not interfere with groundwater recharge. Therefore, impacts would be less than significant and no further analysis is required.

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

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

Less than Significant Impact. There are no streams or rivers on the Project site. The school is fully-developed and the new buildings would not increase impermeable surfaces on Project site. There is a storm drain maintained by the City of Los Angeles located one block south of the Project site on 51st Street and another 0.1 mile on Avalon Boulevard. [80]

Construction Phase

Construction-related activities that expose soils to rainfall/runoff and wind are primarily responsible for erosion. During construction, erosion and siltation from the disturbed areas may occur. Construction activities would expose soil through excavation, grading, and trenching. Unless adequate erosion controls are installed and maintained during construction, sediment may enter storm drains. Proposed Project construction would comply with the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP and SC-HWQ-2 (Compliance Checklist for Storm Water Requirements at Construction Sites). These requirements include provisions for erosion and pollution control measures to protect water quality in stormwater runoff and would not result in substantial erosion or siltation on- or off-site. Therefore, impacts would be less than significant and no further analysis is required.

Operation Phase

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

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

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

Less than Significant Impact. The drainage pattern of the proposed Project would be like existing conditions. Pursuant to LID standards and the State Model Water Efficient Landscape Ordinance (MWELO), the proposed on-site drainage system would discharge a net decrease in runoff to municipal storm drains. Thus, proposed Project development would not increase the amount of surface runoff in a manner that would result in flooding on- or off-site. Therefore, impacts would be less than significant and no further analysis is required.

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

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

iv) Impede or redirect flood flows?

Less than Significant Impact. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) depicting the Site parcel, Panel No. 34005C 0232G, the Project site is located in Zone X (unshaded) and is outside of 100-year and 500-year flood zones mapped by the Federal Emergency Management Agency.[81] However, as stated above, the Project would incorporate SC-HWQ-1, which requires implementation of cost-effective and low impact development like those provided in the LID Standards Manual issued by the County. The proposed on-site drainage system would result in a net decrease in runoff to municipal storm drains, pursuant to LID standards and the State MWELO for landscaped areas. Therefore, the proposed Project would not impede or redirect flood flows, and impacts are less than significant.

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

No Impact. The Project site is outside of 100-year and 500-year flood zones mapped by the Federal Emergency Management Agency[82]. A seiche is an oscillating surface wave in a restricted or enclosed body of water, generated by ground motion, usually during an earthquake. Seiches are of concern for water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a

[81] Federal Emergency Management Agency (FEMA). 2021. December. Accessed 2023, August. FEMA's National Flood Hazard Layer (NFHL) Viewer. https://msc.fema.gov/portal/search?AddressQuery=750%20E%2049th%20St%2C%20Los%20Angeles%2C%20CA%2090011

[82] Federal Emergency Management Agency (FEMA). 2021. December. Accessed 2023, August. FEMA's National Flood Hazard Layer (NFHL) Viewer. https://msc.fema.gov/portal/search?AddressQuery=750%20E%2049th%20St%2C%20Los%20Angeles%2C%20CA%2090011

reservoir, water storage tank, dam, or other artificial body of water. There are no adjacent body of water that would pose a flood hazard to the site due to a seiche. The school is not at risk of inundation by seiche.

Tsunamis are a type of earthquake-induced flooding produced by large-scale sudden disturbances of the sea floor. Tsunami waves interact with the shallow sea floor when approaching a landmass, resulting in an increase in wave height and a destructive wave surge into low-lying coastal areas. The Project site is at an elevation of approximately 174 feet to 179 feet above sea level[83] and is approximately 11 miles inland from the Pacific Ocean.

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

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

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

[83] Geotechnical Professionals Inc. 2022, January 28. Preliminary Geotechnical Investigation Proposed Major Modernization Project Report. 49th Street Elementary School.

4. Environmental Checklist and Analysis

	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:

There are no land use and planning LAUSD SCs.

Would the proposed Project:

a) Physically divide an established community?

No Impact. The Project site and surrounding land is fully developed with urban land uses, including residential, recreational, and institutional uses. The proposed Project would be developed within the existing Campus boundaries and would not divide an established community. Therefore, no impact would occur and no further analysis is required.

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

Less than Significant Impact. The Campus and surrounding developments are within the Southeast Los Angeles Community Plan, which is one of the 35 community plans that comprises the Land Use Element of the General Plan of the City of Los Angeles. The Project site is zoned PF-1 (Public Facility) and designated PF (Public Facilities) in the Southeast Los Angeles Community Plan. The PF-1 zone permits the use and development of publicly-owned land, including public elementary and secondary schools and the Public Facilities designation encourages the development of educational facilities. On February 19, 2019, the LAUSD Board of Education Adopted a Resolution to exempt all LAUSD school sites from local land use regulations under Government Code Section 53094. LAUSD school sites are exempt from all local ordinances, such as those pertaining to building height, parking, preservation and replacement of trees, construction permits (except those in the public right of way), recordation of parcel maps, signage, site plan review, and inspection.

The City of Los Angeles General Plan Land Use designation for the school property is 'Public Facilities', which allows public schools. New construction on the Project site would not represent a change in land use and would not conflict with existing plans, policies, or regulations adopted for the purpose of avoiding or mitigating environmental effects. Although no conflicts would occur, on February 19, 2019 the LAUSD Board of Exemption Adopted a Resolution to exempt all LAUSD school sites from local land use regulations under Government Code Section 53094. (Bd. Of Ed Rprt No. 256-18/19). Therefore, impacts would be less than significant and no further analysis is required.

	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:

There are no mineral resource LAUSD SCs.

Would the proposed Project:

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

No Impact. The Project site is mapped Mineral Resource Zone 3 (MRZ-3) by the California Department of Conservation[84], indicating that it is in an "area containing mineral deposits the significance of which cannot be evaluated from available data" No active mines are in the local vicinity.[85] The closest mine to Project site is the Durbin Mine, located approximately 17 miles northeast[86]. Neither the Project site nor the surrounding community is available for mining. The nearest active oil well is located approximately 0.5 mile to the southwest; and the nearest oil/gas field is the Las Cienegas Oil & Gas Field located approximately 2 miles north of the Project site[87]. Development of the proposed Project would not cause a loss of availability of a known mineral resource valuable to the region and the state. Therefore, no impact would occur and no further analysis is required.

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

No Impact. As discussed in section XII(a), the Project site is not mapped in a mineral resource area, a surface mining district, an oil drilling district, or in a State-designated oil field. No zoning, general plan, specific plan, or any other land use plan delineates the site as a site containing mineral resources. As such, it is not currently used for mineral resource extraction, and there are no plans to use the site for mineral resource extraction in the future due to the lack of presence of mineral resources. Development of the proposed Project would not cause a loss of availability of a mining site. Therefore, no impact would occur and no further analysis is required.

[84] California Department of Conservation. 2023. CGS Information Warehouse: Mineral Land Classification. https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc
[85] California Department of Conservation. Division of Mine Reclamation. https://maps.conservation.ca.gov/mol/index.html
[86] California Department of Conservation. Division of Mine Reclamation. https://maps.conservation.ca.gov/mol/index.html
[87] California Department of Conservation. Well Finder. https://maps.conservation.ca.gov/doggr/wellfinder/

4. Environmental Checklist and Analysis

	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 noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Noise and vibration background and modeling data used in this analysis are included as Appendix I of this Initial Study.

EXPLANATION:

LAUSD applies 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-N1	LAUSD shall design new buildings and other noise-generating sources to include features such as sound walls, building configuration, and other design features that attenuate exterior noise levels on a school campus to less than 67 dBA L_{eq}.[23]
SC-N2	LAUSD shall analyze the acoustical environment of the site (such as traffic) and the characteristics of planned building components (such as Heating, Ventilation, and Air Conditioning [HVAC]), and designs shall achieve interior classroom noise levels of less than 45 dBA L_{eq} with a target of 40 dBA L_{eq} (unoccupied), and a reverberation time of 0.6 seconds. Noise reduction methods shall include, but are not limited to, sound walls, building and/or classroom insulation, HVAC modifications, double-paned windows, and other design features. • New construction should achieve classroom acoustical quality consistent with the current School Design Guide and CHPS (California High Performance Schools) standard of 45 dBA L_{eq}. • New HVAC installations should be designed to achieve the lowest possible noise level consistent with the current School Design Guide. HVAC systems shall be designed so that noise from the system does not cause the ambient noise in a classroom to exceed the current School Design Guide and CHPS standard of 45 dBA L_{eq} • Modernization of existing facilities and/or HVAC replacement projects should improve the sound performance of the HVAC system over the existing system. • The District's purchase of new units should give preference to HVAC manufacturers that sell the lowest noise level units at the lowest cost.

