CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
CITY HALL 200 NORTH SPRING STREET LOS ANGELES CA 90012

Mitigated Negative Declaration

Chaminade College Preparatory, High School Project

Case Number: ENV-2023-1255-MND

Project Location: 7500 North Chaminade Avenue, 23241 West Cohasset Street, 23260 West Saticoy Street, 23217-23255 West Saticoy Street, and 7619-7629 North Woodlake Avenue, West Hills, CA 91304

Community Plan Area: Canoga Park – Winnetka – Woodland Hills – West Hills

Council District: 12—Lee

Project Description: The Project Applicant proposes to update and expand the existing high school campus with a revised campus plan located at 7500 North Chaminade Avenue, 23241 West Cohasset Street, 23260 West Saticoy Street, 23217-23255 West Saticoy Street, and 7619-7629 North Woodlake Avenue in West Hills (the Project Site). The revised campus plan (the Project) would include a total lot area of approximately 25.86 acres, inclusive of: 1) a new three-story school building (Multistory Building), updated parking areas, remodeled athletic fields, new student quads, and renovated classrooms, student service centers and offices on the existing campus located on approximately 21.03 acres in the A1-1 and RS-1 zones, at 7500 North Chaminade Avenue, 23241 West Cohasset Street, and 23260 West Saticoy Street (Main Campus); 2) an expanded school campus area of approximately 4.83 acres located across Saticoy Street, at 23217-23255 West Saticoy Street and North 7619-7629 Woodlake Avenue, proposed for new athletic fields, an aquatic center/outdoor swimming pool, accessory facilities/structures and associated surface parking facilities, in the proposed C2-1 Zone (the North Campus); and 3) a new pedestrian bridge across Saticoy Street. No increase in the maximum permitted student enrollment (1,360 students) is proposed. Upon Project completion, the revised campus plan for the high school would include a total of approximately 196,468 square feet of floor area equating to a floor area ratio (FAR) of 0.17:1 and will have 501 on-site vehicle parking spaces and 78 bicycle parking spaces (76 short-term spaces and 2 long-term spaces). Grading for the North Campus would require approximately 720 cubic yards of soil export, and grading for the Main Campus would require approximately 17,800 cubic yards of soil export.

PREPARED FOR:
The City of Los Angeles
Department of City Planning

PREPARED BY:
CAJA Environmental Services, LLC
9410 Topanga Canyon Blvd., Suite 101
Chatsworth, CA 91311

APPLICANT:
Chaminade College Preparatory
7500 Chaminade Avenue
West Hills, CA 91304

June 2024

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1 INTRODUCTION

An application for the proposed Chaminade College Preparatory, High School Project (Project) has been submitted to the City of Los Angeles (City) Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA) and that the preparation of an Initial Study and Mitigated Negative Declaration (IS/MND) is required. Thus, this document has been prepared in compliance with the relevant provisions of CEQA and the State CEQA Guidelines as implemented by the City. Based on the analysis provided in this IS/MND, the City has concluded that with implementation of the identified mitigation measures, the Project would not result in any significant environmental impacts. The IS/MND is an informational document and is required to be adopted by the decision maker prior to Project approval by the City.

1.1 PURPOSE OF AN INITIAL STUDY

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

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration or Mitigated Negative Declaration is appropriate, an Environmental Impact Report (EIR) is normally required.[2]

[1] The study of alternatives to a project is only required as part of an Environmental Impact Report.

[2] State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the Lead Agency when there is substantial evidence that the project may cause a significant effect on the environment: "(A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration.

1.2 CEQA PROCESS

In compliance with the State CEQA Guidelines, the City, as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. Throughout the CEQA process, an effort will be made to inform, contact, and solicit input on the Project from various government agencies and the general public, including stakeholders and other interested parties.

At the onset of the environmental review process, the City has prepared this Initial Study to determine whether the Project may have a significant effect on the environment. The analysis contained herein determined that with mitigation, the Project would not have a significant effect on the environment. Therefore, an IS/MND was determined to be the appropriate CEQA document.

1.3 ORGANIZATION OF THE IS/MND

This IS/MND is organized into four sections as follows:

1 INTRODUCTION

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

2 EXECUTIVE SUMMARY

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

3 PROJECT DESCRIPTION

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

4 EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project. This Section also includes mitigation measures that will be implemented to reduce impacts to less than significant levels. In accordance with Public Resources Code Section 21064.5 and CEQA Guidelines Sections 15064(f)(2) and 15070(b), the mitigation measures contained in Section 4 have been agreed to by the Applicant.

2 EXECUTIVE SUMMARY

PROJECT TITLE	**CHAMINADE COLLEGE PREPARATORY, HIGH SCHOOL PROJECT**
ENVIRONMENTAL CASE NO.	**ENV-2023-1255-MND**
RELATED CASES	CPC-2009-1477-CU-ZV-ZAA-SPR-PA1, CPC-2023-1254-VZC-HD-ZAD-ZAA, VTT-84101

PROJECT LOCATION	**7500 NORTH CHAMINADE AVENUE, 23241 WEST COHASSET STREET, 23260 WEST SATICOY STREET, 23217-23255 WEST SATICOY STREET, 7619-7629 NORTH WOODLAKE AVENUE, WEST HILLS, CA 91304**
COMMUNITY PLAN AREA	CANOGA PARK – WINNETKA – WOODLAND HILLS – WEST HILLS COMMUNITY PLAN
GENERAL PLAN DESIGNATION	VERY LOW RESIDENTIAL AND LOW RESIDENTIAL (MAIN CAMPUS) AND NEIGHBORHOOD COMMERCIAL (NORTH CAMPUS)
ZONING	EXISTING: A1-1 AND RS-1 (MAIN CAMPUS) AND [Q]C1-1VL AND P-1VL (NORTH CAMPUS) PROPOSED: A1-1 AND RS-1 (MAIN CAMPUS; NO CHANGE) AND C2-1 (NORTH CAMPUS)
COUNCIL DISTRICT	12 – JOHN LEE

LEAD CITY AGENCY	**City of Los Angeles Department of City Planning**
STAFF CONTACT	TREVOR MARTIN
ADDRESS	200 N. SPRING STREET, ROOM 763
PHONE NUMBER	213-978-1341
EMAIL	TREVOR.MARTIN@LACITY.ORG

APPLICANT	**CHAMINADE COLLEGE PREPARATORY**
ADDRESS	7500 NORTH CHAMINADE AVENUE WEST HILLS, CA 91304

PHONE NUMBER	818-347-8305

PROJECT DESCRIPTION

See Section 3. PROJECT DESCRIPTION.

ENVIRONMENTAL SETTING

See Section 3. PROJECT DESCRIPTION.

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

(e.g. permits, financing approval, or participation agreement)

The Project may need additional discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits; haul route; demolition, grading, and building permits; street tree removal permits; and sign permits.

CALIFORNIA NATIVE AMERICAN CONSULTATION

Yes.

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 section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

Trevor Martin	City Planner
PRINTED NAME	**TITLE**
Trevor Martin	6/7/2024
SIGNATURE	**DATE**

EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less 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 a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).

5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analysis Used. Identify and state where they are available for review.

    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

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

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

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

9) The explanation of each issue should identify:

    a) The significance criteria or threshold, if any, used to evaluate each question; and

    b) The mitigation measure identified, if any, to reduce the impact to less than significance.

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Project Applicant, Chaminade College Preparatory, proposes to update and expand the existing high school campus with a revised campus plan located at 7500 North Chaminade Avenue, 23241 West Cohasset Street, 23260 West Saticoy Street, 23217-23255 West Saticoy Street, and 7619-7629 North Woodlake Avenue in West Hills (the Project Site). The revised campus plan (the Project) would include a total lot area of approximately 25.86 acres, inclusive of: 1) a new three-story school building (Multistory Building), updated parking areas, remodeled athletic fields, new student quads, renovated classrooms, student service centers, and offices on the existing campus located on approximately 21.03 acres in the A1-1 and RS-1 zones, at 7500 North Chaminade Avenue, 23241 West Cohasset Street, and 23260 West Saticoy Street (Main Campus); 2) an expanded school campus area of approximately 4.83 acres located across Saticoy Street, at 23217-23255 West Saticoy Street and 7619-7629 North Woodlake Avenue, proposed for new lighted athletic fields, bleachers, an outdoor swimming pool, accessory facilities/structures, and associated surface parking facilities, in the proposed C2-1 Zone (the North Campus); and 3) a new pedestrian bridge connecting the Main Campus and North Campus across Saticoy Street. No increase in the maximum permitted student enrollment (1,360 students) is proposed. Upon Project completion, the Project would include a total of approximately 196,468 square feet of floor area equating to a floor area ratio (FAR) of 0.17:1 and will have 501 on-site surface vehicle parking spaces and 78 bicycle parking spaces (76 short-term spaces and 2 long-term spaces).

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located in the northwest San Fernando Valley in the West Hills community of the City of Los Angeles. The Project Site, which includes the Main Campus (Assessor Parcel Numbers (APNs) 2027-005-002 and -009) and North Campus (APNs 2027-005-005, -006 and -007) as described above, is bifurcated by Saticoy Street and comprised of six parcels which total approximately 25.86 acres of lot area. The Main Campus is approximately 21.03 gross acres in lot area with approximately 666 feet of frontage along the west side of Saticoy Street, approximately 273 feet of frontage along the south side of Keswick Street, approximately 636 feet of frontage along the east side of Chaminade Avenue, and approximately 808 feet of frontage along the north side of Cohasset Street. The North Campus is approximately 4.83 gross acres in lot area with approximately 788 feet of frontage along the east side of Saticoy Street and approximately 244 feet of frontage along the west side of Woodlake Avenue. The Main Campus is currently improved with a range of single-story and multiple story buildings within the existing high school campus, inclusive of academic and administrative buildings, and sports fields and

facilities. The proposed North Campus is currently improved with a one-story, multi-tenant commercial shopping center and surface parking lot, built between 1962 to 1964. The shopping center is currently occupied with retail, restaurant, and grocery store tenants.

The Main Campus is located within the A1-1 and RS-1 zones with a General Plan land use designation of Very Low Residential and Low Residential, and the North Campus is currently located in the [Q]C1-1VL and P-1VL zones with a land use designation of Neighborhood Commercial. Chaminade College Preparatory was established over 70 years ago, and its high school has been operating at the Main Campus location since the 1960s.

3.2.2 Surrounding Land Uses

The following provides a summary of the uses surrounding the Project Site:

Main Campus

Surrounding properties to the existing Main Campus are located within the RE11-1 and RS-1 zones and are generally improved with single-family residential uses and a public park. The abutting properties located along the north side of the Project Site, along and across Keswick Street, and along Atron Avenue to the west, are zoned RE11-1 and improved with single-family residential homes. The properties located to the west of the Project Site, abutting and across Chaminade Avenue, are zoned RE11-1 and improved with single-family residential homes. The properties located to the south and across Cohasset Street are zoned RE11-1 and improved with a single-family residential homes and Four Oaks Park. The properties to the east and abutting, are zoned RS-1 and improved with single-family residential homes.

North Campus

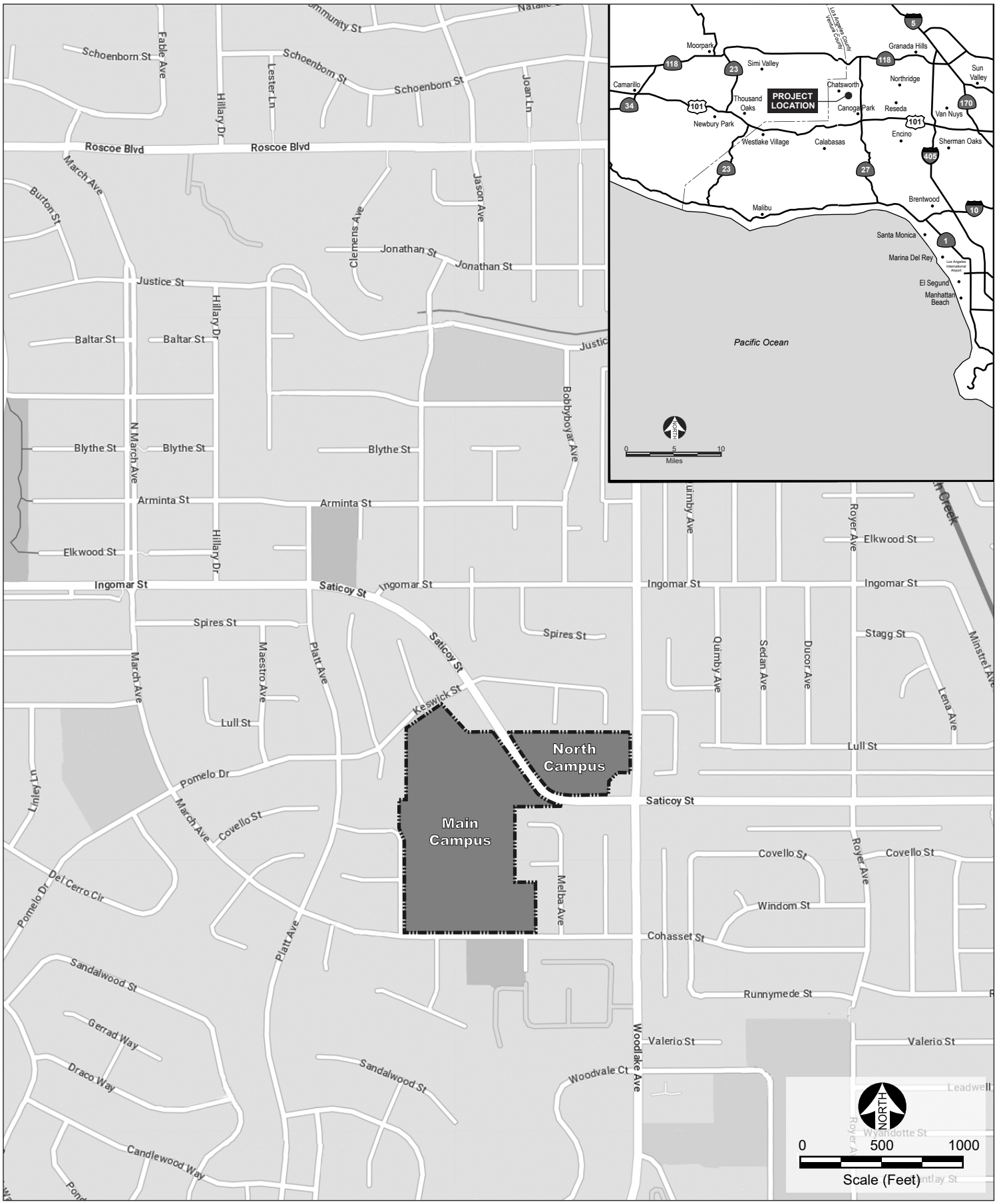
Surrounding properties to the proposed North Campus are located within the RS-1, [Q]C1.5-1VL, (Q)RD5-1A1-1VL Zones, and are generally improved with single-family residential uses and an automotive repair shop. The properties located to the north of the Project Site and abutting, are zoned RS-1 and improved with single-family residential uses. The properties located to the west and south of the Project Site across Saticoy Street, are zoned RS-1 and improved with single-family residential uses, as well as an academic building and a surface parking lot associated with the Main Campus. The property directly abutting to the south and east of the Project Site, at the northwest corner of Saticoy and Woodlake Avenue, is zoned [Q]C1.5-1VL and improved with an automotive repair shop. Finally, the properties located to the east and across Woodlake Avenue are zoned (Q)RD5-1 and A1-1VL and improved with single-family residential homes.

3.2.3 Transit Services

Within a 0.25-mile radius of the Project Site, transit services in the Project area are provided by the Los Angeles County Metropolitan Transportation Authority (Metro). Metro operates local bus routes 152, 162, 165, and 169 in the vicinity of the Project Site.

3.2.4 Existing Facilities

The existing high school encompasses approximately 21.03 acres on the Main Campus, with facilities including 37 classrooms, administrative and support offices, a library, a student center building that can accommodate 928 seats, a performing arts center with 360 seats, a fine arts building, a campus ministry building, a lighted football field with bleachers with 2,500 seats, a basketball gymnasium with bleachers with 1,000 seats, a baseball field with bleachers, and a pool. The existing buildings on the Main Campus total 156,768 square feet of floor area. In addition, the Main Campus currently provides 462 parking spaces.

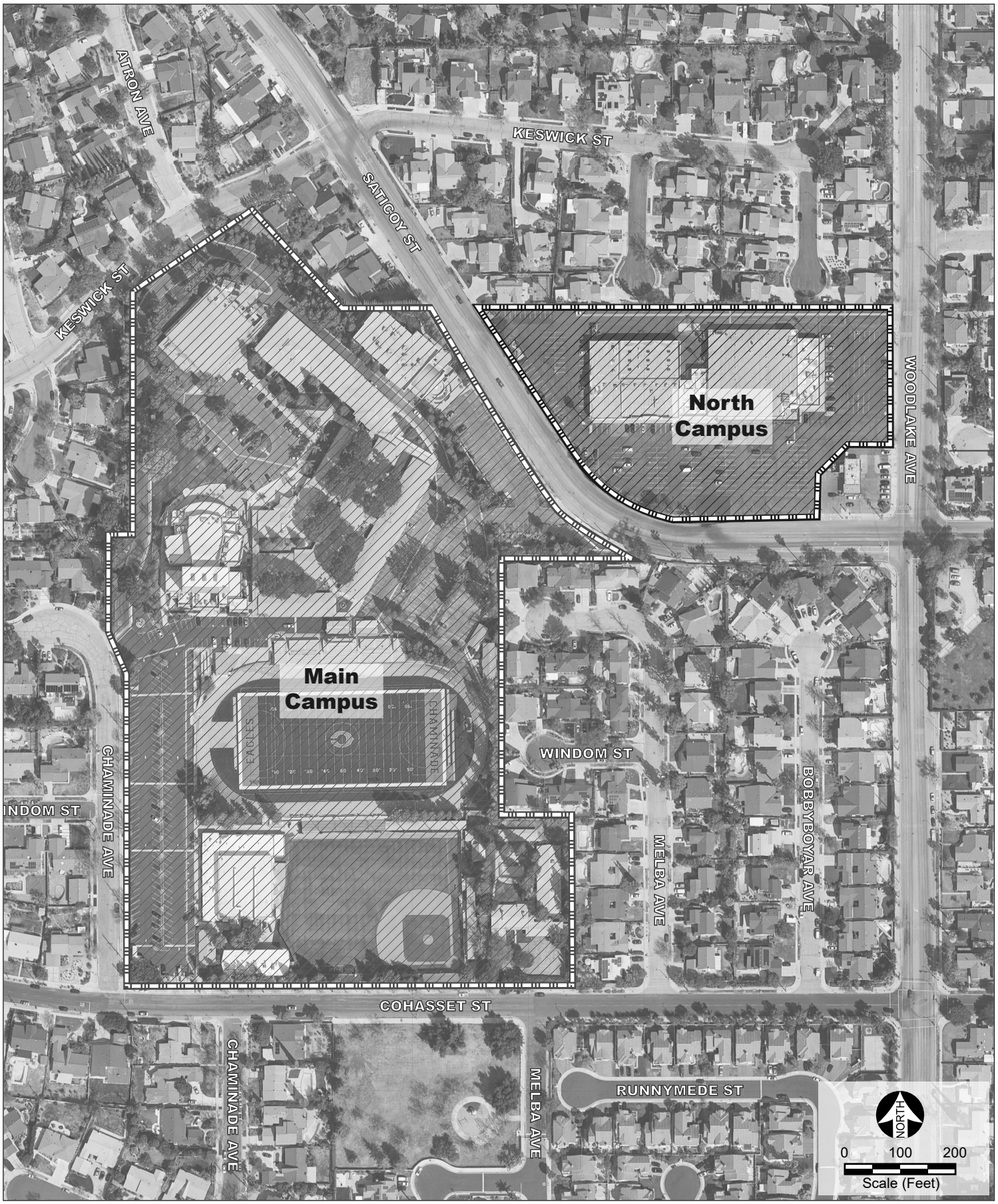


Legend

Project Site

Source: Google Maps 2023.

Figure 3-1
Regional Location Map



Legend

Project Site

Source: Google Maps 2023.

Figure 3-2
Aerial Map

3.3 PROJECT DESCRIPTION

3.3.1 Project Overview

The Project is an updated, comprehensive, and cohesive revised campus plan for the existing high school, integrating both the existing Main Campus and the new North Campus area. The revised campus plan is designed to establish a new entrance for the campus from Saticoy Street, create a cohesive campus outdoor gathering area, improve upon the safety and security of the campus, modernize student service facilities, modernize classrooms including the technology serving the classrooms, provide for an enhanced sports program, and improve campuswide connectivity and circulation. The Project includes changes to the existing Main Campus and the integration of the new North Campus. The changes to the Main Campus include a partial demolition of existing surface parking lots, the demolition of approximately 32,204 square feet of existing classroom buildings (17 classrooms), including the removal of existing portable buildings, and the addition of approximately 60,760 square feet of new floor area within the new Multistory Building to include new administrative, counseling, library, multi-purpose, classroom and laboratory areas with 19 new classrooms (for a net increase of 2 classrooms), renovation of existing offices, and the addition of EV parking and charging stations within most of the existing surface parking lots. It should be noted that six mobile modular trailers/classrooms will be temporarily located on the Main Campus during construction, until the construction of the new Multistory Building is completed.

The expansion of the high school to the North Campus on the east side of Saticoy Street includes the demolition of the existing commercial structures on-site totaling approximately 53,929 square feet of floor area and the demolition of the existing surface parking lot. The expansion to the North Campus includes the development of approximately 8,494 square feet of floor area within a proposed pool house, locker rooms, and structures to house covered bleachers, restrooms, concessions, and storage. The balance of the North Campus site would include proposed new lighted athletic fields, a new outdoor pool, and two new proposed surface parking lots.

3.3.2 New Construction and Campus Changes

New construction on the Main Campus includes the new Multistory Building at the new additional entrance off Saticoy Street, that would include administrative offices, counseling offices, library, multi-purpose room, classrooms, and labs. The floor area contained within the proposed building totals approximately 60,760 square feet and has a height of approximately 48 feet within three stories. In addition, the existing single-story buildings located at the southeast corner of the Main Campus would undergo renovation for administrative offices but would not increase in floor area or height. A new surface parking lot would be constructed in place of the existing paved driveway adjacent to the single-story building at the southeast corner of the Main Campus, fronting on Cohasset Street. Finally, additional improvements to the Main Campus would include minor demolition and resurfacing of the existing baseball field along Cohasset Street, to be reutilized as a softball field, removal of the north surface parking lot, and resurfacing to create a new

landscaped quad area adjacent to the current administrative building to be renovated for student service programming.

To facilitate the construction of the new Multistory Building, six existing classrooms will be removed and relocated into six temporary double-wide mobile modular trailers located in the parking lot south of the proposed location of the new Multistory Building. These temporary classrooms will be installed upon completion of the first phase of North Campus construction and remain in use until occupancy of the new Multistory Building, at which time they will be removed. Parking spaces displaced by these temporary classrooms will be available in the new surface parking lot on the North Campus, prior to the installation of the modular trailers.

Improvements on the North Campus include new athletic fields, outdoor swimming pool, associated facilities, and surface parking. The new athletic fields, to be used for baseball and soccer, would have a 40-foot-high safety netting along a portion of the outfield perimeter and a 26-foot-high electric scoreboard facing Saticoy Street located in left-center outfield, both along the northern property line. There would also be single-story locker rooms, batting cages, and bull pens located along the first and third base lines. Home and visitor bleachers would be along the first base line and third base line, providing approximately 350 seats with a continuous shade structure reaching 19 feet in height, and a press box of approximately 100 square feet would be located behind home plate. Eight stadium light standards ranging in height from 70 to 90 feet are proposed, with the 70-foot light standards located along the perimeter of left and right outfields, with 80- and 90-foot light standards along Saticoy Street and adjacent to the new surface parking lot. To the west of the baseball field is a proposed 1,540 square foot single-story concession and restroom building (16 feet in height) as well as an 86-stall surface parking lot and entrance to the pedestrian bridge. To the east of the baseball field is a proposed 25-meter x 25-yard, in-ground outdoor pool, with four 40-foot-high light standards, a single-story (19-foot tall), 6,094-square foot pool house and 15 surface parking stalls. Bleachers are proposed west of the pool providing approximately 126 seats. Additionally, there would be a public address system on the new North Campus, similar to the public address system currently used on the Main Campus. Figures 3-3 and 3-4 provide the Project site plans, Figure 3-5 provides a rendering of the new Multistory Building on the Main Campus, Figure 3-6 provides renderings of the new North Campus, and Figure 3-7 provides a rendering of the high school campus upon completion of the Project.

A new 2,650-square-foot pedestrian bridge is proposed over Saticoy Street, to connect the North Campus on the east side of Saticoy Street to the Main Campus on the west side of Saticoy Steet. The bridge would allow students, student athletes, faculty, staff, and visitors a safe pedestrian access and connection to the North Campus sports facilities. The North Campus would be secured with gates and fencing along the Saticoy Street frontage and around the campus perimeter to prevent pedestrians from crossing Saticoy Street to access the North Campus. Pedestrians would access the pedestrian bridge at the new surface parking lot on the North Campus and at the new entrance to the high school located on the west side of Saticoy Street on the Main Campus. A stair and elevator tower associated with the pedestrian bridge is proposed on the North Campus side of the bridge (east side of Saticoy Street). The Main Campus side of

the bridge (west side of Saticoy Street) would have an ornamental pedestrian gate for access at ground level on the Main Campus. The bridge abutments and gate landings would be located entirely on-site (on the Main and North Campuses) and out of the public right-of-way. The elevator tower on the North Campus would reach a maximum height of 45 feet as measured from lowest adjacent grade on the North Campus. The bridge itself, however, would reach a maximum height of 30 feet (as measured from lowest adjacent grade on the North Campus and as measured from the street) and a maximum height of 12 feet as measured from lowest adjacent grade on the Main Campus (as the bridge landing on the Main Campus is at a higher elevation and grade than grade level at the North Campus). Minimum vehicular clearance under the pedestrian bridge will be as required by the City of Los Angeles. Figures 3-8 and 3-9 provide elevations and renderings, respectively, of the proposed pedestrian bridge.

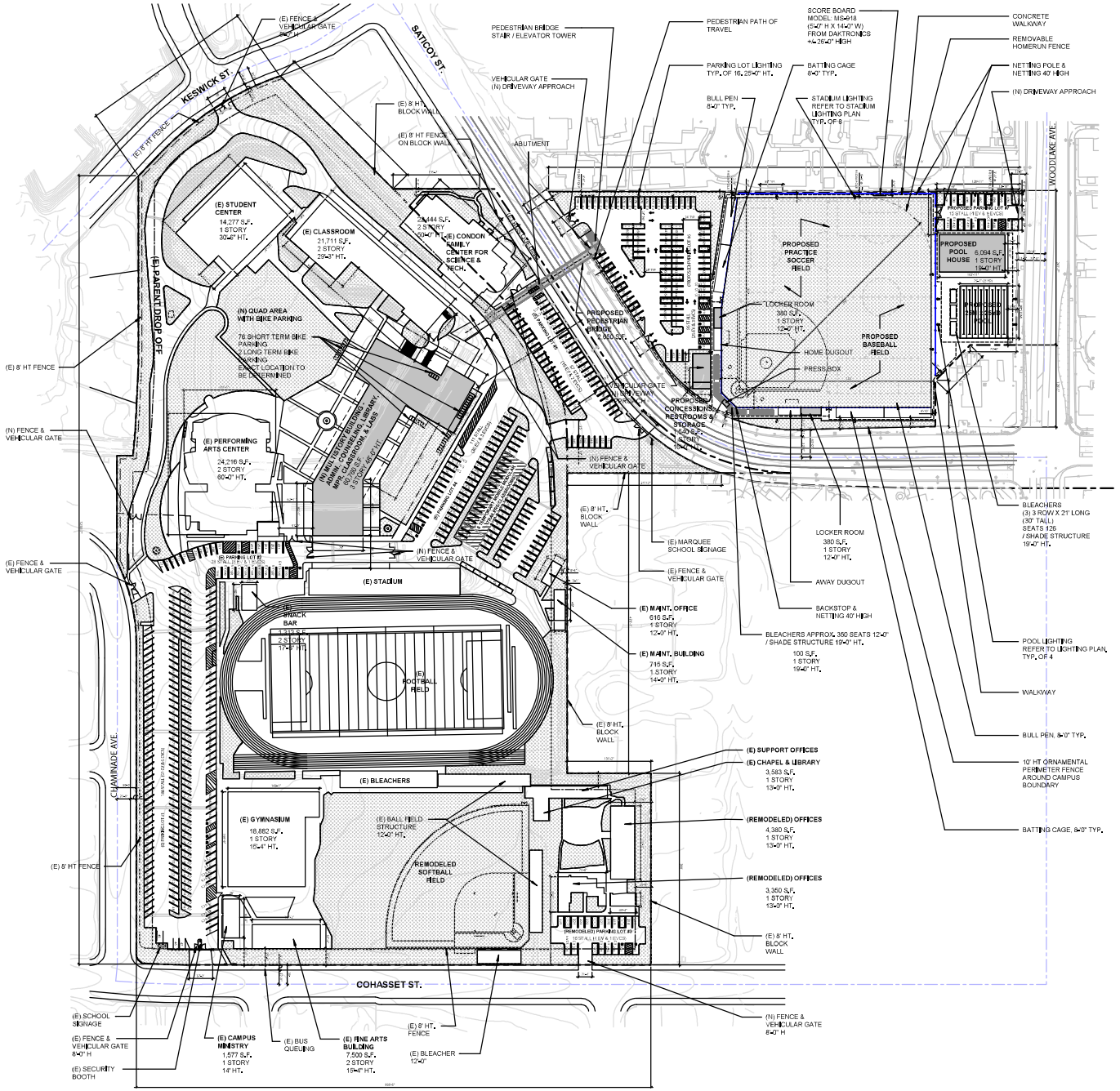


Figure 3-3
Site Plan

Source: HMC Architects, 2024.

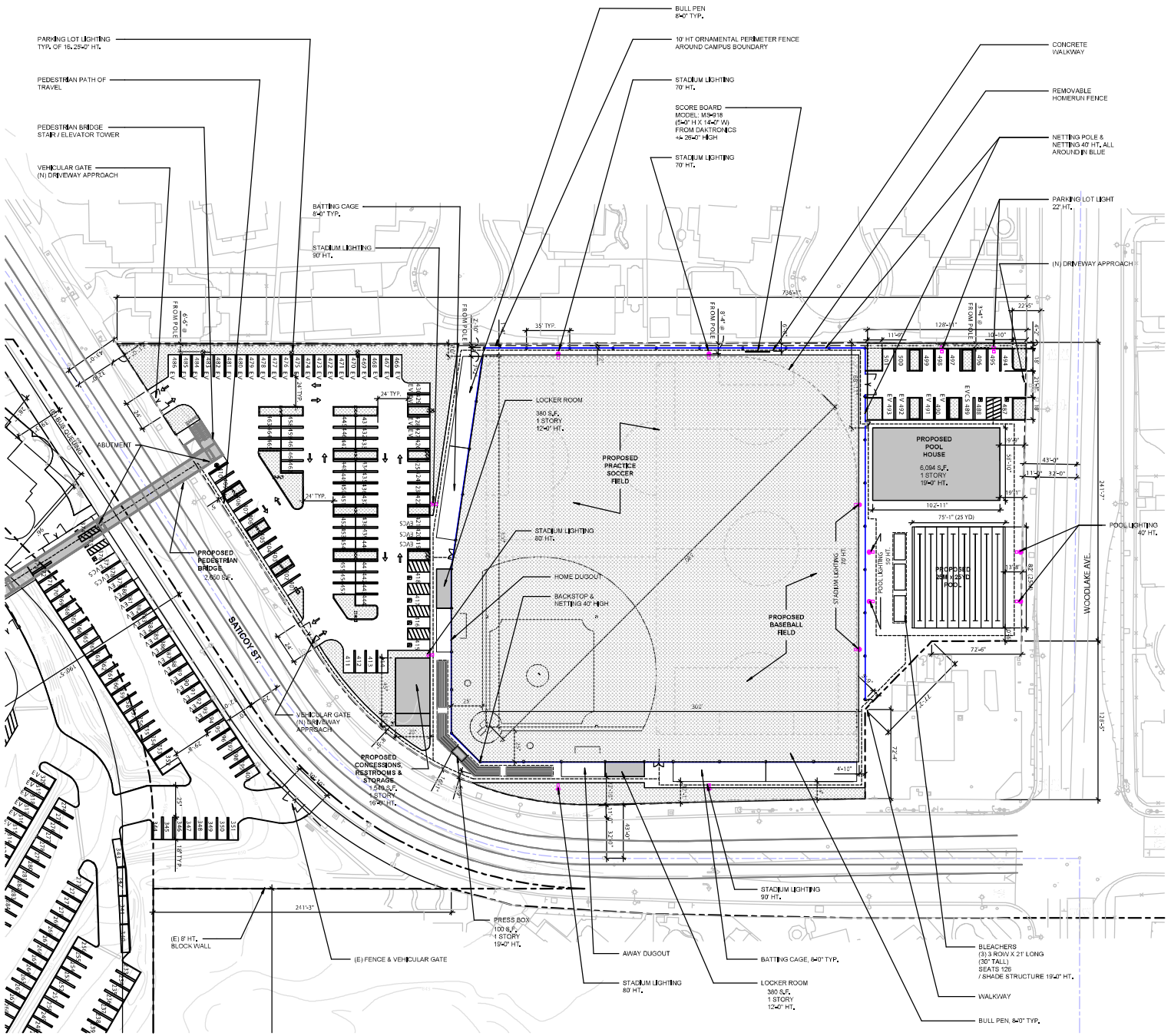


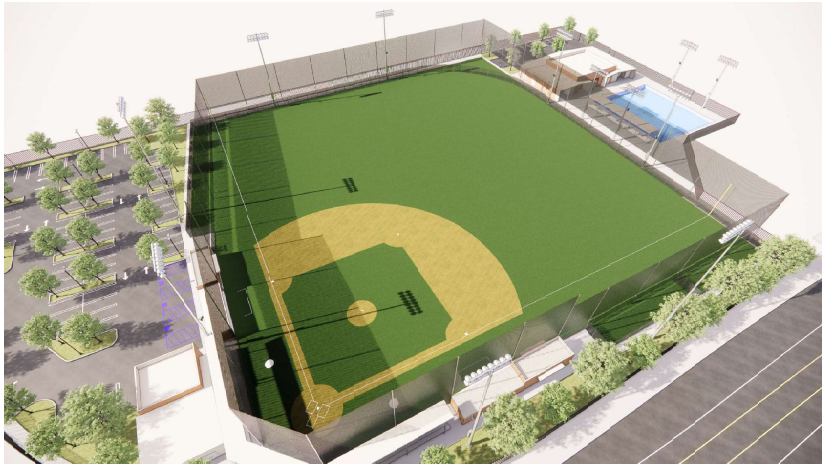
Figure 3-4
North Campus Site Plan

Source: HMC Architects, 2024.

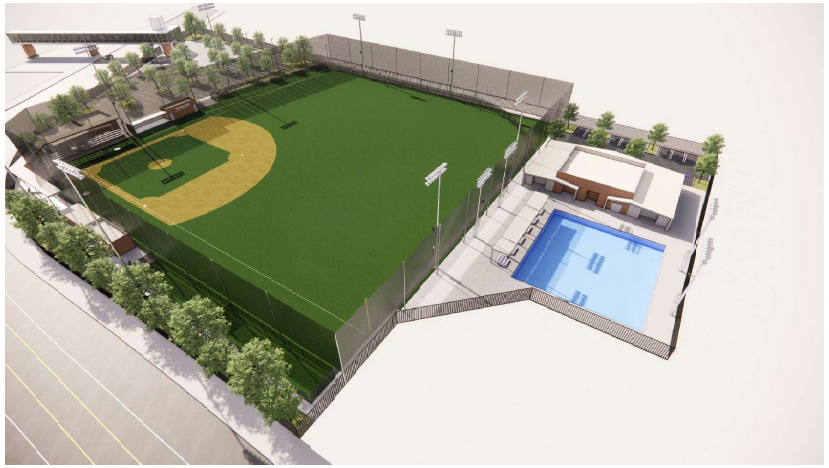
FACILITY

Source: HMC Architects, 2024.

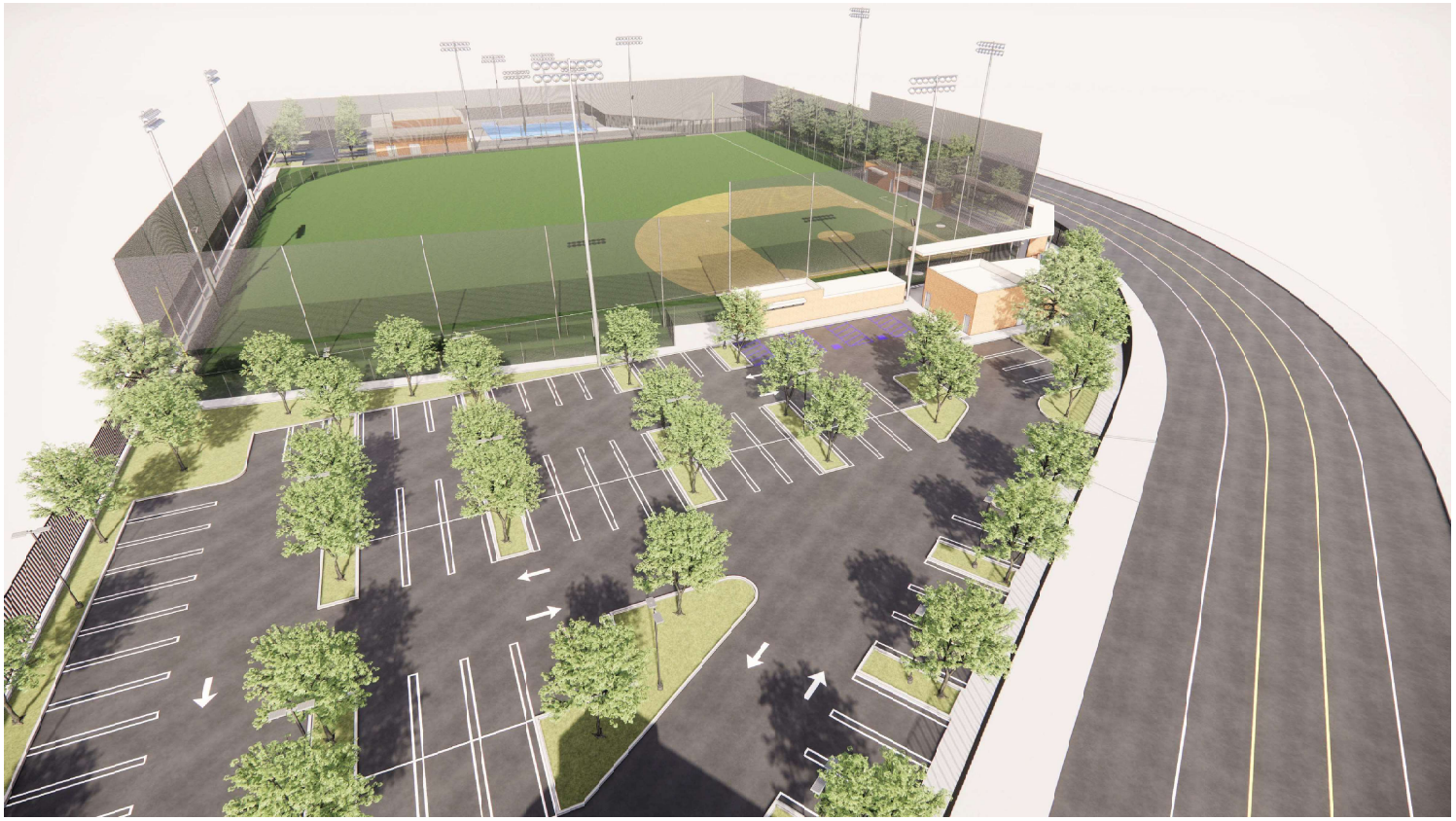
Figure 3-5
Multistory Building Rendering



NORTH CAMPUS - VIEW 01



NORTH CAMPUS - VIEW 02



NORTH CAMPUS - VIEW 03

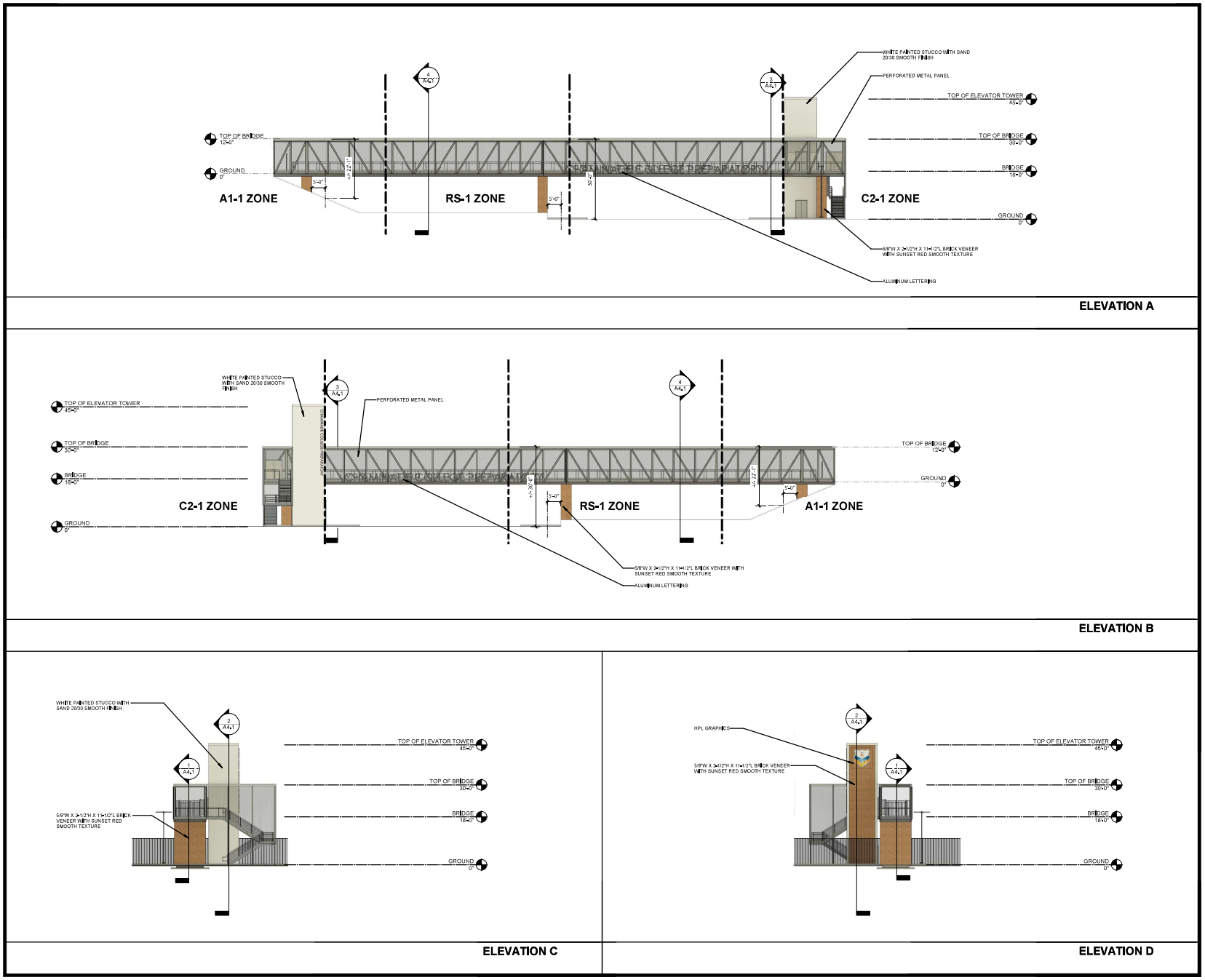
FACILITY:

Source: HMC Architects, 2024.

Figure 3-6
North Campus Renderings

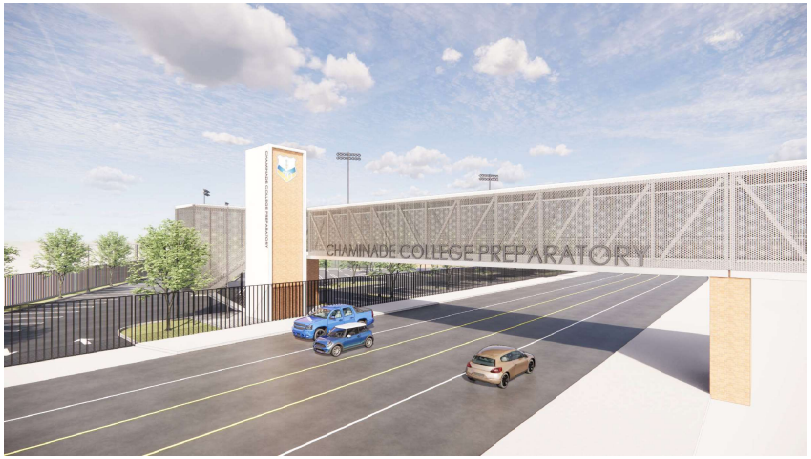
Source: HMC Architects, 2024.

Figure 3-7
Project Rendering



Source: HMC Architects, 2024.

Figure 3-8
Pedestrian Bridge Elevations



PEDESTRIAN BRIDGE - VIEW 01

PEDESTRIAN BRIDGE - VIEW 02

PEDESTRIAN BRIDGE - VIEW 03

FACILITY:

Source: HMC Architects, 2024.

Figure 3-9
Pedestrian Bridge Renderings

3.3.3 Floor Area

The Project would result in a total proposed floor area of approximately 196,468 square feet, representing a net increase of 28,556 square feet of floor area on the Main Campus (from the existing developed structures). Overall, however, the Project would result in a net decrease of approximately 14,229 square feet of floor area, including the demolition of the existing commercial structures on the site of the new North Campus as well as demolition of existing school structures on the Main Campus. It is important to note that although the physical expansion would result in a net increase of lot area with the addition of the 4.83-acre North Campus, the maximum permitted student enrollment of 1,360 students would remain the same. Table 3-1, below, provides a summary of the existing and proposed floor area.

Table 3-1
Floor Area Summary

Use	Size
Main Campus	
Existing high school campus floor area	156,768 sf
Existing floor area to be demolished [a]	(32,204 sf)
New floor area to be added [b]	60,760 sf
Net Total	185,324 sf (increase of 28,556 sf)
New North Campus	
Existing commercial floor area (all to be demolished)	(53,929 sf)
New Project floor area [c]	8,494 sf
Net Total	Reduction of 45,435 sf
Pedestrian Bridge	
New Project floor area	2,650 sf
Total Net Project Floor Area	196,468 sf (reduction of 14,229 sf)

Notes:
[a] Floor area to be demolished on the Main Campus includes 17 classrooms, including the removal of existing portable buildings.
[b] Floor area to be added on the Main Campus includes a new Multistory Building to include new administrative, counseling, library, multi-purpose, classroom, and laboratory areas with 19 new classrooms (for a net increase of 2 classrooms). This does not include six temporary mobile modular trailers/classrooms that will be located on the Main Campus until the Multistory Building is ready for occupancy.
[c] Floor area to be added on the new North Campus includes a pool house, locker rooms, and structures to house restrooms, bleachers, concessions, and storage.
[d] No increase in the maximum permitted student enrollment (1,360 students) is proposed.

3.3.4 Vehicle Access

The Main Campus is currently accessible from Cohasset Street, Chaminade Avenue, Keswick Street, and Saticoy Street. The Project would maintain these access points for the Main Campus. For the North Campus, there are currently six access points for the existing commercial center,

which would be reduced to three access points for the Project as follows: four existing access points along Saticoy Street would be reduced to two access points for the Project; and two access points along Woodlake Avenue would be reduced to one access point at the approximate location of the existing north access point.

3.3.5 Vehicle and Bicycle Parking

There are currently 462 vehicle parking stalls on the existing Main Campus, and after development of the Project, the total number of vehicle parking stalls would increase to approximately 501 stalls within the surface parking lots across both campuses. The Main Campus will include 400 parking stalls and the North Campus will include 101 stalls with 86 stalls in a north parking area and 15 stalls in a parking lot adjacent to the swimming pool area. The Project would also provide 78 bicycle parking spaces, including 76 short-term spaces and 2 long-term spaces.

3.3.6 Trees

As discussed in greater detail in Section 4 of this IS/MND, a tree report was prepared by a certified arborist in accordance with the City's Tree Preservation Ordinance No. 186,873, and this report is included as Appendix C-1 to this IS/MND. The tree report identified the following: 1) 33 parkway street trees; 2) 364 non-protected significant trees with eight-inch diameter at breast height (DBH) or greater on the Project Site; and 3) 108 non-protected non-significant trees (less than eight inches DBH) on the Project Site. None of these trees are protected species as defined by the City's Protected Tree Ordinance. The Project would result in the removal of 40 non-protected significant trees and seven non-protected non-significant trees from the Project Site, and would retain the remaining on-site trees. The Project would also retain the parkway street trees, with the exception of one tree (Street Tree No. 489), which would be removed to construct the pedestrian bridge. The existing significant trees that would be removed as part of the Project would be replaced according to the Urban Forestry Division requirements (the non-significant trees that would be removed would not require replacement).

3.3.7 Lighting

Light is regularly generated on the Main Campus, including from lighted sporting events (e.g., athletic meets and games, etc.) and vehicle travel (e.g., student pick-up/drop-off). The existing Conditional Use Permit requires existing athletic lighting on the Main Campus to be turned off by 11:00 PM on game nights and by 9:00 PM for practices. Low-level security lighting is provided on all nights. No changes are proposed to the existing lighting on the Main Campus, and the allowable hours for the existing lighting for athletic events would also remain unchanged.

On the North Campus, eight stadium light standards ranging in height from 70 to 90 feet are proposed, with the 70-foot light standards located along the perimeter of left and right outfields, with 80- and 90-foot light standards along Saticoy Street and adjacent to the new surface parking lot. In addition, four 40-foot-high light standards would be placed near the outdoor pool. The lighting for the North Campus would be subject to the same restrictions as the existing lighting on

the Main Campus. Therefore, the new lights on the North Campus would be turned off by 11:00 PM on game nights and by 9:00 PM for practices. Low-level security lighting would also be provided on all nights.

3.3.8 Fencing

The Main Campus would retain the existing eight-foot-tall fence, gates, and block wall currently securing the campus perimeter. In addition, new fencing and vehicular gates, to be located along the northwest drive aisle and parent drop-off area along Chaminade Avenue and at the southeastern access point along Cohasset Street, would be provided on the Main Campus to complete the perimeter security. A new 10-foot-high ornamental fence and gates would be provided around the perimeter of the North Campus to secure the campus and prevent pedestrian crossing across Saticoy Street.

3.3.9 School Operations

The new facilities will service existing students, faculty, staff, and visitors. No increase in permitted enrollment is requested, nor would the Project require additional faculty or staff. Sports programming will remain substantially similar to existing programs with some activities/games that currently occur on the Main Campus shifting to the North Campus, except that the new outdoor pool will allow an expanded swim program including practices, classes, and meets, and would be made available on a limited basis to the local community. The following provides a summary of new activities at the North Campus (not including existing school events that would shift from the Main Campus to the North Campus):

- 10 high school swim competitions per year
- 10 middle school swim competitions per year
- Swim practice for other schools (limited to February through April)
- Swim lessons and water exercise classes daily
- Local community swimming (if there are no other activities at the pool)
- Local non-school athletic groups (limited to May through December)

The hours of operation for the North Campus would be more restrictive than the usage hours allowed by the school's current Conditional Use Permit for the Main Campus. The North Campus hours of operations would be:

- Athletic fields/stadium: Monday – Friday, 7:00 AM – 9:00 PM (with exception for overtime/extra inning play); Saturday, 8:00 AM – 9:00 PM; and Sunday, 9:00 AM – 8:00 PM (no more than 15 Sundays per year).

- Aquatic complex/pool: Monday – Friday, 8:00 AM – 8:00 PM; and Saturday 10:00 AM – 7:00 PM. No use is permitted on Sundays.

- Batting cage: Monday – Saturday, 7:00 AM – 8:00 PM. No use is permitted on Sundays.

Rental or lease of the North Campus athletic facilities would be subject to more restrictive day and hour limitations:

- Athletic fields/stadium: Use by community-based athletic organizations shall be limited to 36 days annually, Monday through Saturday, 8:00 AM – 6:00 PM. Use is not permitted on Sundays and national holidays. The rental or lease of the batting cages is not permitted at any time.

- Aquatic complex/pool: Use by community-based organizations, which shall travel to and from the North Campus by bus, shall be limited to daylight hours and end no later than 7:00 PM, Monday through Friday, and no later than 5:00 PM on Saturdays. For community member swim activities, use hours shall be limited to Monday through Saturday, 8:00 AM – 6:00 PM. Use is not permitted on Sundays and national holidays.

Additional parking is provided to enhance on-site parking, especially for the expanded swim program, and to improve circulation. No changes are proposed to the existing school transportation program, which includes school busses and facilitation of carpooling for siblings and neighbors. Existing overflow parking for special events (currently provided at West Hills Hospital) will continue as needed.

As discussed above, lighting at the North Campus will be used for night practices and night games and meets. The lighting for the North Campus would be subject to the same restrictions as the existing lighting on the Main Campus. Therefore, the new lights on the North Campus would be turned off by 11:00 PM on game nights and by 9:00 PM for practices. There would be no change to the lighting on the Main Campus.

3.3.10 Construction Assumptions

Full Project implementation is estimated by 2035, and there is currently no exact schedule or sequence of construction activities or phasing, though it would be necessary for some activities to occur before others. Certain Project elements may be phased. For example, grading of the North Campus would have to occur before construction of the new North Campus athletic and pool facilities, demolition of existing classroom buildings would have to occur before construction of the new Multistory Building on the Main Campus, etc. Table 3-2, below, presents a sequence of the Project's construction activities showing which construction activities/phases may overlap. Project Design Feature 1 (PDF 1), provided later in this section, incorporates the construction sequence shown in Table 3-2.

Table 3-2
Construction Sequence

Construction Activity	Sequence									
	1	2	3	4	5	6	7	8	9	10
North Campus – Demolition†	X									
North Campus – Grading†		X								
North Campus – Construction of new surface parking lot			X							
North Campus – Construction of pedestrian bridge				X						
North Campus – Construction of new athletic fields and ancillary facilities†					X	X	X	X		
North Campus – Construction of new pool facilities†										X
Main Campus – Parking Lot Demolition†					X					
Main Campus – Classroom Demolition†						X				
Main Campus – Multistory Building Grading†							X			
Main Campus – Multistory Building Construction†								X	X	X
Main Campus – Construction of upper-level student quad									X	
Main Campus – Renovation of surface parking lot along Cohasset Street									X	
Main Campus – Renovations to existing athletics facilities, classroom buildings, and administrative offices.								X	X	X

† Denotes construction activities chosen for detailed construction emissions modeling.
Source: Project Applicant.

Grading for the North Campus would require approximately 720 cubic yards of export, and grading for the Main Campus would require approximately 17,800 cubic yards of export. Therefore, a Haul Route would be required as part of the City's permit process. The haul route would likely be as follows, subject to Los Angeles Department of Transportation (LADOT) approval:

- Loaded trucks leaving the Project Site would travel west on Saticoy Street, west on Ingomar Street, south on Valley Circle Boulevard, and west on Long Valley Road to the Ventura Freeway (US 101) on-ramps.

- Empty trucks returning to the Project Site would exit the Ventura Freeway at Mulholland/Valley Circle Boulevard, travel east on Calabasas Road, north on Valley Circle Boulevard, east on Ingomar Street, and east on Saticoy Street.

3.3.8 Project Design Features

The following Project Design Features (PDFs) are included as part of the Project:

PDF-1 The Project will adhere to the construction sequence shown in Table 3-2, except:

- Construction of the new surface parking lot on the North Campus and construction of the pedestrian bridge may interchange in the overall sequence of construction activities, but shall not overlap with each other; and

- Demolition of parking lots on the Main Campus and demolition of classroom buildings on the Main Campus may interchange in the overall sequence of construction activities, but shall not overlap with each other.

PDF-2 The Project will prepare a Traffic Management Plan (TMP) to establish operational procedures for traffic flow around the school related to self-driving students and student drop-off and pick-up operations. The purpose of the plan will be to establish operational procedures to improve traffic circulation utilizing the enhanced access points and parking areas, improve student safety, maximize the efficiency of drop-off and pick-up operations, and reduce delays during those time periods.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The Mitigated Negative Declaration will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

1. Pursuant to Los Angeles Municipal Code (LAMC) Sections 12.32 F and 12.32 Q, a Vesting Zone Change and Height District Change from the [Q]C1-1VL and P-1VL zones to the (T)(Q)C2-1 Zone on the new North Campus;

2. Pursuant to LAMC Section 12.24 X.7, a Zoning Administrator's Determination to allow for existing 8-foot-tall perimeter fences and vehicular gates to remain within the front yards (along Cohasset Street and Keswick Street) and for the construction of a new 8-foot-tall fence and vehicular gate within the front yard (along Cohasset Street) on the Main Campus, in lieu of the maximum height of 6 feet otherwise permitted in the front yard of the A1 Zone pursuant to LAMC Section 12.22 C.20(f);

3. Pursuant to LAMC Section 12.24 X.22, a Zoning Administrator's Determination, to allow for new structures related to the sports facilities on the new North Campus, including, but not limited to, a score board, netting and netting poles, lights and a pedestrian bridge, ranging in height from approximately 25 to 90 feet, in lieu of the 25-foot, 33-foot and 61-foot Transitional Height Limitations permitted within 0-199 feet of lots zoned RW1 or more restrictive pursuant to LAMC Section 12.21.1 A.10;

4. Pursuant to LAMC Section 12.28, a Zoning Administrator's Adjustment to allow the following:

    a. A maximum building height of 48 feet for the new Multistory Building on the Main Campus, in lieu of 45 feet otherwise permitted in the A1 Zone pursuant to LAMC Section 12.21.1; and

    b. The encroachment of a proposed above-grade pedestrian bridge and associated support structures into the required front and side yard setbacks in the RS and A1 zones on the west side of Saticoy Street, and reduced setbacks along Cohasset Street (front yard) and along the easterly property lines (side yards) in the A1 Zone for existing encroaching structures (bleachers and buildings) to remain on the Main Campus, in lieu of the setbacks otherwise required pursuant to LAMC Sections 12.07.1 C and 12.05 C;

5. Pursuant to LAMC Sections 17.03 and 17.15, a Vesting Tentative Tract Map for the merger and re-subdivision of the project site into two (2) ground lots: one for the Main Campus (Lot 1) and one for the North Campus (Lot 2); and one (1) airspace lot (Lot 3) for the vacation of a portion of public right-of-way along Saticoy Street to allow for the construction of a pedestrian bridge connecting the Main Campus to the North Campus;

6. Pursuant to LAMC Section 17.13, a haul route approval for the export of approximately 17,800 cubic yards from the Main Campus and the export of approximately 720 cubic yards from the North Campus;

7. Pursuant to LAMC Section 17.11, a Modification of Requirements in conjunction with a Vesting Tentative Tract Map for the waiver of required dedications and street improvements along Cohasset Street, and for the waiver of a requirement to remove existing driveways and construct new ADA compliant driveways on the Main Campus;

8. Pursuant to LAMC Section 12.24 M, a Plan Approval to allow the continued use and operation of an existing High School in the A1 and RS zones and the expansion of the High School to the property located across the street (North Campus), and to modify certain conditions of the original Conditional Use grant under Case No. CPC-2009-1477-CU-ZV-ZAA-SPR; and

9. Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, demolition permits, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, street tree removal permits, and haul route permits.

3.5 RELATED PROJECTS

In this IS/MND, cumulative impact analyses are provided for each environmental issue discussed in Section 4 (Environmental Impact Analysis) and can be found in each respective subsection of Section 4. As stated in the Transportation Assessment prepared for the Project (included in Appendix H-1 of this IS/MND), according to LADOT, no related projects have been identified within one-half mile of the Project Site.

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099 would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In 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?	☐	☐	☒	☐

The analysis in this section is based in part on the following, which is included in Appendix A of this IS/MND:

- Technical Lighting Analysis, HLB Lighting Design, September 27, 2023.

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

Less Than Significant Impact. A significant impact would occur if a project introduced incompatible scenic elements within a field of view containing a scenic vista or substantially block views of an existing scenic vista. As described in the City of Los Angeles CEQA Thresholds Guide, panoramic views or vistas provide visual access to a large geographic area, for which the field of view 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 area, which provide a geographical orientation not commonly available. Examples of panoramic views might include an urban skyline,

valley, mountain range, the ocean, or other water bodies. The Project Site is located in an urbanized portion of Los Angeles, in an area containing residential, commercial, and institutional uses. Views in the vicinity of the Project Site are largely constrained by the existing structures on the Project Site and structures on adjacent parcels, although views of mountains to the north are currently available from some vantage points. With respect to height, the new Multistory Building proposed at 48 feet tall, as measured from the lowest adjacent grade located 5 feet from the proposed building, or "Grade (Adjacent Ground Level)" as defined in Los Angeles Municipal Code (LAMC) Section 12.03, would be compatible with the existing buildings on the Main Campus and would be shorter than the two tallest existing buildings, which are the Performing Arts Center with a height of 60 feet and the Condon Family Center for Science and Technology which has a height of 50 feet. The new building structures proposed on the North Campus would be one-story and would range in height from 12 feet to 19 feet, with associated necessary structures (i.e. lights, score board, netting poles, etc.) proposed at taller heights, ranging from 26 feet to 90 feet, all as measured from lowest adjacent grade. The pedestrian bridge is proposed to reach a maximum height of 30 feet, as measured from lowest adjacent grade on the North Campus and as measured from the street, and a maximum height of 12 feet as measured from lowest adjacent grade on the Main Campus (as the bridge landing on the Main Campus is at a higher elevation and grade than grade level at the North Campus). The top of the elevator tower proposed on the east side of Saticoy Street will reach a maximum height of 45 feet, as measured from lowest adjacent grade on the North Campus. While the Project would add new buildings to both the Main Campus and the North Campus, the height of the new buildings would be compatible with the existing buildings on the Project Site and in the surrounding area, and views of the mountains to the north would continue to be available in the Project area. In addition, while the pedestrian bridge and associated structures on the North Campus (lights, score board, and netting poles) would be taller than some of the existing and proposed buildings, these structures would not be of such a size as to block views of the mountains to the north. Therefore, Project impacts with respect to scenic vistas would be less than significant.

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

No Impact. A significant impact would occur only where scenic resources within a state scenic highway would be damaged or removed by a project. The Project Site is not located within a state scenic highway.[1] The nearest state designated scenic highway is Topanga Canyon Boulevard (State Route 27), which is approximately 1.6 miles from the Project Site. Therefore, no impact would occur.

[1] California Department of Transportation, List of Eligible and Officially Designated State Scenic Highways, https://dot.ca.gov/-/media/dot-media/programs/design/documents/desig-and-eligible-aug2019_a11y.xlsx, accessed June 15, 2023.

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

Less Than Significant Impact. The Project Site is located within an urbanized area, and thus, the following analysis will focus on whether the Project will conflict with any applicable zoning and/or other regulations governing scenic quality. As discussed below under "Land Use," the Project Site is located within the Canoga Park – Winnetka – Woodland Hills – West Hills Community Plan Area and the Project would be consistent with the existing land use designations for both the Main Campus (Very Low Residential and Low Residential) and North Campus (Neighborhood Commercial). A portion of the Community Plan Area is subject to the Mulholland Scenic Parkway Specific Plan. However, the Project is not located within the boundaries of this Specific Plan and would not conflict with this plan. The Canoga Park – Winnetka – Woodland Hills – West Hills Community Plan does not contain any other policies with regard to scenic quality.

With respect to zoning, the North Campus is currently located in the [Q]C1-1VL and P-1VL zones, and the Applicant is proposing a Vesting Zone Change and Height District Change on the North Campus to the C2-1 Zone, which corresponds to the existing Neighborhood Commercial land use designation of the North Campus. The private school use is permitted by-right within the C2 Zone and approval of the Zone Change would allow the expansion of the existing high school, which has been operating at its current location for over six decades, to integrate additional area for athletic facilities that are needed to serve the existing student population. However, the Zone Change would not result in any impacts with respect to scenic quality. Therefore, the Project would not conflict with any applicable zoning or other regulations governing scenic quality, and this impact would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project were to introduce new sources of light or glare on or from the Project Site which would be incompatible with the area surrounding the Project Site, or which pose a safety hazard to motorists utilizing adjacent streets.

Existing Conditions

Project Site

The Main Campus is currently developed with a private high school campus containing educational, athletic, performing arts, administrative, and religious facilities. Light is regularly generated by the daily use of these facilities, including from lighted sporting events (e.g., athletic meets and games, etc.) and vehicle travel (e.g., student pick-up/drop-off). The existing Conditional Use Permit requires existing athletic lighting on the Main Campus to be turned off by

11:00 PM on game nights and by 9:00 PM for practices. Low-level security lighting is provided on all nights.

The North Campus is developed with a shopping center that contains a grocery store, restaurants, and other commercial uses, as well as surface parking for these uses. Light associated with these uses include parking light lighting, car lights from patrons, and trucks.

Light-Sensitive Receptors

The Main Campus and North Campus sites are surrounded by predominantly residential uses, many of which directly abut the two sites. For example, single-family homes are located directly north of the North Campus site along Saticoy Street, Melba Street, and Bobbyboyar Avenue. Single-family homes are also located directly west of the Main Campus along Woodhall Avenue, Keswick Street, and Atron Avenue.

A map showing the location of the Project and the nearby residential uses is included in Appendix G of this IS/MND.

Project Impacts

Artificial Light

An adverse impact would occur if a project created a substantial new source of artificial light that would adversely affect the surrounding area. Artificial light may be generated from individual (i.e., point) sources as well as from indirect sources of reflected light. Uses such as residences, hospitals, and hotels are considered light sensitive since they are typically occupied by persons who are subject to disturbance by bright light sources during evening hours.

The North Campus portion of the Project will include new lighting for the athletic fields and supporting facilities and parking areas, to include eight stadium light standards ranging in height from 70 to 90 feet, with the 70-foot light standards located along the perimeter of left and right outfields, and with 80- and 90-foot light standards along Saticoy Street and adjacent to the new surface parking lot. In addition, four 40-foot-high light standards would be placed near the outdoor pool. The lighting for the North Campus would be subject to the same restrictions as the existing lighting on the Main Campus. Therefore, the new lights on the North Campus would be turned off by 11:00 PM on game nights and by 9:00 PM for practices. Low-level security lighting would be provided on all nights.

As discussed above, light is regularly generated on the Main Campus, including from lighted sporting events (e.g., athletic meets and games, etc.) and vehicle travel (e.g., student pick-up/drop-off). The existing Conditional Use Permit requires existing athletic lighting on the Main Campus to be turned off by 11:00 PM on game nights and by 9:00 PM for practices. Low-level security lighting is provided on all nights. No changes are proposed to the existing lighting on the

Main Campus, and the allowable hours for the existing lighting for athletic events would also remain unchanged.

A Technical Lighting Analysis (included in Appendix A of this IS/MND) was prepared to assess the lighting impacts associated with the new athletic fields and supporting facilities on the proposed North Campus. As discussed in the Technical Lighting Analysis, the existing uses on the proposed North Campus site currently emit very low light levels with minimum light spill onto immediately adjacent residential properties and greater spill into adjacent public rights-of-way.

The following thresholds are used in the Technical Lighting Analysis to determine the impacts of the proposed improvements on the North Campus:

- Maximum Intensity: Section 93.0117 of the Los Angeles Municipal Code (LAMC), "Lighting Impacting Residential Property," states that "No person shall construct, establish, create, or maintain any stationary exterior light sources that may cause [property containing a residential unit] to...receive direct glare from the light source." Direct glare is defined as glare "resulting from high luminance or insufficiently shielded light sources that is in the field of view." There is an exemption from the above restriction for tennis court exterior lighting provided that the luminaire has a light intensity of less than 25,000 cd/m2. Because the LAMC does not contain a metric for any other sports facility, the Technical Lighting Analysis applies the cutoff metric of 25,000 cd/m2 to the Project's sporting field and facilities.

- Light Spill: Section 93.0117 of the LAMC states that "Light Sources shall be designed and maintained so as to produce not more than two footcandles of illumination as measured at the property line of the nearest residentially zoned property..."

Lighting design analysis for the proposed sport field and adjacent pool was conducted by the proposed lighting manufacturer. The proposed lighting design for the sports field calls for eight poles supporting sport lighting equipment surrounding the recreational field. These poles would range in height from 70 feet to 90 feet and contain between five and ten directional luminaires per pole. These luminaires are mounted at varying heights and range from 500 watts to 1,430 watts. Additionally, four smaller poles are proposed to be located at the exterior pool. These poles would range in height from 40 feet to 50 feet and contain three luminaires each. These luminaires range in wattage from 400 watts to 580 watts. All proposed luminaires are light emitting diode (LED) with a standard 5700K color temperature, 75CRI, and estimated lifespan of L90 >120,000hrs.

Maximum intensity was calculated by the manufacturer to capture potential brightness and glare. Calculation points were placed along Saticoy Street, which bounds the North Campus property to the south and west, with the points specifically located on the sidewalk across the right-of-way and closest to the existing residential uses. Calculation points were also placed along the north property line of the North Campus, abutting the existing residential properties. The maximum intensity values for the proposed design are 11,448 candelas (cd) and 24,736 cd at the Saticoy

Street and northern property lines, respectively. These values both fall below the established threshold of significance for maximum intensity of 25,000cd/m2.

The anticipated illuminance, both horizontal and vertical, along the various property lines was reported by the manufacturer to capture potential spill light. Additionally, horizontal illuminance calculation points were placed extending beyond the property line to the north to capture potential spill light onto the adjacent residential properties. These calculation points were placed at grade with a spacing of five feet by five feet, extending approximately 160 feet to the north of the property line. The maximum spill light value along Saticoy Street is 0.72 footcandles (fc), whereas the maximum light spill to the north of the Project Site is 1.9 fc. These values fall below the threshold of significance of 2.0 fc of illumination at the property line of the nearest residentially-zoned property.

In conclusion, the proposed sports lighting design for the North Campus does demonstrate an increase in both spill light and maximum intensity in comparison to the existing lighting conditions at the North Campus. However, the proposed design does not exceed the threshold of significance outlined for maximum intensity nor does it exceed the threshold for spill light for the land immediately adjacent to the North Campus property lines. In addition, as discussed above, there would be no changes to the existing sports lighting on the Main Campus. Therefore, Project impacts with respect to lighting would be less than significant.

Glare

An adverse impact would occur if a project created a substantial new source of glare that would adversely affect day or nighttime views in the area. Glare is a common phenomenon in the Southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potential reflective surfaces in the Project vicinity include automobiles traveling and parked on streets or in surface parking lots, exterior building windows, and surfaces of brightly painted buildings. Glare currently exists at the Project Site from windows of the existing buildings as well as automobiles parked in the surface parking lots. The Project would provide a similar amount of glare as currently exists at the Project Site (from the windows of the new buildings as well as automobiles parked in the proposed surface parking lots). In addition, all exterior windows and glass used on Project building surfaces would be non-reflective or treated with an anti-reflective coating to minimize glare. Therefore, glare from the Project Site would be similar to the existing uses, and the Project would not create a substantial new source of glare, and this impact would be less than significant.

Cumulative Impacts

No related projects have been identified within one-half mile of the Project Site. However, like the Project, any other development projects would be subject to applicable development standards, which results in individual review of the visual character of each project, to ensure consistency with design standards and that individual projects are compatible with existing land uses.

Therefore, although development of the Project in combination with other development projects could result in a general intensification of land uses in an already urbanized area of the City, the Project would not combine with any other development projects to generate a significant cumulative impact with respect to scenic vistas, views, or visual character.

As it relates to light and glare, development of the Project in combination with other development projects could result in an intensification of land uses in an already urbanized area of the City that currently maintains an elevated level of ambient light and glare. As such, the Project and any other development projects could contribute to ambient light levels within the surrounding area. However, this is a heavily urbanized area and the presence of additional nighttime illumination resulting from the Project or any other development projects would not represent a substantial alteration to the existing nighttime visual environment. For these reasons, cumulative aesthetics impacts would be less than significant.

II. AGRICULTURE AND FORESTRY RESOURCES

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

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

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

No Impact. A significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland" in California. While the existing high school campus is zoned A1-1 and RS-1, the high school has been at its current location on the Main Campus since the 1960s. In addition, the North Campus is currently zoned [Q]C1-1VL and P-1VL and is developed with a shopping center and associated surface parking. The Site is designated Urban and Built-up Land and is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category.[2] Therefore, no impact would occur.

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

No Impact. A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act Contract from agricultural use to non-agricultural use. The Williamson Act of 1965 allows local governments to enter into agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use.[3] No Williamson Act contract applies to the Project Site. While the Main Campus is zoned A1-1 and RS-1, the high school has operated on this Site since the 1960s. The North Campus is zoned [Q]C1-1VL and P-1VL. Therefore, no impact would occur.

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. A significant impact may occur if a project were to cause the rezoning of forest land or timberland. The Project Site is currently zoned A1-1 and RS-1 (Main Campus) and [Q]C1-1VL and P-1VL (North Campus) and is not zoned for forest land or timberland. Therefore, no impact would occur.

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

No Impact. A significant impact may occur if a project were to result in the loss of forest land or the conversion of forest land to a non-forest use. The Project Site is currently zoned A1-1 and

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[2] State of California Department of Conservation, Farmland Mapping and Monitoring Program, https://maps.conservation.ca.gov/DLRP/CIFF/, June 13, 2023.

[3] State of California Department of Conservation, Williamson Act Program, website: http://www.conservation.ca.gov/dlrp/lca/Pages/index.aspx, accessed June 2, 2023.

RS-1 (Main Campus) and [Q]C1-1VL and P-1VL (North Campus) and is developed with the existing high school campus and shopping center with associated surface parking. The Project Site is not used as forest land, and therefore, the Project would not result in the loss of forest land or conversion of forest land to non-forest use, and no impact would occur.

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

No Impact. A significant impact may occur if a project results in the conversion of farmland to another non-agricultural use or conversion of forest land to non-forest use. The Project Site is in an urbanized area of the City and the Project Site is currently developed with the existing high school campus (Main Campus) and shopping center (North Campus). The Project Site does not contain any agricultural or forest land. As such, the Project would not result in the conversion of farmland to a non-agricultural use or the conversion of forest land to a non-forest use, and no impact would occur.

Cumulative Impacts

As described above, the Project would not result in any impacts related to agricultural and forestry resources, and the Project area is developed with urban land uses. In addition, no related projects have been identified within one-half mile of the Project Site. Therefore, no cumulative impacts would occur with respect to agricultural and forestry resources.

III. AIR QUALITY

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

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

The analysis in this section is based on the following, which is included in Appendix B of this IS/MND:

- Air Quality and Greenhouse Gas Emissions Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023.