	• Existing HVAC units operating in excess of 45 dBA Leq inside classrooms should be modified
SC-N4	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-N7	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-N8	Projects within 500 feet of a non-LAUSD sensitive receptor, such as a residence, shall be reviewed by OEHS to determine what, if any, feasible project specific noise reduction measures are needed. The Construction Contractor shall implement project specific noise reduction measures identified by OEHS. Noise reduction measures may include, but are not limited to, the following: <u>Source Controls</u> • Time Constraints – prohibiting work during sensitive nighttime hours. • Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential: only between 7:00 AM and 7:00 PM). • Equipment Restrictions – restricting the type of equipment used. • Substitute Methods – using quieter methods and/or equipment. • Exhaust Mufflers – ensuring equipment has quality mufflers installed. • Lubrication & Maintenance – well maintained equipment is quieter. • Reduced Power Operation – use only necessary size and power. • Limit Equipment On-Site – only have necessary equipment on-site. • Noise Compliance Monitoring – technician on site to ensure compliance. • Quieter Backup Alarms – manually-adjustable or ambient sensitive types. <u>Path Controls</u>

4. Environmental Checklist and Analysis

	• Noise Barriers – semi-permanent or portable wooden or concrete barriers. • Noise Curtains – flexible intervening curtain systems hung from supports. • Enclosures – encasing localized and stationary noise sources. • Increased Distance – perform noisy activities farther away from receptors, including operation of portable equipment, storage and maintenance of equipment. <u>Receptor Controls</u> • Window Treatments – reinforcing the building's noise reduction ability. • Community Participation – open dialog to involve affected residents. • Noise Complaint Process – ability to log and respond to noise complaints. • Advance notice of the start of construction shall be delivered to all noise sensitive receptors adjacent to the project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the Construction Contractor and the District. In the event of noise complaints noise shall be monitored from the construction activity to ensure that construction noise is not obtrusive.
SC-N9	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.[24] Noise control measures may include, but are not limited to: <u>Path Controls</u> • Noise Attenuation Barriers[25] – 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. <u>Source Controls</u> • 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: <u>Receptor Controls</u> • Temporary Window Treatments – temporarily reinforcing the building's noise reduction ability. Temporary Relocation – in extreme otherwise unmitigable cases, students shall be moved to temporary classrooms / facilities away from the construction activity.

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

Would the proposed Project:

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

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

State Noise Regulations

The California Green Building Standards Code (CALGreen) has requirements for insulation that affect exterior-interior noise transmission for non-residential structures.[88] Pursuant to CALGreen Section 5.507.4.1, Exterior Noise Transmission,[89] wall and roof-ceiling assemblies exposed to the noise source making up the building or addition envelope or altered envelope shall meet a composite sound transmission class (STC) rating of at least 50 or a composite outdoor-indoor transmission class (OITC) rating of no less than 40 with exterior windows of a minimum STC of 40 or OITC of 30 within a 65 dBA CNEL or L_{dn} noise contour of an airport, freeway or expressway, railroad, industrial source or fixed-guideway source. Where noise contours are not readily available, buildings exposed to a noise level of 65 dBA L_{eq} during any hour of operation shall have building, addition or alteration exterior wall and roof-ceiling assemblies exposed to the noise source meeting a composite STC rating of at least 45 (or OITC 35), with exterior windows of a minimum of STC 40 (or OITC 30).

City of Los Angeles Noise Regulations

The City of Los Angeles has established policies and regulations concerning the generation and control of noise that could adversely affect noise sensitive land uses.[90] The City does not have established standards for school operational noise.

[88] Multi-family residential buildings greater than three stories are considered under the non-residential standards in Title 24.

[89] California Green Building Standards Code. Chapter 5 Nonresidential Mandatory Measures. Division 5.1 PLANNING AND DESIGN. Section 5.507 Environmental Comfort. 5.507.4.1 Exterior noise transmission, prescriptive method. https://up.codes/viewer/california/ca-green-code-2016/chapter/5/nonresidential-mandatory-measures#5

[90] The City of Los Angeles General Plan identifies noise-sensitive receptors as: single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodgings and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves, and parks.

4. Environmental Checklist and Analysis

For construction noise, Los Angeles Municipal Code LAMC Section 41.40 (Noise Due to Construction, Excavation Work – When Prohibited)[91] states that no construction or repair work, or any excavating for, any building or structure, shall be performed between the hours of 9:00 PM and 7:00 AM. In addition, the operation, repair or servicing of construction equipment and the job-site delivery of construction materials in such areas shall be prohibited between the hours of 9:00 PM and 7:00 AM.

No person, other than an individual homeowner engaged in the repair or construction of his/her single-family dwelling, shall perform any construction or repair work of any kind or perform such work (or operation, repair or servicing of construction equipment and the job-site delivering of construction materials) within 500 feet of land so occupied before 8:00 AM or after 6:00 PM on any Saturday or on a federal holiday, or at any time on Sunday. Under certain conditions, the City may grant a waiver to allow limited construction activities to occur outside of the limits described above. This code does not apply to emergency repair work.

LAMC Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools)[92] states that "Between the hours of 7:00 a.m. and 10:00 p.m., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at 50 feet therefrom:

(a) 75 dB(A) for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment…"

However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means the above noise limitation cannot be met despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of equipment.

Construction Noise

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

---

91 Los Angeles Municipal Code. Chapter IV Public Welfare. Section 41.40 (Noise Due to Construction, Excavation Work – When Prohibited) http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc

92 Los Angeles Municipal Code. Chapter XI Noise Regulation. Article 2 Special Noise Sources Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools). http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc

Construction Vehicles

The transport of workers and equipment to the construction site would incrementally increase noise levels along access roadways. The highest construction worker and vendor traffic would have a maximum of about 36 worker and vendor trips per day over a time span of 33 days during site preparation. Throughout construction, the size of the work crew at the school each day would vary depending on the construction phase and construction activities.[93]

The number of construction-related trips would not significantly increase traffic noise when compared to the level of noise currently generated on the roadways. When compared to existing traffic, such as existing elementary school enrollment of 568 students (estimated at 1,074 average daily trips [ADT])[94], the additional 36 worker and vendor construction-related trips would be negligible.

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

Construction Equipment

Each stage of construction involves the use of different kinds of construction equipment and therefore has its own distinct noise characteristics. Table 10, *Construction Equipment Noise Levels*, lists maximum construction equipment noise levels at 50 feet.[95]

Table 10. Construction Equipment Noise Levels

Equipment	Noise Level (dBA, Lmax) at 50 ft
Auger Drill Rig	85
Backhoe	80
Chain Saw	85
Clam Shovel	93
Compactor (ground)	80
Compressor (air)	80
Concrete Mixer Truck	85
Concrete Pump	82
Concrete Saw	90
Crane (mobile or stationary)	85

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

[94] Based on the ITE Trip Generation Manual 9th Edition. Public school daily trip rates for elementary school at 1.89 daily trips per student x 568 (existing) students = 1,074 average daily trips.

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

Table 10. Construction Equipment Noise Levels

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

Source: FHWA, 2006. Construction Noise Handbook. August.
Note: KVA = kilovolt amps

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

On-Campus Receptors

Interim portable classroom facilities at 50 feet from construction activities that have a direct sightline may experience exterior noise levels as high as 90 dBA L_{max}. With a typical 25 dB exterior-to-interior noise reduction, interior noise levels may be as high as 65 dBA L_{max}.

LAUSD's interior noise threshold is 45 dBA and depending on the classroom activity, interior levels above this threshold may be disruptive to the learning environment. However, low-intensity construction phases would generate lower noise levels and would be less likely to result in disruptions due to excessive interior noise environments. Additionally, for some construction activities, noise would be further reduced by shielding effects from buildings between the construction zone and classrooms.

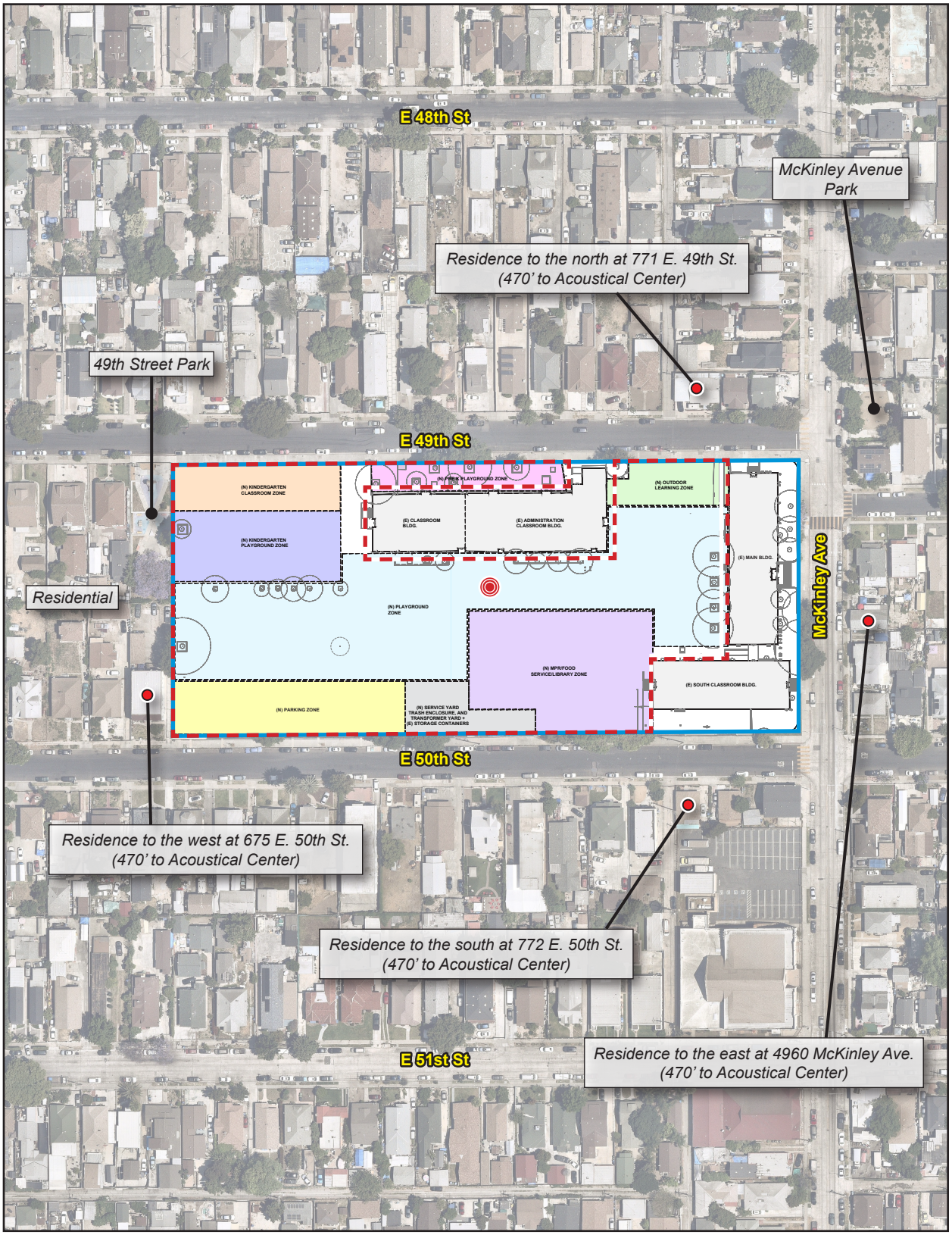
Implementation of SC-N-4, SC-N-7 and SC-N-9 requires: construction equipment that is properly tuned and maintained to ensure excessive noise is not generated, coordination between construction contractor and school administrators prior to and throughout construction to schedule high noise producing activities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

Off-Site Receptors

The nearest off-site sensitive receptors from the acoustical center of the construction site are the single-family residences approximately 225 feet north across 49th Street and to the south across East 50th Street. The acoustical center of the construction site would be located approximately within the center of the Project Site/Area of Work. Other nearby off-site receivers are also single-family residences to the west approximately 333 feet west and 470 feet east from the acoustical center of the construction site. Figure 11, *Acoustical Noise,* presents the chosen receptors for analysis purposes below and shows the acoustical center of the construction. The anticipated construction equipment mix was categorized by construction activity using the FHWA Roadway Construction Noise Model (RCNM)[96]. The maximum and average noise levels—grouped by construction phase—are summarized in Table 11, *Project-Related Construction Noise Levels*.

[96] Federal Highway Administration (FHWA). 2006, January. FHWA Roadway Construction Noise Model (RCNM) User's Guide.

Figure 11 - Acoustical Noise



Source: Nearmap 2023; DLR Group 2023.

Table 11. Project-Related Construction Noise Levels

Construction Phase	Maximum at 50 feet (Lmax dBA)	Residences 225 feet to the North[a]	Residences 470 feet to the East[a]	Residences 225 feet to the South[a]	Residences 333 feet to the West[a]
Demolition	90	77	71	77	74
Site Prep	84	71	65	71	68
Grading	85	72	66	72	69
Building Construction	84	71	65	71	68
Architectural Coating	78	65	59	65	62
Paving	90	77	71	77	74

Source: FHWA, August.2006. Construction Noise Handbook.
[a] Noise levels are Lmax dBA, as measured from the acoustical center of the construction site to the nearest property line.

According to LAMC Section 41.40, construction or repair work is allowed between 7:00 AM and 9:00 PM, Monday through Friday, and between 8:00 AM and 6:00 PM on Saturdays or national holidays (not allowed on Sundays). District contractors would comply with City regulations for construction hours.

LAMC Section 112.05 specifies the maximum noise level of 75 dBA at 50 feet. However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means the above noise limitation cannot be met despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of equipment. As shown in Table 11, the construction noise levels would average between 62 and 77 dBA L_{max} at the nearest sensitive receptors. At times when construction equipment is operating at the western edge of the construction site, noise levels could sporadically reach 90 dBA L_{max} only during the paving and demolition phase. However, this would not be constant or long term on a day-to-day or week-to-week basis.

Implementation of SC-N-8 requires all feasible measures to reduce construction noise below the Municipal Code standard through source controls (e.g., scheduling, equipment restrictions, mufflers, reduced power, noise compliance monitoring), path controls (e.g., temporary noise barriers, noise curtains, enclosures), and receptor controls (e.g., community participation, noise complaint response and communications). With implementation of SC-N-8 construction noise levels could be reduced by up to 15 dBA. During paving, which is estimated to be the loudest phase, this would reduce construction noise levels to approximately 75 dBA L_{max}, which would not exceed the 75 dBA L_{max} criterion. Construction would not generate a substantial noise increase in excess of established standards. Impacts would be less than significant and no further analysis is required.

Mobile Source Noise

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

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

Stationary Source Noise

Operation of the Project could include use of rooftop heating, ventilation, and air conditioning systems (HVAC). Such equipment would typically generate noise levels ranging up to 72 dBA at a distance of three feet. The noise generated by mechanical systems to be installed on the new building is expected to be similar to the mechanical equipment noise generated by surrounding buildings in the area. Conservatively assuming the nearest proposed building is within 50 feet of the Project site boundary, the nearest sensitive receptors would be residents abutting to Project site boundary to the west. At this distance, HVAC noise would attenuate to approximately 48 dBA, thereby the overall noise from HVAC would be less than 50 dBA during the daytime, which would not exceed City noise standards for residential uses.[97] SC-N-2 has restrictions on HVAC noise to limit potential noise impacts for HVAC installation that would exceed established standards. Impacts would be less than significant and no further analysis is required.

Other noise sources that are considered stationary include vehicles idling during student drop-off and pick-up times, students during outdoor activities, school buzzers or bells, and landscaping equipment.

Vehicle-related sounds during student drop-off and pick-up times (such as braking, car doors closing, honking, and idling engines) would temporarily raise the localized ambient noise along the school frontage since pick-up and drop-off activity would occur curbside, however, it would only occur twice a day during the school year. Therefore, student drop-off and pick-up activities would not significantly raise the community noise levels. Impacts would be less than significant and no further analysis is required.

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

Less than Significant Impact.