Regulatory Framework

Federal

Clean Air Act

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years, with the most recent amendments occurring in 1990. At the federal level, the United States Environmental Protection Agency (USEPA) is responsible for implementing some portions of the CAA (e.g., certain mobile source and other requirements). Other portions of the CAA (e.g., stationary source requirements) are implemented by state and local agencies. In California the California Clean Air Act (CCAA) is administered by the California Air Resources Board (CARB) at the state level and by the air quality management districts and air pollution control districts at the regional and local levels.

The CAA governs the establishment, review, and revision, as appropriate, of the National Ambient Air Quality Standards (NAAQS), which provide protection for the nation's public health and the environment. NAAQS are based on quantitative characterizations of exposures and associated risks to human health and the environment. The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress towards attainment and the incorporation of additional sanctions for failure to attain or to meet interim milestones. NAAQS have been established for seven major air pollutants: carbon monoxide (CO), nitrogen dioxide (NO_2), ozone (O_3), $PM_{2.5}$ (particulate matter, 2.5 microns), PM_{10} (particulate matter, 10 microns), sulfur dioxide (SO_2), and lead (Pb).

The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are shown in Table III-1. USEPA has classified the Los Angeles County portion of the South Coast Air Basin (Basin) as a nonattainment area for O_3, $PM_{2.5}$, and lead.

Table III-1
State and Federal Ambient Air Quality Standards and Attainment for L.A. County

Pollutant	Averaging Period	California		Federal	
		Standard	Attainment Status	Standard	Attainment Status
Ozone – O_3	1-hour	0.09 ppm (180 µg/m^3)	Non-attainment	-	-
	8-hour	0.070 ppm (137 µg/m^3)	Non-attainment	0.070 ppm (137 µg/m^3)	Non-attainment
Respirable Particulate Matter – PM_{10}	24-hour	50 µg/m^3	Non-attainment	150 µg/m^3	Attainment
	Annual Arithmetic Mean	20 µg/m^3	Non-attainment	-	-
Fine Particulate Matter – $PM_{2.5}$	24-hour	-	-	35 µg/m^3	Non-attainment
	Annual Arithmetic Mean	12 µg/m^3	Non-attainment	12 µg/m^3	Non-attainment
Carbon Monoxide – CO	1-hour	20 ppm (23 mg/m^3)	Attainment	35 ppm (40 mg/m^3)	Attainment
	8-hour	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Attainment
Nitrogen Dioxide – NO_2	1-hour	0.18 ppm (338 µg/m^3)	Attainment	100 ppb (188 µg/m^3)	Attainment
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	Attainment	53 ppb (100 µg/m^3)	Attainment

Table III-1
State and Federal Ambient Air Quality Standards and Attainment for L.A. County

Pollutant	Averaging Period	California		Federal	
		Standard	Attainment Status	Standard	Attainment Status
Sulfur Dioxide – SO_2	1-hour	0.25 ppm (655 µg/m^3)	Attainment	75 ppb (196 µg/m^3)	Attainment
	24-hour	0.04 ppm (105 µg/m^3)	Attainment	-	-
Lead – Pb	30-day average	1.5 µg/m^3	Attainment	-	-
	Calendar Quarter	-	-	0.15 µg/m^3	Non-attainment

Source: Maps of State and Federal Area Designations, https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations. Accessed May 12, 2023.

State

California Clean Air Act

In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the CCAA. In California the CCAA is administered by CARB at the state level and by the air quality management districts and air pollution control districts at the regional and local levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for meeting the state requirements of the CAA, administering the CCAA, and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to achieve and maintain the CAAQS. CAAQS are generally more stringent than their corresponding NAAQS and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. CAAQS define clean air: they represent the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without any harmful effects on people or the environment.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS thresholds have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the non-desert Los Angeles County portion of the Basin is designated as a nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The State standards and attainment/non-attainment are also shown in Table III-1, above.

California Air Toxics Program

CARB's Air Toxics Program was established in 1983 in response to the adoption of AB 1807, the Toxic Air Contaminant Identification and Control Act. AB 1807 directs CARB and the State Office of Environmental Health Hazard Assessment (OEHHA) to identify toxic air contaminants (TACs) and determine whether any regulatory action is necessary to reduce their risks to public health. Substances formally identified as TACs include diesel particulate matter and environmental tobacco smoke.

Air Quality and Land Use Handbook

Released by CARB in 2005, the *Air Quality and Land Use Handbook: A Community Health Perspective* provides recommendations regarding the siting of new sensitive land uses near potential sources of TACs (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gas stations), as well as the siting of new TAC sources in proximity to existing sensitive land uses.[4] The recommendations are advisory and should not necessarily be interpreted as defined "buffer zones"; if a project or sensitive land uses are within the siting distance, CARB recommends further analysis.

Regional

South Coast Air Quality Management District

The Project Site is located within the 6,745-square-mile South Coast Air Basin (Basin). The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. It is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and the San Diego County line to the south. The South Coast Air Quality Management District (SCAQMD) is the agency principally responsible for air pollution control in the Basin. Specifically, SCAQMD is responsible for planning, implementing, and enforcing programs designed to attain and maintain CAAQS established by CARB and NAAQS established by the USEPA. All projects in the SCAQMD jurisdiction are subject to SCAQMD rules and regulations, including, but not limited to, the following:

- Rule 401 Visible Emissions: This rule prohibits air discharge that results in a plume that is as dark as or darker than what is designed as No. 1 Ringelmann Chart by the United States Bureau of Mines for an aggregate of three minutes in any one hour.

- Rule 402 Nuisance: This rule prohibits the discharge of "such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of people or the public, or which endanger the comfort, repose, health or safety of

[4] CARB, Air Quality and Land Use Handbook, A Community Health Perspective, April 2005.

any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."

- Rule 403 Fugitive Dust: This rule mandates that projects reduce the amount of particulate matter entrained in the ambient air as a result of fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions from any active operation, open storage pile, or disturbed surface area.

2022 Air Quality Management Plan

The 2022 Air Quality Management Plan (2016 AQMP) was adopted in December 2022 and represents the most updated regional blueprint for achieving federal air quality standards. It relies on emissions forecasts based on demographic and economic growth projections provided by the Southern California Association of Governments' (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS).

Southern California Association of Governments

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties that is tasked with addressing regional issues relating to transportation, the economy, community development, and the environment. As the federally designated Metropolitan Planning Organization (MPO) for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and state air quality plan goals to attain NAAQS. Additionally, SCAG is a co-producer, along with the SCAQMD, of the transportation strategy and transportation control measure sections of the Basin's AQMP. The 2020-2045 RTP/SCS (Connect SoCal), SCAG's latest long-range plan, continues to recognize that transportation investments and future land use patterns are inextricably linked, and acknowledges how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region. In short, the 2020-2045 RTP/SCS offers a blueprint for how Southern California can grow more sustainably. To this end, the 2020-2045 RTP/SCS land use pattern continues the trend of focusing new housing and employment in the region's High Quality Transit Areas (HQTAs) and aims to enhance and build out the region's transit network. At the time of the 2016-2040 RTP/SCS, HQTAs accounted for just 3 percent of total land in the SCAG region, but they are projected to accommodate 46 percent of the region's future household growth and 55 percent of the region's future employment growth by 2040.[5] HQTAs are a cornerstone of land use planning best practice in the SCAG region, and studies by the California Department of Transportation, the USEPA, and the Metropolitan Transportation Commission have found that

[5] SCAG, Final 2016-2040 RTP/SCS, April 2017. HQTAs are defined as areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours.

focusing development in areas served by transit can result in local, regional, and statewide benefits including reduced air pollution and energy consumption.

Local

City of Los Angeles General Plan Air Quality Element

The City's General Plan Air Quality Element identifies policies and strategies for advancing the City's clean air goals. The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and air quality goals. The Air Quality Element includes six key goals:

Goal 1: Good air quality in an environment of continued population growth and healthy economic structure.

Goal 2: Less reliance on single-occupant vehicles with fewer commute and non-work trips.

Goal 3: Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand management techniques.

Goal 4: Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.

Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting.

Goal 6: Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

Pollutants and Effects

State and Federal Criteria Pollutants

Air quality is measured by the ambient air concentrations of seven pollutants that have been identified by the USEPA due to their potentially harmful effects on public health and the environment. These "criteria air pollutants" include carbon monoxide, ground-level ozone, nitrogen dioxide, sulfur dioxide, particulate matter ten microns or less in diameter, particulate matter 2.5 microns or less in diameter, and lead. The following descriptions of each criteria air

pollutant and their health effects are based on information provided by the USEPA and the SCAQMD.[6,7]

Carbon Monoxide – CO

CO is a colorless and odorless gas that is released when something is burned. Outdoors, the greatest sources of CO are cars, trucks, and other vehicles or machinery that burn fossil fuels. Unvented kerosene and gas space heaters, leaking chimneys and furnaces, and gas stoves can release CO and affect air quality indoors. Breathing air with elevated concentrations of CO reduces the amount of oxygen that can be transported via the blood stream and can lead to weakened heart contractions; as a result, CO inhalation can be particularly harmful to people with chronic heart disease. At moderate concentrations, CO inhalation can cause nausea, dizziness, and headaches. High concentrations of CO may be fatal; however, such conditions are not likely to occur outdoors.

Ozone – O_3

O_3 is a colorless gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_X) undergo slow photochemical reactions in the presence of ultraviolet sunlight. The greatest source of VOC and NO_X emissions is automobile exhaust. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperatures are favorable to its formation. Elevated levels of O_3 irritate the lungs and airways and may cause throat and chest pain, as well as coughing, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to the scarring of lung tissue and reduced lung efficiency.

Nitrogen Dioxide – NO_2

NO_2 is primarily a byproduct of fossil fuel combustion and is therefore emitted by automobiles, power plants, and industrial facilities. The principal form of nitrogen oxide produced by fossil fuel combustion is nitric oxide (NO), which reacts quickly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. NO_2 absorbs blue light and results in reduced visibility and a brownish-red cast to the atmosphere. NO_2 also contributes to the formation of PM_{10}. Nitrogen oxides irritate the nose and throat and increase susceptibility to respiratory infections, especially in people with asthma. Longer exposures to elevated concentrations of NO_2 may even contribute to the development of asthma. The principal concern of NO_X is as a precursor to the formation of ozone.

[6] USEPA, Criteria Air Pollutants, www.epa.gov/criteria-air-pollutants.

[7] SCAQMD, Final 2012 Air Quality Management Plan, February 2013.

Sulfur Dioxide – SO_2

Sulfur oxides (SO_X) are compounds of sulfur and oxygen molecules. SO_2 is the pre-dominant form found in the lower atmosphere and is a product of burning sulfur or sulfur-containing materials. Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. SO_2 may aggravate lung diseases, especially bronchitis. It also constricts breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO_2 may cause wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of SO_2, and long-term exposure to both pollutants leads to higher rates of respiratory illnesses.

Particulate Matter (PM_{10} and $PM_{2.5}$)

The human body naturally prevents the entry of larger particles into itself. However, smaller particles less than 10 microns (PM_{10}) or even less than 2.5 microns ($PM_{2.5}$) in diameter can enter the body and become trapped in the nose, throat, and upper respiratory tract. Here, these particulates may aggravate existing heart and lung diseases, affect the body's defenses against inhaled materials, and damage lung tissue. Those most sensitive to PM_{10} and $PM_{2.5}$ include children, the elderly, and those with chronic lung and/or heart disease.

Lead – Pb

Airborne lead is emitted from industrial facilities and from the sanding or removal of old lead-based paint. Smelting and other metal processing activities are the primary sources of lead emissions. The lead effects most commonly encountered in current populations are neurological effects in children and cardiovascular effects in adults (e.g., high blood pressure and heart disease). Infants and young children are especially sensitive to even low levels of lead, which may contribute to behavioral problems, learning deficits, and lowered IQ.

Toxic Air Contaminants

Toxic air contaminants (TACs) refer to a diverse group of "non-criteria" air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above, but because their effects tend to be local rather than regional. CARB and OEHHA determine if a substance should be formally identified, or "listed," as a TAC in California. A complete list of these substances is maintained on CARB's website.[8] SCAQMD has not set regulatory guidance for TACs concerning construction sites or established localized or regional thresholds for their emissions.

One key TAC is diesel particulate matter (diesel PM), which is emitted in diesel engine exhaust. Released in 2021 by the SCAQMD, the Multiple Air Toxics Exposure Study V (MATES V) determined that about 88 percent of the carcinogenic risk from air toxics in the Basin is attributable

[8] CARB, Toxic Air Contaminant Identification List, www.arb.ca.gov/toxics/id/taclist.htm, last reviewed by CARB July 18, 2011.

to mobile source emissions. Of the three carcinogenic TACs that constitute the majority of the known health risk from motor vehicle traffic – diesel PM from primarily trucks, and benzene and 1,3-butadiene from passenger vehicles – diesel PM is responsible for the greatest potential cancer risk from vehicle traffic.[9] Overall, diesel PM was found to account for, on average, about 50 percent of the air toxics risk in the Basin.[10] In addition to its carcinogenic potential, diesel PM also may contribute to increased respiratory and cardiovascular hospitalizations, worsened asthma and other respiratory symptoms, decreased lung function in children, and premature death for people already with heart or lung disease. Those most vulnerable to the non-cancer health effects of diesel PM are children whose lungs are still developing and the elderly who may have other chronic health problems.[11]

Volatile Organic Compounds

Volatile organic compounds (VOCs) are typically formed from the combustion of fuels and/or released through the evaporation of organic liquids. Some VOCs are also classified by the state as toxic air contaminants, though there are no VOC-specific ambient air quality standards. Once emitted, VOCs can mix in the air with other pollutants (e.g. NO_X, CO, SO_2…) and contribute to the formation of photochemical smog.

Existing Conditions

As discussed earlier, the Project is located within the 6,745-square-mile South Coast Air Basin that includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. Air quality within the Basin is influenced by a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, and industry. These sources in addition to the topography and climate of Southern California combine to make the Basin an area of high air pollution potential. Particularly, ambient pollution concentrations recorded in the Los Angeles County portion of the Basin are among the highest in the four counties comprising the Basin. The USEPA has classified Los Angeles County as a nonattainment area for O_3, $PM_{2.5}$, and lead, meaning that the Basin does not meet NAAQS for these pollutants. Additionally, this portion of the Basin also does not meet CAAQS for O_3, PM_{10}, and $PM_{2.5}$. Table III-1, above, summarizes State and National Ambient Air Quality Standards and the attainment status for Los Angeles County with respect to each criteria pollutant.

Air Quality Monitoring Data

The SCAQMD monitors air quality conditions at 38 source receptor areas (SRAs) throughout the Basin. The Project is located in SCAQMD's SRA No. 6, "West San Fernando Valley." Table III-2 shows pollutant levels, State and federal standards, and the number of exceedances recorded in

[9] CARB, Air Quality and Land Use Handbook: A Community Health Perspective, April 2005.

[10] SCAQMD, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES V), 2021.

[11] CARB, Overview: Diesel Exhaust & Health, ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

SRA No. 6 from 2019 through 2021. As shown, the one-hour State standard for O_3 was exceeded 6 times during this three-year period, and the federal standard was exceeded 11 times. CO, NO_2, and $PM_{2.5}$ levels did not exceed their respective CAAQS or NAAQS during this period. Data for PM_{10}, SO_2, and lead is not available for this period.

Table III-2
Ambient Air Quality Data – SRA No. 6 "West San Fernando Valley"

Pollutants and State and Federal Standards	Maximum Concentrations and Frequencies of State/Federal Standards Exceedance		
	2019	2020	2021
Ozone – O_3			
Maximum 1-hour Concentration (ppm)	0.101	0.142	0.110
Days > 0.09 ppm (State 1-hour standard)	1	14	4
Days > 0.070 ppm (Federal 8-hour standard)	6	49	31
Carbon Monoxide – CO			
Maximum 1-hour Concentration (ppm)	2.6	2.0	2.6
Days > 20 ppm (State 1-hour standard)	0	0	0
Maximum 8-hour Concentration (ppm)	2.2	1.7	1.9
Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide – NO_2			
Maximum 1-hour Concentration (ppb)	0.0644	0.0572	0.0542
Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM_{10}			
Maximum 24-hour Concentration (µm/m^3)	N/A	N/A	N/A
Days > 50 µg/m^3 (State 24-hour standard)	N/A	N/A	N/A
$PM_{2.5}$			
Maximum 24-hour Concentration (µg/m^3)	30.00	27.60	55.50
Days > 35 µg/m^3 (Federal 24-hour standard)	0	0	3
Sulfur Dioxide – SO_2			
Maximum 24-hour Concentration (ppb)	N/A	N/A	N/A
Days > 0.04 ppm (State 24-hour standard)	N/A	N/A	N/A
Lead - Pb			
Maximum Monthly Average Concentration (µg/m^3)	N/A	N/A	N/A
Maximum 3-Month Rolling Averages (µg/m^3)	N/A	N/A	N/A

N/A = data not available
ppm = parts per million of air, by volume
µg/m^3 = micrograms per cubic meter
Source: SCAQMD Historical Data By Year, www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year. Accessed May 12, 2023.

Existing Health Risk

The Multiple Air Toxics Exposure Study V (MATES V) is the latest air toxics monitoring and evaluation study conducted in the Air Basin. In short, MATES V is a modeling effort to characterize

risk from air toxics across the Air Basin. Based on the MATES V model, the calculated cancer risk from air toxics in the Project's zip code (91304) is approximately 301 in one million, which is lower than the Air Basin's average risk of 454 per one million. The air toxics risk in the Project's zip code is less than it is for 84.0% of the population with the air basin.[12]

The OEHHA, on behalf of the California Environmental Protection Agency (CalEPA), provides a screening tool called CalEnviroScreen that identifies which California communities are disproportionately burdened by, and vulnerable to, multiple sources of pollution. The tool ranks census tracts in California based on potential exposures to pollutants, adverse environmental conditions, socioeconomic factors, and prevalence of certain health conditions. According to the Draft CalEnviroScreen 4.0, the Main Campus' census tract is ranked 39th percentile. The tract's pollution-specific burden, irrespective of other factors, is ranked 48th percentile. The North Campus' census tract is ranked 35th percentile, while its pollution-specific burden is ranked 32nd percentile.[13]

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. Generally speaking, sensitive land uses, or sensitive receptors, are those where sensitive individuals are most likely to spend time. Individuals most susceptible to poor air quality include children, the elderly, athletes, and those with cardiovascular and chronic respiratory diseases. As a result, land uses sensitive to air quality may include schools (i.e., elementary schools or high schools), child care centers, parks and playgrounds, long-term health care facilities, rehabilitation facilities, convalescent facilities, retirement facilities, residences, and athletic facilities. For the purposes of CEQA analyses, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, or convalescent facility where it is possible that an individual could remain for 24 hours. The SCAQMD does not consider commercial and industrial facilities to be sensitive receptors because employees do not typically remain onsite at such facilities for 24 hours, but are present for shorter periods (such as eight hour shifts). However, the SCAQMD suggests that localized significance thresholds (LSTs) based on shorter averaging periods, such as the NO_2 and CO LSTs, may also be applied to receptors such as commercial and industrial facilities since it is reasonable to assume that workers at these sites may be present for up to eight hours.[14] The Project is located in a residential neighborhood and is surrounded by numerous residential land uses, many of which abut the Main Campus and North Campus sites. For example, single-family homes are located directly north of the North Campus site along Saticoy Street, Melba Street, and

[12] SCAQMD, Multiple Air Toxics Exposure Study V, MATES Data Visualization Tool, https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/home/?data_id=dataSource_105-a5ba9580e3aa43508a793fac819a5a4d%3A207&views=view_1. Accessed May 12, 2023.

[13] Office of Environmental Health Hazard Assessment, CalEnviroScreen 4.0. https://experience.arcgis.com/experience/11d2f52282a54ceebcac7428e6184203/page/CalEnviroScreen-4_0/. Accessed May 12, 2023.

[14] SCAQMD, Final Localized Significance Threshold Methodology, June 2003. Revised July 2008.

Bobbyboyar Avenue. Single-family homes are also located directly west of the Main Campus along Woodhall Avenue, Keswick Street, and Atron Avenue.

Existing Project Site Emissions

The Main Campus site is currently developed with a private high school campus containing educational, athletic, performing arts, administrative, and religious facilities. The North Campus site is developed with an approximately 53,929 square foot commercial building that contains a grocery store, restaurants, and other commercial uses, as well as surface parking for these uses. Existing emissions related to these uses have been estimated for informational purposes and are shown in Table III-3.

Table III-3
Existing Project Site Regional and Localized Operational Emissions

Emissions Source	Emissions in lbs per day					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Shopping Plaza with Supermarket						
Area	1.70	0.02	2.34	<0.01	<0.01	<0.01
Energy	0.01	0.13	0.11	<0.01	0.01	0.01
Mobile Sources	9.58	9.72	93.0	0.19	6.46	1.25
Subtotal:	11.29	9.87	95.45	0.19	6.47	1.26
Private High School[B]						
Area	5.76	0.07	8.04	<0.01	0.01	0.01
Energy	0.06	1.01	0.85	0.01	0.08	0.08
Mobile Sources	12.5	12.0	111	0.21	6.87	1.34
Subtotal:	18.32	13.08	119.89	0.22	6.96	1.43
Total Existing Regional Emissions:[C]	**29.61**	**22.95**	**215.34**	**0.41**	**13.43**	**2.69**
Total Existing Localized Emissions:	**7.46**	**0.09**	**10.38**	**<0.01**	**0.01**	**0.01**

Notes:

[A] "Shopping Plaza with Supermarket" land use assumed the following land use types and sizes in CalEEMod:

- Supermarket – 27,000 square feet
- Strip Mall – 26,929 square feet
- Parking Lot – 3.59 acres

[B] "Private High School" land use assumed the following land use and size in CalEEMod:

- High School – 21.3 acres, 185,324 building square feet.

[C] Some figures may not add up properly due to rounding.

Source: Air Quality Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix B of this IS/MND.

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The following analysis assesses the Project's consistency with the SCAQMD 2022 AQMP and SCAG's latest 2020-2045 RTP/SCS. As discussed earlier, the 2022 AQMP's projections for achieving state and federal air quality goals are based on population, housing, and employment trend assumptions in the previous 2020-2045 RTP/SCS, which are themselves largely based on growth forecasts from local governments like the City of Los Angeles; therefore a project is consistent with the 2022 AQMP, in part, if it is consistent with the population, housing, and employment assumptions and smart growth policies that were used in the formation of the AQMP.

The Project's development would not exceed the growth assumptions of the 2020-2045 RTP/SCS and therefore would not result in emissions that are unaccounted for by the 2022 AQMP. This is mainly due to the following key factors. First, the Project would not result in an increase in student enrollment or a substantial change in the operations of the school, as described in greater detail in Section 3, Project Description, of this IS/MND. In addition, due to the removal of the existing supermarket and other commercial uses located on the North Campus property, the Project would result in a net reduction of 1,355 daily trips.[15] Because of this significant reduction in site-related daily trips, the Project would result in a net decrease in operational emissions as compared to existing site uses. This reduction would ultimately aid in the region's attainment of ambient air quality standards. Therefore, the Project would be consistent with the air quality attainment goals of the 2022 AQMP.

City of Los Angeles Policies

In addition to the 2022 AQMP and 2020-2045 RTP/SCS, the City of Los Angeles General Plan Air Quality Element also identifies policies and strategies for advancing the City's clean air goals. As shown below in Table III-4, the Project would be consistent with the applicable policies of the Air Quality Element.

[15] Armen Hovanessian Transportation Consulting, Chaminade College Preparatory School Transportation Assessment Report. April 18, 2023.

Table III-4
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy 1.3.1 – Minimize particulate emissions from construction sites.	**Consistent.** The Project would minimize particulate emissions during construction through best practices and/or SCAQMD rules.
Policy 1.3.2 – Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	**Consistent.** The Project would not include the development of any unpaved roads or parking lots. Unpaved areas exposed during grading would comply with SCAQMD fugitive dust regulations to minimize particulate emissions.
Policy 2.1.1 – Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	**Consistent.** The Project would result in a net reduction of 1,355 daily trips and therefore would contribute to significant reductions in VMT.
Policy 2.1.2 – Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors in order to reduce work trips.	**Consistent.** The Project would result in a net reduction of 1,355 daily trips, which would substantially contribute to the Air Quality Element's goals of reducing emissions from vehicle travel.
Policy 2.2.1 – Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans, and ridesharing subsidies.	**Consistent.** The Project would result in a net reduction of 1,355 daily trips, which would substantially contribute to the Air Quality Element's goals of reducing emissions from vehicle travel.
Policy 2.2.2 – Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	**Consistent.** The Project would result in a net reduction of 1,355 daily trips, which would substantially contribute to the Air Quality Element's goals of reducing emissions from vehicle travel.
Policy 2.2.3 – Minimize the use of single-occupant vehicles associated with special events or in areas and in times of high levels of pedestrian activities.	**Not Applicable.** The Project would not include any facilities for the types of special events referenced by this policy (e.g., concerts, professional sports, and other ticketed events with large attendance).
Policy 3.2.1 – Manage traffic congestion during peak hours.	**Consistent.** The Project is not estimated to cause or materially contribute to substantial traffic congestion during peak hours. According to the Project's transportation study (included in Appendix H-1 of this IS/MND), during the A.M. peak hour, the Project would result in a net reduction of 2 trips. During the P.M. peak hour, the Project would result in a net increase of 292 trips, but this would not have a substantial effect on level of services and delays at surrounding intersections. Overall, the Project would result in a net reduction of 1,355 daily trips.
Policy 4.1.1 – Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	**Consistent.** The Project is being entitled through the City of Los Angeles, which coordinates with SCAG, Metro, and other regional agencies on the management of land use, air quality, and transportation policies.
Policy 4.1.2 – Ensure that project level review and approval of land use development remains at the local level.	**Consistent.** The Project would be entitled and environmentally cleared at the local City level.

Table III-4
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy 4.2.3 – Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**Consistent.** As discussed in the Transportation Assessment (contained in Appendix H-1 of this IS/MND), the Project would not conflict with any bicycle or transit infrastructure. In addition, the Project would include approximately 137 EV spaces and 17 electric vehicle charging stations (EVCS), in addition to other EV infrastructure, and would also provide 78 bicycle parking spaces. Finally, the Project includes the pedestrian bridge over Saticoy Street to connect the North Campus to the Main Campus, allowing students, faculty, staff, and visitors or those parking on the Main Campus for sporting events a safe pedestrian access to the North Campus athletic facilities.
Policy 4.2.4 – Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	**Consistent.** The Project's air quality impacts are analyzed in this document, and as provided herein, all Project impacts with respect to air quality would be less than significant.
Policy 4.2.5 – Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	**Consistent.** The Project would result in a net reduction in daily traffic from the Project Site and would be consistent with this policy.
Policy 5.3.1 – Support the development and use of equipment powered by electric or low-emitting fuels.	**Consistent.** The Project would be designed to meet the applicable requirements of the State's Green Building Standards Code and the City's Green Building Code and would include approximately 137 EV spaces and 17 electric vehicle charging stations (EVCS),
Source: Noah Tanski Environmental Consulting (NTEC), May 2023.	

Conclusion

To summarize the analysis in response to Threshold (a): (1) operation of the Project would result in a net reduction of site-related emissions and therefore would not result in new emissions that are unaccounted for by the 2022 AQMP; (2) the Project would result in a substantial net reduction of 1,355 daily trips; and (3) as further discussed under Threshold (b) below, pollutant emissions associated with the Project's construction and operation would neither exceed nor contribute to any exceedance of ambient air quality standards and thresholds, nor would they interfere with the AQMP's attainment of air quality standards or interim emissions reductions. As a result, the Project would not conflict with or obstruct the implementation of any applicable air quality plans, and its impact with respect to Threshold (a) would be less than significant.

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less Than Significant Impact. The Project would contribute to local and regional air pollutant emissions during its construction (short-term) and operations (long-term). However, construction and operation of the Project would not result in exceedances of SCAQMD daily thresholds for project-specific impacts that could subsequently cause cumulatively considerable increases in emissions of pollutants for which the Basin is designated as non-attainment.

Methodology

Construction

Construction of the Project could affect local and regional air quality due to the use of gasoline and diesel-powered construction equipment, as well as the generation of construction vehicle trips. Demolition, grading, and any site preparation activities would also result in fugitive dust emissions. It is important to consider that construction emissions can vary substantially from day to day depending on levels of construction activity, the specific types of construction activities taking place, and the types of vehicles/equipment in use. For dust, the prevailing weather conditions can influence emissions.

Based on the criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to construction emissions if its regional emissions from both direct and indirect construction sources would exceed the threshold levels shown in Table III-5.

SCAQMD localized significance thresholds (LSTs) for one and two-acre project sizes are also included below in Table III-5. To be discussed in greater detail below, the Project would involve a variety of construction activities, some of which would take place on construction footprints that are greater than one acre. Depending on the construction footprint of the specific activity, different LSTs would apply. For example, grading for the North Campus may involve up to one-acre of soil disturbance per day, and the one-acre LST would apply. Demolition of classrooms and a parking lot on the Main Campus would be spread over a 2.75-acre parcel, and the two-acre LST would apply. Additional discussion regarding construction activities and applicable LSTs is included throughout this analysis. LSTs represent the maximum emissions from a project that would not be expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards. LSTs are developed based on the ambient concentrations of a given pollutant for a source receptor and distances to the nearest sensitive receptor. The SCAQMD provides LSTs for NO_X, CO, PM_{10}, and $PM_{2.5}$. The SCAQMD does not provide a LST for SO_2 because land use development projects typically result in negligible construction and long-term operational emissions of this pollutant. Additionally, because VOCs are not a criteria

pollutant, there is no ambient standard or SCAQMD LST for VOCs. However, due to the role that VOCs play in O_3 formation and their classification as a precursor pollutant, a regional emissions threshold has been established. LSTs for the Project were obtained via the SCAQMD's mass rate look-up tables, which are used to determine whether or not a project may generate significant adverse localized air quality impacts.[16] The construction analysis compares the Project's localized emissions with LSTs for one and two-acre project sizes, depending on the construction phase.

Construction emissions were estimated using CalEEMod version 2022. Because the SCAQMD's regional and localized significance thresholds for construction emissions are representative of maximum daily emissions that would not be expected to cause or contribute to an exceedance of the most stringent NAAQS or CAAQS for pollutants, the objective of the analysis is to determine whether the Project's maximum single-day construction emissions would have the potential to exceed these thresholds. The CalEEMod analysis for the Project relies on conservative construction and phasing/overlap assumptions in an effort to conclusively rule out the possibility that threshold exceedances could occur. Construction is a dynamic process and day-to-day emissions can vary widely, even within the same construction phase or subphase. This modeling approach therefore minimizes the potential for inadvertently underestimating daily construction emissions, which are the basis of SCAQMD's air pollutant thresholds.

The modeling also accounts for SCAQMD Rule 403 for fugitive dust, which is a regulatory compliance measure applicable to the Project. SCAQMD Rule 403 contains general requirements applicable to all fugitive dust sources that involve minimizing visible emissions and reducing trackout from site driveways. SCAQMD Rule 403(d)(2) requires all sources to implement "best available control measures" (BACMs) for fugitive dust. The BACMs, which are included in Table 1 of the regulation, require sources to adopt measures such as pre-watering soils prior to cut and fill activities, stabilizing soils during and after cut and fill activities, and stabilizing disturbed soils with water or other stabilizing agents to prevent the generation of visible dust plumes.

[16] SCAQMD, Final LST Methodology, Revised July 2008.

Table III-5
SCAQMD Construction Emissions Thresholds

Criteria Pollutant	Construction Emissions (lbs per day)		
	Regional	Localized[A]	
		1 acre	2 acres
Volatile Organic Compounds – VOCs	75	-	-
Nitrogen Oxides - NO_X	100	103	147
Carbon Monoxide – CO	550	426	644
Sulfur Oxides - SO_X	150	-	-
Respirable Particulates – PM_{10}	150	4	6
Fine Particulates – $PM_{2.5}$	55	3	4

[A] Localized significance thresholds assumed the following:

- 25-meter (82-foot) receptor distance. This is the shortest distance used for analysis in the LST guidance document, and it results in the most stringent emissions thresholds.
- The Project is located in SRA No. 6, "West San Fernando Valley."

Sources: SCAQMD, Air Quality Significance Thresholds, revised March 2023; and, SCAQMD, LST Methodology Appendix C – Mass Rate LST Look-Up Table, October 2009.

Operation

The SCAQMD has also established significance thresholds to evaluate potential impacts associated with long-term project operations. Regional thresholds and LSTs for Project operations are shown below in Table III-6. The analysis utilizes LSTs for a five-acre project size, which is the largest project size utilized for the LST methodology.[17] Operational emissions for the Project were also calculated using CalEEMod version 2022.

Table III-6
SCAQMD Operational Emissions Thresholds

Criteria Pollutant	Operational Emissions (lbs per day)	
	Regional	Localized[A]
Volatile Organic Compounds - VOCs	55	-
Nitrogen Oxides - NO_X	55	221
Carbon Monoxide – CO	550	1,158
Sulfur Oxides - SO_X	150	-
Respirable Particulates – PM_{10}	150	3
Fine Particulates – $PM_{2.5}$	55	2

[A] Localized significance thresholds assumed the following:

- 5-acre project size.
- 25-meter (82-foot) receptor distance. This is the shortest distance used for analysis in the LST guidance document, and it results in the most stringent emissions thresholds.
- The Project is located in SRA No. 6, "West San Fernando Valley."

[17] SCAQMD, Final LST Methodology, Revised July 2008.

Sources: SCAQMD, Air Quality Significance Thresholds, revised March 2023; and, SCAQMD, LST Methodology Appendix C – Mass RateST Look-Up Table, October 2009.

Toxic Air Contaminants (Construction and Operation)

Potential TAC impacts are evaluated by conducting a qualitative analysis consistent with the CARB Handbook, followed by a more detailed analysis (i.e., dispersion modeling), as necessary. The qualitative analysis consists of reviewing the Project to identify any new or modified TAC emissions sources. If the qualitative evaluation does not rule out significant impacts from a new source, or modification of an existing TAC emissions source, a more detailed analysis is conducted.

The Office of Environmental Health Hazard Assessment (OEHHA) provides guidance related to the preparation of health risk assessments (HRAs) in the State. However, no guidance has been adopted by the OEHHA which would be applicable to the Project. The OEHHA's latest guidance on this issue was released in February 2015, Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments ("2015 Guidance Manual"). The 2015 Guidance Manual was prepared to assist local air districts in the formulation of their own rules and guidelines surrounding the preparation of HRAs. As stated in the manual's introduction: "The intent in developing [the 2015 Guidance Manual] is to provide HRA procedures for use in the Air Toxics Hot Spots Program or for the permitting of existing, new, or modified stationary sources." It notes "The Hot Spots Act requires that each local Air Pollution Control District or Air Quality Management District (hereinafter referred to as District) determine which facilities will prepare an HRA." It acknowledges that "local air pollution control districts sometimes use the risk assessment guidelines for the Hot Spots program in permitting decisions for short-term projects such as construction or waste site remediation." The Project's construction would not be subject to SCAQMD permitting decisions. Therefore, the OEHHA and its guidance as contained in the 2015 Guidance Manual do not apply concerning whether the Project is obligated to provide a HRA. The decision to require an HRA is at the discretion of the SCAQMD, and the SCAQMD has not published any requirements, recommendations, or guidance endorsing the 2015 Guidance Manual's use for CEQA analysis of potential construction impacts.

Construction

The Project may not be fully implemented until 2035, and there is currently no exact sequence of construction activities or phasing, though it would be necessary for some activities to occur before others. For example, grading of the North Campus would have to occur before construction of the new North Campus athletic and pool facilities, and demolition of existing classroom buildings would have to occur before construction of the new Main Campus Multistory Building.

Table III-7 (which is the same as Table 3-2 in Section 2, Project Description) presents a sequence of the Project's construction activities showing which construction activities/phases may overlap.

The Project would include Project Design Feature 1 (PDF 1), which incorporates this construction sequence.

Table III-7
Construction Sequence

Construction Activity	Sequence									
	1	2	3	4	5	6	7	8	9	10
North Campus – Demolition†	X									
North Campus – Grading†		X								
North Campus – Construction of new surface parking lot			X							
North Campus – Construction of pedestrian bridge				X						
North Campus – Construction of new athletic fields and ancillary facilities†					X	X	X	X		
North Campus – Construction of new pool facilities†										X
Main Campus – Parking Lot Demolition†					X					
Main Campus – Classroom Demolition†						X				
Main Campus – Multistory Building Grading†							X			
Main Campus – Multistory Building Construction†								X	X	X
Main Campus – Construction of upper-level student quad									X	
Main Campus – Renovation of surface parking lot along Cohasset Street									X	
Main Campus – Renovations to existing athletics facilities, classroom buildings, and administrative offices.								X	X	X

† Denotes construction activities chosen for detailed construction emissions modeling.
Source: Project Applicant.

The following construction activities are evaluated in detail below in the modeling analysis, on the basis that these represent the most intense activities with the greatest probability of creating emission impacts:

North Campus - Demolition

North Campus - Grading

North Campus – Construction of new athletic fields and ancillary facilities

North Campus - Construction of new pool facilities

Main Campus – Classroom and parking lot demolition (addressed together)

Main Campus – Multistory Building grading

Main Campus – Multistory Building construction

Pollutant emissions for these construction activities were modeled to ascertain the Project's potential to exceed SCAQMD daily regional and localized construction emissions thresholds. The modeled construction activities were chosen because they are the activities that would generate the most pollutant emissions from diesel-powered equipment usage, haul trips, application of architectural coatings, demolition, and fugitive dust.

An exact construction activity schedule or phasing plan has not yet been determined for the Project. Therefore, to achieve a conservative analysis, the construction activities were all modeled with a start date of January 1, 2024. This is a conservative approach as CalEEMod assumes that construction equipment emissions become cleaner over time due to the increased penetration of newer cleaner equipment into statewide fleets. By assuming that all activities begin on January 1, 2024, the modeling does not assume that emissions would benefit from future, cleaner construction equipment.[18] Given the scope of the Project, it is very likely that the majority of construction activities would occur after 2024.