Operational Vibration

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

Construction Vibration

Construction activities can generate varying degrees of ground vibration, depending on the construction procedures, the equipment used, and the proximity to vibration-sensitive uses. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings near a construction site varies depending on soil type, ground strata, and receptor building construction. The generation of vibration can range from no perceptible effects at the lowest

[97] Los Angeles Municipal Code Section 111.03.

vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight damage at the highest levels. Ground vibrations from construction activities rarely reach levels that can damage structures but can achieve levels in buildings close to a construction site that are perceptible.[98] Table 12, *Construction Equipment Vibration Levels*, lists vibration levels for different types of construction equipment.

Table 12. Construction Equipment Vibration Levels

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

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

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

Typical construction equipment rarely exceeds vibration levels that are perceptible.[99] Groundborne vibration is rarely annoying to people who are outdoors, so it is usually evaluated in terms of indoor receivers. For annoyance, vibration is typically noticed nearby when objects in a building generate noise from rattling windows or picture frames; impacts are based on the distance to the nearest building.[100]

Construction Vibration-Induced Annoyance

Human annoyance occurs when vibration rises significantly above the threshold of human perception for extended periods of time. A threshold commonly used to assess when construction vibration becomes annoying is above 78 VdB for residential uses.[101]

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

4. Environmental Checklist and Analysis

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

Table 13, *Construction Equipment Vibration Annoyance*, shows the vibration levels from typical construction equipment at adjacent receptors. As shown, vibration from construction activities is not anticipated to be perceptible at the nearest receptors.

Table 13. Construction Equipment Vibration Annoyance

Equipment	Vibration Annoyance Threshold				
	Reference Vibration VdB at 25 feet	Residence to the North at 771 East 49th Street (225 Feet)[a] [78 VdB][b]	Residence to the East at 4960 McKinley Avenue (470 Feet)[a] [78 VdB][b]	Residence to the South at 772 East 50th Street (225 feet)[a] [78 VdB][b]	Residence to the West at 675 East 50th Street (333 feet)[a] [78 VdB]
Vibratory Roller	94.0	65.4	55.8	65.4	60.3
Static Roller	82.0	53.4	43.8	53.4	48.3
Large Bulldozer	87.0	58.4	48.8	58.4	53.3
Loaded Trucks	86.0	57.4	47.8	57.4	52.3
Jackhammer	79.0	50.4	40.8	50.4	45.3
Small Bulldozer	58.0	29.4	19.8	29.4	24.3

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

As heavy construction equipment moves around the Project site, average vibration levels at the nearest structures would diminish with increasing distance between structures and the equipment and would generally not be perceptible. As part of the Project, implementation of SC-N-5 requires the use of less-vibration-intensive equipment when working next to existing buildings. Under SC-N-4, LAUSD Facilities Division or its construction contractor shall consult and coordinate nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption.

As required by the City of Los Angeles Municipal Code Section 41.40, construction activities would not occur outside of the allowable hours of 7:00 AM to 9:00 PM Monday through Friday or 8:00 AM and 6:00 PM on Saturdays. No construction activities would occur on Sundays or federal holidays. Annoyance vibration impacts would be less than significant, and no further analysis is required.

On-Campus Receptors

Since construction activities may take place while school is in session and since temporary classroom facilities may be located near the construction site, it is possible that the students' learning activities could be affected. However, to the extent feasible, a substantial amount of construction work would be conducted during school breaks when students are not on Campus.

Depending on construction and classroom schedule construction areas may be adjacent to active classrooms; however, it is not possible to assess specific vibration levels for every possible scenario over the course of the construction period. Generally, students in classrooms may experience vibration levels more than 78 VdB when vibratory rollers operate within approximately 85 feet of the classrooms, and within approximately 50 feet of large bulldozers and other heavy equipment. At 78 VdB vibrations are barely felt, but groundborne noise may be audible. Vibration levels would diminish rapidly with increased distance between the receptors and the equipment, and construction activities farther than 85 feet from classrooms would not be felt. Implementation of SC-N-5 provides requirements for discussions between construction contractor and school administrators prior and throughout construction to schedule high vibration producing activities at times that minimize disruption to classes.

Implementation of SC-N-5 would reduce construction vibration and annoyance to staff and students in adjacent buildings. School administration and the construction contractor will work together to communicate and coordinate construction activities, location, schedule, and potential vibration-intensive activities during each construction phase. Administrators may arrange for alternative classroom occupancy in the event that construction vibration causes any disturbance to classroom instruction. Other typical methods for dealing with classroom disruption are for the construction contractor to conduct vibration-intensive activities before or after class instruction at the nearest classrooms. Some construction work would be conducted during school breaks when students are not on Campus. Therefore, construction-generated vibration annoyance for on-Campus receptors would be less than significant and no further analysis is required.

Construction Vibration-Induced Architectural Damage

Since damage from vibrational energy is typically a one-time event and is most likely to occur when the source and receptor are very close. The threshold for the assessment of risk of architectural damage is 0.2 inches per second peak particle velocity (in/sec PPV) for typical residential and school buildings.[102] Vibration levels exceed 0.2 PPV in/sec if a vibratory roller is operated within approximately 25 feet of the receiving structure, or when large bulldozers or loaded trucks are operated at distances closer than 15 feet.

Table 14, *Construction Equipment Vibration Damage*, shows the reference vibration levels for typical construction equipment. Impacts would be less than significant, and no further analysis is required with the implementation of LAUSD standard conditions of approval.

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

Table 14. Construction Equipment Vibration Damage

Equipment	Vibration Levels at 25 Feet PPV (inch/sec)
Vibratory Roller	0.21
Static Roller	0.05
Large Bulldozer	0.089
Small Bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076

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

Off-Site Receptors

The nearest off-Campus structure is a residence approximately 10 feet to the west of the Project site boundary. At 10 feet, there could be a potential for architectural damage due to construction vibration from vibratory rollers and large bulldozers. At the off-site sensitive receptors, maximum vibration levels could reach up to 0.830 in/sec PPV from the use of a vibratory roller at 10 feet, which would be above the threshold of 0.2 in/sec PPV. Additionally, the main classroom building approximately 15 feet to the east from the development zone boundary is considered historic, therefore, SC-N-7 would be applied to reduce the possibility of architectural damage to historic buildings. SC-N-7 requires the use of less-vibration-intensive equipment when working next to existing historic buildings. Alternatives shall include mechanical methods using static, non-vibratory rollers or small bulldozers in lieu of large bulldozers. Additionally, implementation of inspection and reporting on the current foundation and structural condition of the existing building. Therefore, with implementation of these standard conditions, impacts from vibration-induced architectural damage would be less than significant to the historic on-site building and off-site sensitive receptors.

On-Campus Receptors

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

The West and South Classroom Building, Main Classroom Building, and the Auditorium were identified as historic. As part of the Project, implementation of SC-N-6 requires that if demolition is necessary adjacent to historic or fragile structures the construction contractor would avoid using impact tools, if feasible. SC-N-8 requires the construction contractor to identify alternative methods of demolition and construction for activities that do not involve vibration-intensive equipment or activities.

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

Groundborne Noise

Construction-related groundborne noise occurs mainly from the powered mechanical equipment for rock breaking/drilling works (such as hydraulic breaker, rock drill, pile rig, etc.) and tunnel boring machine.

Operation-related groundborne noise occurs when trains operate in tunnels that are located in close proximity to occupied structures. Vibrations associated with train pass-bys can be transmitted through the ground and structure and be radiated as noise in the occupied spaces within the structure. The transmitted noise through structures may have potential impact on the noise sensitive receivers.

The Project does not include activities or equipment that would generate substantial construction or operational groundborne noise. No impacts would occur and no further analysis is required.

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

No Impact. There are no private airstrips within 10 miles of the Project site. There are several private heliports within 10 miles of the Project site; the closest are:[103]

- Los Angeles Police Department Hooper Heliport 5.6 miles northeast.
- Randy Champe-Howe Heliport (private) (private) 2.05 miles southwest
- Maguire- California Hospital Heliport (private) 2.5 miles north
- California Mart Heliport (private) 2.9 miles north.
- Multiple private helipads for residential and commercial high-rises near the International Tower Heliport (private) 3.3 miles north.

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

The nearest airport to the school is Hawthorne Municipal Airport in the City of Hawthorne, a public airport approximately 9.5 miles southwest.[104] The site is not within the airport influence area or the airport land use planning area of the airport.[105] The site is outside the 65 dBA CNEL noise exposure contours of the airport. Thus, Project development would not expose people working on-site to excessive airport noise levels. No impacts would occur and no further analysis is required.