Analysis

North Campus - Demolition

Demolition of existing North Campus improvements would last approximately one month and would require construction equipment such as bulldozers, excavators, and skid steer loaders. As shown in Table III-7, this phase would not overlap with any other construction phases or activities. Unmitigated maximum daily regional and localized emissions from this construction phase are shown in Table III-8 along with the applicable regional thresholds and LSTs. LSTs for this phase reflect a one-acre project size, which is the smallest project size used for analysis in the LST guidance document and results in the most stringent emissions thresholds. A receptor distance of 25 meters (approximately 82 feet) was utilized, which is the shortest distance used for analysis in the LST guidance document and also results in the most stringent emissions thresholds. As shown, unmitigated regional construction emissions would not exceed SCAQMD regional

[18] For example, according to CARB, Tier 0 (uncontrolled), Tier 1, and Tier 2 off-road diesel vehicles make up one third of the statewide fleet reported to CARB but contributed to 60 percent of NO_X and PM emissions in 2022. CARB's 2022 Amendments to the In-Use Off-Road Diesel-Fueled Fleets Regulations would prohibit this equipment in large fleets by 2028, medium fleets by 2030, and small fleets by 2032, substantially reducing NO_X and PM emissions.

significance thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Localized emissions would not exceed SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$.

Table III-8
North Campus – Demolition
Maximum Regional and Localized Daily Construction Emissions (Unmitigated)

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
North Campus – Demolition	2.88	32.8	30.4	0.08	4.41	1.83
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
North Campus – Demolition	2.72	26.0	27.2	0.04	2.66	1.31
Localized Significance Threshold	-	103	426	-	4	3
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Source: Air Quality Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix B of this IS/MND.

North Campus – Grading

Grading of the North Campus could occur in stages. For example, grading for the proposed surface parking lot, pedestrian bridge abutments/landing, and athletic field facilities may occur prior to grading for the new pool facilities. However, the modeling conservatively assumes that grading of the entire North Campus would occur at once, and that this would last approximately one month. Grading would utilize construction equipment such as graders, excavators, loaders, bulldozers, and rollers.

As shown in Table III-7, grading of the North Campus would not overlap with any other construction phases or activities. Unmitigated maximum daily regional and localized emissions from this construction phase are shown in Table III-9 along with the applicable regional thresholds and LSTs. LSTs for this phase reflect a one-acre project size, which is the smallest project size used for analysis in the LST guidance document and results in the most stringent emissions thresholds. Use of this project size is also consistent with the SCAQMD's "Fact Sheet for Applying CalEEMod to Localized Significance Thresholds" document, which concerns the selection of appropriate LSTs for grading activities. A receptor distance of 25 meters (approximately 82 feet) was utilized, which is the shortest distance used for analysis in the LST guidance document and also results in the most stringent emissions thresholds. As shown, unmitigated regional construction emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Localized emissions would not exceed SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$.

Table III-9
North Campus – Grading
Maximum Regional and Localized Daily Construction Emissions (Unmitigated)

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
North Campus – Grading	2.22	20.5	23.4	0.04	4.07	2.29
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
North Campus – Grading	2.13	19.7	22.1	0.03	3.69	2.19
Localized Significance Threshold	-	103	426	-	4	3
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Source: Air Quality Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix B of this IS/MND.

North Campus – Construction of new athletic fields and ancillary facilities

This phase would involve installation of field turf and facilities that are ancillary to the athletics field (i.e., bleachers, dugout, batting cage, etc.). Installation of these features could partially overlap. Therefore, the modeling conservatively assumes that all activities associated with the installation of these features would occur simultaneously and last approximately one month. Construction would require equipment such as forklifts, loaders, a roller, and a truck-mounted crane. Unmitigated maximum daily regional and localized emissions from this phase are shown in Table III-10 along with the applicable regional thresholds and LSTs. LSTs for this phase reflect a two-acre project size, which is less than the approximately 2.4-acre area in which improvements would occur, and which presents a conservative analysis. A receptor distance of 25 meters (approximately 82 feet) was utilized, which is the shortest distance used for analysis in the LST guidance document and results in the most stringent emissions thresholds. As shown, unmitigated regional construction emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Localized emissions would not exceed SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$.

As shown in Table III-7, this construction phase may overlap with Main Campus demolition, Main Campus grading, and construction of the multistory buildings on the Main Campus. Analysis pertaining to these overlapping phases is included below. As demonstrated, these overlapping construction phases would not generate the necessary emissions to cause exceedances of regional thresholds or LSTs.

Table III-10
North Campus – Construction of New Athletic Fields and Ancillary Facilities
Maximum Regional and Localized Daily Construction Emissions (Unmitigated)

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
North Campus – Construction of New Athletic Fields and Ancillary Facilities	1.38	12.6	15.9	0.03	0.90	0.59
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
North Campus – Construction of New Athletic Fields and Ancillary Facilities	1.28	12.1	14.4	0.03	0.54	0.50
Localized Significance Threshold	-	147	644	-	6	4
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Source: Air Quality Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix B of this IS/MND.

Main Campus –Parking Lot and Classroom Demolition

Parking lot and classroom demolition would occur sequentially (see Table III-7 and PDF 1), but the modeling conservatively assumes that all demolition would occur at once, and that this would last approximately three weeks. Demolition would utilize construction equipment such as bulldozers, excavators, and skid steer loaders. Unmitigated maximum daily regional and localized emissions from this demolition phase are shown in Table III-11 along with the applicable regional thresholds and LSTs. LSTs for this phase reflect a two-acre project size, which is less than the 2.75-acre area in which demolition would occur, and which presents a conservative analysis. A receptor distance of 25 meters (approximately 82 feet) was utilized, which is the shortest distance used for analysis in the LST guidance document and results in the most stringent emissions thresholds. As shown, unmitigated regional construction emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Localized emissions would not exceed SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$.

As shown in Table III-7, Main Campus demolition may overlap with the construction of athletic fields and ancillary facilities on the North Campus. Table III-12 demonstrates that overlapping worst-case emissions from Main Campus demolition and construction of athletic fields and ancillary facilities on the North Campus would be well below SCAQMD regional thresholds and LSTs for even the smallest, most conservative one-acre project size.

Table III-11
Main Campus – Parking Lot and Classroom Demolition
Maximum Regional and Localized Daily Construction Emissions (Unmitigated)

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
Main Campus – Classroom and Parking Lot Demolition	1.78	20.7	21.3	0.06	3.40	1.25
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
Main Campus – Classroom and Parking Lot Demolition	1.66	15.6	18.8	0.03	2.07	0.86
Localized Significance Threshold	-	147	644	-	6	4
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Source: Air Quality Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix B of this IS/MND.

Table III-12
Main Campus Demolition and North Campus Athletic Field Construction – Overlapping
Maximum Regional and Localized Daily Construction Emissions (Unmitigated)

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
North Campus – Construction of New Athletic Fields and Ancillary Facilities	1.38	12.6	15.9	0.03	0.90	0.59
Main Campus – Classroom and Parking Lot Demolition	1.78	20.7	21.3	0.06	3.40	1.25
Total Overlapping Emissions:	3.16	33.3	37.2	0.09	4.30	1.84
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
North Campus – Construction of New Athletic Fields and Ancillary Facilities	1.28	12.1	14.4	0.03	0.54	0.50
Main Campus – Classroom and Parking Lot Demolition	1.66	15.6	18.8	0.03	2.07	0.86
Total Overlapping Emissions:	2.94	27.7	33.2	0.06	2.61	0.36
Localized Significance Threshold	-	103	426	-	4	3
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Source: Air Quality Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix B of this IS/MND.

Main Campus – Multistory Building Grading

Grading for the proposed Multistory Building would last approximately one month and would require construction equipment such as bulldozers, excavators, and skid steer loaders.

Unmitigated maximum daily regional and localized emissions from this grading phase are shown in Table III-13 along with the applicable regional thresholds and LSTs. LSTs for this phase reflect a two-acre project size, which is less than the 2.75-acre area in which grading would occur, and which presents a conservative analysis. A receptor distance of 25 meters (approximately 82 feet) was utilized, which is the shortest distance used for analysis in the LST guidance document and results in the most stringent emissions thresholds. As shown, unmitigated regional construction emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Localized emissions would not exceed SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$.

As shown in Table III-7, Main Campus grading may overlap with the construction of athletic fields and ancillary facilities on the North Campus. Table III-14 demonstrates that overlapping worst-case emissions from Main Campus grading and construction of athletic fields and ancillary facilities on the North Campus would be well below SCAQMD regional thresholds and LSTs for even the smallest, most conservative one-acre project size.

Table III-13
Main Campus – Multistory Building Grading
Maximum Regional and Localized Daily Construction Emissions (Unmitigated)

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
Main Campus – Multistory Building Grading	1.74	30.0	21.5	0.11	6.99	3.05
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
Main Campus – Multistory Building Grading	1.48	14.2	15.5	0.02	3.21	1.91
Localized Significance Threshold	-	147	644	-	6	4
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Source: Air Quality Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix B of this IS/MND.

Table III-14
Main Campus Grading and North Campus Athletic Field Construction - Overlapping Maximum Regional and Localized Daily Construction Emissions (Unmitigated)

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
North Campus – Construction of New Athletic Fields and Ancillary Facilities	1.38	12.6	15.9	0.03	0.90	0.59
Main Campus – Multistory Building Grading	1.74	30.0	21.5	0.11	6.99	3.05
Total Overlapping Emissions:	3.12	42.6	37.4	0.14	7.89	3.64
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
North Campus – Construction of New Athletic Fields and Ancillary Facilities	1.28	12.1	14.4	0.03	0.54	0.50
Main Campus – Multistory Building Grading	1.48	14.2	15.5	0.02	3.21	1.91
Total Overlapping Emissions:	2.76	26.3	29.9	0.05	3.75	2.41
Localized Significance Threshold	-	103	426	-	4	3
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Source: Air Quality Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix B of this IS/MND.

Main Campus – Multistory Building Construction

Construction of the proposed Multistory Building would last approximately 18 months, including six months of overlapping architectural coatings activities, which have been incorporated into the modeling. Diesel-fueled construction equipment would include cranes, forklifts, skid steer loaders, welders, and air compressors. Unmitigated maximum daily regional and localized emissions from this building construction and overlapping application of architectural coatings are shown in Table III-15 along with the applicable regional thresholds and LSTs. LSTs for this phase reflect a one-acre project size, which is less than the approximately 1.39-acre footprint of the proposed Multistory Building, and which presents a conservative analysis. A receptor distance of 25 meters (approximately 82 feet) was utilized, which is the shortest distance used for analysis in the LST guidance document and results in the most stringent emissions thresholds. As shown, unmitigated regional construction emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Localized emissions would not exceed SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$.

As shown in Table III-7, construction of the Multistory Building may overlap with the construction of athletic fields and ancillary facilities on the North Campus. Table III-16 demonstrates that overlapping worst-case emissions from Main Campus Multistory Building construction and construction of athletic fields and ancillary facilities on the North Campus would be well below

SCAQMD regional thresholds and LSTs for even the smallest, most conservative one-acre project size.

Construction of the Multistory Building may also overlap with construction of the upper-level student quad, renovation of a small surface parking lot along Cohasset Street, and other campus improvements that involve repurposing the existing baseball field as a softball field and renovating administrative offices and buildings. However, these activities would require minimal use of diesel-powered equipment compared to the overlap scenario addressed in Table III-16 and therefore would generate less pollutant emissions. As shown in Table III-16, worst-case overlapping emissions associated with construction of the Multistory Building and the athletic fields would be over 50 percent below the SCAQMD's most stringent regional thresholds and LSTs. Therefore, it is estimated that emissions associated with this second overlap scenario would also be well below SCAQMD thresholds.

Emissions associated with the overlap of Multistory Building construction and the construction of pool facilities on the North Campus are discussed in the following section.

Table III-15
Main Campus – Multistory Building Construction
Maximum Regional and Localized Daily Construction Emissions (Unmitigated)

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
Main Campus – Building Construction and Architectural Coatings (Overlap)	6.07	13.9	18.3	0.03	0.99	0.60
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
Main Campus – Building Construction and Architectural Coatings (Overlap)	5.93	13.38	16.02	0.03	0.51	0.46
Localized Significance Threshold	-	103	426	-	4	3
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Source: Air Quality Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix B of this IS/MND.

Table III-16
Main Campus Multistory Building Construction and North Campus Athletic Field Construction – Overlapping Maximum Regional and Localized Daily Construction Emissions (Unmitigated)

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
North Campus – Construction of New Athletic Fields and Ancillary Facilities	1.38	12.6	15.9	0.03	0.90	0.59
Main Campus – Building Construction and Architectural Coatings (Overlap)	6.07	13.9	18.3	0.03	0.99	0.60
Total Overlapping Emissions:	7.45	25.6	34.2	0.06	1.89	1.19
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
North Campus – Construction of New Athletic Fields and Ancillary Facilities	1.28	12.1	14.4	0.03	0.54	0.50
Main Campus – Building Construction and Architectural Coatings (Overlap)	5.93	13.38	16.02	0.03	0.51	0.46
Total Overlapping Emissions:	7.21	25.48	30.42	0.06	1.05	0.96
Localized Significance Threshold	-	103	426	-	4	3
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Source: Air Quality Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix B of this IS/MND.

North Campus – Pool Facility Construction

Construction of the proposed pool facility would require approximately two weeks of grading activities followed by seven months of building construction, including one week of overlapping paving activities and two weeks of overlapping architectural coatings activities. Diesel-fueled construction equipment would include bulldozers, skid steer loaders, excavators, rollers, cranes, forklifts, and various paving equipment. Emissions, including overlapping emissions, have been modeled for each of these subphases. Unmitigated maximum daily regional emissions associated with this phase, as well as localized emissions from its subphases, are shown in Table III-17 along with the applicable regional thresholds and LSTs. LSTs for this phase reflect a one-acre project size, which is the smallest project size used for analysis in the LST guidance document and results in the most stringent emissions thresholds. A receptor distance of 25 meters (approximately 82 feet) was utilized, which is the shortest distance used for analysis in the LST guidance document and also results in the most stringent emissions thresholds. As shown, unmitigated regional construction emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Localized emissions would not exceed SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$.

Table III-17
North Campus – Pool Facility Construction
Maximum Regional and Localized Daily Construction Emissions (Unmitigated)

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
North Campus – Pool Facility Construction	1.72	19.2	17.0	0.05	4.54	2.30
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
North Campus – Pool Facility Grading	1.51	13.9	14.6	0.02	3.19	1.89
North Campus – Pool Facility Building Construction, Paving, and Architectural Coatings (Overlap)	1.50	13.57	14.99	0.02	0.61	0.56
Localized Significance Threshold	-	103	426	-	4	3
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Source: Air Quality Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix B of this IS/MND.

As noted earlier and shown in Table III-7, construction of the North Campus pool facility may overlap with construction of the Multistory Building on the Main Campus. Construction may also overlap with other Main Campus improvements, such as renovations to existing administrative offices and the conversion of the existing baseball field to a softball field. Table III-18 presents the emissions that may result from overlapping pool facility and Multistory Building construction along with SCAQMD regional thresholds and LSTs. As shown, unmitigated regional construction emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Localized emissions also would not exceed SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$. In addition, the following should be noted. Even though construction of the North Campus pool facility and the Main Campus Multistory Building would occur at two separate locations separated by approximately 700 feet, and even though the construction footprint of these phases would total 2.1 acres, LSTs shown in Table III-18 conservatively reflect a one-acre project size, which, as explained throughout this analysis, results in the most stringent emissions thresholds. A receptor distance of 25 meters (approximately 82 feet) was utilized, which is the shortest distance used for analysis in the LST guidance document and also results in the most stringent emissions thresholds. The fact that the combined localized emissions from construction of the North Campus pool facility and the Main Campus Multistory Building would not exceed these minimum thresholds is conclusive evidence that their overlapping construction would not result in significant localized air quality impacts. Whether construction occurs over one acre, two acres, or ten acres, localized emissions that are less than the SCAQMD's most stringent LSTs for the smallest project size and the smallest receptor distance would result in less than significant impacts. Other renovations occurring at the same time as overlapping North Campus pool facility and Main Campus Multistory Building construction activities would not result in materially greater localized pollutant emissions. For example, as explained earlier, renovations to administrative

offices and buildings would utilize mostly hand tools and electric power tools. Fugitive dust emissions associated with these activities would be nominal, as there would be limited demolition or soil disturbance.

Table III-18
Pool Facility and Multistory Building Construction – Overlapping
Maximum Regional and Localized Daily Construction Emissions (Unmitigated)

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
North Campus – Pool Facility Construction (From Table III-17)	1.72	19.2	17.0	0.05	4.54	2.30
Main Campus – Multistory Building Construction (From Table III-15)	6.07	13.9	18.3	0.03	0.99	0.60
Total Overlapping Emissions:	7.79	33.1	35.3	0.08	5.53	2.90
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
North Campus – Pool Facility Construction (Maximum Localized Emissions From Table III-17)	1.51	13.9	14.99	0.02	3.19	1.89
Main Campus – Multistory Building Construction (From Table III-15)	5.93	13.38	16.02	0.03	0.51	0.46
Total Overlapping Emissions:	7.44	27.28	31.01	0.05	3.7	2.35
Localized Significance Threshold	-	103	426	-	4	3
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Source: Air Quality Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix B of this IS/MND.

Construction Emissions – Impact Summary and Recommended Mitigation

As demonstrated by the preceding analysis, the Project's unmitigated construction emissions would not exceed SCAQMD regional thresholds or LSTs. As a result, the Project's construction-related emissions impacts on regional and localized air quality would be less than significant.

Despite this less than significant impact, Mitigation Measure AQ-1 is recommended, which would require the use of construction equipment that meets or exceeds the equivalent emissions performance of USEPA Tier 4 Interim standards for off-road engines to the extent such equipment is commercially available. Use of construction equipment that does not meet or exceed the equivalent emissions performance of USEPA Tier 3 standards would be prohibited.

MM AQ-1 All off-road diesel-powered construction equipment shall meet, at a minimum, USEPA Tier 4 Interim off-road emissions standards, or if such equipment is not

commercially available for lease or short-term rental within 50 miles of the Project Site, USEPA Tier 3 off-road emissions standards.

The following Tables III-19 through III-29 show the Project's estimated construction emissions after the implementation of Mitigation Measure AQ-1 and reflect the use construction equipment that meets USEPA Tier 4 Interim off-road emissions standards.

Table III-19
North Campus – Demolition
Maximum Regional and Localized Daily Construction Emissions (Mitigated)

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
North Campus – Demolition	0.73	20.4	28.6	0.08	3.32	0.83
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
North Campus – Demolition	0.57	13.6	25.4	0.04	1.57	0.31
Localized Significance Threshold	-	103	426	-	4	3
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Source: Air Quality Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix B of this IS/MND.

Table III-20
North Campus – Grading
Maximum Regional and Localized Daily Construction Emissions (Mitigated)

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
North Campus – Grading	0.94	14.4	22.6	0.04	3.46	1.73
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
North Campus – Grading	0.85	13.7	21.3	0.03	3.08	1.64
Localized Significance Threshold	-	103	426	-	4	3
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Source: Air Quality Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix B of this IS/MND.

Table III-21
North Campus – Construction of New Athletic Fields and Ancillary Facilities
Maximum Regional and Localized Daily Construction Emissions (Mitigated)

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
North Campus – Construction of New Athletic Fields and Ancillary Facilities	0.55	10.8	18.1	0.03	0.46	0.20
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
North Campus – Construction of New Athletic Fields and Ancillary Facilities	0.46	10.3	16.6	0.03	0.11	0.11
Localized Significance Threshold	-	147	644	-	6	4
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Source: Air Quality Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix B of this IS/MND.

Table III-22
Main Campus –Parking Lot and Classroom Demolition
Maximum Regional and Localized Daily Construction Emissions (Mitigated)

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
Main Campus – Classroom and Parking Lot Demolition	0.54	15.4	21.1	0.06	2.75	0.66
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
Main Campus – Classroom and Parking Lot Demolition	0.41	10.3	18.6	0.03	1.42	0.27
Localized Significance Threshold	-	147	644	-	6	4
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Source: Air Quality Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix B of this IS/MND.

Table III-23
Main Campus Demolition and North Campus Athletic Field Construction – Overlapping Maximum Regional and Localized Daily Construction Emissions (Mitigated)

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
North Campus – Construction of New Athletic Fields and Ancillary Facilities	0.55	10.8	18.1	0.03	0.46	0.20
Main Campus – Classroom and Parking Lot Demolition	0.54	15.4	21.1	0.06	2.75	0.66
Total Overlapping Emissions:	1.09	26.2	39.2	0.09	3.21	0.86
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
North Campus – Construction of New Athletic Fields and Ancillary Facilities	0.46	10.3	16.6	0.03	0.11	0.11
Main Campus – Classroom and Parking Lot Demolition	0.41	10.3	18.6	0.03	1.42	0.27
Total Overlapping Emissions:	0.87	20.6	35.2	0.06	1.53	0.38
Localized Significance Threshold	-	103	426	-	4	3
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Source: Air Quality Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix B of this IS/MND.

Table III-24
Main Campus – Multistory Building Grading
Maximum Regional and Localized Daily Construction Emissions (Mitigated)

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
Main Campus – Multistory Building Grading	0.59	23.8	20.7	0.11	6.39	2.51
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
Main Campus – Multistory Building Grading	0.33	7.97	14.7	0.02	2.62	1.37
Localized Significance Threshold	-	147	644	-	6	4
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Source: Air Quality Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix B of this IS/MND.

Table III-25
Main Campus Grading and North Campus Athletic Field Construction - Overlapping
Maximum Regional and Localized Daily Construction Emissions (Mitigated)

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
North Campus – Construction of New Athletic Fields and Ancillary Facilities	0.55	10.8	18.1	0.03	0.46	0.20
Main Campus – Multistory Building Grading	0.59	23.8	20.7	0.11	6.39	2.51
Total Overlapping Emissions:	1.14	34.6	38.8	0.14	6.85	2.71
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
North Campus – Construction of New Athletic Fields and Ancillary Facilities	0.46	10.3	16.6	0.03	0.11	0.11
Main Campus – Multistory Building Grading	0.33	7.97	14.7	0.02	2.62	1.37
Total Overlapping Emissions:	0.79	18.27	31.3	0.05	2.73	1.48
Localized Significance Threshold	-	103	426	-	4	3
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Source: Air Quality Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix B of this IS/MND.

Table III-26
Main Campus – Multistory Building Construction
Maximum Regional and Localized Daily Construction Emissions (Mitigated)

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
Main Campus – Building Construction and Architectural Coatings (Overlap)	4.98	13.7	19.7	0.03	0.74	0.35
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
Main Campus – Building Construction and Architectural Coatings (Overlap)	4.84	13.23	17.38	0.03	0.25	0.24
Localized Significance Threshold	-	103	426	-	4	3
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Source: Air Quality Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix B of this IS/MND.

Table III-27
Main Campus Multistory Building Construction and North Campus Athletic Field Construction – Overlapping Maximum Regional and Localized Daily Construction Emissions (Mitigated)

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
North Campus – Construction of New Athletic Fields and Ancillary Facilities	0.55	10.8	18.1	0.03	0.46	0.20
Main Campus – Building Construction and Architectural Coatings (Overlap)	4.98	13.7	19.7	0.03	0.74	0.35
Total Overlapping Emissions:	5.53	24.5	37.8	0.06	1.20	0.55
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
North Campus – Construction of New Athletic Fields and Ancillary Facilities	0.46	10.3	16.6	0.03	0.11	0.11
Main Campus – Building Construction and Architectural Coatings (Overlap)	4.84	13.23	17.38	0.03	0.25	0.24
Total Overlapping Emissions:	5.3	23.53	33.98	0.06	0.36	0.35
Localized Significance Threshold	-	103	426	-	4	3
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Source: Air Quality Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix B of this IS/MND.

Table III-28
North Campus – Pool Facility Construction
Maximum Regional and Localized Daily Construction Emissions (Mitigated)

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
North Campus – Pool Facility Construction	0.78	13.2	18.7	0.05	3.98	1.79
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
North Campus – Pool Facility Grading	0.31	7.89	13.7	0.02	2.63	1.38
North Campus – Pool Facility Building Construction, Paving, and Architectural Coatings (Overlap)	0.66	11.53	16.93	0.02	0.18	0.17
Localized Significance Threshold	-	103	426	-	4	3
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Source: Air Quality Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix B of this IS/MND.

Table III-29
Pool Facility and Multistory Building Construction – Overlapping
Maximum Regional and Localized Daily Construction Emissions (Mitigated)

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
North Campus – Pool Facility Construction (From Table III-28)	0.78	13.2	18.7	0.05	3.98	1.79
Main Campus – Multistory Building Construction (From Table III-26)	4.98	13.7	19.7	0.03	0.74	0.35
Total Overlapping Emissions:	5.76	26.9	38.4	0.08	4.72	2.14
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
North Campus – Pool Facility Construction (Maximum Localized Emissions From Table III-28)	0.66	11.53	16.93	0.02	2.63	1.38
Main Campus – Multistory Building Construction (From Table III-26)	4.84	13.23	17.38	0.03	0.25	0.24
Total Overlapping Emissions:	5.5	24.76	34.31	0.05	2.88	1.62
Localized Significance Threshold	-	103	426	-	4	3
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Source: Air Quality Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix B of this IS/MND.

Operation

To ascertain the Project's potential to result in exceedances of SCAQMD regional thresholds or LSTs for operation, emissions associated with operation of the following improvements were estimated:

- 60,760 square feet of net new building area associated with the proposed Multistory Building on the Main Campus;
- 8,494 square feet of net new building area associated with the proposed pool and athletic facilities on the North Campus;
- 4.83 acres of net new campus area associated with the North Campus; and
- North Campus parking lot, pool facility parking lot, and new administrative offices parking lot.

Table III-30 presents the emissions that would result from the operation of these improvements along with SCAQMD regional thresholds and LSTs. As shown, emissions would be far below SCAQMD regional thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Localized emissions also would be far below SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$. Emissions from the Project's other improvements (such as the pedestrian bridge, converted softball field, and campus renovations) would be marginal – far less than emissions associated with the aforementioned

improvements that are shown in Table III-30. Therefore, Project operations would not result in exceedances of SCAQMD regional or localized thresholds, and impacts would be less than significant.

Table III-30
Regional and Localized Operational Emissions

Emissions Source	Emissions in lbs per day					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Proposed Additions						
Area[A]	2.21	0.03	3.27	<0.01	<0.01	0.01
Energy[B]	0.02	0.38	0.32	<0.01	0.03	0.03
Mobile Sources[C]	3.79	3.47	33.0	0.07	2.21	0.39
Regional Emissions:	6.02	3.88	36.59	0.07	2.24	0.43
Regional Daily Thresholds	55	55	550	150	150	55
Exceed Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions:	2.21	0.03	3.27	<0.01	<0.01	<0.01
Localized Significant Thresholds	-	221	1,158	-	3	2
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Notes:

[A] "Area" emissions are those associated with the on-site use of powered equipment.

[B] "Energy" emissions are those associated with electricity and natural gas use for space heating and cooling, water heating, energy consumption, and lighting.

[C] "Mobile Source" emissions are those associated with a project's related vehicle travel. For this Project, mobile source emissions reflect emissions that would be generated by the Project's gross trip generation, namely trips associated with the proposed pool facility. Conservatively, this analysis does not consider the fact that the Project would actually result in a net reduction of 1,355 daily trips.

Source: Air Quality Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix B of this IS/MND.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact.

Construction

As discussed above, there is no threshold or guidance on how to evaluate TAC impacts from a single construction project. In general, a review of the SCAQMD emissions thresholds is used, plus a qualitative analysis of potential for risk. The Project's construction emissions would not exceed the SCAQMD's regional significance thresholds. Construction emissions also would not exceed SCAQMD LSTs, meaning that nearby sensitive receptors (located within 25 meters from

the Project) would not be exposed to substantial criteria pollutant concentrations that would present a public health concern.

The primary TAC that would be generated by construction activities is diesel PM, which would be released from the exhaust pipes of diesel-powered construction vehicles and equipment. Health risks from carcinogenic air toxics such as diesel PM are usually quantified in terms of individual cancer risk, which is the likelihood that a person exposed to concentrations of TACs over a 30-year period every day would contract cancer based on standard risk-assessment methodology. The following considerations support that the Project would result in less than significant health risk impacts related to diesel PM emissions. First, construction of the Project would not expose any individual to TAC concentrations every day for 30 years. Buildout of the Project would require approximately three years of construction activities. Further, the Project's most intensive construction phases – i.e., those that would involve the highest utilization of diesel-powered vehicles emitting PM emissions – would be limited in duration. For example, North Campus demolition would last approximately one month, as would North Campus grading. Demolition for the Multistory Building would last approximately three weeks, and grading for this building would last approximately one month.

In addition, the Project's construction activities would be spread across the 25.86 acres that comprise the Main Campus and North Campus sites. This would substantially dilute concentrations of diesel PM at surrounding receptors. As shown earlier, the Project's maximum daily PM emissions, which include exhaust PM, would not exceed applicable regional thresholds and LSTs and will be further reduced by the recommended mitigation to Tier 4 Interim equipment (see Mitigation Measure AQ-1). Further, the maximum daily construction emissions are conservative estimates that are not anticipated every day for the entire duration of construction.

Given these considerations, TAC emissions from the Project's construction equipment would not result in significant health risks.

Operation

As also discussed previously, the Project's operational emissions would not exceed SCAQMD regional significance thresholds or LSTs. Additionally, the Project does not propose typical sources of acutely and chronically hazardous TACs, such as industrial manufacturing processes, automotive repair facilities, or warehouse distribution facilities. As a result, the Project's operations would not warrant the need for a health risk assessment, and this impact would be less than significant.

Regarding CO hotspots, the Project would result in a net reduction of 1,355 daily trips and therefore would not contribute to the levels of traffic congestion and emissions necessary to trigger a potential CO hotspot. Therefore, the Project's potential to expose sensitive receptors to substantial CO concentrations as a result of CO hotspots would be less than significant.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

No Impact. The Project would not result in activities that create objectionable odors and would not include any land uses typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). The Project would result in the continued operation of the existing high school. As a result, no impact with respect to odors would occur as a result of the Project.

Cumulative Impacts

SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also be considered cumulatively considerable.[19] Individual projects that would not generate emissions in excess of SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions. As shown above, the Project's emissions would not exceed any of the SCAQMD's regional or localized significance thresholds. Therefore, the Project's contribution to cumulative air quality impacts would be less than significant.

[19] SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf, August 2003.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US 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 following, which are included in Appendix C of this IS/MND:

- Protected Tree Report, The Tree Resource, December 7, 2023.
- Biological Technical Memorandum, SWCA Environmental Consultants, January 20, 2023.

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. A significant impact would occur if a project would remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the State or federal regulatory agencies cited above. The Project Site is located in an urbanized and developed area of the City, and is currently developed with a high school (Main Campus) and shopping center and associated surface parking (North Campus). The Project Site does not contain any natural open spaces, act as a wildlife corridor, nor possess any areas of significant biological resource value.[20] No hydrological features are present on the Site and there are no sensitive habitats present. Due to the urbanized nature of the Project Site and surrounding area, the Project Site does not support habitat for candidate, sensitive, or special status species identified in local plans, policies, or regulations by the California Department of Fish and Wildlife (CDFW), the California Native Plant Society (CNPS), or the U.S. Fish and Wildlife Service (USFWS).[21] Therefore, no impact would occur.

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

No Impact. A significant impact would occur if riparian habitat or any other sensitive natural community identified locally, regionally, or by the State and federal regulatory agencies cited would be adversely modified by a project. As discussed above, the Project Site and surrounding area are located in an urbanized setting. No riparian areas or other sensitive natural communities are located on the Project Site. Thus, implementation of the Project would not result in any adverse effect on riparian habitat or other sensitive natural communities, and no impact would occur.

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. A significant impact would occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed by a project. A review of the National

[20] NavigateLA, Significant Ecological Area layer: http://navigatela.lacity.org/navigatela/, accessed June 12, 2023.

[21] Biological Technical Memorandum, SWCA Environmental Consultants, January 30, 2023 (included in Appendix C-2 of this IS/MND).

Wetlands Inventory identified no wetlands or water features on the Project Site. Therefore, no impact would occur.[22]

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. A significant impact would occur if a project would interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites. The Project Site is currently developed with a high school (Main Campus) and shopping center and associated surface parking (North Campus), and does not interfere substantially with the movement of any native resident or migratory birds. The Project Site is located within an urban area that is highly disturbed and does not contain any major water bodies that would contain or support habitat for native resident or migratory bird species. According to the tree report prepared for the Project Site (included as Appendix C-1 of this IS/MND and discussed in greater detail below), the Project would result in the removal of 40 non-protected significant trees and seven non-protected non-significant trees from the Project Site. During Project construction activities, the removal of these trees would comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. To the extent that vegetation removal activities must occur during the nesting season (generally January 15 through August 31), a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If any active nests are detected, the area would be flagged with a buffer (ranging between 25-50 feet for songbirds and 100 feet for raptors, as determined by the monitoring biologist), and the area would be avoided until the nesting cycle has been completed or the monitoring biologist has determined that the nest is vacated, juveniles have fledged, and there is no second nesting attempt. With compliance with existing regulatory requirements, impacts to nesting and migratory birds would be less than significant.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

Less Than Significant Impact. A significant adverse impact would occur if a project were inconsistent with local regulations pertaining to biological resources. Local ordinances protecting biological resources are limited to the City of Los Angeles Protected Tree Ordinance, as modified by Ordinance No. 177404. The amended Protected Tree Ordinance provides guidelines for the preservation of all Oak trees indigenous to California (excluding the Scrub Oak or *Quercus dumosa*) as well as the following tree species: Southern California Black Walnut *(Juglans californica var. californica)*; Western Sycamore *(Platanus racemosa)*; and California Bay

[22] U.S. Fish & Wildlife Service, National Wetlands Inventory: http://www.fws.gov/wetlands/data/mapper.HTML, accessed June 12, 2023.

(Umbellularia californica).[23] In addition, in December 2020, Mexican Elderberry (*Sambucus Mexicana*) and Toyon (*Heteromeles arbutifolia*) were added to the class of "protected trees" (Ordinance No. 186873). The tree report prepared for the Project Site (included as Appendix C-1 of this IS/MND) identified the following: 1) 33 parkway street trees; 2) 364 non-protected significant trees with eight-inch diameter at breast height (DBH) or greater on the Project Site; and 3) 108 non-protected non-significant trees (less than eight inches DBH) on the Project Site. None of these trees are protected species as defined by the City's Protected Tree Ordinance. The Project would result in the removal of 40 non-protected significant trees and seven non-protected non-significant trees from the Project Site, and would retain the remaining on-site trees. The Project would also retain the parkway street trees, with the exception of one tree (Street Tree No. 489), which would be removed to construct the pedestrian bridge. The existing significant trees that would be removed as part of the Project would be replaced according to the Urban Forestry Division requirements (the non-significant trees that would be removed would not require replacement). As none of the trees located on the Project Site are protected trees, a less than significant impact would occur.

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. A significant impact would occur if a project would be inconsistent with policies in any draft or adopted conservation plan. The Project Site is located in an urbanized area of the City, and is currently developed with a high school (Main Campus) and shopping center and associated surface parking (North Campus). There are no identified Significant Ecological Areas (SEAs) within the vicinity of the Project Site,[24] and the Site is not subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan.[25] Thus, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional, or state habitat conservation plan, and no impact would occur.

Cumulative Impacts

The Project Site is located in an urbanized area that does not contain significant biological resources, such as candidate, sensitive or special status species, riparian habitat, or sensitive natural communities. Further, the Project area is not part of a wildlife corridor or SEA or subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan. No related projects have been identified within one-half mile of the Project Site. However, it is assumed that like the Project, any other development projects would also be required to comply with the requirements of the MBTA as well as the City's Protected Tree Ordinance and the City's requirements regarding street tree removal and replacement. Because the Project would not

[23] City of Los Angeles, Ordinance No. 177404, effective April 23, 2006.

[24] NavigateLA, Significant Ecological Area layer: http://navigatela.lacity.org/navigatela/, accessed June 12, 2023.

[25] City of Los Angeles General Plan Conservation Element, Exhibit B2.

result in any impacts related to biological resources, the Project does not have the potential to contribute to any cumulative biological resources impacts. Therefore, cumulative impacts related to biological resources would be less than significant.

V. CULTURAL RESOURCES

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

The analysis in this section is based in part on the following, which are included in Appendix D of this IS/MND:

- Phase I Historic Assessment, Teresa Grimes Historic Preservation, September 6, 2023.
- Archaeological Resources Technical Memorandum, SWCA Environmental Consultants, March 9, 2023.

a. Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines §15064.5?

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

As the Project involves the demolition of buildings over 45 years of age on both the Main Campus and the North Campus, a Phase I Historic Assessment was prepared (included in Appendix D-1 of this IS/MND) to determine whether the Project would result in any impacts to historical resources. The Phase I Historic Assessment reviewed available sources to determine that none of the existing buildings on either the Main Campus or North Campus are currently listed in the National Register of Historic Places, the California Register of Historical Resources, or as a City

of Los Angeles Historic-Cultural Monument. In addition, none of the existing buildings were identified by SurveyLA as appearing eligible to be designated as a historic resource or otherwise requiring further historic preservation review.

The Phase I Historic Assessment then evaluated the Main Campus and the North Campus to determine whether any buildings had the potential to meet eligibility standards in the *Los Angeles Citywide Historic Context Statement* (*LACHCS*) for listing under federal, state, and local landmark or historic district programs.