[103] Airnav.com. 2023, October 17. https://airnav.com/cgi-bin/airport-search
[104] Airnav.com. 2023, August 11. Airport Information. http://www.airnav.com/airports
[105] Los Angeles County Department of Public Works. 2017, August. Los Angeles County Airports. http://dpw.lacounty.gov/avi/airports/map.aspx?extent=-13182592.650342794,4063015.015811797,-13180758.161663902,4064543.7563775414.

4. Environmental Checklist and Analysis

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

EXPLANATION:

LAUSD applies 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-PED2	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-PED3	LAUSD shall implement the applicable sidewalk requirements outlined in the School Design Guide. LAUSD shall also coordinate with the responsible traffic jurisdiction/agency to implement infrastructure improvements prior to the opening of a school. Improvements shall include, but are not limited to: • Clearly designate passenger loading areas with the use of signage, painted curbs, etc. • Install new walkway and/or sidewalk segments where none exist. • Substandard walkway/sidewalk segments shall be improved to a minimum of eight feet wide. Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades.
SC-PED4	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-PED5	LAUSD shall design new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide. **School Design Guide.** The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.
SC-T3	Implementation of SC-T-3.
SC-T4	Implementation of SC-T-4.

Would the proposed Project:

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

Less than Significant Impact. Construction activities may be considered an incompatible use because they would require the use of haul trucks, equipment, worker vehicles, and construction activities on the Campus while students are in school. The construction and demolition activities would result in a temporary increase in truck activity on the roadway network. Construction activity would not require roadway or sidewalk closures and/or traffic detours on school days.

To avoid conflicts between construction activities and students, the District will implement SC-T-4, which requires the construction contractor to prepare a construction worksite traffic control plan prior to commencement of construction. This plan would establish methods to avoid conflicts between the construction traffic and the existing vehicle, pedestrian, and bicycle traffic on the Campus and in the neighborhood. LAUSD's construction BMPs, identified in the construction worksite traffic control plan, would include the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. Construction contractors would work closely with the school administration during all construction to coordinate activities and ensure students are safe.

SC-PED-2 includes the implementation of OEHS Safe School Traffic Program 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. Additionally, SC-PED-2 requires new school projects be designed so that bus loading areas that do not overlap with car loading areas, which would reduce the potential for conflicts between cars and buses arriving and departing, especially during the busiest

drop-off and pick-up periods. With the implementation of SC-PED-2, the proposed Project would not create new roads or dangerous driveway turning movements.

The school is in a developed urban area characterized by residential, recreation, and institutional (churches and schools) land uses. The school has passenger vehicle traffic (personal vehicles and trucks), non-motorized traffic (pedestrians and bicyclists), and limited truck traffic for school deliveries on the surrounding roadways. All three roadways surrounding the school, including East 49th Street, McKinley Avenue, and East 50th Street, are two lanes each. Existing traffic controls at the two intersections next to the school are:

- East 49th Street at McKinley Avenue: 3-way stop - Installed Continental Crosswalk[106]
  - Continental crosswalks are high-visibility crosswalks use patterns (i.e., bar pairs, continental, ladder) that are visible to both the driver and pedestrian from farther away compared to traditional transverse line crosswalks[107].
- East 49th Place at McKinley Avenue – Planned Continental Crosswalk
- East 50th Street at McKinley Avenue: 4-way stop – Planned Continental Crosswalk

Pedestrian access to the school would not change; students would continue to use the main entrance on East 49th Street for student pick up and drop off.

Since the proposed Project would construct new parking areas, SC-T-2 requires vehicular access and parking designs to comply with the Vehicular Access and Parking standards of the School Design Guide, and SC-PED-5 to design bus loading areas and parking areas to comply with the School Design Guide. Compliance with SC-PED-5, SC-T-2 and SC-T-4 would reduce vehicle, pedestrian, and bicycle impacts during construction. Therefore, impacts would be less than significant and no further analysis is required.

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

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

The proposed Project would be constructed entirely within the boundary of the existing elementary school and would not increase student enrollment (i.e., pedestrian traffic). The proposed Project's development zone affects existing vehicular areas and pedestrian access and therefore, may result in changes to the internal site circulation and site access by students walking from the neighborhood. However, it would not create unsafe routes to schools for students walking from local neighborhoods with the implementation of Standard

[106] Los Angeles Department of Transportation. (LADOT). 2023. https://ladotlivablestreets.org/overall-map/maps
[107] Federal Highway Administration (FHWA). 2023. Crosswalk Visibility Enhancements. https://highways.dot.gov/safety/proven-safety-countermeasures/crosswalk-visibility-enhancements

Conditions and compliance with local ordinances and regulations. The Project's location and design of pedestrian areas and access would implement SC-PED-4 to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures. Pursuant to the requirements of SC-PED-3, LAUSD shall implement the applicable sidewalk requirements outlined in the School Design Guide by coordinating with LADOT to implement any required infrastructure improvements affecting pedestrian safety. The District would implement SC-PED-2 though SC-PED-4, to implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program and design the proposed Project to comply with the traffic and pedestrian guidelines in the School Traffic Safety Reference Guide. Therefore, impacts to existing routes to school would be less than significant and no further analysis is required.

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

Less than Significant Impact. The Project site is approximately one mile east of Interstate 110 (I-110) and 2.3 miles south of Interstate 10 (I-10). The nearest four-lane arterial roadway to the Project site is Avalon Boulevard, approximately 0.1 mile to the west, classified as a Major Highway in the Los Angeles County Highway Plan[108]. The proposed Project site is not adjacent to or near a major arterial roadway or freeway that may pose a safety hazard. No impacts would occur and no further analysis is required.

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

4. Environmental Checklist and Analysis

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

EXPLANATION:

There are no population and housing LAUSD SCs that apply to the proposed Project.

Would the proposed Project:

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

No Impact. The Project site is an operational elementary school Campus within an urbanized community, where no changes to the capacity of the existing roadways are being proposed. The proposed Project does not include the construction of any new homes or businesses or changes to the existing land uses. The proposed Project activities would not increase the number of classrooms nor accommodate an increase above planned student enrollment capacity. The proposed Project's construction activities would not result in substantial increase in workers. Therefore, no impacts would occur and no further analysis is required.

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

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, 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 applies 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-PS1	If necessary, LAUSD shall: • Have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval. Provide a full site plan for the local review, including all buildings, both existing and proposed; fences; drive gates; retaining walls; and other construction affecting emergency vehicle access, with unobstructed fire lanes for access indicated.
SC-PS2	LAUSD shall implement emergency preparedness and response procedures in all schools as required in LAUSD References, Bulletins, Safety Notes, and Emergency Preparedness Plans.

Would the proposed Project:

a) Result in adverse impacts related to fire protection?

Less than Significant Impact. The City of Los Angeles Fire Department (LAFD) currently provides fire protection and emergency medical services to the Project site. The nearest LAFD fire station to the site is Fire Station 21 in the South Bureau at 1192 E. 51st Street, approximately 0.37 miles east of the Project site.[109] The proposed Project would not accommodate an increase above planned student enrollment capacity; therefore, it would not require the need for additional fire protection services or require construction of new or expanded fire stations. As shown in Table 15, *LAFD Response Metrics for 2023*, on average, response times from Station 21 are faster than the average City-Wide response times in 2023[110]. All LAUSD school projects are required to comply with fire department and department of building and safety regulations for water availability and fire

[109] City of Los Angeles Fire Department (LAFD). 2023. Find Your Station. https://www.lafd.org/fire-stations/station-results.
[110] City of Los Angeles Fire Department (LAFD). 2023. Response Metrics for 2023. https://www.lafd.org/fsla/stations-map?station=21&address=750%20E%2049th%20Street&year=2023

hydrant pressure, and accessibility for firefighting equipment to minimize any threat of a fire. Additionally, all projects are required to comply with standard design requirements in accordance with the California Building Code (CBC), California Fire Code (CFC), and local fire department requirements, which include fire sprinklers, fire alarm devices, emergency access, and evacuation procedures.

Table 15. LAFD Response Metrics for 2023

	Station 21 (Minutes: Seconds)	City-Wide (Minutes: Seconds)
Operational Response Time for EMS	06:50	07:21
Operational Response Time for Non-EMS	06:47	07:08
Operation Response Time for Critical ALS	05:39	06:15
Operation Response Time for Structural Fire	04:57	05:31

Source: LAFD 2023

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

b) Result in adverse impacts related to police protection?