Main Campus

The current Main Campus was founded in 1961 (relocated from the school's original site in Cheviot Hills) with buildings constructed in 1961 and 1964, including an administration building, a library, a classroom building, a lab building, a multipurpose building, and a cafeteria. The original buildings on the Main Campus were designed by architects Barker and Ott.

Most of the buildings and structures on the Main Campus are less than 50 years of age and include: a telescope house (later converted into the Fine Arts Building) constructed in 1975; a locker room building constructed in 1975; a classroom building constructed in 1978; the Uribe Sports Center constructed in 1981; bleacher seating constructed in 1988; Marian Hall, a classroom building, constructed 1992; Mundy's, a merchandise sales and storage building, constructed in 1997; the Condon Family Center for Science and Technology constructed in 2005; and the Tutor Family Center for Performing Arts constructed in 2012.

The significance of a property must be evaluated within its historic context(s). Historic contexts are those patterns or trends in history by which a specific property is understood. The *Los Angeles Citywide Historic Context Statement* (*LACHCS*) was used to identify the relevant contexts for judging the significance of the Main Campus. The *LACHCS* is organized into nine broad contexts that cover the period from 1850 to 1980 and are specific to Los Angeles. The most relevant context for the evaluation of the Main Campus is Public and Private Institutional Development. The property's potential to meet the eligibility standards for the associated theme and subthemes within this context is discussed below.

Parochial school campuses may be eligible in the Public and Private Institutional Development Context, in the Education Theme, and in the Educational Development and Campus Planning Subthemes. A narrative for these two subthemes has not been developed yet. According to the Archdiocese of Los Angeles Administrative Handbook, the Catholic school system in Southern California was developed by Bishop Thomas J. Conaty (1847-1915); originating with 19 parochial schools and five academies in 1903 with a total enrollment of 2,895. Founded in 1952, Chaminade College Preparatory does not represent an important aspect of educational development in Los Angeles because it was not among the earliest high schools established. Additionally, it is not significant for an association with West Hills. It was originally located in Cheviot Hills and only moved to West Hills for more space. Furthermore, the campus does not retain the essential physical features from the period of significance, which would be the 1960s when the school

moved to West Hills. Most of the buildings and structures were constructed over the last 50 years. Thus, the campus does not convey a visual sense of an historic environment. For the reasons outlined above, the Main Campus does not meet the eligibility standards for the Educational Development Subtheme.

Likewise, the Main Campus does not meet the eligibility standards for the Campus Planning Subtheme. There appears to have been a master plan for the Main Campus at one time. However, after the first buildings were constructed in 1961 the master plan appears to have been abandoned. Henceforth, buildings and structures were constructed as needed and as funds were available. Therefore, the Main Campus does not possess a significant concentration of buildings and structures united historically or aesthetically by a master plan. Additionally, the individual buildings were not designed in prominent architectural styles of the period and are not important examples of the work of master architects. Barker and Ott was a partnership between Merl Lee Barker (1888-1970) and G. Lawrence Ott (1895- 1975). The partnership began in the 1930s and the Catholic church was a primary client. Other examples of the firm's work include the Mount Carmel High School (1934-35, demolished) and St. Charles Borromeo Church (1937-38); Congregational Church of the Messiah (1953); St. Bernadette Roman Catholic Church (1961), and St. John Baptist de la Salle Church (1969). Barker and Ott may have designed a few noteworthy buildings, but no information was found that they could be considered master architects, which is defined by the National Register as a figure of generally recognized greatness in the field and by the Los Angeles Cultural Heritage Ordinance as a person whose individual genius influenced his or her age.

North Campus

The North Campus is occupied by the West Hills Shopping Center, which includes a main building that was constructed in stages between 1962 and 2004 and surface parking lots. The building is one story in height and is mostly covered by a flat roof surrounded by raised parapets. The most relevant context from the *LACHCS* for the evaluation of the North Campus is Commercial Development. The property's potential to meet the eligibility standards for the associated theme and subtheme within this context is discussed below.

Shopping centers may be eligible in the Commercial Development Context in the Neighborhood Commercial Development Theme and in the Post WWII Neighborhood Shopping Centers Subtheme. The North Campus property, however, does not meet the eligibility standards for this subtheme because it was not originally designed as a shopping center. It was designed as a market and did not evolve into a true shopping center until long after the period of significance (1936-1965) for the subtheme. The building is set back from the street and oriented toward the surface parking lot, but that is true of most commercial buildings from the period.

For most of its history, the property was owned by the Walter H. Leimert Company. While the company played a significant role in the residential development, and to a lesser extent the commercial development, of Los Angeles, the property is not significant for this association. Mere

association is not in and of itself to qualify, the association must be important. The property appears to be one of many developed and owned by the company since its founding in Oakland in 1902. In 1926, Leimert moved the company to Southern California and developed Bellhurst Park in Glendale. The company is best known for the development of Leimert Park in 1928 and would go on to develop Beverlywood, Cheviot Knolls, and Rancho Malibu among other subdivisions. The company was prolific, and the building is not an important example of their work.

Additionally, the property does not meet the eligibility standards for the Markets Subtheme in the Neighborhood Commercial Development Theme. The original portion of the building was constructed as a market during the period of significance (1910-1975) for the subtheme and includes a surface parking lot, but it does not exhibit quality of design through distinctive features that would make it a good example of a type, period, or method of construction. The name of the original architect, if any, is unknown.

The Alpha Beta Acme Market may have been the original tenant; however, the building is not significant for an important association with this company. Alpha Beta Food Markets incorporated in 1929, but the first store opened in Pomona in 1917. In 1961, the company merged with American Stores, operators of Acme Markets on the East Coast, and assumed the name Alpha Beta Acme Markets. As the building does not appear to have been constructed by the company, it is not an example of the store design from the 1960s. When Alpha Beta Acme closed at this location is unclear. The name does not appear at this address in available City Directories after 1965.The demise of the Alpha Beta Acme name began with the 1988 merger of American Stores with Lucky Stores. It has been occupied by West Hills Market, later called Fields Market, since the early 2000s.

The Commercial Merchants, Leaders, and Builders Theme in the Commercial Development Context pertains to people who played a significant role in the commercial history of Los Angeles. Several steps are involved in determining whether a property is significant under this theme. First, the person must be significant within the context commercial development. Second, the property must be associated with the person's productive life. Finally, the property must be compared with other associated properties to identify the best representation of the person's historic contributions. Walter H. Leimert Jr. served as president of the Walter H. Leimert Company from 1960 until his death in 2004. Initially with his father, who died in 1970, and then on his own, Leimert developed Beverly Highlands in the Hollywood Hills, Saint Hubert Wood and Sierra Park in Orange County, and Cambria Pines near Hearst Castle. Leimert Jr. may be significant in the context of residential development but not commercial development. Even if he was, the building does not represent his productive life.

Finally, the Filming Locations Associated with the Motion Picture and Television Broadcasting Industries Theme in the Entertainment Industry Context provides guidance for the evaluation of filming locations as potential historical resources. The existing market on the North Campus has been used as a filming location since the 1990s. The first known film shoot was for the television show ”Seventh Heaven” in 1994. Others have included “Desperate Housewives,” “Criminal

Minds," "NCIS," and "Bones." As properties generally need to achieve significance more than 50 years ago to be considered potential historical resources, the period of significance for the *LACHCS* ends in 1980. Properties associated with events and activities that have occurred since 1973 would need to be of exceptional importance to qualify as historical resources. The North Campus property does not meet the eligibility standards for this theme. It was not an important filming location for an early motion picture; it was not the long-term filming location for any television show, significant or otherwise; it is not an iconic film location; and it has not played an integral role in shaping the narrative of a significant film with a specific influence on the plot or structure.

Conclusion

According to the Phase I Historic Assessment, neither the Main Campus nor the North Campus qualify as historic resources. None of the existing buildings on either the Main Campus or North Campus are currently listed in the National Register of Historic Places, the California Register of Historical Resources, or as a City of Los Angeles Historic-Cultural Monument. In addition, none of the existing buildings were identified by SurveyLA as appearing eligible to be designated as a historic resource or otherwise requiring further historic preservation review. Finally, the properties have no potential to meet the relevant eligibility standards in the LACHCS for listing under federal, state, and local landmark or historic district programs due to a lack of significance and/or integrity. As such, the Project would result in no impact with respect to historic resources.

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

Less Than Significant with Mitigation Incorporated. State CEQA Guidelines Section 15064.5 defines significant archaeological resources as resources that meet the criteria for historical resources or resources that constitute unique archaeological resources. A project-related significant impact could occur if a project would significantly affect archaeological resources that fall under either of these categories. According to the archaeological resources technical memorandum (included in Appendix D-2 of this IS/MND), archival research indicated that beginning at least in the mid-1940s, the Project Site (both the Main and proposed North Campuses) was a plowed field associated with agricultural activities. The parcels were graded sometime after 1959 for the construction of the existing high school (Main Campus) and shopping center (North Campus). Archaeological remains associated with prehistoric or historic Native Americans can occur below paved surfaces within developed urban settings. While the California Historic Resources Information System (CHRIS) records search results did not identify any such archaeological resources within the Project Site or vicinity, most of the Project Site was not inspected for archaeological resources before being developed. SWCA (the preparer of the archaeological resources technical memorandum) considers the greater region of the Project Site as having moderate sensitivity for prehistoric or historic Native American archaeological resources. However, the Project Site consists of a comparatively small area within the greater region and has been subject to multiple episodes of ground disturbances. As a result,

archaeological materials once located on the surface or in shallow deposits are very unlikely to have been preserved within the Project Site, and though more deeply buried deposits could exist, SWCA considers the sensitivity for prehistoric and historic Native American archaeological resources to decrease within the Project Site, compared with the surrounding area.

Based on the above considerations, SWCA finds a low potential for encountering prehistoric and Historic period Native American archaeological resources within the Project Site, which is supported by the surficial geology of the Project Site. The likelihood of encountering any cultural resources is further decreased due to the compromised integrity of the physical setting as a result of plowing, as evidenced by past agricultural activities as seen on historic aerial imagery, and the development of the school campus and commercial property. For these reasons, SWCA finds the Project Site has a low sensitivity for containing Historic period (non-Native American) archaeological resources.

The City has established a standard condition of approval to address the inadvertent discovery of archaeological resources. Should archaeological resources be inadvertently encountered, this condition of approval provides for temporarily halting construction activities near the encounter so that the find can be evaluated. An archaeologist shall then assess the discovered material(s) and prepare a survey, study, or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey or report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements. In addition, as discussed further below under "Tribal Cultural Resources," the Project would implement Mitigation Measures MM-TCR-1 through MM-TCR-3 regarding the inadvertent discovery of such resources. With implementation of the City's established condition of approval to address any inadvertent discovery of archaeological resources, as well as MM-TCR-1 through MM-TCR-3, Project impacts would be less than significant.

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

Less Than Significant with Mitigation Incorporated. A project-related significant adverse effect could occur if grading or excavation activities associated with the Project would disturb previously interred human remains. The Project Site is located in an urbanized area, and is developed with an existing high school (Main Campus) and shopping center and associated surface parking (North Campus). No human remains are known to exist at the Project Site, and although unlikely due to the presence of artificial fill soils at the Project Site, there is a possibility that human remains could be encountered during excavation and grading activities. Should human remains inadvertently be encountered, the Project would comply with the City's standard condition of approval for inadvertent discovery of human remains, which states the following:

Human Remains Inadvertent Discovery. In the event that human skeletal remains are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5, which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event human skeletal remains are discovered during construction or during any ground disturbance activities, the following procedures shall be followed:

Stop immediately and contact the County Coroner:
1104 N. Mission Road
Los Angeles, CA 90033
323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods as provided in Public Resources Code Section 5097.98. If the Applicant does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

In addition, as discussed further below under "Tribal Cultural Resources," the Project would implement Mitigation Measures MM-TCR-1 through MM-TCR-3 regarding the inadvertent discovery of such resources, including human remains. Compliance with the City's standard condition of approval described above, as well as implementation of MM-TCR-1 through MM-TCR-3, would ensure appropriate treatment of any potential human remains discovered during Project construction activities. Therefore, the Project's impacts on human remains would be less than significant.

Cumulative Impacts

As discussed above, the Project would not result in indirect or direct impacts to any significant historical resource. Thus, the Project would not have the potential to contribute toward any significant cumulative impacts related to historic resources. Impacts related to archaeological resources and human remains are site-specific and are assessed on a site-by-site basis. The Project would implement standard City conditions of approval and would comply with State regulations related to the inadvertent discovery of any archaeological resources and/or human remains, if necessary. In addition, no related projects have been identified within one-half mile of the Project Site. For these reasons, cumulative impacts related to historical resources,

archaeological resources, and human remains would not be cumulatively considerable and less than significant.

VI. ENERGY

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

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

Less Than Significant. This analysis relies on Appendix F of the CEQA Guidelines, which was prepared in response to the requirement in Public Resources Code Section 21100(b)(3), which states that an EIR shall include a detailed statement setting forth "[m]itigation measures proposed to minimize significant effects of the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy."

In addition, with regard to potential impacts to energy, the *L.A. CEQA Thresholds Guide* states that a determination of significance shall be made on a case-by case basis, considering the following factors:

- The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure; or capacity-enhancing alterations to existing facilities;
- Whether and when the needed infrastructure was anticipated by adopted plans; and
- The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.

In accordance with Appendix G and the *L.A. CEQA Thresholds Guide,* the following eight factors will be considered in determining whether this threshold of significance is met:

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;

2. The effects of the project on local and regional energy supplies and on requirements for additional capacity;

3. The effects of the project on peak and base period demands for electricity and other forms of energy;

4. The degree to which the project complies with existing energy standards;

5. The effects of the project on energy resources;

6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives;

7. The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements; and

8. Whether the project conflicts with adopted energy conservation plans.

Each of these factors is discussed in detail below, under "Project Impacts."

Project Impacts

1) The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed.

Construction

Electricity

The Project would have short-term construction impacts, as construction activities would consume relatively minor quantities of electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. This electricity would be supplied to the Project Site by the Los Angeles Department of Water and Power (LADWP) and would be obtained from the existing electrical lines that connect to the Project Site. Where power poles are available, electricity from power poles and/or solar-powered generators rather than temporary diesel or gasoline generators would be used during construction. Moreover, construction electricity usage would replace the electricity usage associated with the existing buildings that would be demolished. Overall, construction activities associated with the Project would require limited electricity generation that would not be expected to have an adverse impact on available electricity supplies.

Natural Gas

Construction activities, including the construction of new buildings, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities, and thus there would be no natural gas demand during construction of the Project.

Transportation Energy

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project construction contractors would comply with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other TACs. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h)) to reduce NO_X, PM_{10}, and $PM_{2.5}$ emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023.[26] In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repowering of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014, and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. Compliance with the above anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities.

Energy Conservation

The Project would utilize construction contractors who demonstrate compliance with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other TACs. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025,

[26] California Air Resources Board, Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles, http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf.

subsection (h)) to reduce NO_X, PM_{10}, and $PM_{2.5}$ emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023.[27] In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repowering of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014, and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. Compliance with the above anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities.

Operation

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to HVAC, lighting (including sports lighting for the pool and athletic fields on the North Campus), pool equipment, and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. Table VI-1 shows the Project's demand for electricity and Table VI-2 shows the Project's demand for natural gas.

Electricity

Buildout of the Project would result in an increase in the on-site demand for electricity totaling approximately 651,256 kWh per year (refer to Table VI-1). In addition, by 2020, LADWP was required to procure at least 33 percent of their energy portfolio from renewable sources. SB 350 further required 50 percent renewables by 2030. The current sources procured by LADWP include wind, solar, and geothermal sources. These sources accounted for 34.9 percent of LADWP's overall energy mix in 2020.[28] This represents the available off-site renewable sources of energy that would meet the Project's energy demand. Furthermore, the Project would incorporate active energy conservation strategies, such as LED lighting with day-lighting controls and dimming capabilities, and Energy Star light bulbs.

Based on LADWP's 2017 SLTRP, LADWP forecasts that its total energy sales in the 2035-2036 fiscal year (encompassing the Project's 2035 buildout year) is estimated to be approximately

[27] California Air Resources Board, Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles, http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf.

[28] LADWP, Power Content Label, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-powercontentlabel;jsessionid=Ld1LvpwPXtpwfKpfn65sQcnmchNvlX5xNm13hS5WRDKJjWLhY2Vn!455318738?_afrLoop=937924243040778&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D937924243040778%26_afrWindowMode%3D0%26_adf.ctrl-state%3D2q0qi6hk_4, accessed June 6, 2022.

26,320 GWh of electricity[29] As such, the Project-related increase in annual electricity consumption of 651,256 kWh per year would represent approximately 0.0025 percent of LADWP's projected sales in 2035.

Table IV-1
Estimated Project Electricity Demand

Land Use	Size	Total (kw-h/yr)[1]
High School	69,254 sf	489,673
Parking Lot	1.39 acres	53,040
	Subtotal	542,713
	20% Contingency[2]	108,543
	Total	**651,256**

sf = square feet. kw-h = kilowatt-hour yr = year
1 Calculated via CalEEMod. Refer to Appendix B of this IS/MND.
2 A 20 percent contingency factor has been added to account for the pool equipment and the lighting for the new pool and athletic fields on the North Campus.

Natural Gas

Buildout of the Project would result in an increase in the on-site demand of natural gas totaling approximately 1,407,774 kBTU per year (see Table IV-2), or approximately 3,857 cf per day.[30] Based on the 2022 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas's planning area will be approximately 1,973 million cf per day in 2035 (the Project's buildout year).[31] The Project would account for approximately 0.0002 percent of the forecasted 2035 consumption in SoCalGas's planning area. In addition, the Project would incorporate a variety of energy conservation measures as required under the City's Green Building Code to reduce energy usage.

[29] 2017 Power Strategic Long-Term Resource Plan, December 2017, LADWP, Appendix A.

[30] Assuming 1 kBTU = 1 cf.

[31] California Gas and Electric Utilities, 2022 California Gas Report, p. 186.

Table IV-2
Estimated Project Natural Gas Demand

Land Use	Size	Total (kBTU/yr)[1]
High School	69,254 sf	1,407,774
Parking Lot	1.39 acres	0
	Total	**1,407,774**

sf = square feet kBTU = 1,000 British Thermal Units yr = year

[1] Calculated via CalEEMod. Refer to Appendix B of this IS/MND. It is not anticipated that natural gas would be required for the pool equipment of lighting for the pool and athletic fields on the North Campus.

Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. As noted previously, while the Project includes physical improvements to the existing high school, it would not increase student enrollment beyond the currently permitted maximum student enrollment. In addition, with the removal of the existing shopping center for expansion of the high school into the North Campus, the Project results in the reduction of 1,355 daily trips, which reduce VMT and related GHG emissions.

During Project operations, vehicles traveling to and from the Project Site are also assumed to comply with Corporate Average Fuel Economy (CAFÉ) fuel economy standards. Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards, which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards. It is anticipated that the future Project-related vehicle trips are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would ultimately reduce non-renewable transportation fuel consumption. Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. The Project would also include approximately 137 EV spaces and 17 EVCS which would encourage the use of alternative-fueled, electric, and hybrid vehicles by students, faculty, and visitors to the Project Site, which would serve to reduce the Project's consumption of gasoline and diesel. Therefore, Project operations would not result in wasteful, inefficient, and unnecessary consumption of energy.

2) The effects of the project on local and regional energy supplies and on requirements for additional capacity.

Construction

As discussed above, electricity would be intermittently consumed during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease

upon completion of construction. When not in use, electric equipment would be powered off to avoid unnecessary energy consumption. As energy consumption during Project construction activities would be relatively negligible, the Project would not likely affect regional energy consumption in years during the construction period.

Operation

As stated above, the Project-related increase in annual electricity consumption would represent approximately 0.0025 percent of LADWP's projected sales in 2035-2036. Also, the Project's estimated increase in demand for natural gas would account for approximately 0.0002 percent of the forecasted 2035 consumption in SoCalGas's planning area. In summary, energy consumption during Project operations would be negligible, and energy requirements would be within LADWP's and SoCalGas's service provisions.

3) The effects of the project on peak and base period demands for electricity and other forms of energy.

Electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of LADWP's power grid and base load conditions. With regard to peak load conditions, LADWP's power system experienced an all-time high peak of 6,432 MW on August 31, 2017.[32] LADWP also estimates a peak load based on two years of data known as base case peak demand to account for typical peak conditions. Based on LADWP estimates for 2017, the base case peak demand for the power grid is 5,854 MW.[33] In comparison to the LADWP power grid base peak load of 5,854 MW in 2017, the Project would represent approximately 0.0011 percent of the LADWP base peak load conditions. In addition, LADWP's annual growth projection in peak demand of the electrical power grid of 0.4 percent would be enough to account for future electrical demand by the Project.[34] Therefore, Project electricity consumption during operational activities would have a negligible effect on peak load conditions of the power grid.

4) The degree to which the project complies with existing energy standards.

Although Title 24 requirements typically apply to energy usage for buildings, construction equipment would also comply with Title 24 requirements where applicable. Electricity and natural gas usage during Project operations presented on Tables VI-1 and VI-2 would comply with Title 24 standards and CalGreen Code requirements, as well as the City's Green Building Code. Therefore, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage.

[32] LADWP, 2017 Retail Electric Sales and Demand Forecast. p. 6.

[33] LADWP, 2017 Retail Electric Sales and Demand Forecast. p. 6.

[34] LADWP, 2017 Retail Electric Sales and Demand Forecast. p. 6.

With regard to transportation fuels, trucks, and equipment used during proposed construction activities, the Project would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. During Project operations, vehicles traveling to and from the Project Site are assumed to comply with CAFÉ fuel economy standards. Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards, which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards. Therefore, Project construction and operational activities would comply with existing energy standards with regards to transportation fuel consumption.

5) Effects of the Project on Energy Resources

As discussed above, LADWP's electricity generation is derived from a mix of non-renewable and renewable sources such as coal, natural gas, solar, geothermal, wind, and hydropower. LADWP's 2017 SLTRP identifies adequate resources (natural gas, coal) to support future generation capacity.

Natural gas supplied to the Southern California is mainly sourced from out of state with a small portion originating in California. Sources of natural gas for the Southern California region are obtained from locations throughout the western United States as well as Canada. According to the U.S. Energy Information Administration (EIA), as of January 2019, the United States currently has about 84 years of natural gas reserves.[35] Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years. Therefore, Project construction and operational activities would have a negligible effect on natural gas supply.

Transportation fuels (gasoline and diesel) are produced from crude oil, which is imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of consumption.[36] The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards, which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards. In addition, based on the removal of existing uses, the Project would result in the reduction of 1,355 daily vehicle trips. Therefore, Project construction and operational activities would have a negligible effect on the transportation fuel supply.

Due to the Project Site location, most on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, municipal solid

[35] U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed November 15, 2021.

[36] BP Global, https://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil.html, accessed November 15, 2021.

waste, ocean thermal, ocean wave, and tidal current technologies, or multi- fuel facilities using renewable fuels. Additionally, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin. Specifically, based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential.[37]

6) The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Approximately 616,121 thousand barrels of crude oil (approximately 25.9 billion gallons) were supplied to California refineries in 2019.[38] Assuming the same supply of crude oil is provided to California, the Project's estimated consumption would be a small fraction of one percent of available fuel reserves. In addition, while the Project includes physical improvements to the existing high school and to North Campus for the expansion of athletic and surface parking facilities, it would not increase student enrollment beyond the currently permitted maximum student enrollment. Further, as described in Section XVII (Transportation), the Project would result in the reduction of 1,355 daily vehicle trips when compared to the existing uses at the Project Site, thereby the Project's transportation energy use. The Project would also include approximately 137 EV spaces and 17 EVCS. Alternative-fueled, electric, and hybrid vehicles, to the extent these types of vehicles would be utilized by students, faculty, and visitors to the Project Site would further reduce the Project's transportation energy use.

7) The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements

The City's current Green Building Code requires compliance with the CalGreen Code and California's Building Energy Efficiency Standards (Title 24). The Project would be required to comply with the City's Green Building Code. The City has also adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. These regulations include the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986). These solid waste reduction programs and ordinances help to reduce the number of trips associated with hauling solid waste, thereby reducing the amount of petroleum-based fuel consumed. Furthermore, recycling efforts indirectly reduce the energy necessary to create new products made of raw material, which is an energy-intensive process. Thus, through compliance with the City's solid waste recycling programs, the Project would contribute to reduced fuel-related energy consumption.

[37] CEC, National Renewable Energy Laboratory (NREL) Wind Prospector, https://maps.nrel.gov/wind-prospector/#/?aL=kM6jR-%255Bv%255D%3Dt%26qCw3hR%255Bv%255D%3Dt%26qCw3hR%255Bd%255D%3D1&bL=groad&cE=0&lR=0&mC=36.416862115300304%2C-120.421142578125&zL=8, accessed November 15, 2021.

[38] California Energy Commission, Oil Supply Sources to California Refineries, https://ww2.energy.ca.gov/almanac/petroleum_data/statistics/crude_oil_receipts.html, accessed April 27, 2020.

8) Whether the Project conflicts with adopted energy conservation plans.

The Project would comply with applicable regulatory requirements for the design of new buildings, the new pool, and the new lights on the North Campus, including the provisions set forth in the CalGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code. In addition, the athletic lighting on the North Campus for the pool and athletic fields would all be light-emitting diode (LED), which is more energy efficient than incandescent lighting. With regard to transportation energy uses, the Project would reduce VMT based on the reduction in daily trips when compared to the existing uses and would also encourage the use of alternative modes of transportation by providing approximately 137 EV spaces and 17 EVCS. As discussed previously, the 2020-2045 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources. The Project would therefore be consistent with the energy efficiency policies emphasized in the 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS would result in an estimated 8 percent decrease in VMT by 2020 and a 19 percent decrease in VMT by 2035. By meeting and exceeding the SB 375 targets for 2020 and 2035, the 2020-2045 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state's GHG emission reduction goals. Thus, consistent with the 2020-2045 RTP/SCS, the Project would reduce VMT and associated petroleum-based fuel. As such, based on the above, the Project would be consistent with adopted energy conservation plans.

Conclusion

As demonstrated in the analysis of the eight criteria discussed above, the Project would not result in any wasteful, inefficient, or unnecessary consumption of energy during construction or operation. The Project's energy requirements would not significantly affect local and regional supplies or capacity. The Project's energy usage during peak and base periods would also be consistent with electricity and natural gas future projections for the region. Electricity generation capacity, and supplies of natural gas and transportation fuels, would also be sufficient to meet the needs of Project-related construction and operations. During operation, the Project would comply with the City's existing energy efficiency requirements under the City's Green Building Code. In summary, the Project's energy demands would not significantly affect available energy supplies and would comply with existing energy efficiency standards. Therefore, Project impacts related to energy use would be less than significant during construction and operation.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. The energy conservation plans and policies relevant to the Project include, but are not limited to, the California Title 24 energy standards, the 2022 CALGreen building code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City of Los Angeles Building Code, the Project would not conflict with or obstruct implementation of applicable plans for renewable energy or

efficiency. In addition, the Project would implement sustainability measures to exceed Title 24 energy efficiency requirements.

With regard to transportation related energy usage, the Project would comply with the goals of SCAG's 2020-2045 RTP/SCS, which incorporates VMT targets established by SB 375. The Project's reduction in daily trips would serve to reduce VMT and associated transportation fuel usage within the region. In addition, vehicle trips generated during Project operations would comply with CAFÉ fuel economy standards. Based on the above, the Project would not conflict with adopted energy conservation plans, or violate State or federal energy standards. Therefore, Project impacts associated with regulatory consistency would be less than significant.

Cumulative Impacts

As described previously, no related projects have been identified within one-half mile of the Project Site. Nevertheless, the following provides a general discussion of cumulative impacts.

Electricity

The Project, in conjunction with any other development projects, could result in an increased demand for electricity supplies. LADWP's 2017 SLTRP serves as a comprehensive 20-year plan to supply reliable electricity to the City in an environmentally responsible and cost-effective manner. The 2017 SLTRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. Based on the projections and strategies within the 2017 SLTRP, energy efficiency and solar savings are expected to increase in the future and significantly reduce electricity demands, Thus, LADWP anticipates that it can meet the future demands of cumulative growth within its service area with implementation of regulatory and reliability initiatives and strategic initiatives.

LADWP will continue to pursue and implement energy efficiency programs per SB 350, which has an adopted goal of achieving 50 percent renewable energy sources by 2030. Furthermore, in accordance with current building codes and construction standards, both the Project and any other development projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code and the City's Green Building Code. Compliance with Title 24 energy conservation standards, City's Green Building Code, and other energy conservation programs on the local level will further reduce cumulative energy demands. As such, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient, and unnecessary use of electricity. Therefore, cumulative impacts related to electricity would be less than significant.

Natural Gas

The Project, in conjunction with any other development projects, could result in an increased demand for natural gas supplies. As a public utility provider, SoCalGas continuously analyzes increases in natural gas demands resulting from projected population and employment growth in

its service area and it is anticipated that it would be able to meet the needs of future development within the region. Both the Project and any other development projects would be reviewed on a case-by-case basis to determine SoCalGas's ability to serve each project. Additionally, compliance with energy conservation standards pursuant to Title 24 would reduce cumulative demand for natural gas resources. As such, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient, and unnecessary use of natural gas. Therefore, cumulative impacts related to natural gas would be less than significant.

Transportation Energy

The Project, in conjunction with any other development projects, could result in a net increased demand for transportation energy. As discussed previously, the NHTSA and CARB have implemented several policies, rules, and regulations to improve vehicle efficiency, increase the use of alternative fuels, and decrease the reliance on fossil fuels. It is anticipated that the future vehicle trips are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would ultimately reduce non-renewable transportation fuel consumption. Also, the Project and any other development projects are located in a transit-rich area of the City and as such, provide opportunities for alternative sources of transportation. Thus, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient, and unnecessary use of transportation energy. Therefore, cumulative impacts related to transportation energy would be less than significant.

VII. GEOLOGY AND SOILS

In 2015, the California Supreme Court in the California Building Industry Association v. Bay Area Air Quality Management District (62 Cal.4th 369 [Case No. S213478]) (CBIA v. BAAQMD), held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The City's revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project physically exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, in accordance with Appendix G of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the Project would have a significant impact related to geology and soils if it would result in any of the following impacts to future residents or users.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

The analysis in this section is based on the following items, which are included as Appendix E of this IS/MND:

- Geotechnical Investigation, Geocon West, January 12, 2023
- Response to Soils Report Review Letter, Geocon West, May 8, 2023.
- Soils Report Approval Letter, Los Angeles Department of Building and Safety, June 27, 2023.
- Paleontological Resources Technical Memorandum, SWCA Environmental Consultants, December 15, 2022.

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. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement more recently than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The CGS establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

According to the Geotechnical Investigation prepared for the Project (included in Appendix E of this IS/MND), the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone and no Holocene-active or pre-Holocene faults with the potential for surface fault rupture are known to pass directly beneath the Project Site, and thus the possibility of surface fault rupture at the Project Site is considered to be low.[39] As such, the Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the Alquist-Priolo Special Studies Zone Map issued by the State Geologist in 2014 for the area or based on other substantial evidence of a known fault on the Project Site.

Additionally, given that no active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site, the Project would not exacerbate existing fault rupture conditions. Construction of the Project would be subject to compliance with existing state and local regulations, including the California Building Code (CBC) and the Los Angeles Building Code (LABC) and with the recommendations contained in the final geotechnical report prepared for the Project by a licensed engineer and approved by the City of Los Angeles Department of Building and Safety (LADBS). The CBC and LABC, with which the Project would be required to comply, contain construction requirements to ensure that structures are built to a level such that they can withstand acceptable seismic risk. Therefore, the Project would not cause potential substantial adverse effects as a result of a known earthquake fault in or around the Project Site, and Project impacts with respect to fault rupture would be less than significant.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region. However, the Project does not include the types of activities, such as mining operations, boring of large areas, the extraction or injection of oil or groundwater, horizontal drilling, or other activities that would cause or exacerbate substantial adverse effects involving strong seismic ground shaking. Given the Project Site's location in a seismically active region, the Project Site could experience seismic ground shaking in the event of an earthquake.

[39] Geotechnical Investigation, Geocon West, January 12, 2023, page 7.

However, as with any new development in the State of California, building design and construction for the Project would be required to conform to the current seismic design provisions of the CBC. The CBC would preclude the Project from employing techniques or methods which would directly or indirectly initiate or worsen seismic ground shaking as part of the normal construction and operations. The CBC incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and provide for the latest in earthquake safety. Additionally, construction of the Project would be required to adhere to the seismic safety requirements contained in the LABC, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards. Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property, or infrastructure directly or indirectly to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region, and would minimize the potential to expose people or structures to substantial risk, loss, or injury. Based on the above, development of the Project would not exacerbate seismic conditions on the Project Site. With compliance with existing building codes, Project impacts associated with seismic ground shaking would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their shear strength due to excess water pressure that builds up during repeated seismic shaking. A shallow groundwater table, the presence of loose to medium dense sand and silty sand, and a long duration and high acceleration of seismic shaking are factors that contribute to the potential for liquefaction. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials.

According to the Geotechnical Investigation prepared for the Project Site, the State of California Seismic Hazard Zone Map for the Calabasas Quadrangle indicates that the southern portion of the Main Campus and the entire North Campus are located in an area designated as having a potential for liquefaction. Consequently, the proposed pool, pool house, and pedestrian bridge are located within areas designated as having a potential for liquefaction.[40]

According to the Geotechnical Investigation and Geotechnical Investigation Corrections Response Letter (both included in Appendix E of this IS/MND), the pedestrian bridge and Main Campus structures can be founded on relatively shallow bedrock using deepened foundations extending through the potentially liquefiable materials. Since the structures would be supported on bedrock, it is the opinion of Geocon West that the potential for liquefaction and associated ground deformation to impact the bridge and Main Campus structures is considered very low.

[40] Geotechnical Investigation, Geocon West, January 12, 2023, page 11.

The North Campus is underlain by artificial fill, potentially liquefiable alluvium, and further underlain by Monterey formation bedrock. The depth of the bedrock ranges from 12 feet on the west portion of the property, to 42 feet on the east side of the property. Due to the depth of bedrock on the east side of the North Campus, deepened foundations are not considered economically feasible for the construction of the North Campus pool house improvements. Therefore, a liquefaction analysis was performed to represent both the worst-case liquefaction potential and the lowest liquefaction potential for the North Campus, and the Geotechnical Investigation and associated corrections letter provided design recommendations for the proposed foundation system for the North Campus.

Construction of the Project would not involve the injection of water or any other liquid into the ground. In addition, construction of the Project would be subject to the LABC requirements and recommendations included in the final geotechnical report, including recommendations with respect to liquefaction. Based on the above, development of the Project would not directly or indirectly cause or exacerbate geologic hazards, including seismic-related liquefaction, and Project impacts with respect to liquefaction would be less than significant.

iv. Landslides?

Less Than Significant Impact. While the topography at the Project Site slopes to the south with 42 feet of elevation difference, the Project Site is not identified by ZIMAS as being within a landslide hazard zone. According to the CGS, the Project Site is not located within an area identified as having a potential for seismic slope instability, and there are no known landslides near the Project Site, nor is the Project Site in the path of any known or potential landslides.[41] Therefore, Project impacts with respect to landslides would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. The Project Site is currently completely developed with the existing high school (Main Campus) and shopping center and associated surface parking (North Campus) and does not contain any topsoil. During the Project's construction phase, activities such as excavation for utilities, grading, and site preparation could leave soils at the Project Sites susceptible to soil erosion. The Project Applicant would be required to comply with SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the Site, as well as prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs

[41] Geotechnical Investigation, Geocon West, January 12, 2023, page 13.

that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities.

Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during the construction phase. Further, during the Project's operational phase, the Project Site would be developed with impervious surfaces or landscaping, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. Therefore, with compliance with applicable regulatory requirements, development of the Project would not cause or exacerbate soil erosion or loss of topsoil and impacts regarding soil erosion or the loss of topsoil would be less than significant.

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

Less Than Significant Impact. Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. As discussed in the Geotechnical Investigation, the majority of the Project Site is underlain by shallow bedrock that is not susceptible to subsidence.[42]

While the topography at the Project Site slopes to the south with 42 feet of elevation difference, the Project Site is not identified by ZIMAS as being within a landslide hazard zone. According to the CGS, the Project Site is not located within an area identified as having a potential for seismic slope instability, and there are no known landslides near the Project Site, nor is the Project Site in the path of any known or potential landslides. Based on these considerations, the potential for slope stability hazards to impact the Project is low. [43]

With respect to liquefaction, as discussed previously, while the southern portion of the Main Campus and the entire North Campus are located in an area designated as having a potential for liquefaction. construction of the Project would be subject to the LABC requirements and

[42] Geotechnical Investigation, Geocon West, January 12, 2023, page 14.

[43] Geotechnical Investigation, Geocon West, January 12, 2023, page 13.

recommendations included in the final geotechnical report, including recommendations with respect to liquefaction. Therefore, Project impacts with respect to liquefaction would be less than significant.

According to the Geotechnical Investigation, the Project Site is underlain by artificial fill, Holocene age alluvium and colluvium, and the northern portion of the Main Campus is underlain by shallow sedimentary bedrock of the Monterey Formation, also called the Modelo Formation.[44] The Project Applicant would be required by the LADBS, as part of the permitting process, to submit a final geotechnical report that would address the building standards and recommendations that shall be followed in order to construct the proposed structure in accordance with CBC and LABC building standards that apply to buildings within the types of soils found at the Project Site, including areas prone to geologic or soil instability. Through compliance with the CBC and LABC, and with recommendations included in the final geotechnical report, impacts related to geologic and soil instability would be less than significant. Based on the above, development of the Project would not cause or exacerbate geologic hazards by being located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and Project impacts would be less than significant.