Less than Significant Impact. The Los Angeles Police Department's (LAPD) Newton Community Police Station at 3400 S. Central Ave, approximately 1 mile northeast of the Campus,[111] provides police service to the Campus and surrounding neighborhood The Newton Community Police Station services Fashion District, Pueblo Del Rio, South Park-Entertainment; the stations boundaries extend from Alameda Street in the east, Florence Avenue in the south, I-110 in the west, and 7th Street in the north[112].

LAUSD's Los Angeles School Police Department (LASPD) is responsible for Campus safety and creating safe school passages for students, staff, and the school community.[113] The Campus is served by LASPD's East Division. LASPD is a recognized independent school police department, with 211 sworn police officers, 25 non-sworn school safety officers (SSO), and 32 civilian support staff dedicated to serving the District. LASPD officers are assigned to support school traffic safety, parking enforcement and facility protection.[114]

The proposed Project would not accommodate an increase above planned student enrollment capacity; therefore, it would not require the need for additional police protection services or require construction of new or expanded police stations. Any increase in police demands due to construction activities would be temporary and would not require construction of new or expanded police facilities. Thus, implementation of the proposed Project would not substantially increase demands for police services in the area, and the elementary school

[111] Los Angeles Police Department (LAPD). 2023. Newton Community Police Station. https://www.lapdonline.org/lapd-contact/central-bureau/newton-community-police-station/?zip=%20%2090011
[112] LAPD. 2023. Newton Community Police Station Service Area. https://lapdonlinestrgeacc.blob.core.usgovcloudapi.net/lapdonlinemedia/2021/03/NEWT11x17.pdf
[113] Los Angeles School Police Department. 2023. https://ca01000043.schoolwires.net/Page/12393
[114] LA School Police Department (LASPD). https://www.lausd.org/Page/15609

upgrades would not require construction of new or expanded police stations. Therefore, impacts would be less than significant and no further analysis is required.

c) Result in adverse impacts related to schools?

Less Than Significant Impact. The District evaluated the physical adequacy several existing school sites based on an assessment of 10 weighted facilities-based datasets that best express a school's physical condition using the following criteria and scoring:

- Facilities Condition Index (FCI) for buildings (26.23 percent)
- Seismic risk (21.31 percent)
- FCI for grounds (13.11 percent)
- Library square footage adequacy (5.94 percent)
- Assembly square footage adequacy (5.94 percent)
- Food services square footage adequacy (5.94 percent)
- Play acreage adequacy (5.94 percent)
- Percentage of relocatable classroom buildings (5.19 percent)
- Secure entrance (5.19 percent)
- Site density (5.19 percent)

As a result of the assessment, the Campus was prioritized for major modernization as it ranked within the top 10 percent of the sites in Board District 7. The proposed Project would implement the District's Core Principles to Scoping Major Modernization Projects:

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

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

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

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

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

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

The proposed Project would not accommodate an increase above planned student enrollment capacity, nor would it displace the current student population to offsite locations. The proposed Project addresses the most critical physical conditions and essential safety issues at each respective school site as defined by the Board of Education and consequently, the Project upgrades the physical capabilities of the Campus buildings, which date back to the 1930s and 1960s, to continue providing education to its students.

The environmental effects of the construction and operation of the Project are considered throughout the environmental analysis in this Negative Declaration. Construction of the proposed Project would require the implementation of a fully electric interim relocatable kitchen and one interim relocatable restroom building on the Project site during construction activities. No other LAUSD campuses or facilities outside of 49th Street ES would be impacted by the proposed Project. Therefore, the impacts would be less than significant and no further analysis is required.

d) Result in adverse impacts related to parks?

No Impact. The proposed Project would not have an adverse physical impact on any parks near the Project site, including 49th Street Park and McKinley Avenue Park, that are located adjacent to the Project site. The proposed Project would not induce growth in the community and would not require the construction of new parks. The proposed Project would include recreation facilities and outdoor play areas and would not require that students use off-Campus parks. Thus, the proposed Project would not result in the need for new or expanded park facilities. Therefore, no impact would occur and no further analysis is required.

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

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. RECREATION.				
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 which might have an adverse physical effect on the environment?	☐	☐	☐	☒

EXPLANATION:

There are no recreation LAUSD adopted SCs.

Would the proposed 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?

Less than Significant Impact. In compliance with Education Code 38131 (b) Civic Center Act, every school in the District makes facilities available for various nonprofit community organizations and members of the public to use for supervised recreational activities, meetings, and public discussions. Schools are available during designated hours when regular school activities will not be disrupted. School facilities that can be used are gymnasiums, play fields, stadiums, auditoriums, multipurpose rooms, cafeterias, and classrooms. Designated year-round hours for civic center use start two hours after the close of school, and are typically 6:00 PM until 9:30 PM on weekdays, 8:00 AM until 9:30 PM on Saturday, and 12:00 PM until 5:00 PM on Sundays. No civic center use is allowed at elementary schools on Sundays. A permit from the LAUSD is required to use school facilities[115].

The proposed Project would provide approximately 114,500 square feet of playgrounds and outdoor learning areas. The proposed Project would provide new playgrounds for all students, including cool coating asphalt, striped games, two play structures with protective surfacing, natural grass fields, basketball courts, volleyball courts, tetherball courts, handball courts, and backstops. The proposed Project also includes new outdoor learning environments that are located in the following areas: adjacent to the new Kindergarten classrooms, between the existing Administration/Classroom Building and Main Classroom Building, and adjacent to the new library. However, the proposed Project would not induce growth in the community and would not increase the use of existing neighborhood and regional parks or other recreational facilities, including 49th Street Park and McKinley Park which surround the Campus, and South Park, which is located approximately 0.10 mile west of the Campus, along Avalon Boulevard. Therefore, it would not cause physical deterioration of or cause

[115] LAUSD. Civic Center Permits. https://achieve.lausd.net/Page/2792.

accelerated physical deterioration of neighborhood and regional parks or other recreational facilities. Therefore, no impact would occur and no further analysis is required.

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

No Impact. As described above, the proposed Project would provide approximately 114,500 square feet of playgrounds and outdoor learning areas. These recreational facility upgrades are intended to better meet the recreational needs of students on-site and would not substantially expand facilities or use of Campus recreational facilities in comparison to existing conditions. The proposed Project would not require the construction or expansion of additional recreational facilities that would have an adverse effect on the environment. Therefore, no impact would occur and no further analysis is required.

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

EXPLANATION:

LAUSD applies 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-T2	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-T4	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.

Would the proposed Project:

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

Less than Significant Impact.

4. Environmental Checklist and Analysis

Existing Conditions

Roadways

Existing roadways in the Project study area are described below[116].

- **East 49th Street** is an east-west roadway north of the school classified as a Collector street. There is one travel lane in each direction.
- **McKinley Avenue** is a north-south roadway east of the school classified as a Collector street. There is one travel lane in each direction.
- **East 50th Street** is an east-west roadway south of the school classified as a Local/Other street. There is one travel lane in each direction.
- **Avalon Boulevard** is a north-south roadway approximately 0.1 mile west of the school and is classified as an Avenue II. The roadway consists of one travel lane and a Tier 1 Protected Bicycle Lanes bicycle lane in each direction and a two-way median turn lane.

Vehicular Access

Student pick-up and drop-off occurs curbside along East 49th Street, at the front of the existing Campus. Vehicular access to the Campus is currently provided via one driveway along East 49th Street, located on the northwestern portion of the Project site. Additional vehicular access entrances are located along East 50th Street, which forms the Project site's southern boundary at the existing parking lot located near the intersection of East 50th Street and McKinley Avenue, and one delivery gate located behind the existing cafeteria.

Intersections

- East 49th Street at McKinley Avenue: 4-way stop
- East 50th Street at McKinley Avenue: 4-way stop
- McKinley Avenue and East 49th Place: 3-way stop

Bicycle and Pedestrian Facilities

Bicycle Facilities

There is a Tier 1 Protected Bicycle Lanes bicycle lanes on each side of Avalon Boulevard[117].

Pedestrian Facilities

Sidewalks are present on each side of all roadways surrounding the school. Yellow school crossing crosswalks are present at all intersections.

[116] City of Los Angeles General Plan. Mobility Element. 2016. https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf
[117] City of Los Angeles General Plan. Mobility Element. 2016. https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf

Pedestrian Access

Pedestrian access to the Project site is currently provided via multiple entrances along East 49th Street, which forms the Project site's northern boundary, near the existing staff parking lot, the main entrance within Administration/Library/Classroom Building, and one additional entrance near the intersection of East 49th Street and McKinley Avenue. Additional pedestrian access entrances are located along East 50th Street, which forms the Project site's southern boundary at the existing Auditorium.

Transit Service

Transit service to the Project site is provided by the Los Angeles County Metropolitan Authority (Metro), which operates Bus Line 51 along Avalon Boulevard and Bus Line 53 along Central Avenue, approximately 0.1 mile west and 0.25 mile east of the Project site, respectively. Regional service is provided by the Metro A Line, along Long Beach Avenue. The closest station to the Project site is Vernon Station, approximately 1.1 mile northeast and the Slauson Station, approximately 1.2 mile southeast of the Project site. Additionally, school buses pick-up and drop off students on East 49th Street, along the northern portion of the Campus.

Construction

Construction of the proposed Project is anticipated to start in the second quarter of 2025 and is expected to take 42 months to complete; however, because the proposed Project would occur on an active Campus and has several components, the Campus would not be under construction the entire time. Construction work would be intermittent and conducted in stages during the 42-month period. Project close out and occupation is anticipated in the second quarter of 2029.

Project construction would generate trips from the work crew, haul trips, and equipment and materials delivery. Consistent with the City of Los Angeles Municipal Code Section 41.40, construction activities would only occur during the hours of 7:00 AM to 9:00 PM during the weekdays and between 8:00 AM to 6:00 PM on Saturdays and national holidays.

Construction staging (i.e., storage of equipment and materials) would be contained on the Project site. Parking for workers is anticipated to be provided in the staging area while school is in session and Campus parking lots during school breaks. Construction trucks would not affect the existing school driveways or parking lots during school hours. Construction worker traffic would occur during building construction and demolition. Throughout construction, the size of the work crew at the school each day would vary depending on the construction phase and construction activities.

Based on the anticipated construction schedule, construction workers are expected to arrive at the school before 7:00 AM (before peak morning commute hours). Construction workers would not arrive at the construction site within the same hour, nor would they all leave the site at the same time. Importantly, construction worker trips and construction haul trips would not occur at the same time because workers would arrive before 7:00 AM and hauling cannot start until 7:00 AM and must avoid peak commute. Typical construction hours end after student dismissal times. Construction worker traffic would not significantly impact nearby roadways. Construction vehicles would cause only temporary and intermittent increases in traffic on area roadways and

would not contribute to a significant increase in traffic volumes. Construction traffic impacts would be less than significant.

Proposed Project construction traffic would not displace bus stops or impact public transit bus services on the surrounding roadways. The Construction Worksite Traffic Control Plan (per SC-T-4) would include measures to prevent traffic and pedestrian hazards between trucks entering and exiting the Project site. Therefore, impacts would be less than significant and no further analysis is required.

Operation

The project would relocate the existing staff and visitor parking lot from the northwestern portion of the Project site to the southwestern portion of the Project site. Vehicular access to the Project site would be provided via two new driveways along East 50th Street. However, the proposed Project would not accommodate an increase above planned student enrollment capacity at the school. Additionally, the District would implement SC-T-2, which would require the implementation of applicable vehicular access and parking design guidelines during the planning process. Therefore, the proposed Project would not result in changes to the volume of traffic or the distribution of trips over roadways near the Project site.

The Project would not change the operation or use of bicycle lanes on Avalon Boulevard or any sidewalks or school crosswalks at roadways or intersections. Potential circulation changes to the Campus would include new driveways along East 50th Street at the new staff parking lot, and new pedestrian and ADA pathways from the sidewalk at the proposed new Campus entrances that would be located along East 49th Street and East 50th Street. Project operation would not block or remove, or otherwise interfere with the safety or performance of the circulation system and would not interfere with Metro bus services operating near the Project site. Therefore, the proposed Project would not conflict with policies, plans, or programs regarding transit, bicycle, or pedestrian facilities, and the Project would not decrease the performance or safety of such facilities, and no further analysis is required.

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

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

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

The proposed Project would not change the land use of the school, increase the capacity of the school, or change the attendance boundaries of the school. Because the proposed Project would not generate an increase in traffic or a change in traffic patterns; thus, the proposed Project would have no impact pertaining to vehicle miles travelled during operation of the Project and a less than significant impact during construction. Therefore, no impacts would occur and no further analysis is required.

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

Less than Significant Impact.

Construction

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

Operational Impacts

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

d) Result in inadequate emergency access?

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

4. Environmental Checklist and Analysis

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

EXPLANATION:

LAUSD applies 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-TCR1	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-TCR2	In the event that Tribal cultural resources are identified, the Archaeologist will retain a Native American Monitor to begin monitoring ground disturbance activities. The Native American Monitor shall be approved by the District and must have at least one or more of the following qualifications: • At least one year of experience providing Native American monitoring support during similar construction activities. • Be designated by the Tribe as capable of providing Native American monitoring support. • Have a combination of education and experience with Tribal cultural resources. Prior to reinitiating construction, the construction crew(s) will be provided with a brief summary of the sensitivity of Tribal cultural resources, the rationale behind the need for protection of resources, and information on the initial identification of Tribal cultural resources. This information shall be included in a worker's environmental awareness program that is prepared by LAUSD for the project (as applicable).

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

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

No Impact. The Los Angeles City Planning's Office of Historic Resources (OHR) does not list the site as a Historic-Cultural Monument resource nor the site a part of any one of its 35 designated historic districts/Historic Preservation Overlay Zones (HPOZ).[118], [119] The Project site is not listed on the National Register of Historic Places,[120] as a California Historical Landmark or a California Point of Historical Interest.[121] The 49th Street ES Campus is not listed or eligible for listing as defined in Public Resources Code section 5020.1(k). No impacts would occur and no further analysis is required.

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

Less than Significant Impact. Assembly Bill 52 (AB 52) requires meaningful consultation with California Native American tribes on potential impacts to tribal cultural resources, as defined in PRC 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.[122]

As part of the AB 52 process, Native American tribes must have submitted 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 proposed 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

[118] An Historic-Cultural Monument (HCM) may be a building, site, structure, or resource — including, trees and plant life — recognized for its historic significance; an HCM can identify with important events; notable figures of national, state, or local importance; and/or distinctive architectural styles. https://planning.lacity.org/preservation-design/historic-landmarks/detail?cpa=southeast-los-angeles

[119] Historic Landmarks – Southeast Community Plan Area. https://planning.lacity.org/odocument/24f6fce7-f73d-4bca-87bc-c77ed3fc5d4f/Historical_Cultural_Monuments_List.pdf

[120] National Park Service (NPS). 2023National Register of Historic Places. https://www.nps.gov/maps/full.html?mapId=7ad17cc9-b808-4ff8-a2f9-a99909164466.

[121] Office of Historic Preservation (OHP). 2023. California Historical Resources. p://ohp.parks.ca.gov/listedresources/.

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

effect on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached.

The LAUSD Office of Environmental Health and Safety sent Project notification on August 25, 2023 to all tribes affiliated within the area as provided by the Native American Heritage Commission. No tribes responded to the District's request for consultation at the close of the 30-day period. LAUSD has adopted Standard Conditions of Approval (SC-TCR-1 and SC-TCR-2) to protect potential unanticipated discoveries associated with Tribal Cultural Resources. With implementation of SC-TCR-1 and SC-TCR-2, the impacts of the Project pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 would be less than significant and no further analysis is required.

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

EXPLANATION:

LAUSD applies 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-USS1	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

SC-USS2	LAUSD shall coordinate with the City of Los Angeles Department of Water and Power or other appropriate jurisdictions and departments prior to relocating or upgrading any water facilities to reduce the potential for disruptions in service.
SC-USS3	LAUSD shall provide an easily accessible area that services the entire school and is dedicated to the collection and storage of materials for recycling, including (at a minimum) paper, cardboard, glass, plastics, metals, and landscaping waste. There shall be at least one centralized collection point (loading dock), and the capacity for separation of recyclables where waste is disposed of for classrooms and common areas such as cafeterias, gyms, or multi-purpose rooms.
SC-GHG1	Implementation of SC-GHG-1.
SC-GHG2	Implementation of SC-GHG-2.
SC-GHG3	Implementation of SC-GHG-3.