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

Less Than Significant Impact. Based on the Geotechnical Investigation prepared for the Project Site, soils at the Project Site are considered to have a low to medium expansive potential and are classified as "expansive" in accordance with the 2022 CBC Section 1803.5.3.[45] Construction of the Project would be required to adhere to the CBC and LABC, as well as the applicable recommendations provided in the geotechnical investigation required by the City to minimize impacts with respect to expansive soils. Adherence to current building codes and engineering practices would ensure that the Project would not cause or exacerbate geologic hazards, and impacts with respect to expansive soils would be less than significant.

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 Project Site is located within a community served by existing sewage infrastructure. The Project would connect to the City's existing sewer system and would not require the use of septic tanks or alternative wastewater disposal systems. Thus, the Project would not result in any impacts related to soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available

[44] Geotechnical Investigation, Geocon West, January 12, 2023, page 4.

[45] Geotechnical Investigation, Geocon West, January 12, 2023, page 18.

for the disposal of wastewater. Therefore, no impacts related to this issue would occur as a result of the Project.

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

Less Than Significant with Mitigation Incorporated. A project-related significant adverse effect could occur if grading or excavation activities associated with the Project would disturb paleontological resources or geologic features which presently exist within the Project Site. According to the paleontological resources technical memorandum (included in Appendix E of this IS/MND), SWCA (the preparer of the technical memorandum) determined the paleontological potential of the geologic units underlying the Project area. Recent to late Holocene artificial fill likely exists within the Project area as a thin veneer, overlying previously undisturbed sedimentary deposits. Artificial fill has the potential to yield paleontological resources; however, any such fossil has been removed from its original stratigraphic context (provenance). Therefore, artificial fill has a low paleontological sensitivity based on Society of Vertebrate Paleontology (SVP) (2010) guidelines. Based on SVP (2010) guidelines and definition of significant paleontological resources, late to middle Pleistocene old alluvial fan deposits and late Miocene Modelo Formation, which both underlie the artificial fill at unknown, but likely very shallow depths, have a high paleontological sensitivity. In summary, the overall Project area has a low paleontological sensitivity in the uppermost disturbed sediments and a high paleontological sensitivity in the underlying, previously undisturbed sediments. The depth to the previously undisturbed sediments within the Project area is likely very shallow based on the local topography of the existing built environment.

The changes to the Main Campus include a partial demolition of existing structures and the addition of a new administrative, multi-purpose, and classroom building, as well as the renovation of existing offices and the addition of electric vehicle parking and charging stations. The expansion to the North Campus includes the development of a proposed athletic field pool house, locker rooms, and proposed building to house restrooms and concessions. The balance of the North Campus site would include a proposed new soccer and baseball field, a new pool, and two new proposed surface parking lots. Based on the features of the Project, substantial ground-disturbing activities are anticipated to impact previously undisturbed sediments underlying the artificial fill present as a veneer across the Project Site. The depth to the underlying, previously undisturbed sediments is unknown, but likely very shallow (e.g., three feet below ground surface). Project-related ground-disturbing activities are likely to exceed the depth of the artificial fill and impact the underlying previously undisturbed geologic units of high paleontological sensitivity. Therefore, fossils may be encountered during the ground-disturbing activities. Should significant fossils be encountered, they would be at risk for damage or destruction from construction activities, which would constitute a significant impact. Therefore, the Project would be required to implement Mitigation Measure GEO-1, which would ensure that impacts with respect to paleontological resources are less than significant.

Mitigation Measure

GEO-1 The Project Applicant shall implement the following best practices with respect to paleontology:

- **Retain a Qualified Professional Paleontologist:** The Project Applicant shall retain a Qualified Professional Paleontologist (Project Paleontologist), who meets or exceeds the SVP standards, to oversee all regulatory compliance measures and protocols related to paleontological resources.

- **Conduct Worker Training:** The Project Paleontologist should develop a Worker Environmental Awareness Program (WEAP) to train the construction crew on the legal requirements for preserving fossil resources, as well as the procedures to follow in the event of a fossil discovery. This training program would be given to the crew before ground-disturbing work commences and would include handouts to be given to new workers as needed.

- **Monitor for Paleontological Resources:** Ground disturbances greater than or equal to 3 feet below ground surface with the potential to impact late to middle Pleistocene old alluvial fan deposits (Qof) and/or late Miocene Modelo Formation (Tm) should be monitored full-time. Monitoring should be reduced or ceased once over-excavations into the underlying previously undisturbed deposits have been completed, or if Recent to late Holocene artificial fill (Qaf) is the only geologic units encountered during earthwork activities. Ground disturbances in previously disturbed sediments should not be monitored, regardless of depth.

  Monitoring should be conducted by a paleontological monitor who meets the standards of the SVP (2010) working under the supervision of the Project Paleontologist. The Project Paleontologist may periodically inspect construction activities to adjust the level of monitoring in response to subsurface conditions. In consultation with the lead agency and the Project Applicant, monitoring efforts can be increased, reduced, or ceased entirely if determined adequate by the Project Paleontologist. Paleontological monitoring should include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments. The monitor should have authority to temporarily divert activity away from exposed fossils to evaluate the significance of the find and, should the fossils be determined significant, professionally and efficiently recover the fossil specimens and collect associated data. Paleontological monitors should record pertinent geologic data and collect appropriate sediment samples from any fossil localities.

- **Prepare a Paleontological Resources Monitoring Report:** Upon conclusion of ground-disturbing activities, the Project Paleontologist overseeing paleontological monitoring should prepare a final Paleontological Resources Monitoring Report

(PRMR) that documents the paleontological monitoring efforts for the Project and describes any paleontological resources discoveries observed and/or recorded during the life of the Project. If paleontological resources are curated, the final PRMR and any associated data pertinent to the curated specimen(s) should be submitted to the designated repository. A copy of the final PRMR should be filed with the lead agency.

Cumulative Impacts

Geotechnical impacts related to future development in the City involve site-specific soil conditions, erosion, and ground-shaking during earthquakes. The impacts on each site are specific to that site and its users and would not be in common or contribute to (or shared with, in an additive sense) the impacts on other sites. While no related projects have been identified within one-half mile of the Project Site, development on each site is subject to uniform site development as well as CBC and LABC construction standards that are designed to protect public safety. Like the Project, it is assumed that any other development projects would be required to comply with CBC and LABC construction standards and requirements. Impacts with respect to paleontological resources are also assessed on a site-by-site basis. All development in the City (including the Project and any other development projects) that includes ground-disturbing activities is required to adhere to existing State and City regulations and/or any required mitigation measures related to the discovery of paleontological resources. For these reasons, cumulative impacts related to geology and soils would be less than significant.

VIII. GREENHOUSE GAS EMISSIONS

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

The analysis in this section is based on the following, which is included in Appendix B of this IS/MND:

- Air Quality and Greenhouse Gas Emissions Technical Modeling, Noah Tanski Environmental Consulting, May 2023.

Climate Change Background

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and storms. Global warming, a related concept, is the observed increase in average temperature of Earth's surface and atmosphere. One identified cause of global warming is an increase of GHG emissions in the atmosphere. GHG emissions are those compounds in Earth's atmosphere that play a critical role in determining Earth's surface temperature.

Earth's natural warming process is known as the "greenhouse effect." It is called the greenhouse effect because Earth and the atmosphere surrounding it are similar to a greenhouse with glass panes in that the glass allows solar radiation (sunlight) into Earth's atmosphere but prevents radiative heat from escaping, thus warming Earth's atmosphere. Some levels of GHG emissions keep the average surface temperature of Earth close to a hospitable 60 degrees Fahrenheit. However, it is believed that excessive concentrations of anthropogenic GHG emissions in the atmosphere can result in increased global mean temperatures, with associated adverse climatic and ecological consequences.

GHG Emissions Background

GHG emissions include CO_2, methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3).[46] Carbon dioxide is the most abundant GHG. Other GHG emissions are less abundant but have greater global warming potential than CO_2. Thus, emissions of other GHGs are frequently expressed in their equivalent mass of CO_2, denoted as CO_2e. Forest fires, decomposition, industrial processes, landfills, and the consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions.

Regulatory Framework

There are any number of agreements, strategies, policies, regulations, and standards that relate to GHG emissions – from international climate accords to local climate action plans (CAPs). Below is a discussion of (1) the plans, policies, and regulations (collectively, the "Applicable GHG Regulations") that are fundamental to determining whether the Project would have a significant impact on GHG emissions, and (2) the existing conditions under the Applicable GHG Regulations.

State

The State legislature, executive office, and administrative agencies have promulgated several rules that govern GHG emissions. Below is a timeline thereof, followed by explanations of each:

- June 2005: Executive Order S-3-05 (EO S-3-05)
- September 2005: Assembly Bill 32 (AB 32) (codified EO S-3-05)
- August 2007: Senate Bill 97 (SB 97)
- September 2008: Senate Bill 375 (SB 375)
- December 2008: CARB adopts Climate Change Scoping Plan (the "AB 32 Scoping Plan")
- August 2011: CARB adopts Supplemental Functional Equivalent Document to the Climate Change Scoping Plan (the "Supplemental FED")
- May 2014: CARB adopts First Update to the Climate Change Scoping Plan: Building on the Framework (the "First Update")
- April 2015: Executive Order B-30-15 (EO B-30-15)
- September 2016: Senate Bill 32 (SB 32) (codified EO B-30-15)
- November 2017: CARB adopts the 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target (the "2017 Scoping Plan")
- September 2018: Executive Order B-55-18 (EO B-55-18)
- September 2022: Assembly Bill 1297 (AB 1297) (codified EO B-55-18)

[46] As defined by California Assembly Bill (AB) 32 and Senate Bill (SB) 104.

- November 2022: CARB adopts the 2022 Scoping Plan for Achieving Carbon Neutrality (the "2022 Scoping Plan")

Other regulations would also have an indirect effect on the Project's GHG emissions. The Project's relation to the following regulations would not be determinative of its CEQA significance. Nevertheless, explanations of these regulations are also provided below for informational purposes:

- SB 350, the Clean Energy and Efficiency Act of 2015
- Cap-and-Trade Program

EO S-3-05

In June 2005, Governor Arnold Schwarzenegger signed EO-S-3-05, which had the goal of reducing the State's GHG emissions to 2000 levels by 2010, to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.

AB 32

In September 2005, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, AB 32, into law. AB 32 committed the State to achieving the following:

- By 2010, reduce statewide GHG emissions to 2000 levels.[47]
- By 2020, reduce statewide GHG emissions to 1990 levels.

AB 32 required CARB to adopt rules and regulations that achieve the maximum technologically feasible and cost-effective GHG emissions reductions. The State achieved its 2020 GHG emissions target of returning to 1990 levels four years earlier than mandated by AB 32.

SB 97

Passed in August 2007, SB 97 required the State Office of Planning and Research (OPR) to prepare and develop CEQA guidelines for the effects and/or mitigation of GHG emissions, including effects associated with transportation and energy consumption. Subsequently, the Draft Guidelines Amendments for Greenhouse Gas Emissions (the "Guidelines Amendments") were adopted in December 2009 to address the specific obligations of public agencies when analyzing GHG emissions to determine a project's effect on the environment, as pursuant to CEQA.

The Guidelines Amendments do not provide thresholds of significance or any specific mitigation measures; rather, they require a lead agency to make a good-faith effort to describe, calculate, or estimate the amount of GHG emissions that would result from a project, to the extent possible based on scientific and factual data. The Guidelines Amendments give discretion to the lead

[47] The 2010 target to reduce GHG emissions to 2000 levels was not met.

agency whether to (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use, or (2) rely on a qualitative analysis or performance-based standards. Additionally, three factors that should be considered in the evaluation of the significance of GHG emissions are identified:

(1) The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;

(2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and

(3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The administrative record for the Guidelines Amendments also clarifies "that the effects of greenhouse gas emissions are cumulative and should be analyzed in the context of CEQA's requirements for the cumulative impact analysis."[48]

The California Natural Resources Agency is required to periodically update the Guidelines Amendments to incorporate new information or criteria established by CARB pursuant to AB 32. SB 97 applies to any environmental impact report (EIR), negative declaration, mitigated negative declaration, or other document requirement by CEQA.

SB 375

In September 2008, Governor Schwarzenegger signed SB 375, the Sustainable Communities and Climate Protection Act of 2008, to align regional planning for housing and transportation with the GHG reduction goals outlined by AB 32. SB 375 requires each Metropolitan Planning Organization (MPO) to adopt a Sustainable Community Strategy (SCS) encouraging compact development that reduces passenger VMT and trips, all for the purpose of meeting CARB-determined regional GHG emissions reduction targets.

EO B-30-15

In April 2015, Governor Brown promulgated EO B-30-15, which had the goal of reducing the State's GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050.

[48] Letter from Cynthia Bryant, Director of the Governor's Office of Planning and Research, to Mike Chrisman, California Secretary for Natural Resources, dated 13 April 2009.

SB 32

Signed in September 2016 by Governor Jerry Brown, SB 32 updates AB 32 to include an emissions reduction goal for the year 2030. Specifically, SB 32 requires CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. New goals outlined in SB 32 update AB 32's scoping plan requirement and involve increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

EO B-55-18

On September 10, 2018, Governor Jerry Brown issued EO B-55-18, which established a target for California to achieve carbon net neutrality by 2045. EO B-55-18 identifies the statewide goal to achieve and maintain carbon neutrality as soon as possible, and no later than 2045.

AB 1297

Governor Gavin Newsom codified the goals outlined in EO-B-55-18 in September 2022 when he signed AB 1279. It requires the state to reduce statewide anthropogenic GHG emissions to at least 85 percent below 1990 levels and to maintain net negative GHG emissions thereafter. AB 1279 tasks CARB with monitoring and regulating GHG emissions to achieve this goal. AB 1297 represents the State's latest – and most stringent – GHG reduction target.

SB 350

SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. The objectives of SB 350 are: (1) to increase the procurement of electricity from renewable resources from 33 percent to 50 percent by 2030, and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.[49]

Cap-and-Trade Program

The Scoping Plans identify the Cap-and-Trade Program as one of the strategies California will employ to reduce GHG emissions. Under Cap-and-Trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap are able to trade permits to emit GHGs. CARB designed and adopted the California Cap-and-Trade Project pursuant to its authority under AB 32.

Climate Change Scoping Plans

The Scoping Plan is a GHG reduction roadmap developed and updated by CARB at least once every five years, as required by AB 32. It lays out the transformations needed across various

[49] Senate Bill 350 (2015-2016 Re. Session) Stats 2015, ch. 547.

sectors to reduce GHG emissions and reach the State's climate targets. CARB published the 2022 Scoping Plan Update in November 2022, as the third update to the initial plan that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 target of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below business as usual activities. The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for using multiple tools to meet California's GHG targets. The 2013 Scoping Plan Update (adopted in 2014) assessed progress toward achieving the 2020 target and made the case for addressing short-lived climate pollutants (SLCPs). The 2017 Scoping Plan Update shifted focus to the newer SB 32 goal of a 40 percent below 1990 levels by 2030 by laying out a detailed cost-effective and technologically feasible path to this target, and also assessed progress towards achieving the AB 32 goal of returning to 1990 GHG levels by 2020. The 2020 goal was ultimately reached in 2016, four years ahead of the schedule called for under AB 32.

The 2022 Scoping Plan is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible, cost-effective, and equity-focused path to achieve the aforementioned targets, while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan. The 2030 target is an interim but important stepping stone along the critical path to the broader goal of deep decarbonization by 2045. The relatively longer path assessed in the 2022 Scoping Plan incorporates, coordinates, and leverages many existing and ongoing efforts to reduce GHGs and air pollution, while identifying new clean technologies and energy. Given the focus on carbon neutrality, the 2022 Scoping Plan also includes discussion for the first time of the natural and working lands sectors as sources for both sequestration and carbon storage, and as sources of emissions as a result of wildfires.

Table VIII-1
Estimated Statewide GHG Emissions Reductions in the 2022 Scoping Plan

Emissions Scenario	GHG Emissions ($MMTCO_2e$)
2019	
2019 State GHG Emissions	404
2030	
2030 BAU Forecast	312
2030 GHG Emissions without Carbon Removal and Capture	233
2030 GHG Emissions with Carbon Removal and Capture	226
2030 Emissions Target Set by AB 32 (i.e., 1990 level by 2030)	260
Reduction below BAU necessary to achieve 1990 levels by 2030	52 (16.7%)[A]
2045	
2045 BAU Forecast	266
2045 GHG Emissions without Carbon Removal and Capture	72
2045 GHG Emissions with Carbon Removal and Capture	(3)
Notes:	

$MMTCO_2e$ = million metric tons of carbon dioxide equivalents; parenthetical numbers represent negative values.

[A] 312 – 260 = 52. 52 / 312 = 16.7%

Source: CARB, Final 2022 Climate Change Scoping Plan, November 2022.

The 2022 Scoping Plan Update reflects existing and recent direction in the Governor's Executive Orders and State Statutes, which identify policies, strategies, and regulations in support of and implementation of the Scoping Plan. Among these include Executive Order B-55-18 and AB 1279 (The California Climate Crisis Act), which identify the 2045 carbon neutrality and GHG reduction targets required for the Scoping Plan.

Table VIII-2 provides a summary of major climate legislation and executive orders issued since the adoption of the 2017 Scoping Plan.

Table VIII-2
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan

Bill/Executive Order	Summary
Assembly Bill 1279 (AB 1279) (Muratsuchi, Chapter 337, Statutes of 2022) *The California Climate Crisis Act*	AB 1279 establishes the policy of the state to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. The bill requires CARB to ensure that the Scoping Plan updates identify and recommend measures to achieve carbon neutrality, and to identify and implement policies and strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage (CCUS) technologies. This bill is reflected directly in the 2022 Scoping Plan Update.
Senate Bill 905 (SB 905) (Caballero, Chapter 359, Statutes of 2022) *Carbon Capture, Removal, Utilization, and Storage Program*	SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate CCUS and carbon dioxide removal (CDR) projects and technology. The bill requires CARB, on or before January 1, 2025, to adopt regulations creating a unified state permitting application for approval of CCUS and CDR projects. The bill also requires the Secretary of the Natural Resources Agency to publish a framework for governing agreements for two or more tracts of land overlying the same geologic storage reservoir for the purposes of a carbon sequestration project. The 2022 Scoping Plan Update modeling reflects both CCUS and CDR contributions to achieve carbon neutrality.
Senate Bill 846 (SB 846) (Dodd, Chapter 239, Statutes of 2022) *Diablo Canyon Powerplant: Extension of Operations*	SB 846 extends the Diablo Canyon Power Plant's sunset date by up to five additional years for each of its two units and seeks to make the nuclear power plant eligible for federal loans. The bill requires that the California Public Utilities Commission (CPUC) not include and disallow a load-serving entity from

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Bill/Executive Order	Summary
	including in their adopted resource plan, the energy, capacity, or any attribute from the Diablo Canyon power plant. The 2022 Scoping Plan Update explains the emissions impact of this legislation.
Senate Bill 1020 (SB 1020) (Laird, Chapter 361, Statutes of 2022) *Clean Energy, Jobs, and Affordability Act of 2022*	SB 1020 adds interim renewable energy and zero carbon energy retail sales of electricity targets to California end-use customers set at 90 percent in 2035 and 95 percent in 2040. It accelerates the timeline required to have 100 percent renewable energy and zero carbon energy procured to serve state agencies from the original target year of 2045 to 2035. This bill requires each state agency to individually achieve the 100 percent goal by 2035 with specified requirements. This bill requires the CPUC, California Energy Commission (CEC), and CARB, on or before December 1, 2023, and annually thereafter, to issue a joint reliability progress report that reviews system and local reliability. The bill also modifies the requirement for CARB to hold a portion of its Scoping Plan workshops in regions of the state with the most significant exposure to air pollutants by further specifying that this includes communities with minority populations or low-income communities in areas designated as being in extreme federal non-attainment. The 2022 Scoping Plan Update describes the implications of this legislation on emissions.
Senate Bill 1137 (SB 1137) (Gonzales, Chapter 365, Statutes of 2022) *Oil & Gas Operations: Location Restrictions: Notice of Intention: Health protection zone: Sensitive receptors*	SB 1137 prohibits the development of new oil and gas wells or infrastructure in health protection zones, as defined, except for purposes of public health and safety or other limited exceptions. The bill requires operators of existing oil and gas wells or infrastructure within health protection zones to undertake specified monitoring, public notice, and nuisance requirements. The bill requires CARB to consult and concur with the California Geologic Energy Management Division (CalGEM) on leak detection and repair plans for these facilities, adopt regulations as necessary to implement emission detection system standards, and collaborate with CalGEM on public access to emissions detection data.
Senate Bill 1075 (SB 1075) (Skinner, Chapter 363, Statutes of 2022) *Hydrogen: Green Hydrogen: Emissions of Greenhouse Gases*	SB 1075 requires CARB, by June 1, 2024, to prepare an evaluation that includes: policy recommendations regarding the use of hydrogen, and specifically the use of green hydrogen, in California; a description of strategies supporting hydrogen infrastructure, including identifying policies that promote the reduction of GHGs and short-lived climate pollutants; a description of other forms of hydrogen to achieve emission reductions; an analysis of curtailed electricity; an estimate of GHG and emission reductions that could be achieved through deployment of green hydrogen through a variety of scenarios; an analysis of the potential for opportunities to integrate hydrogen production and applications with drinking water supply

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Bill/Executive Order	Summary
	treatment needs; policy recommendations for regulatory and permitting processes associated with transmitting and distributing hydrogen from production sites to end uses; an analysis of the life-cycle GHG emissions from various forms of hydrogen production; and an analysis of air pollution and other environmental impacts from hydrogen distribution and end uses. This bill would inform the production of hydrogen at the scale called for in the 2022 Scoping Plan Update.
Assembly Bill 1757 (AB 1757) (Garcia, Chapter 341, Statutes of 2022) *California Global Warming Solutions Act of 2006: Climate Goal: Natural and Working Lands*	AB 1757 requires the California Natural Resources Agency (CNRA), in collaboration with CARB, other state agencies, and an expert advisory committee, to determine a range of targets for natural carbon sequestration, and for nature-based climate solutions, that reduce GHG emissions in 2030, 2038, and 2045 by January 1, 2024. These targets must support state goals to achieve carbon neutrality and foster climate adaptation and resilience. This bill also requires CARB to develop standard methods for state agencies to consistently track GHG emissions and reductions, carbon sequestration, and additional benefits from natural and working lands over time. These methods will account for GHG emissions reductions of CO2, methane, and nitrous oxide related to natural and working lands and the potential impacts of climate change on the ability to reduce GHG emissions and sequester carbon from natural and working lands, where feasible. This 2022 Scoping Plan Update describes the next steps and implications of this legislation for the natural and working lands sector.
Senate Bill 1206 (SB 1206) (Skinner, Chapter 884, Statutes of 2022) *Hydrofluorocarbon gases: sale or distribution*	SB 1206 mandates a stepped sales prohibition on newly produced high- global warming potential (GWP) HFCs to transition California's economy toward recycled and reclaimed HFCs for servicing existing HFC-based equipment. Additionally, SB 1206 also requires CARB to develop regulations to increase the adoption of very low-, i.e., GWP < 10, and no-GWP technologies in sectors that currently rely on higher-GWP HFCs.
Senate Bill 27 (SB 27) (Skinner, Chapter 237, Statutes of 2021) *Carbon Sequestration: State Goals: Natural and Working Lands: Registry of Projects*	SB 27 requires CNRA, in coordination with other state agencies, to establish the Natural and Working Lands Climate Smart Strategy by July 1, 2023. This bill also requires CARB to establish specified CO2 removal targets for 2030 and beyond as part of its Scoping Plan. Under SB 27, CNRA is to establish and maintain a registry to identify projects in the state that drive climate action on natural and working lands and are seeking funding. CNRA also must track carbon removal and GHG emission reduction benefits derived from projects funded through the registry.

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Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan

Bill/Executive Order	Summary
	This bill is reflected directly in the 2022 Scoping Plan Update as CO2 removal targets for 2030 and 2045 in support of carbon neutrality.
Senate Bill 596 (SB 596) (Becker, Chapter 246, Statutes of 2021) *Greenhouse Gases: Cement Sector: Net- zero Emissions Strategy*	SB 596 requires CARB, by July 1, 2023, to develop a comprehensive strategy for the state's cement sector to achieve net-zero-emissions of GHGs associated with cement used within the state as soon as possible, but no later than December 31, 2045. The bill establishes an interim target of 40 percent below the 2019 average GHG intensity of cement by December 31, 2035. Under SB 596, CARB must: • Define a metric for GHG intensity and establish a baseline from which to measure GHG intensity reductions. • Evaluate the feasibility of the 2035 interim target (40 percent reduction in GHG intensity) by July 1, 2028. • Coordinate and consult with other state agencies. • Prioritize actions that leverage state and federal incentives. • Evaluate measures to support market demand and financial incentives to encourage the production and use of cement with low GHG intensity. The 2022 Scoping Plan Update modeling is designed to achieve these outcomes.
Executive Order N-82-20	Governor Newsom signed Executive Order N-82-20 in October 2020 to combat the climate and biodiversity crises by setting a statewide goal to conserve at least 30 percent of California's land and coastal waters by 2030. The Executive Order also instructed the CNRA, in consultation with other state agencies, to develop a Natural and Working Lands Climate Smart Strategy that serves as a framework to advance the state's carbon neutrality goal and build climate resilience. In addition to setting a statewide conservation goal, the Executive Order directed CARB to update the target for natural and working lands in support of carbon neutrality as part of this Scoping Plan, and to take into consideration the NWL Climate Smart Strategy. CO2 Executive Order N-82-20 also calls on the CNRA, in consultation with other state agencies, to establish the California Biodiversity Collaborative (Collaborative). The Collaborative shall be made up of governmental partners, California Native American tribes, experts, business and community leaders, and other stakeholders from across the state. State agencies will consult the Collaborative on efforts to: • Establish a baseline assessment of California's biodiversity that builds upon existing data and can be updated over time. • Analyze and project the impact of climate change and other stressors in California's biodiversity.

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Bill/Executive Order	Summary
	• Inventory current biodiversity efforts across all sectors and highlight opportunities for additional action to preserve and enhance biodiversity. CNRA also is tasked with advancing efforts to conserve biodiversity through various actions, such as streamlining the state's process to approve and facilitate projects related to environmental restoration and land management. The California Department of Food and Agriculture (CDFA) is directed to advance efforts to conserve biodiversity through measures such as reinvigorating populations of pollinator insects, which restore biodiversity and improve agricultural production. The Natural and Working Lands Climate Smart Strategy informs the 2022 Scoping Plan Update.
Executive Order N-79-20	Governor Newsom signed Executive Order N-79-20 in September 2020 to establish targets for the transportation sector to support the state in its goal to achieve carbon neutrality by 2045. The targets established in this Executive Order are: • 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035. • 100 percent of medium- and heavy-duty vehicles will be zero-emission by 2045 for all operations where feasible, and by 2035 for drayage trucks. • 100 percent of off-road vehicles and equipment will be zero-emission by 2035 where feasible. The Executive Order also tasked CARB to develop and propose regulations that require increasing volumes of zero- electric passenger vehicles, medium- and heavy-duty vehicles, drayage trucks, and off-road vehicles toward their corresponding targets of 100 percent zero-emission by 2035 or 2045, as listed above. The 2022 Scoping Plan Update modeling reflects achieving these targets.
Executive Order N-19-19	Governor Newsom signed Executive Order N-19-19 in September 2019 to direct state government to redouble its efforts to reduce GHG emissions and mitigate the impacts of climate change while building a sustainable, inclusive economy. This Executive Order instructs the Department of Finance to create a Climate Investment Framework that: • Includes a proactive strategy for the state's pension funds that reflects the increased risks to the economy and physical environment due to climate change. • Provides a timeline and criteria to shift investments to companies and industry sectors with greater growth potential based on their focus of reducing carbon emissions and adapting to the impacts of climate change.

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Bill/Executive Order	Summary
	• Aligns with the fiduciary responsibilities of the California Public Employees' Retirement System, California State Teachers' Retirement System, and the University of California Retirement Program. Executive Order N-19-19 directs the State Transportation Agency to leverage more than $5 billion in annual state transportation spending to help reverse the trend of increased fuel consumption and reduce GHG emissions associated with the transportation sector. It also calls on the Department of General Services to leverage its management and ownership of the state's 19 million square feet in managed buildings, 51,000 vehicles, and other physical assets and goods to minimize state government's carbon footprint. Finally, it tasks CARB with accelerating progress toward California's goal of five million ZEV sales by 2030 by: • Developing new criteria for clean vehicle incentive programs to encourage manufacturers to produce clean, affordable cars. • Proposing new strategies to increase demand in the primary and secondary markets for ZEVs. • Considering strengthening existing regulations or adopting new ones to achieve the necessary GHG reductions from within the transportation sector. The 2022 Scoping Plan Update modeling reflects efforts to accelerate ZEV deployment.
Senate Bill 576 (SB 576) (Umberg, Chapter 374, Statutes of 2019) *Coastal Resources: Climate Ready Program and Coastal Climate Change Adaptation, Infrastructure and Readiness Program*	Sea level rise, combined with storm-driven waves, poses a direct risk to the state's coastal resources, including public and private real property and infrastructure. Rising marine waters threaten sensitive coastal areas, habitats, the survival of threatened and endangered species, beaches, other recreation areas, and urban waterfronts. SB 576 mandates that the Ocean Protection Council develop and implement a coastal climate adaptation, infrastructure, and readiness program to improve the climate change resiliency of California's coastal communities, infrastructure, and habitat. This bill also instructs the State Coastal Conservancy to administer the Climate Ready Program, which addresses the impacts and potential impacts of climate change on resources within the conservancy's jurisdiction.
Assembly Bill 65 (AB 65) (Petrie-Norris, Chapter 347, Statutes of 2019) *Coastal Protection: Climate Adaption: Project Prioritization: Natural Infrastructure: Local General Plans*	This bill requires the State Coastal Conservancy, when it allocates any funding appropriated pursuant to the California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access For All Act of 2018, to prioritize projects that use natural infrastructure in coastal communities to help adapt to climate change. The bill requires the conservancy to provide information to the Office of Planning and Research on any projects funded pursuant to the above provision to be considered for inclusion into the clearinghouse for climate

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Bill/Executive Order	Summary
	adaptation information. The bill authorizes the conservancy to provide technical assistance to coastal communities to better assist them with their projects that use natural infrastructure.
Executive Order B-55-18	Governor Brown signed Executive Order B-55-18 in September 2018 to establish a statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and to achieve and maintain net negative emissions thereafter. Policies and programs undertaken to achieve this goal shall: a. Seek to improve air quality and support the health and economic resiliency of urban and rural communities, particularly low-income and disadvantaged communities. b. Be implemented in a manner that supports climate adaptation and biodiversity, including protection of the state's water supply, water quality, and native plants and animals. This Executive Order also calls for CARB to: • Develop a framework for implementation and accounting that tracks progress toward this goal. • Ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The 2022 Scoping Plan Update is designed to achieve carbon neutrality no later than 2045 and the modeling includes technology and fuel transitions to achieve that outcome.
Senate Bill 100 (SB 100) (De León, Chapter 312, Statutes of 2018) *California Renewables Portfolio Standard Program: emissions of greenhouse gases*	Under SB 100, the CPUC, CEC, and CARB shall use programs under existing laws to achieve 100 percent clean electricity. The statute requires these agencies to issue a joint policy report on SB 100 every four years. The first of these reports was issued in 2021. The 2022 Scoping Plan Update reflects the SB 100 Core Scenario resource mix with a few minor updates.
Assembly Bill 2127 (AB 2127) (Ting, Chapter 365, Statutes of 2018) *Electric Vehicle Charging Infrastructure: Assessment*	This bill requires the CEC, working with CARB and the CPUC, to prepare and biennially update a statewide assessment of the electric vehicle charging infrastructure needed to support the levels of electric vehicle adoption required for the state to meet its goals of putting at least 5 million zero-emission vehicles on California roads by 2030 and of reducing emissions of GHGs to 40 percent below 1990 levels by 2030. The bill requires the CEC to regularly seek data and input from stakeholders relating to electric vehicle charging infrastructure. This bill supports the deployment of ZEVs as modeled in the 2022 Scoping Plan Update.
Senate Bill 30 (SB 30) (Lara, Chapter 614, Statutes of 2018)	This bill requires the Insurance Commissioner to convene a working group to identify, assess, and recommend risk transfer market mechanisms that, among other things, promote

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Bill/Executive Order	Summary
Insurance: Climate Change	investment in natural infrastructure to reduce the risks of climate change related to catastrophic events, create incentives for investment in natural infrastructure to reduce risks to communities, and provide mitigation incentives for private investment in natural lands to lessen exposure and reduce climate risks to public safety, property, utilities, and infrastructure. The bill requires the policies recommended to address specified questions.
Assembly Bill 2061 (AB 2061) (Frazier, Chapter 580, Statutes of 2018) *Near-zero-emission and Zero-emission Vehicles*	Existing state and federal law set specified limits on the total gross weight imposed on the highway by a vehicle with any group of two or more consecutive axles. Under existing federal law, the maximum gross vehicle weight of that vehicle may not exceed 82,000 pounds. AB 2061 authorizes a near-zero-emission vehicle or a zero-emission vehicle to exceed the weight limits on the power unit by up to 2,000 pounds. This bill supports the deployment of cleaner trucks as modeled in the 2022 Scoping Plan Update.

The 2022 Scoping Plan scenario identifies the need to accelerate AB 32's 2030 target, from 40 percent to 48 percent below 1990 levels. Cap-and-Trade regulation continues to play a large factor in the reduction of near-term emissions for meeting the 2030 reduction target. Every sector of the economy will need to begin to transition in this decade to meet these GHG reduction goals and achieve carbon neutrality no later than 2045. The 2022 Scoping Plan approaches decarbonization from two perspectives, managing a phasedown of existing energy sources and technologies, as well as increasing, developing, and deploying alternative clean energy sources and technology. The Scoping Plan scenario is summarized in Table 2-1 (starting on page 72) of the 2022 Scoping Plan. It includes references to relevant statutes and Executive Orders, although it is not comprehensive of all existing new authorities for directing or supporting the actions described. Table 2-1 identifies actions related to a variety of sectors such as: smart growth and reductions in VMT; light-duty vehicles (LDV) and zero-emission vehicles (ZEV); truck ZEVs; reduce fossil energy, emissions, and GHGs for aviation, ocean-going vessels, port operations, freight and passenger rail, oil and gas extraction; and petroleum refining; improvements in electricity generation; electrical appliances in new and existing residential and commercial buildings; electrification and emission reductions across industries such as for food products, construction equipment, chemicals and allied products, pulp and paper, stone/clay/glass/cement, other industrial manufacturing, and agriculture; retiring of combined heat and power facilities; low carbon fuels for transportation, business, and industry; improvements in non-combustion methane emissions, and introduction of low GWP refrigerants.

Achieving the targets described in the 2022 Scoping Plan will require continued commitment to and successful implementation of existing policies and programs, and identification of new policy tools and technical solutions to go further, faster. California's Legislature and state agencies will continue to collaborate to achieve the state's climate, clean air, equity, and broader economic and environmental protection goals. It will be necessary to maintain and strengthen this collaborative effort, and to draw upon the assistance of the federal government, regional and local governments, tribes, communities, academic institutions, and the private sector to achieve the state's near-term and longer-term emission reduction goals and a more equitable future for all Californians. The Scoping Plan acknowledges that the path forward is not dependent on one agency, one state, or even one country. However, the State can lead by engaging Californians and demonstrating how actions at the state, regional, and local levels of governments, as well as action at community and individual levels, can contribute to addressing the challenge.

Aligning local jurisdiction action with state-level priorities to tackle climate change and the outcomes called for in the 2022 Scoping Plan is identified as critical to achieving the statutory targets for 2030 and 2045. The 2022 Scoping Plan discusses the role of local governments in meeting the State's GHG reductions goals. Local governments have the primary authority to plan, zone, approve, and permit how and where land is developed to accommodate population growth, economic growth, and the changing needs of their jurisdictions. They also make critical decisions on how and when to deploy transportation infrastructure, and can choose to support transit, walking, bicycling, and neighborhoods that do not force people into cars. Local governments also have the option to adopt building ordinances that exceed statewide building code requirements and play a critical role in facilitating the rollout of ZEV infrastructure. As a result, local government decisions play a critical role in supporting state-level measures to contain the growth of GHG emissions associated with the transportation system and the built environment – the two largest GHG emissions sectors over which local governments have authority. The City has taken the initiative in combating climate change by developing programs and regulations such as:

- Green New Deal
- Green Building Code
- City of Los Angeles All-Electric Buildings
- General Plan Housing Element (Housing Needs Assessment)
- Mobility Plan 2035

These programs and regulations are discussed below under the section for local GHG regulatory framework.

Regional

2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

In September 2008 Governor Arnold Schwarzenegger signed the Sustainable Communities and Climate Protection Act of 2008, also known as SB 375, to align regional planning for housing and transportation with the GHG emissions reduction goals outlined by AB 32. SB 375 requires each MPO to adopt an SCS encouraging compact development that reduces passenger VMT and trips, all for the purpose of meeting CARB-determined regional GHG emissions reduction targets.

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development, and the environment. As the federally designated MPO for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and state air quality plan goals to attain NAAQS. SCAG is also a co-producer, with the SCAQMD, of the transportation strategy and transportation control measure sections of the Basin's AQMP.

CARB set GHG emissions reduction targets of 8 percent by 2020 and 19 percent by 2035 (compared with 2005 levels) for the SCAG region, effective as of October 1, 2018. Adopted on September 3, 2020, SCAG's long-range plan, the 2020-2045 RTP/SCS serves as the roadmap to fulfilling the region's compliance with these latest GHG reduction targets. To this end, the 2020-2045 RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked and acknowledges how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region.

The 2020-2045 RTP/SCS land use pattern continues the trend of focusing new housing and employment growth in the region's high quality transit areas (HQTAs) and aims to enhance and build out the region's transit network. At the time of the previous 2016-2040 RTP/SCS, HQTAs accounted for just 3 percent of total land in the SCAG region, but they are projected to accommodate 46 percent of the region's future household growth and 55 percent of the region's future employment growth by 2040.[50] HQTAs are a cornerstone of land use planning best practice in the SCAG region, and studies by the California Department of Transportation, the US Environmental Protection Agency (USEPA), and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional, and statewide benefits including reduced air pollution and energy consumption. In addition, HQTAs concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability. As a result, HQTAs are vital to the

[50] SCAG, Final 2016-2040 RTP/SCS, April 2017. HQTAs are defined as areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours.

attainment of regional GHG emissions reduction targets: successful implementation of the 2020-2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, reducing automobile use and, crucially, associated GHG emissions.

The SB 375 GHG reduction targets for the SCAG region correspond with reductions in regional VMT per capita. OPR has recommended that achieving 15 percent lower per capita (residential) or per employee (commercial) VMT than existing development is generally feasible and is supported by evidence that connects these reductions to the state's emissions goals.

South Coast Air Quality Management District CEQA Guidance

The City of Los Angeles is located in the South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) is responsible for air quality planning in the Basin and developing rules and regulations to bring the area into attainment of the ambient air quality standards. This is accomplished through air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles.

In 2008, SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds.[51] A GHG Significance Threshold Working Group was formed to further evaluate potential GHG significance thresholds.[52] The SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 $MTCO_2e$ per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 $MTCO_2e$ per year would be assumed to have a less than significant impact on climate change. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 $MTCO_2e$ per year for stationary source/industrial projects where the SCAQMD is the lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects). The Working Group has been inactive since 2011, and SCAQMD has not formally adopted any GHG significance thresholds for other jurisdictions.

Local

City of Los Angeles Green New Deal

In 2007 the City addressed the issue of global climate change by releasing *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* ("LA Green Plan/Climate LA"). This document

[51] SCAQMD, Board Meeting, December 5, 2008. Agenda No. 31, http://www3.aqmd.gov/hb/2008/081231.a.thm. Accessed June 23, 2022.

[52] SCAQMD, Greenhouse Gases CEQA Significance Thresholds, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds. Accessed June 23, 2022.

outlined various goals and actions that the City established to reduce the generation and emissions of GHGs from both public and private activities.

In April 2019, the City released the *Green New Deal* (also referred to as the *Sustainable City Plan 2019*). This program contains actions designed to create sustainability-based performance targets through 2050 that are themselves intended to advance economic, environmental, and equity objectives. It is the first four-year update to the City's first "Sustainable City pLAn" that was released in 2015. It augments, expands, and elaborates the City's vision for a sustainable future and tackles climate change with accelerated targets and new aggressive goals.

Though the *Green New Deal* is not a plan adopted solely to reduce GHG emissions, it lists "Climate Mitigation" (i.e., GHG reduction) as one of eight explicit benefits that help define its strategies and goals. Goals that are directly or indirectly linked to climate mitigation include:

- Reduce potable water use per capita by 22.5 percent by 2025; 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.
- Reduce building energy use per square feet for all building types by 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (from a baseline of 68mBTU/sf in 2015).
- All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.
- Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.
- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; 75 percent by 2050.
- Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides, or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.
- Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.
- Increase the percentage of electric and zero emission vehicles in the city to 25 percent by 2025; 80 percent by 2035; and 100 percent by 2050.
- Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035; and 100 percent by 2050.

- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 pounds of waste generated per capita per day in 2011).

- Eliminate organic waste going to landfills by 2028.

- Reduce the urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035.

- Ensure the proportion of Angelenos living within ½ mile of a park or open space is at least 65 percent by 2025; 75 percent by 2035; and 100 percent by 2050.

City of Los Angeles Green Building Code

In December 2019, the Los Angeles City Council approved Ordinance No. 186,488, which amended Chapter IX of the Los Angeles Municipal Code (LAMC), referred to as the Los Angeles Green Building Code, by adding a new Article 9 to incorporate various provisions of the 2019 CALGreen Code. Projects filed on or after January 1, 2020, must comply with the provisions of the Los Angeles Green Building Code.

City of Los Angeles All-Electric Buildings

Chapter IX of the LAMC requires that all new buildings be all-electric buildings, with few exceptions. Equipment typically powered by natural gas such as space heating, water heating, cooking appliances, and clothes drying would need to be powered by electricity for new construction. Exceptions are made for commercial restaurants, laboratories, and research and development uses. The LAMC is consistent with 2022 Title 24 goals of encouraging all-electric development which requires new residential uses to be electric-ready (wiring installed for all-electric appliances). Buildings in Los Angeles account for 43 percent of greenhouse gas emissions – more than any other sector in the City. These LAMC requirements ensure that new buildings being constructed are built to leverage the increasingly clean electric grid, which is anticipated to be carbon-free by 2035, rather than relying on fossil fuels.

City of Los Angeles General Plan Housing Element (Housing Needs Assessment)

The Housing Element of the City's General Plan is prepared pursuant to state law and provides planning guidance in meeting housing needs identified in the SCAG Regional Housing Needs Assessment (RHNA). The Housing Element identifies the City's housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy, and provides an array of programs the City intends to implement to create and preserve sustainable, mixed-income neighborhoods across the City.

The Housing Needs Assessment chapter of the Housing Element discusses the City's population and housing stock to identify housing needs for a variety of household types across the City. The

current RHNA goal for affordable housing within the City is approximately 40 percent of new construction. However, the City's projections show affordable housing comprising 20 percent of new construction, which falls short of the 40 percent RHNA goal. In order to address this shortfall in affordable housing, the Housing Element provides measures to streamline and incentivize development of affordable housing. Such measures include revising density bonuses for affordable housing; identifying locations which are ideal for funding programs to meet low-income housing goals; and rezoning areas to encourage low-income housing. With implementation of such measures to increase affordable housing, the Housing Element predicts a significant increase in housing production at all income ranges compared to previous cycles.

The Housing Element also promotes sustainability and resilience, and environmental justice through housing, as well as the need to reduce displacement. It encourages the utilization of alternatives to current parking standards that lower the cost of housing, support GHG and VMT goals and recognize the emergence of shared and alternative mobility. The Element also identifies housing strategies for energy conservation, water conservation, alternative energy sources and sustainable development which support conservation and reduce demand.

Mobility Plan 2035

In August 2015, the City Council adopted the Mobility Plan 2035, which serves as the City's General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment in September 2016. The Mobility Plan incorporates "complete streets" principles and lays the foundation for how the City's residents interact with their streets. While the Mobility Plan 2035 mainly relates to transportation, certain components would serve to reduce VMT and mobile source GHG emissions. One component of the Mobility Plan is a GHG emission tracking program to establish compliance with SB 375, AB 32, and the region's Sustainable Community Strategy.

Existing Conditions

Existing Statewide GHG Emissions

CARB reports that in 2019, emissions from GHG emissions statewide were 404 $MMTCO_2e$, 27 $MMTCO_2e$ below the state's 2020 GHG limit of 431 $MMTCO_2e$. The transportation sector was the largest source of GHG emissions, accounting for approximately half of the state's GHG inventory when including upstream transportation emissions from the refinery and oil and gas industrial sectors. The commercial and residential sectors accounted for approximately 10 percent of GHG emissions. Agriculture accounted for approximately 8 percent, and electricity generation accounted for approximately 20 percent. Remaining emissions came from sectors such as non-transportation fuel-related industrial sources, recycling and waste management, and from high global warming potential gases.

In 2021, approximately 52 percent of electricity generation serving California came from renewable and zero-carbon resources (e.g., solar and wind).

Existing Project Site Emissions

The Main Campus site is currently improved with the existing high school and includes educational, athletic, performing arts, administrative, and religious facilities. The North Campus site is developed with a shopping center that contains a grocery store, restaurants, and other commercial uses, as well as surface parking for these uses. Existing GHG emissions related to these uses have been estimated for informational purposes. It is estimated that the high school generates approximately 3,563 $MTCO_2e$ of annual GHG emissions and that the North Campus existing uses generate approximately 3,847 $MTCO_2e$ of annual GHG emissions, for a combined total of 7,410 $MTCO_2e$ of annual GHG emissions.

Thresholds of Significance

The City has adopted the thresholds set forth in Appendix G of the CEQA Guidelines as project-specific thresholds of significance. Pursuant to the Appendix G thresholds, the Project would have a significant impact with respect to GHG emissions if it would:

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?

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

Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), as long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15130(f)). It is noted that the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact less than significant.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved

plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of GHG emissions." Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significant for GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory strategies to reduce GHG emissions.[53]

In the absence of any applicable adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the Project is consistent with applicable regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For this Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the 2020-2045 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers qualitative consistency with regulations or requirements adopted by the 2022 Scoping Plan Update, as well as the City's Green New Deal.

SCAQMD Thresholds

SCAQMD has an interim GHG significance threshold of 10,000 $MTCO_2e$ per year for stationary source/industrial projects where SCAQMD is the lead agency. This SCAQMD interim GHG significance threshold is not applicable to the Project as the Project is not a stationary source or industrial project and the City of Los Angeles is the Lead Agency.

2006 L.A. CEQA Thresholds Guide

The *L.A. CEQA Thresholds Guide* does not identify any factors to evaluate GHG emissions impacts. Thus, the potential for the Project to result in impacts from GHG emissions is based on the Appendix G thresholds.

For the reasons set forth above, to answer both of the above Appendix G thresholds, the City will consider whether the Project is consistent with AB 1279 – the State's latest and most stringent

[53] See for example: San Joaquin Valley Air Pollution Control District, CEQA Determinations of Significance for Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR – 2030 (June 25, 2014), in which the SJVAPCD "determined that GHG emissions increases that are covered under ARB's Cap-and-Trade regulation cannot constitute significant increases under CEQA…" Further, the SCAQMD has taken this position in CEQA documents it has produced as a lead agency. The SCAQMD has prepared three Negative Declarations and one Draft Environmental Impact Report that demonstrate the SCAQMD has applied its 10,000 $MTCO_2e$ per year significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold.

GHG reduction regulation – through demonstration of conformance with the 2020-2045 RTP/SCS, the 2022 Scoping Plan Update, and the Green New Deal.

Methodology

Amendments to CEQA Guidelines Section 15064.4 were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. Consistent with existing CEQA practice, Section 15064.4 gives lead agencies the discretion to determine whether to assess those emissions quantitatively or qualitatively. If a qualitative analysis is used, in addition to quantification, this section recommends certain qualitative factors that may be used in the determination of significance (i.e., the extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs).

The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions and has not formally adopted a local plan for reducing GHG emissions. In addition, neither SCAQMD, OPR, CARB, CAPCOA, nor any other state or regional agency has adopted a numerical significance threshold for assessing GHG emissions that is applicable to the Project. Since there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the Project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG-related impacts on the environment.

For informational purposes, the analysis also estimates the amount of GHG emissions that would be attributable to the Project using recommended air quality models, as described below. The primary purpose of quantifying the Project's GHG emissions is to satisfy the State CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. However, the significance of the Project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the Project.

Consistency with Plans

The Project's GHG impacts are evaluated by assessing the Project's consistency with applicable statewide, regional, and local GHG reduction strategies. As discussed previously, the Project will be evaluated for consistency with the 2020-2045 RTP/SCS, the 2022 Scoping Plan Update, and the Green New Deal.

OPR encourages lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. On a statewide level, the 2022 Scoping Plan Update provides measures to achieve the State's GHG reduction targets. On a regional level, SCAG's 2020-2045 RTP/SCS contains measures to achieve VMT reductions (and

corresponding GHG reductions) required under SB 375. The City does not have a programmatic mitigation plan to tier from, such as a GHG Emissions Reduction Plan as recommended in the relevant amendments to the CEQA Guidelines. However, the City has the Green New Deal and Green Building Code that encourage and require applicable projects to implement energy efficiency measures. The Green New Deal is a mayoral initiative and not an adopted plan. However, it includes short-term and long-term aspirations pertaining to climate change. This analysis addresses consistency with the Green New Deal's strategies and goals. Thus, if the Project is designed in accordance with the 2020-2045 RTP/SCS, the 2022 Scoping Plan Update, and the Green New Deal, the Project would result in a less than significant impact, because it would be consistent with the overarching State regulations on GHG reduction (i.e., SB 375 for the 2020-2045 RTP/SCS and AB 1279 for the 2022 Scoping Plan Update). A consistency analysis is provided and describes the Project's compliance or conflict with performance-based standards included in the applicable portions of the 2020-2045 RTP/SCS, the 2022 Scoping Plan Update, and the Green New Deal.

2022 Scoping Plan Update

Appendix D, Local Actions, of the 2022 Scoping Plan Update includes "recommendations intended to building momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under CEQA.

The State encourages local governments to adopt a CEQA-qualified CAP addressing the three priority areas (transportation electrification, VMT reduction, and building decarbonization). However, the State recognizes that almost 50 percent of jurisdictions do not have an adopted CAP, among other reasons because they are costly, requiring technical expertise, staffing, and funding. Additionally, CAPs need to be monitored and updated as State targets change and new data is available. Jurisdictions that wish to take meaningful climate action (such as preparing a non-CEQA qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP are advised to look to the three priority areas when developing local climate plans, measures, policies, and actions. According to Appendix D, "By prioritizing climate action in these three priority areas, local governments can address the largest sources of GHGs within their jurisdiction."

The State also recognizes in Appendix D, Local Actions, of the 2022 Scoping Plan that each community or local area has distinctive situations and local jurisdictions must balance the urgent need for housing while demonstrating that a project is in alignment with the State's climate goals. The State calls for the climate crisis and the housing crisis to be confronted simultaneously. Jurisdictions should avoid creating targets that are impossible to meet as a basis to determine significance. Ultimately, targets that make it more difficult to achieve statewide goals by prohibiting or complicating projects that are needed to support the State's climate goals, like infill development, low-income housing or solar arrays, are not consistent with the State's goals. The

State also recognizes the lead agencies' discretion to develop evidence-based approaches for determining whether a project would have a potentially significant impact on GHG emissions.

Quantification of Project GHG Emissions

The California Emissions Estimator Model (CalEEMod) is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California, which provided data (e.g., emissions factors, trip lengths, meteorology, source inventory, etc.) to account for local requirements and conditions. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.

A fundamental difficulty in the analysis of GHG emissions is the global nature of existing and cumulative future conditions. Changes in GHG emissions can be difficult to attribute to a particular planning program or project because the planning effort or project may cause a shift in the locale for some type of GHG emissions, rather than causing "new" GHG emissions. As a result, there is frequently an inability to conclude whether a project's GHG emissions represent a net global increase, reduction, or no change in GHGs that would existing if the project were not implemented. For example, if a multi-family residential project replaces an existing supermarket, GHG emissions associated with the existing supermarket would not be totally eliminated because former patrons of the supermarket would still drive and get groceries somewhere else, which would continue to generate associated GHG emissions. GHG emissions associated with the new multi-family residential project would not be totally new, because many residents will have presumably moved there from other housing. Their GHG emissions would be shifted to their new housing, not created from thin air. But, if the new multi-family residential project has access to high quality transit and walkable destinations, then there is a strong likelihood that the residents' GHG per capita would be reduced on average by their move to the new project. Notwithstanding these complexities, the analysis of the Project's GHG emissions is conservative because it assumes all the Project's direct and indirect GHG emissions would be new additions to the atmosphere.

Construction

The Project's construction emissions were estimated using CalEEMod Version 2022. Details regarding modeling assumptions are provided in the appendix to this report. CalEEMod calculates emissions from sources such as off-road equipment usage and on-road vehicle travel associated with hauling, delivery, and construction worker trips. GHG emissions during construction were estimated based on the assumptions provided in the appendix. GHG emissions generated by the Project's construction activities reflect the types and quantities of construction equipment that would be used to demolish existing buildings, grade the Project Site, and construct the Project.

In accordance with the SCAQMD's guidance, GHG emissions from construction were amortized (i.e., averaged annually) over the lifetime of the Project, assumed to be 30 years. As impacts from construction activities occur over a relatively short-term period of time, they contribute a relatively small portion of the overall lifetime project GHG emissions. Additionally, GHG emission reductions measures for construction equipment are relatively limited. Therefore, the SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime, so that any GHG reduction measures will address construction GHG emissions as part of operational GHG reduction strategies. Thus, total construction GHG emissions were divided by 30 and then added to the Project's annual operational GHG emissions inventory.

Operation

Similar to construction, CalEEMod Version 2022 was used to estimate potential direct and indirect GHG emissions generated by the Project's operations. Details regarding modeling assumptions are also provided in the appendix**.** The analysis addresses GHG emissions from the following sources:

- Area Sources: Emissions associated with the on-site use of powered equipment.
- Energy Sources: Emissions associated with a project's electricity and natural gas use for space heating and cooling, water heating, energy consumption, and lighting.
- Mobile Sources: Emissions associated with a project's related vehicle travel.
- Water/Wastewater Sources: Emissions associated with energy used to pump, convey, delivery, and treat water.
- Solid Waste Sources: Emissions associated with the disposal of solid waste into landfills.
- Refrigerant Sources: Emissions associated with fugitive GHG emissions associated with building air conditioning and refrigeration equipment.

Analysis of Project Impacts

The Appendix G thresholds questions concerning GHG emissions are addressed together in the following analysis:

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?

Plan Consistency

Less Than Significant Impact. As described above, compliance with applicable GHG emissions reduction plans would result in a less than significant Project-level and cumulative impact. The following section describes the extent the Project complies with or exceeds the performance-based standards included in the 2020-2045 RTP/SCS, the 2022 Scoping Plan Update, and the Green New Deal. As demonstrated below, the Project would be consistent with these applicable GHG reduction plans and policies, and its GHG impact would therefore be less than significant.

2020-2045 RTP/SCS

SCAG's latest 2020-2045 RTP/SCS (Connect SoCal) is expected to help the SCAG region, and in turn California, reach its latest GHG reduction goals. Implementation of the 2020-2045 RTP/SCS is projected to reduce per capita vehicle GHG emissions by 19 percent by 2035, thus enabling the region to fulfill its portion of SB 375 compliance. Implementation is also projected to reduce daily VMT per capita by 5 percent by 2045.

The 2020-2045 RTP/SCS has limited applicability to the Project, but the Project would aid in the attainment of its VMT-related GHG reduction goals by reducing overall traffic generation. While the Project would result in a net increase of 292 trips during the PM peak hour, with the elimination of the existing shopping center, the Project results in a reduction of 1,355 net trips per day, which would reduce VMT associated with the Project Site. In addition, Table VIII-3, below, provides a comparison of the Project against the GHG-related performance measures of the 2020-2045 RTP/SCS and confirms that the Project would not conflict with the applicable GHG-related policies.

Table VIII-3
Consistency with the 2020-2045 RTP/SCS

Objectives	Consistency Analysis[a]
Increase percentage of region's total household growth occurring within HQTAs.	**Not Applicable.** The Project includes the update and expansion of an existing high school, and would not result in any household growth. Therefore, this objective would not be applicable to the Project.
Increase percent of the region's total employment growth occurring within HQTAs.	**Not Applicable.** The Project does not include any employment growth. In fact, with demolition of the existing commercial structures, employment on the Project Site is decreased. Therefore, this objective would not be applicable to the Project.
Decrease total acreage of greenfield or otherwise rural land uses converted to urban use.	**Consistent.** The Project represents an infill development that would not be built on greenfield or rural land, thereby reducing the demand for sprawl development on greenfield or rural areas on the fringes of Southern California.
Decrease daily vehicle miles driven per person.	**Consistent.** While the Project would result in a net increase of 292 trips during the PM peak hour, with

Table VIII-3
Consistency with the 2020-2045 RTP/SCS

Objectives	Consistency Analysis[a]
	the elimination of the existing shopping center, the Project results in a reduction of 1,355 net trips per day, which would reduce VMT associated with the Project Site.
Decrease average daily distance traveled for work and non-work trips (in miles)	**Consistent.** The Project does not include any employment growth and therefore, the length of work trips would not change as a result of the Project. In addition, the Project does not propose any changes to student enrollment, and therefore, the average daily distance traveled by students would remain unchanged as a result of the Project. For other non-work trips, the Project would result in approximately 292 new PM peak hour trips as a result of the expanded swim program on the North Campus (although the Project as a whole would still result in the reduction of 1,355 daily trips when taking into account the removal of the existing shopping center). Some of the uses at the new pool allow for limited community use of the pool, for people residing within one mile of the Project Site. Therefore, the Project would likely decrease the distance traveled for these trips, based on the requirement that people live within a one-mile radius.
Increase percentage of work and non-work trips which are less than 3 miles in length.	**Consistent.** The Project does not include any employment growth and therefore, the length of work trips would not change as a result of the Project. In addition, the Project does not propose any changes to student enrollment, and therefore, the length of trips for students to reach the Project Site would remain unchanged as a result of the Project. For other non-work trips, the Project would result in approximately 292 new PM peak hour trips as a result of the expanded swim program on the North Campus (although the Project as a whole would still result in the reduction of 1,355 daily trips when taking into account the removal of the existing shopping center). Some of the uses at the new pool allow for limited community use of the pool, for people residing within one mile of the Project Site.

Table VIII-3
Consistency with the 2020-2045 RTP/SCS

Objectives	Consistency Analysis[a]
	Therefore, the Project would increase the percentage of non-work trips which are less than three miles in length.
Increase share of short trip lengths for commute purposes.	**Not Applicable.** The Project does not include any employment growth and the commutes for the existing employees would not change as a result of the Project. Therefore, this objective would not be applicable to the Project.
Increase percentage of trips that use transit (work and all trips)	**Consistent.** The Project does not include any employment or student growth, and as discussed in Section 3, Project Description, approximately 20% of the students arrive by school bus. The Project's location near existing transit, including Metro local bus routes 152, 162, 165, and 169 would help increase the potential that visitors to the Project Site would use transit to access the Project Site.
Decrease average travel time to work (all modes)	**Not Applicable.** The Project does not include any employment growth and the travel time for the existing employees would not change as a result of the Project. Therefore, this objective would not be applicable to the Project.
Increase percentage of trips using either walking or biking (by trip type)	**Consistent.** The new pedestrian bridge would allow for people to safely walk between the Main Campus and North Campus, rather than drive. The Project would also include 78 bicycle parking spaces to support student and staff biking.
Reduce per capita GHG emissions (from 2005 levels)	**Consistent.** The Project represents an infill development to expand and update an existing school campus that will reduce GHG emissions. With the elimination of the existing shopping center, the Project results in a reduction of 1,355 net trips per day, which would reduce VMT and associated GHG emissions associated with the Project Site. As such, it is consistent with AB 32, SB 32, SB 375, and other initiatives designed to reduce per capita GHG emissions from 2005 levels.
Increase percentage of trips using a travel mode other than single occupancy vehicle (SOV)	**Consistent.** The Project will continue to implement the existing school transportation program, which includes school buses and facilitation of carpooling for siblings and neighbors. The Project would also include 78 bicycle parking spaces to support student and staff use of bicycle transportation.

Table VIII-3
Consistency with the 2020-2045 RTP/SCS

Objectives	Consistency Analysis[a]
	In addition, the new pedestrian bridge would encourage walking by providing a safe pedestrian connection between the Main Campus and North Campus.
Objectives from Table 5.1, Connect SoCal Performance Measures & Results, of SCAG's 2020-2045 RTP/SCS.	

2022 Scoping Plan Update

As discussed previously, jurisdictions that want to take meaningful climate action should look to the following three priority areas: transportation electrification, VMT reduction, and building decarbonization. An assessment of the goals, plans, and policies implemented by the City which would support GHG reduction strategies in the three priority areas is provided below.

Transportation Electrification

The priority GHG reduction strategies for local government climate action related to transportation electrification are discussed below and would support the Scoping Plan action to have 100 percent of all new passenger vehicles be zero-emission by 2035.

- **Convert local government fleets to zero-emission vehicles (ZEV)**

CARB approved the Advanced Clean Cars II rule which codifies Executive Order N-79-20 and requires 100 percent of new cars and light trucks sold in California to be zero-emission vehicles by 2035. The State has also adopted AB 2127, which requires the CEC to analyze and examine charging needs to support California's EVs in 2030. This report would help decision-makers allocate resources to install new EV chargers where they are needed most.

The City of LA Green New Deal (Sustainable City pLAn 2019) identifies a number of measures to reduce VMT and associated GHG emissions. Such measures that would support the local reduction strategy include converting all city fleet vehicles to zero emission where technically feasible by 2028. Starting in 2021, all vehicle procurement followed a "zero emission first" policy for City fleets. The Green New Deal also establishes a target to increase the percentage of zero emission vehicles to 25 percent by 2025, 80 percent by 2035, and 100 percent by 2050. In order to achieve this goal, the City would build 20 Fast Charging Plazas throughout the City. The City would also install 28,000 publicly available chargers by 2028 to encourage adoption of ZEVs.

The City's goals of converting the municipal fleet to zero emissions and installation of EV chargers throughout the City would be consistent with the Scoping Plan goals of transitioning to EVs. Although this measure mainly applies to City fleets, the Project would not conflict with these goals. The Project would support transition to ZEVs through its inclusion of approximately 137 EV

spaces and 17 EV charging stations (EVCS), consistent with City of Los Angeles Green Building Code requirements.

- **Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans.**

The State has adopted AB 1236 and AB 970, which require cities to adopt streamlined permitting procedures for EV charging stations. As a result, the City updated Section IX of the LAMC, which requires most new construction to designate 30 percent of new parking spaces as capable of supporting future electric vehicle supply equipment (EVSE). This would exceed the CALGreen 2022 requirements of 20 percent of new parking spaces as EV capable. The ordinance also requires new construction to install EVSE at 10 percent of total parking spaces. This requirement also exceeds the CALGreen 2022 requirements of installing EVSE for 25 percent of EV capable parking spaces which is approximately five percent of total parking spaces. The City has also implemented programs to increase the amount of EV charging on city streets, EV carshare, and incentive programs for apartments to be retrofitted with EV chargers.

The City's goals of installing EV chargers throughout the City would be consistent with the Scoping Plan's goals of transitioning to EVs. The Project would support this goal, as well. As noted, the Project would support transition to ZEVs through its inclusion of approximately 137 EV spaces and 17 EVCS, consistent with City of Los Angeles Green Building Code requirements.

VMT Reduction

The priority GHG reduction strategies for local government climate action related to VMT reduction are discussed below and would support the Scoping Plan action to reduce VMT per capita 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045.

- **Reduce or eliminate minimum parking standards in new developments.**
- **Implement parking pricing or transportation demand management pricing strategies.**

The City of Los Angeles Mobility Plan 2035, which is the Transportation Element of the City's General Plan, contains measures and programs related to VMT reduction throughout the City. With regard to parking standards, the implementation of Mobility Plan Programs and AB 2097 reduce or eliminate parking requirements for certain types of development near transit (within half a mile). These reduction strategies and TDM programs would serve to reduce minimum parking standards and reduce vehicle trips through the City, but they would not apply to the Project. Nevertheless, the Project would not interfere with implementation of these strategies.

- **Implement Complete Streets policies and investments, consistent with general plan circulation element requirements.**

The City of Los Angeles Mobility Plan 2035 established a "Complete Streets" planning framework which resulted in the City of Los Angeles Complete Streets Design Guide in 2015, consistent with the State's Complete Streets Act of 2008. A supplemental update to the Complete Streets Design Guide was adopted in 2020.

The Complete Streets Design Guide provides a number of measures to increase public access to electric shuttles, car sharing, and other active transportation modes. The Design Guide establishes guidelines for establishing on-street parking for car sharing. The City has also established BlueLA, which is a car sharing network consisting of more than 100 electric vehicles located throughout the City. In addition, under the Green New Deal, the City would install 28,000 publicly available chargers by 2028 and introduce 135 new electric DASH buses.

The Project would not conflict with the City's Complete Streets policies and circulation strategies. The Project proposes the expansion of an existing high school, with no changes to student enrollment. The Project's net reduction of 1,355 daily vehicle trips would also lead to substantial reductions in site-related VMT.

- **Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc.**
- **Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking.**
- **Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood).**
- **Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert "greenfield" land to urban uses (e.g., green belts, strategic conservation easements).**

These reduction strategies are supported through implementation of SB 375, which requires integration of planning processes for transportation, land-use and housing and generally encourages jobs/housing proximity, promote transit-oriented development, and encourages high-density residential/commercial development along transit corridors.

To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020-2045 RTP/SCS, also referred to as Connect SoCal. The 2020-2045 RTP/SCS's "Core Vision" prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets.

On a local level, the City has developed the Complete Streets Design Guide, which provides a number of reduction strategies to increase public access to electric shuttles, car sharing and walking, continues to build out networks in the Mobility Plan for pedestrians, bicyclists, and transit users, has implemented an EV car sharing network, and is working towards increasing publicly available chargers, and introducing new electric DASH buses.

As explained, the Project would not conflict with the 2020-2045 RTP/SCS or the City's Complete Streets strategies.

Building Decarbonization

The priority GHG reduction strategies for local government climate action related to electrification are discussed below and would support the Scoping Plan actions regarding meeting increased demand for electrification without new fossil gas-fired resources and all electric appliances beginning in 2026 (residential) and 2029 (commercial).

- **Adopt all-electric new construction reach codes for residential and commercial uses.**

California's transition away from fossil fuel-based energy sources will bring the Project's GHG emissions associated with building energy use down to zero as the State's electric supply becomes 100 percent carbon free. California has committed to achieving this goal by 2045 through SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 strengthened the State's RPS Standard by requiring that 60 percent of all electricity provided to retail users in California come from renewable sources by 2030 and that 100 percent come from carbon-free sources by 2045. The land use sector will benefit from RPS because the electricity used in buildings will be increasingly carbon-free, but implementation does not depend (directly, at least) on how buildings are designed and built.

The City has updated the LAMC with requirements for all new buildings, with some exceptions, to be all-electric, which will reduce GHG emissions related to natural gas combustion. Space heating, water heating, and cooking for non-restaurant uses would be required to be powered by electricity. In future years, LADWP will be required to increase the amount of renewable energy in the power mix to comply with SB 100 requirements. The combination of all-electric LAMC regulations and increasing availability of renewable energy will serve to reduce GHG emissions from sources traditionally powered by natural gas.

The Project would be required to comply with the City's LAMC for the new buildings and would not include natural gas uses in the new buildings except where allowable for laboratory and cafeteria/food stand uses.

- **Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-**

intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers).

This reduction strategy would support the Scoping Plan action regarding electrification of appliances in existing residential buildings. The City and LADWP have established rebate programs to promote use of energy-efficient products and home upgrades. Under LADWP's Consumer Rebate Program, residential customers would receive rebates for energy-efficient upgrades such as Cool Roofs, Energy Star Windows, HVAC upgrades, pool pumps and insulation upgrades. Such upgrades would serve to reduce wasteful energy and water use and associated GHG emissions. As part of the Project, the existing single-story buildings located at the southeast corner of the Main Campus would undergo renovation for administrative offices. This renovation would include upgrades to existing lighting and replacement of existing windows with more efficient systems.

Green New Deal

The Green New Deal provides information as to what the City will do with buildings and infrastructure in its control, and it provides aspirational targets related to housing and development, as well as mobility and transit, that are related to GHG reduction. For example, targets include reducing VMT per capita five percent by 2025 and increasing trips made by walking, biking, or transit 35 percent by 2025. The Green New Deal has also established increased renewables requirements for LADWP. Regarding housing, the Green New Deal aspires that 75 percent of new housing units are built within 1,500 feet of transit by 2035.

The Project would not conflict with the City's aspirational targets in the Green New Deal. The Project, which proposes the expansion of school facilities with no change in enrollment, would have no measurable effect on VMT per capita of employees, students, or other users, though it would result in a net reduction of 1,355 daily vehicle trips, which would reduce site-related VMT. Regarding energy use, the Project would be built according to the City's Green Building Code and would benefit from the Green New Deal's increased renewables targets for LADWP.

Consistency Analysis - Conclusion

In summary, the Project's location, land use characteristics, and design would not conflict with 2020-2045 RTP/SCS, 2022 Scoping Plan Update, and Green New Deal efforts and strategies to reduce GHG emissions in accordance with the latest and most stringent AB 1279 and SB 375 targets. As a result, the Project's impacts related to GHG emissions and climate change would be less than significant.

Project GHG Emissions

As discussed above, compliance with applicable GHG emissions reductions plans renders a Project's impact less than significant. In support of the consistency analysis provided above, the

following quantitative estimates of the Project's GHG emissions are provided. The Project would result in direct and indirect GHG emissions generated by the following emissions sources:

- Construction: emissions associated with construction-related equipment and vehicle use.
- Area Sources: emissions associated with the on-site use of powered equipment.
- Energy Sources: emissions associated with the Project's electricity and natural gas use for space heating and cooling, water heating, energy consumption, and lighting.
- Mobile Sources: emissions associated with the Project's related vehicle travel.
- Water/Wastewater: emissions associated with energy used to pump, convey, deliver, and treat water.

Construction

As described previously, the Project may not be fully implemented until 2035. GHG emissions associated with the Project's most intensive construction phases were modeled, which are as follows:

- North Campus – Demolition
- North Campus – Grading
- North Campus – Construction of new athletic fields and ancillary facilities
- North Campus – Construction of new pool facilities
- Main Campus – Classroom and parking lot demolition
- Main Campus – Multistory Building grading
- Main Campus – Multistory Building construction

As shown in Table VIII-4, these construction phases are estimated to generate approximately 1,164 $MTCO_2e$. The Project would also involve the construction of a pedestrian bridge connecting the North Campus to the Main Campus, construction of new surface parking lots on the North Campus, construction of a new upper level student quad on the Main Campus, renovation of a small surface parking lot along Cohasset Street, and campus-wide renovations to existing athletics facilities, classroom buildings, and administrative offices. For a number of reasons, these phases/activities would generate substantially less GHG emissions than the previously listed phases. For example, renovations to classroom buildings and administrative offices would utilize mostly hand tools and electric power tools. Paving activities for the new surface parking lots would not last more than several workdays at each site. None of these activities/phases would require a substantial number of haul trips. Notwithstanding, to ensure that the Project's estimated construction-related GHG emissions are not underestimated, the Project's modeled GHG emissions estimate has been increased 20% to reflect GHG emissions that may be generated by these activities/phases. This results in an estimated 1,397 $MTCO_2e$ of construction-related GHG emissions. As recommended by the SCAQMD, the total construction-related GHG emissions

were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's annual operational emissions) in order to determine the Project's annual GHG emissions inventory.[54] This results in annual Project construction emissions of approximately 46.6 $MTCO_2e$.

Table VIII-4
Construction-Related GHG Emissions

Phase	Emissions ($MTCO_2e$)
North Campus – Demolition	110
North Campus – Grading	45
North Campus – Construction of Athletic Fields and Ancillary Facilities	35
North Campus – Construction of Pool Facilities	138
Main Campus – Classroom and Parking Lot Demolition	52
Main Campus – Multistory Building Grading	186
Main Campus – Multistory Building Construction	598
Subtotal:	1,164
20% Adjustment for Other Activities/Phases	233
Total	1,397
Amortized over 30 years	46.6
Source: Greenhouse Gas Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, contained in Appendix B of this IS/MND.	

Operation

GHG emissions associated with the Project's major improvements were modeled to estimate the Project's GHG emissions from operations. The major improvements used in the modeling represent the largest sources of emissions from new facilities. Other campus improvements are renovations of existing facilities which will include upgraded and more energy efficient components. Therefore, the modeling accounted for:

- 69,254 new square feet of building area (Multistory Building, pool facilities, ancillary athletics buildings, etc.)
- 1.39 acres of new surface parking lot (North Campus surface parking lot, pool facility surface parking lot, renovated parking lot along Cohasset Street)
- 6,150 square foot new swimming pool

[54] SCAQMD Governing Board Agenda Item 31. December 5, 2008.

- 0.23 acres of new paved area
- New LED sports lighting

Table VIII-5 shows the Project's estimated GHG emissions from these improvements, including the Project's annualized construction-related GHG emissions. As shown, operation of the Project at buildout is estimated to result in approximately 1,430 $MTCO_2e$ per year.

Table VIII-5
Operations-Related GHG Emissions at Project Buildout

Source	Annual Emissions ($MTCO_2e$)
Area	1.53
Energy	246
Mobile	1,088
Solid Waste	39.0
Water/Wastewater	9.33
Construction	46.6
Total Emissions	1,430
Source: Greenhouse Gas Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, contained in Appendix B of this IS/MND.	

Conclusion

The emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. The consequences of that climate change can cause adverse environmental effects. A project's GHG emissions typically would be very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. The State has mandated goals of reducing statewide emissions to 1990 levels, even though statewide population and commerce is predicted to continue to expand. In order to achieve this goal, CARB has adopted various plans and regulations to reduce statewide GHG emissions.

Consistent with CEQA Guidelines Section 15064(h)(3), the City as Lead Agency has determined that the Project's contribution to cumulative GHG emissions and global climate change would be less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce GHG emissions. Given the Project's consistency with the applicable plans, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project's impacts are cumulatively less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would 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 the following item, which is included as Appendix F of this IS/MND:

- Phase I Environmental Site Assessment and Limited Soil Vapor Survey, Dudek, January 2018.

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

Less Than Significant Impact. A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect the public or the environment. Construction of the Project would not use a significant amount of hazardous materials, and the types of hazardous materials that would be used during construction of the Project would be typical of those hazardous materials necessary for construction of similar commercial buildings (e.g., paints, solvents, fuel for construction equipment, building materials, etc.). While construction of the Project would require the temporary transport, use, and disposal of hazardous waste, construction activities associated with the Project would be required to comply with all applicable federal, state, and local regulations governing such activities. As the Project would not use a significant amount of hazardous materials during construction, it would not create a significant hazard to the public or the environment, and this impact would be less than significant.