Would the proposed Project:

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

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

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

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

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

Less than Significant Impact. LADWP provides water to the existing Project site. The primary water sources for LADWP are from the Los Angeles Aqueducts (LAA), local groundwater, State Water Project (supplied by

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

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

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

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

Less than Significant Impact. The two largest destinations for solid waste generated in the City of Los Angeles are the Chiquita Canyon Landfill in the Community of Castaic in unincorporated Los Angeles County; and the Sunshine Canyon Landfill in the Community of Sylmar in the City of Los Angeles.

Construction

Demolition and construction waste would be generated and disposed of at local landfills. The excavated soil would be segregated and managed as non-hazardous, non-Resource Conservation and Recovery Act (RCRA) hazardous, or RCRA hazardous waste. The proposed Project may require haul and disposal of approximately 2,195 tons of contaminated soil and material. Contaminated soil and material would result in an incremental and intermittent increase in solid waste disposal at licensed landfills and other waste disposal facilities within Los Angeles County.

Section 5.408 (Construction Waste Reduction, Disposal, and Recycling) of the CALGreen Building Standards Code (Title 24, CCR, Part 11, Section 5.408.1.1) requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged

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

Operation

The proposed Project would not increase the student population and thus would not increase solid waste generation. The District would also implement SC-USS-3, which would implement recycling programs on Campus to reduce solid waste production. With the implementation of SC-USS-3, the proposed Project is expected have a less than significant impact during operation on solid waste production. The proposed Project would not generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, impacts would be less than significant and no further analysis is required.

e) Would the Project comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

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

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:

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

There are no Wildfire SCs applicable to the Project.

Wildland fire protection in California is the responsibility of either the State, local government, or the federal government. State Responsibility Areas (SRA) are the areas in the state where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. The SRA forms one large area over 31 million acres to which the State Department of Forestry and Fire Protection (CAL FIRE) provides a basic level of wildland fire prevention and protection services[123].

Local responsibility areas (LRA) include incorporated cities, cultivated agriculture lands, and portions of the desert. LRA fire protection is typically provided by city fire departments, fire protection districts, counties, and by CAL FIRE under contract to local government.[124] CAL FIRE uses an extension of the state responsibility area Fire Hazard Severity Zone model as the basis for evaluating fire hazard in local responsibility area. The local responsibility area hazard rating reflects flame and ember intrusion from adjacent wildlands and from

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

flammable vegetation in the urban area. The City of Los Angeles Fire Department (LAFD) provides fire protection and emergency medical services to the City, including to the Project site.

Fire Hazard Severity Zones (FHSZ) are identified by Moderate, High and Very High in an SRA, and Very High in a LRA. The nearest FHSZ in the SRA is a Very High about 14 miles east in Sycamore Canyon in the City of Whittier[125]. The nearest fire in the LRA is approximately 4.5 miles west in the Baldwin Hills.[126]

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

Would the proposed Project:

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

No Impact. The emergency response plans in effect in the City of Los Angeles are the City's Emergency Operations Plan[127] and the Los Angeles County Operational Area Emergency Response Plan (ERP)[128]. The City's Emergency Operations Plan provides guidance and structure to the City of Los Angeles Emergency Management Department, describes the overall citywide response functions and capabilities, and is to be used by each department identified within this Plan to develop their own standardized operating procedures (SOPs) specifically for their department to direct tactical operations.

The ERP identifies County agencies and other agencies that would be involved in emergency responses; threat summaries and assessments; and procedures for responding agencies that would be involved in coordinating and managing responses. The ERP is focused on emergencies beyond the scope of the daily functions of public safety agencies, such as emergencies requiring multi-agency and/or multi-jurisdictional responses.

Emergency preparedness and response planning would be coordinated through LAUSD's Office of Emergency Services. The existing school currently has an emergency school evacuation plan in compliance with District's "Integrated Safe School Plan"[129]. The proposed Project would not interfere with any other existing emergency response plans or emergency evacuation plans. Therefore, no impact would occur and no further analysis is required.

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

No Impact. The Project site is located in an urban and built-up area, which does not contain any wildlands in the immediate vicinity of the Project site. The Project site is generally flat without significant topography, and

[125] California Department of Forestry and Fire Protection (CAL FIRE). 2023. https://egis.fire.ca.gov/FHSZ/
[126] California Department of Forestry and Fire Prevention (CAL FIRE). https://egis.fire.ca.gov/FHSZ/
[127] City of Los Angeles. 2018. Emergency Operations Plan. https://emergency.lacity.gov/sites/g/files/wph1791/files/2021-04/comprehensive_emergency_operations_plan_eop-2018.pdf
[128] County of Los Angeles. 2012. https://ceo.lacounty.gov/wp-content/uploads/2019/12/OAERP-Approved-Adopted-Version-6-19-2012.pdf
[129] LAUSD. 2020. Integrated Safe School Plan. https://www.lausd.org/Page/16314#:~:text=LAUSD%20schools%20are%20required%20to,traffic%20safety%20and%20crisis%20intervention.

there are no steep slopes where high winds can exacerbate wildfire risks. Furthermore, CAL FIRE does not classify any adjacent areas as VHFHSZ. Project development would not place people or structures at risk from wildfire. Therefore, no impact would occur and no further analysis is required.

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

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

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

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

4. Environmental Checklist and Analysis

	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 substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

EXPLANATION

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

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

The proposed Project would demolish three buildings, the lunch pavilion, and three sheltered corridors, construct two new buildings, and modernize other buildings on an existing Campus and would not change the character of the surrounding neighborhoods. As described in section V, *Cultural Resources*, after implementation of the proposed Project, the potential historic district would retain integrity of location, design, setting, workmanship, and association from the identified period of significance. Additionally, since the Project site has been highly disturbed and is covered by fill soils, discovery of archaeological and paleontological resources during excavation activities is unlikely. Therefore, impacts related to archaeological, paleontological, and historic resources and human remains would be less than significant and no further analysis is required.

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

Less than Significant Impact. Based on the preceding analysis, with implementation of SCs and compliance with existing regulations, the proposed Project would not result in significant adverse impacts that could contribute to a cumulatively considerable impact. In consideration of the preceding analysis, the proposed Project's contribution to cumulative impacts would be less than significant, and therefore, Project impacts would not be cumulatively considerable.

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

Less than Significant Impact. As discussed in the above analyses, the prosed Project would not result in significant direct or indirect adverse impacts or result in substantial adverse effects on human beings. No further analysis is required.

4. Environmental Checklist and Analysis

This page intentionally left blank.

5. List of Preparers

5.1 LEAD AGENCY

Los Angeles Unified School District, Office of Environmental Health & Safety

Bryan Ramos Fernandez, AICP, CEQA Project Manager

Ed Paek, AICP, Senior CEQA Project Manager

Gwenn Godek, CEQA Advisor

Christian Taylor, Historic Preservation Specialist

Anthony Espinoza, Environmental Health Manager/Environmental Program

Carlos Torres, Director

Jay Golida, Associate General Counsel

5.2 CEQA CONSULTANT

PlaceWorks

Addie Farrell, Principal

Alen Estrada-Rodas, Associate

John Vang, JD, Senior Associate

Kristie Nguyen, Project Planner

Tony Chung, Senior Associate

Abdul Khan, Project Planner

Mike Watson, Senior Geologist

Cary Nakama, Graphic Artist

Becky Golden-Harrell, Technical Editor

Laura Muñoz, Document Specialist

Historic Resources Group

Paul Travis, Managing Principal

Kari Fowler, Senior Preservation Planner

5. List of Preparers

This page intentionally left blank.

Appendices

Appendices are on USB Drive

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

B. 49th Street Elementary School Tree Inventory Report, Carlberg Associates

C. 49th Street Elementary School Historical Resources Evaluation Report, Historic Resources Group

D. 49th Street Elementary School Historic Resources Technical Report, Historic Resources Group

E. Preliminary Geotechnical Investigation – Proposed Major Modernization Project – 49th Street Elementary School, Geotechnical Professionals Inc.

F. Phase I Environmental Site Assessment 49th Street Elementary School, Tetra Tech

G. Preliminary Environmental Assessment Equivalent Report - 49th Street Elementary School – Major Modernization Project, Ninyo & Moore Geotechnical & Environmental Sciences Consultants

H. 49th Street Elementary School Removal Action Workplan – Major Modernization, Ninyo & Moore Geotechnical & Environmental Sciences Consultants

I. Noise and Vibration Background and Modeling Data, PlaceWorks

Appendices

This page intentionally left blank.