The Project includes the partial demolition of existing surface parking lots and classroom buildings from the Main Campus, and the demolition of the shopping center and associated surface parking from the North Campus, and then the construction of new school uses, including a new Multistory Building on the Main Campus and athletic fields, pool, and pool house on the North Campus. The types of hazardous materials that would be found on the Project Site during the Project's operational phase would be those typically associated with a school use – paints, cleaning supplies, and small amounts of petroleum products. Such use of these materials would be consistent with the use of these materials currently occurring on the Project Site. The use of these materials would comply with all applicable federal, state, and local regulations, which may include the Resource Conservation and Recovery Act, California Hazardous Waste Control Law, Federal and State Occupational Safety and Health Acts, SCAQMD rules, and permits and associated conditions issued by LADBS. Therefore, the Project would not require the routine transport, use, or disposal of hazardous materials that would create a significant hazard to the public or the environment, and this impact would be less than significant.

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

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project could potentially pose a hazard to the public or the environment by releasing hazardous materials into the environment through accident or upset conditions. The following provides a summary of observations from the Phase I Environmental Site Assessment and Limited Soil Vapor Survey (Phase I and II ESA) prepared by Dudek, which is included in Appendix F of this IS/MND).

The Phase I ESA identified the following recognized environmental conditions (RECs) in connection with the Project Site:

- The long-term presence of a dry cleaner at the Project Site with known solvent releases;
- The known release of hydrocarbons to soil and groundwater from the adjacent gas station;
- Potential vapor intrusion concerns from the dry cleaner and adjacent former gas station; and
- Former agricultural use from before 1928 until sometime after 1959.

As a result of the identification of these RECs, a limited Phase II ESA was performed related to the dry cleaner, adjacent former gas station, and former agricultural use of the Project Site. The results of the limited Phase II ESA are included in Appendix F of this IS/MND, and based on these results, the shallow perchloroethylene (PCE)-impacted soil vapor shall be remediated to mitigate potential vapor intrusion risk. This remediation is formally required as Mitigation Measure HAZ-1, provided below. With implementation of Mitigation Measure HAZ-1, Project impacts with respect to vapor intrusion would be less than significant. The results of the limited Phase II ESA also indicate that the former agricultural use of the Project Site is unlikely to present a risk to human health and is therefore considered to be de minimis.

The existing buildings were built between 1962 and 1964. Therefore, there is the potential for asbestos-containing materials (ACM) to be in the building materials. ACMs, which are carcinogenic and can cause lung disease, are derived from naturally occurring fibrous minerals that have been mined for their useful properties in built structures, such as thermal insulation, chemical and thermal stability, and high tensile strength. When left intact and undisturbed, these materials do not pose a health risk to building occupants. There is, however, a potential for exposure when the material becomes damaged to the extent that asbestos fibers become airborne and are inhaled. The principal federal government agencies that regulate asbestos exposure at the Occupational Safety and Health Administration (OSHA) and the US EPA, both of which began regulating asbestos exposure in the early 1970s. Additional regulation and oversight is provided by the SCAQMD.

Removal of asbestos in a building is not unusual and can be readily accomplished. In accordance with existing City, State, and federal rules and regulations, including the federal EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP) regulation (40 Code of Federal Regulations 61 Subpart M), the federal regulations under the Occupational Safety and Health Act (29 Code of Federal Regulations Section 1926.1101) California Occupational Safety and Health Administration (CAL-OSHA) regulations (California Code of Regulations, title 8, Sections 341.15, 1529), and SCAQMD Rule 1403, all materials, which are identified as ACM, would be removed by a trained and licensed asbestos abatement contractor. Generally, asbestos removal is a low risk operation. When following asbestos-related regulations, the possibility of exposure to airborne asbestos fibers from asbestos removal projects is limited. The removal and disposal of ACMs

from the Project Site in accordance with existing regulations would ensure that the Project would not create a significant hazard to the public or the environment through accident or upset conditions, and the Project's impact would be less than significant.

As the existing buildings were constructed between 1962 and 1964, it is likely that they also contain lead-based paint (LBP). Demolition of the existing buildings could therefore release LBP present in the structures. In order to ensure minimal exposure to sensitive receptors and workers, LBP found in the buildings would be removed and disposed of as recommended by a qualified Department of Health Services lead consultant and in accordance with applicable federal, State, and City regulations, including the federal regulations under the Occupational Safety and Health Act (29 Code of Federal Regulations Section 1926 et seq.), CAL-OSHA regulations (California Code of Regulations, title 8, Sections 1532.1 and 35001 *et seq.*). The removal and disposal of LBP from the Project Site in accordance with existing regulations would ensure that the Project would not create a significant hazard to the public or the environment through accident or upset conditions, and the Project's impact would be less than significant.

Mitigation Measure

HAZ-1 Prior to the issuance of a grading permit, the shallow PCE-impacted soil vapor shall be remediated using soil vapor extraction (SVE) as the primary means of remediation. An SVE remediation system shall be installed consisting of 17 vapor extraction wells. Each vapor extraction well would have a 10-foot screened interval, from five to 15 feet below ground surface, and the wells would be connected to the SVE unit via sub-grade PVC-piping. The soil vapor shall be remediated to the satisfaction of the Los Angeles Fire Department and the Department of Building and Safety.

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. A significant adverse effect may occur if a project site is located within one-quarter mile of an existing or proposed school site and is projected to release toxic emissions which pose a health hazard beyond regulatory thresholds. Pomelo Community Charter School is located approximately one-quarter mile west of the Main Campus and Justice Street Academy Charter School is located approximately one-quarter mile north of the North Campus. The types of hazardous materials that would be used during construction of the Project would be typical of those hazardous materials necessary for construction (e.g., paints, solvents, fuel for construction equipment, building materials, etc.), which could emit hazardous emissions. However, the use of these materials would comply with all applicable federal, state, and local regulations. In addition, there are intervening structures and roadways between the schools and the Project Site, and the distance between the Project Site and the nearest schools would ensure that the Project's use of these materials would not pose a hazard to these schools.

While the Project would be operational during school hours as it is also a school, to the extent that the Project would require the use of hazardous materials, such use would be in accordance

with existing local, state, and federal regulations. In addition, there are intervening structures and roadways between the schools and the Project Site. Therefore, the Project would not pose a significant risk involving the routine transport, use, and disposal of hazardous materials or the accidental release of hazardous materials, and impacts associated with the emission of hazardous materials near an existing or proposed school would be less than significant.

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

Less Than Significant Impact. California Government Code Section 65962.5 requires various state agencies, including but not limited to, the Department of Toxic Substances Control (DTSC) and SWRCB, to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis, commonly referred to as the "Cortese List." A significant impact may occur if a project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses. According to the Phase I ESA (included in Appendix F of this IS/MND), the Project Site does not appear on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and therefore, this impact would be less than significant.

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

No Impact. A significant impact may occur if a project is located within an airport land use plan, or within two miles of a public airport or public use airport, and would subject people residing or working in the area to a safety hazard or excessive noise levels. The Project Site is not located within an airport land use plan or within two miles of a public airport or public use airport. Thus, implementation of the Project would not have the potential to exacerbate current environmental conditions as to result in a safety hazard or excessive noise for people residing or working in the area of the Project Site, and no impact would occur.

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

Less Than Significant Impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan. While it is expected that the majority of construction activities for the Project would be confined to the Project Site, temporary and limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially affect emergency access adjacent to the Project Site. Access to the Project Site and surrounding area

during construction of the Project would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access (Mitigation Measure TRANS-1 provides the requirement for a Construction Traffic Management Plan). Furthermore, prior to the issuance of a building permit, the Project Applicant would be required by the Los Angeles Fire Department (LAFD) and the Department of Building and Safety to develop an emergency response plan for the Project in consultation with the LAFD and the Los Angeles Department of Transportation (LADOT). The emergency response plan shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. Preparation and implementation of the Project-specific emergency response plan as required by City regulations would ensure that Project impacts related to emergency response would be less than significant.

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

No Impact. A significant impact may occur if a project is located in proximity to wildland areas and poses a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project Site is not located in a Very High Fire Hazard Severity Zone.[55] Therefore, no impact regarding this topic would occur.

Cumulative Impacts

The geographic extent of the Project's environmental impacts is limited to the Project Site and would not contribute to any other potential environmental impact that may occur beyond the Project Site boundaries. In addition, no related projects have been identified within one-half mile of the Project Site. As stated previously, the Project would not result in any significant impacts related to hazards and hazardous materials. Therefore, cumulative impacts related to hazards and hazardous materials would be less than significant.

[55] City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, June 12, 2023.

X. HYDROLOGY AND WATER QUALITY

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

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

Less Than Significant Impact. A significant impact may occur if a project discharges water which does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed

by the State Water Resources Control Board (SWRCB). During construction of the Project, particularly during the grading and excavation phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. Thus, a significant impact could occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into storm water drainage systems or would not comply with all applicable regulations as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB).

The Project would be required to comply with the NPDES General Construction Permit, which satisfies the LARWQCB water quality standards, including the preparation of a SWPPP and implementation of BMPs, required to minimize soil erosion and sedimentation from entering the storm drains during the construction period. In addition, the Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Site would be minimized for downstream receiving waters. Compliance with the NPDES and implementation of the SWPPP and BMPs, as well as the City's discharge requirements, would ensure that the Project complies with the LARWQCB standards and therefore that construction stormwater runoff would not violate water quality and/or discharge requirements.

Stormwater runoff generated during operation of the Project has the potential to introduce small amounts of pollutants (e.g., typical commercial cleaning products, landscaping pesticides, and vehicle petroleum products) into the stormwater system. Stormwater runoff from precipitation events could carry urban pollutants into municipal storm drains. However, during operation, the Project would be required to comply with the City's Low Impact Development (LID) Ordinance. The LID Ordinance applies to all development and redevelopment projects in the City that require a building permit. LID plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance, the Project would be required to capture and treat the first 3/4-inch of rainfall in accordance with established stormwater treatment protocols. Regulatory compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. Regulatory compliance with the LID Plan and Standard Urban Stormwater Mitigation Plan (SUSMP), including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality.

Compliance with these regulations would ensure construction and operational activities of the Project would not violate water quality standards, waste discharge requirements, or otherwise substantially degrade water quality, and Project impacts related to water quality would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement or includes withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge. During a storm event, stormwater runoff flows to the adjacent roadways where it is directed into the City's storm drain system. As such, the Project Site is not a source of groundwater recharge. Following redevelopment of the Project Site, groundwater recharge would remain negligible, similar to existing conditions.

According to the Geotechnical Investigation conducted for the Project Site (refer to Appendix E-1 of this IS/MND), based on the reported historic high groundwater levels in the Project Site vicinity, the depth to groundwater encountered in the borings advanced as part of the Geotechnical Investigation, and the depth of proposed construction, static groundwater is not expected to be encountered during construction or to have a detrimental effect on the Project.[56] Therefore, it is not likely that any temporary dewatering would be required during construction. Finally, all water consumption associated with the Project would be supplied by LADWP and not from any groundwater beneath the Project Site. Thus, Project impacts with respect to groundwater would be less than significant.

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

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

Less Than Significant Impact. A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation. The Project Site is located in an urbanized area of the City, and there are no natural watercourses on the Project Site. The North Campus is currently developed with a shopping center and associated surface parking lot, and is almost entirely impervious. The Project would increase the amount of pervious surface on the North Campus as a new soccer and baseball field would be constructed on the North Campus. Current stormwater runoff flows to the local storm drain system. Under the post-Project condition, the Project Site would contain more pervious surface, based on the changes to the North Campus site. In addition, the Project Applicant would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. While grading and construction activities may temporarily alter the existing drainage patterns of the Project Site, BMPs would be implemented to minimize soil erosion impacts during Project grading and construction activities. In addition, the Project

[56] Geotechnical Investigation, Geocon West, January 12, 2023, page 6.

Applicant would be required to implement a LID Plan (during operation), which would reduce the amount of surface water runoff leaving the Project Site after a storm event. Specifically, the LID Plan would require the implementation of stormwater BMPs to retain or treat the runoff from a storm event producing 3/4-inch of rainfall in a 24-hour period. Therefore, the Project would not result in substantial erosion or siltation on- or off-site, impacts would be less than significant.

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. A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the Project Site or nearby properties. Grading and construction activities on the Project Site may temporarily alter the existing drainage patterns and change off-site flows. However, construction and operation of the Project would not result in a significant increase in site runoff or any changes in the local drainage patterns that would result in flooding on- or off-site. The North Campus is currently developed with a shopping center and associated surface parking lot, and is almost entirely impervious. The Project would increase the amount of pervious surface on the North Campus as a new soccer and baseball field would be constructed on the North Campus. The Project would also be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. Regulatory compliance with the LID Ordinance would also reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. Project impacts would therefore be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project would increase the volume of stormwater runoff to a level that exceeds the capacity of the storm drain system serving the Project Site, or if a project would substantially increase the probability that polluted runoff would reach storm drains. Runoff from the Project Site flows to the adjacent roadways where it is directed into the City's storm drain system. Three general sources of potential short-term construction-related stormwater pollution associated with the Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment. Pursuant to City policy, stormwater retention would be required as part of the LID/SUSMP implementation features (despite an increase in pervious surfaces on the North Campus). Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. During construction, the Applicant will be required to demonstrate compliance with NPDES permitting, and will implement all applicable and mandatory BMPs in accordance with the approved LID Plan and the SWPPP. These "good-

housekeeping" practices would ensure that short-term construction-related activities would not result in polluted stormwater leaving the site.

Pollutants resulting from Project operation, including petroleum products associated with the Project's parking and circulation areas, would be subject to the requirements and water quality standards and wastewater discharge BMPs set forth by the City, the SWRCB, and the Project's approved LID Plan. Further, the Project would be required to comply with the NPDES and applicable LID Ordinance requirements. Accordingly, the Project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first three-quarters inch of rainfall in a 24-hour period. Thus, the Project would not create or contribute surface runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, Project impacts related to storm drain capacity and water quality would be less than significant.

iv. Impede or redirect flood flows?

No Impact. The Project Site is not located near any bodies of water, rivers, or streams that are subject to flooding. Thus, the Project would not have the potential to impede or redirect flood flows and no impact related to this issue would occur.

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

No Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes. Mudflows occur as a result of downslope movement of soil and/or rock under the influence of gravity. The Project Site is not located within a 100-year flood zone, as mapped by the Federal Emergency Management Agency (FEMA, Flood Insurance Rate Map number 06037C1275F).[57] Further, the City of Los Angeles 2018 Local Hazard Mitigation Plan does not map the Project Site as being located within an area potentially affected by a tsunami.[58] Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, and no impact would occur.

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

Less Than Significant Impact. The Project is within the jurisdiction of the LARWQCB, and grading, excavation, and other construction activities associated with the implementation of the

[57] FEMA Flood Map Service Center, Search by Address, website: https://msc.fema.gov/portal/search#searchresultsanchor, accessed June 14, 2023.

[58] City of Los Angeles, 2018 Local Hazard Mitigation Plan, Figures 12-1 and 12-2.

Project could impact water quality due to erosion resulting from exposed soils that may be transported from the Project Site in stormwater runoff. Compliance with the NPDES program would ensure that stormwater pollutants would not substantially degrade water quality. Further, the Project would be required to comply with the City's SUSMP requirements. Compliance with these regulations would ensure that Project impacts with respect to a water quality control plan or groundwater management plan would be less than significant.

Cumulative Impacts

The Project would be located in an urbanized area where most of the surrounding properties are already developed. The existing storm drainage system serving this area has been designed to accommodate runoff from an urban built-out environment. Although no related projects have been identified within one-half mile of the Project Site, when new construction occurs, it generally does not lead to substantial additional runoff, since new developments are required to control the amount and quality of stormwater runoff coming from their respective sites. All new development in the City, such as the Project and any other development projects, is required to comply with the City's LID Ordinance and incorporate appropriate stormwater pollution control measures into the design plans to ensure that water quality impacts are minimized. Therefore, cumulative impacts related to hydrology and water quality would be less than significant.

XI. LAND USE AND PLANNING

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

a. Physically divide an established community?

No Impact. A significant impact may occur if a project is sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project which involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community). The Project Site is located in an urbanized area of the City. The Main Campus site has been developed with the existing high school for over six decades. The North Campus site has been developed with a commercial shopping center. The Project includes the expansion of the existing school to include the North Campus site, to provide additional athletic and parking facilities to serve the existing student population. Overall, the Project would be compatible with and complement the existing uses in the surrounding area and would not be of a density, scale, or height to constitute a physical barrier separating an established community. Thus, no impact would occur.

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

Less Than Significant Impact. A project is considered consistent with the provisions and general policies of an applicable City or regional land use plans and regulations if it is consistent with the overall intent of the plans and would not preclude the attainment of its primary goals.[59] More specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be "consistent," the project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning that a project must be in "agreement or harmony" with the applicable land use plan to be consistent with that plan.

Various local and regional plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's consistency with the requirements and policies

[59] Sequoyah Hills Homeowners Association v. City of Oakland (1993) 23 Cal.App.4th 704, 719.

of SCAG's RTP/SCS, the City's General Plan (including the Framework Element), the Canoga Park – Winnetka – Woodland Hills – West Hills Community Plan, and the LAMC, to the extent that various goals, objectives, and policies of these plans have been adopted for the purpose of avoiding or mitigating an environmental effect.

As discussed below, the Project would be substantially consistent with all of the applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect associated with development of the Project Site. Therefore, Project impacts related to land use and planning would be less than significant, as further described below.

Regional

SCAG's 2020-2045 RTP/SCS

SB 375 requires MPOs such as SCAG to revise and update their RTPs and SCS' periodically. On September 3, 2020, SCAG's Regional Council formally adopted the 2020-2045 RTP/SCS (also known as Connect SoCal). The 2020-2045 RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians.

The 2020-2045 RTP/SCS outlines more than $638 billion in transportation system investments through 2045 and was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. The 2020-2045 RTP/SCS includes strategies for accommodating projected population, household, and employment growth in the SCAG region by 2045 as well as a transportation investment strategy for the region. These land use strategies are directly tied to supporting related GHG emissions reductions through increasing transportation choices with a reduced dependence on automobiles and an increase growth in walkable, mixed-use communities and HQTAs and by encouraging growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region.

Project Consistency Discussion

As discussed on Table XI-1, the Project would be substantially consistent with the goals and principles contained in the 2020-2045 RTP/SCS.

Table XI-1
Project Consistency with the 2020-2045 RTP/SCS

Goals and Guiding Principles	Consistency Assessment
Goal 1 Encourage regional economic prosperity and global competitiveness.	**Not Applicable.** This goal is directed towards SCAG and the City and does not apply to the Project.
Goal 2 Improve mobility, accessibility, reliability, and travel safety for people and goods.	**Consistent.** The Project Site is located in an urbanized area of the City and involves the expansion and upgrade of an existing high school. The Project improves vehicular and pedestrian circulation with new access points and a pedestrian bridge. The Project also would be subject to the site plan review requirements of the City and would be required to coordinate with LADOT, the Department of Building and Safety and the Los Angeles Fire Department to ensure that all access points, driveways, and parking areas would not create a design hazard to local roadways. Therefore, the Project would allow for mobility, accessibility, reliability, and travel safety for people and goods.
Goal 3 Enhance the preservation, security, and resilience of the regional transportation system.	**Not Applicable.** This goal is directed toward SCAG and other jurisdictions that are responsible for developing, maintaining, and improving the regional transportation system.
Goal 4 Increase person and goods movement and travel choices within the transportation system.	**Consistent.** The Project includes the expansion and upgrade of an existing high school. With the removal of the existing uses on the North Campus, the Project would result in a net reduction of 1,355 daily trips and therefore would contribute to significant reductions in VMT. In addition, the Project would provide approximately 137 EV spaces and 17 EVCS, as well as 78 bicycle parking spaces.
Goal 5 Reduce greenhouse gas emissions and improve air quality.	**Consistent.** The Project would result in a net reduction of 1,355 daily trips and therefore would contribute to significant reductions in VMT and associated GHG and other pollutant emissions.
Goal 6 Support healthy and equitable communities.	**Consistent.** The Project includes development of additional recreational facilities, including a baseball/soccer field and pool, which would be made available on a limited basis to the community. In addition, the Project would result in a net reduction of 1,355 daily trips and therefore would contribute to significant reductions in VMT and associated GHG and other pollutant emissions.
Goal 7 Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**Consistent.** The Project would result in a net reduction of 1,355 daily trips and therefore would contribute to significant reductions in VMT and associated mobile-source GHG emissions. In addition, the Project would provide approximately

Table XI-1
Project Consistency with the 2020-2045 RTP/SCS

Goals and Guiding Principles	Consistency Assessment
	137 EV spaces and 17 EVCS, as well as 78 bicycle parking spaces.
Goal 8 Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**Not Applicable.** This goal is directed toward SCAG and other jurisdictions that are responsible for developing, maintaining, and improving the regional transportation system.
Goal 10 Promote conservation of natural and agricultural lands and restoration of habitats.	**Consistent.** The Project is an infill development on a previously fully developed site that would not affect any natural or agricultural lands or restoration of habitats.
Guiding Principle 1 Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.
Guiding Principle 2 Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.
Guiding Principle 3 Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing and implementing growth strategies.
Guiding Principle 4 Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.
Guiding Principle 5 Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that have control over transportation investments.
Guiding Principle 6 Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies.	**Not Applicable.** This principle is directed toward SCAG that has the responsibility of monitoring the progress of Connect SoCal.
Guiding Principle 7 Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that have control over transportation investments.
Source: 2020-2045 RTP/SCS.	

Local

City of Los Angeles General Plan

The City's General Plan, adopted December 1996 and re-adopted August 2001, provides general guidance on land use issues for the entire City. The General Plan consists of a Framework Element (including chapters pertaining to Land Use and Urban Form and Neighborhood Design), a Land Use Element (comprising 35 community plans prepared for distinct geographic areas of the City), and 10 Citywide elements.

Framework Element

The Framework Element of the General Plan serves as guide for the City's overall long-range growth and development policies and serves as a guide to update the community plans and the Citywide elements. The Citywide elements address functional topics that cross community boundaries, such as transportation, and address these topics in more detail than is appropriate in the Framework Element, which is the "umbrella document" that provides the direction and vision necessary to bring cohesion to the City's overall general plan. The Framework Element provides a conceptual relationship between land use and transportation and provides guidance for future updates to the various elements of the General Plan but does not supersede the more detailed community and specific plans. The Land Use chapter of the Framework Element contains Long Range Land Use Diagrams that depict the generalized distribution of centers, districts, and mixed-use boulevards throughout the City, but the community plans determine the specific land use designations. The Land Use Element of the General Plan is contained within 35 community plans. The Project Site is located in the Canoga Park – Winnetka – Woodland Hills – West Hills Community Plan (Community Plan) Area, discussed further below.

Project Consistency Analysis

As discussed on Table XI-2, the Project would be substantially consistent with policies contained in the Framework Element.

Table XI-2
Project Consistency with Applicable Policies of the Framework Element

Objective	Project Consistency
Framework Element: Land Use Chapter	
Goal 3A A physically balanced distribution of land uses that contributes towards and facilitates the • City's long-term fiscal and economic viability, • Revitalization of economically depressed areas, • Conservation of existing residential neighborhoods, • Equitable distribution of public resources, • Conservation of natural resources, • Provision of adequate infrastructure and public services, • Reduction of traffic congestion and improvement of air quality, • Enhancement of recreation and open space opportunities, • Assurance of environmental justice and a healthful living environment, and • Achievement of the vision for a more livable city.	**Consistent.** The Project includes the expansion and upgrade of an existing high school. The school is an educational resource that serves the community. The new North Campus would replace an existing shopping center and will provide additional sports facilities with a swimming pool available on a limited basis to the community. In addition, the improvements to the Main Campus would modernize the existing facilities. Finally, the Project would result in a net reduction of 1,355 daily trips and therefore would contribute to significant reductions in VMT and associated GHG and other pollutant emissions.
Objective 3.2 Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.	**Consistent.** The Project would result in a net reduction of 1,355 daily trips and therefore would contribute to significant reductions in VMT.
Framework Element: Urban Form & Neighborhood Design Chapter	
Policy 5.4.1 Encourage the design of existing and new schools for multiple functions, including, but not limited to, the following: a. Design of school yards to be used as parks accessible to the surrounding neighborhoods; b. Design of school libraries to be used as community libraries, where feasible; and c. Design of school auditoriums to be used as community meeting rooms.	**Consistent.** This policy is aimed at public schools. However, the existing private high school currently allows the community to utilize certain school facilities. It is anticipated that the new facilities included in the Project, including the swimming pool, will also be available on a limited basis to the local community.
Framework Element: Open Space and Conservation Chapter	
Policy 6.4.11 Seek opportunities to site open space adjacent to existing public facilities, such as schools, and encourage the establishment of mutually beneficial development agreements that make privately-owned open space accessible to the public. For example, encourage the improvement of scattered small open spaces for public access in private projects with small branch libraries, child care centers, or decentralized schools.	**Consistent.** The existing private high school currently allows the community to utilize certain school facilities. It is anticipated that the new facilities included in the Project, including the swimming pool, will also be available on a limited basis to the local community.

Table XI-2
Project Consistency with Applicable Policies of the Framework Element

Objective	Project Consistency
Framework Element: Infrastructure and Public Services Chapter	
Objective 9.33 Maximize the use of local schools for community use and local open space and parks for school use.	**Consistent.** This policy is aimed at public schools. However, the existing private high school currently allows the community to utilize certain school facilities. It is anticipated that the new facilities included in the Project, including the swimming pool, will also be available on a limited basis to the local community.
Source: City of Los Angeles General Plan Framework Element.	

Canoga Park – Winnetka – Woodland Hills – West Hills Community Plan

The Community Plan is one of 35 Community Plans established for different areas of the City that are intended to implement the policies of the General Plan Framework. Together, the plans make up the Land Use Element of the General Plan. The Community Plan is intended to promote an arrangement of land uses, streets, and services, which will encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community. The Community Plan is also intended to guide development in order to create a healthful and pleasing environment. The community plans coordinate development among the various communities of Los Angeles and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community.

Project Consistency Discussion

The Canoga Park – Winnetka – Woodland Hills – West Hills Community Plan objectives and guidelines related to school uses are:

- Policy 6.1.1: Explore creative alternatives for providing new school sites in the City, where appropriate.
- Objective 6.2: Maximize the use of local schools for community use and local open space and parks for school use.
- Policy 6.2.1: Encourage the siting of community facilities (libraries, parks, schools, and auditoriums) together.

The Project would be substantially consistent with these objectives and policies contained in the Community Plan. Specifically, the Project Applicant has the opportunity to expand the existing private high school facilities to a property located across the street (North Campus), to provide additional recreational and athletic programming opportunities and options for its students, in addition to additional surface parking, in close proximity to the existing campus (Main Campus). The Main Campus is also located in very close to Four Oaks Park, which is located across

Cohasset Street, to the south. The close proximity of the Main Campus to the proposed new North Campus and to Four Oaks Park allows for the Project to implement the objective to site community facilities together.

The Project would allow the expansion of an existing school in a residential neighborhood, following and keeping with the current land use pattern while expanding athletic and parking facilities. In addition, the existing private high school currently allows the community to utilize certain school facilities. It is anticipated that the new facilities included in the Project, including the swimming pool, will also be available on a limited basis to the local community. For these reasons, the Project substantially conforms with the purposes, intent, and provisions of the General Plan and the applicable community plan (Canoga Park – Winnetka – Woodland Hills – West Hills Community Plan).

City of Los Angeles Zoning Code

Use

The Main Campus is within the A1-1 and RS-1 zones, and the North Campus is currently located in the [Q]C1-1VL and P-1VL zones. The Applicant is proposing a Vesting Zone Change and Height District Change on the North Campus to the C2-1 zone. The proposed C2 zone corresponds to the existing Neighborhood Commercial land use designation of the North Campus and by re-zoning it entirely to C2-1, it eliminates the outdated “footprint” zoning. In addition, the private school use is permitted by-right within the C2 zone. Approval of the Zone Change would allow the existing high school, which has been operating at its current location for over six decades, to integrate additional area for athletic facilities that are needed to serve the existing student population.

Floor Area

The update and expansion of the high school would result in a total proposed floor area of approximately 196,468 square feet, representing a net increase of 28,556 square feet of floor area on the Main Campus (from the existing developed structures). Overall, however, the Project would result in a net decrease of approximately 14,229 square feet of floor area, including the demolition of the existing commercial structures on the site of the new North Campus as well as demolition of existing school structures on the Main Campus. It is important to note that although the physical expansion would result in a net increase of lot area with the addition of the 4.83-acre North Campus, the maximum permitted student enrollment of 1,360 students per the current Conditional Use Permit (CUP) would remain the same. Furthermore, the current CUP permits a maximum floor area of 203,896 square feet on the Main Campus, which is more than the approximately 196,458 square feet of total floor area proposed at Project completion (including the Main and North Campuses as well as the pedestrian bridge).

Cumulative Impacts

Given the built-out conditions of the greater Los Angeles region, including the Project area, cumulative development likely would convert existing underutilized properties in the Los Angeles area to revitalized higher-density developments to respond to the need for housing, sources of employment, and associated retail land uses. As discussed previously, no related projects have been identified within one-half mile of the Project Site. Nevertheless, like the Project, any other development projects would be subject to the same City development standards and requirements. As discussed above, the Project's impacts with respect to land use and planning would be less than significant, and cumulative impacts would also be less than significant.

XII. MINERAL RESOURCES

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

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

No Impact. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the Project would convert an existing or future regionally-important mineral extraction use to another use, or if the Project would affect access to a site used or potentially available for regionally-important mineral resource extraction. The Project Site is not located in a City-designated Mineral Resource Zone 2 Area (MRZ-2). Therefore, the Project would have no impact with respect to the loss of availability of a known regionally-important mineral resource, and no impact would occur.

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

No Impact. A significant impact may occur if a project is located in an area used or available for extraction of a locally-important mineral resource extraction, and if the project converted an existing or potential future locally-important mineral extraction use to another use, or if the project affected access to a site used or potentially available for locally-important mineral resource extraction. Government Code Section 65302(d) states that a conservation element of the general plan shall address “minerals and other natural resources.” According to the Conservation Element of the City of Los Angeles General Plan, sites that contain potentially significant sand and gravel deposits which are to be conserved follow the Los Angeles River flood plain, coastal plain, and other water bodies and courses and lie along the flood plain from the San Fernando Valley through Downtown Los Angeles. The Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present. Furthermore, the Project Site is developed and located in an urbanized area. Development of the Project would therefore not result in impacts associated with the loss or availability of a known mineral resource that would be of value to the region and the residents of the state, and no impact would occur.

Cumulative Impacts

As discussed above, the Project would not result in any impacts related to mineral resources and no related projects have been identified within one-half mile of the Project Site. Therefore, no cumulative impacts related to mineral resources would occur.

XIII. NOISE

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

The analysis in this section is based on the following, which are included in Appendix G of this IS/MND:

- Noise Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023.
- Chaminade High School North Campus Athletic Facilities – Technical Memorandum, NTEC, April 2024.

Existing Conditions

Project Site

The Project Site is composed of the Main Campus property and the North Campus property. The Main Campus is currently developed with a private high school campus containing educational, athletic, performing arts, administrative, and religious facilities. Noise is regularly generated by the daily use of these facilities, including from events (e.g., athletic meets, etc.) and vehicle travel (e.g., student pick-up/drop-off). The North Campus is developed with a shopping center that contains a grocery store, restaurants, and other commercial uses, as well as surface parking for these uses. Noise associated with these uses include parking noises from patrons, delivery noises from trucks, and mechanical noises from rooftop heating, ventilation, and air conditioning (HVAC) equipment.

Noise-Sensitive Receptors

The Main Campus and North Campus sites are surrounded by predominantly residential uses, many of which directly abut the two sites. For example, single-family homes are located directly north of the North Campus site along Saticoy Street, Melba Street, and Bobbyboyar Avenue. Single-family homes are also located directly west of the Main Campus along Woodhall Avenue, Keswick Street, and Atron Avenue.

A map showing the location of the Project and the nearby residential uses is included in Appendix G of this IS/MND.

Existing Ambient Noise Conditions

On Thursday, August 18, 2022, noise measurements were obtained at multiple locations surrounding the Main Campus and North Campus sites to aid in the characterization of daytime ambient noise conditions at nearby sensitive receptors. The measured noise levels are shown in Table XIII-1, below. Descriptions of noise sources are also included for each noise measurement.

Table XIII-1
Existing Noise Levels

Noise Measurement Location	Noise Sources	Sound Level (dBA L_{eq})
1. Intersection of Keswick St. and Woodhall Ave.	Traffic along Woodhall Ave. and Saticoy St.	57.5
2. Intersection of Saticoy St. and Keswick St.	Traffic along Saticoy St.	64.1
3. Melba Street – End of Cul-de-sac	Shopping center to south, including delivery, mechanical, and parking noises. Traffic along Saticoy St.	53.9
4. Saticoy Street – Near 23309 Saticoy St. Residence	Traffic along Saticoy St.	66.3
5. Woodlake Ave. – S of Kens Way	Traffic along Woodlake Ave.	67.2
6. Intersection of Saticoy St. and Woodlake Ave.	Traffic along Saticoy St. and Woodlake Ave.	69.1
7. Saticoy Street – Near Main Campus Driveway	Traffic along Saticoy St.	68.6
8. Covello St. – End of Cul-de-sac	Traffic along Saticoy St.	49.5
9. Cohasset St. – Near Baseball Field	Traffic along Cohasset St.	62.4
10. Chaminade Ave. – Near Cul-de-sac	Traffic along Chaminade Ave., school parking lot	51.9
11. Atron Ave – End of Cul-de-sac	Traffic along Keswick St.	48.6

Source: Noise Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix G of this IS/MND. (Appendix G).

Methodology

On-Site Construction Activities

The Project's construction noise impact associated with its on-site construction activities was determined by identifying the noise levels of construction equipment with the greatest potential to disrupt nearby sensitive receptors and assessing the noise increases that could result from their operations. Reference equipment noise levels were derived from the Federal Highway Administration's Roadway Construction Noise Model, version 2.0 (FHWA RCNM 2.0).

Off-Site Construction Activities

The Project's off-site construction noise impact from construction trucks was evaluated by using the FHWA's Traffic Noise Model version 2.5 (TNM 2.5). This noise prediction software uses traffic volumes, vehicle mix, average speeds, roadway geometry, and other inputs to calculate average noise levels along roadway segments. The Project's noise levels from its maximum construction trip generation were estimated with TNM 2.5 and then compared with existing ambient noise conditions along surrounding roadways to determine significance.

On-Site Operational Noise Sources

The Project's potential to result in significant noise impacts from on-site operational noise sources was assessed by identifying likely on-site noise sources and considering the impacts they could produce given the nature of the source (i.e., loudness and/or whether noise would be generated during daytime or more-sensitive nighttime hours), distances to nearby noise-sensitive receptors, surrounding ambient noise levels, the presence of similar noise sources in the vicinity, and maximum allowable noise levels permitted by the LAMC. The analysis also reviewed noise levels that were documented as part of studies for similar athletics facilities projects to aid in the characterization and prediction of noise impacts that would result from the Project's athletics activities. A more-detailed discussion of this methodology, including source documentation, is included in Appendix G of this IS/MND.

Off-Site Operational Noise Sources

The Project would result in a net-reduction in vehicle trips when compared to existing uses and therefore would not contribute to traffic-related noise increases.

Construction Vibration Sources

The Project's potential to generate damaging levels of groundborne vibration was analyzed by identifying construction vibration sources and estimating the maximum vibration levels that they

could produce at nearby buildings, all based on the principles and guidelines recommended by the Federal Transit Administration (FTA) in its 2018 Transit Noise and Vibration Impact Assessment manual. Vibration levels were then compared with the manual's suggested damage criteria for various building categories.

Operational Vibration Sources

Significant sources of operational vibration are generally limited to heavy equipment or industrial operations. The Project proposes to construct educational and athletics facilities, and no such operations would take place.

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

Less Than Significant with Mitigation Incorporated.

Construction

On-Site Construction Activities

5 dBA L_{eq} Threshold Analysis

The Project may not be fully implemented until 2035, and there is currently no exact sequence of construction activities or phasing, though it would be necessary for some activities to occur before others. For example, grading of the North Campus would have to occur before construction of the new North Campus athletic and pool facilities, demolition of existing classroom buildings would have to occur before construction of the new Main Campus Multistory Building, etc.

Table XIII-2 (which is the same as Table 3-2 in Section 2, Project Description) presents a sequence of the Project's construction activities showing which construction activities/phases may overlap. The Project would include Project Design Feature 1 (PDF 1), which incorporates this construction sequence.

Table XIII-2
Construction Sequence

Construction Activity	Sequence									
	1	2	3	4	5	6	7	8	9	10
North Campus – Demolition†	X									
North Campus – Grading†		X								
North Campus – Construction of new surface parking lot			X							
North Campus – Construction of pedestrian bridge†				X						
North Campus – Construction of new athletic fields and ancillary facilities					X	X	X	X		
North Campus – Construction of new pool facilities										X
Main Campus – Parking Lot Demolition†					X					
Main Campus – Classroom Demolition†						X				
Main Campus – Multistory Building Grading							X			
Main Campus – Multistory Building Construction								X	X	X
Main Campus – Construction of upper-level student quad									X	
Main Campus – Renovation of surface parking lot along Cohasset Street									X	
Main Campus – Renovations to existing athletics facilities, classroom buildings, and administrative offices.								X	X	X

† Denotes construction activities chosen for detailed construction noise modeling.
Source: Project Applicant.

During all construction phases, noise-generating activities would be permitted to occur at the Project Site between the hours of 7:00 A.M. and 9:00 P.M. Monday through Friday, in accordance with Section 41.40(a) of the LAMC. On Saturdays, construction activities would be permitted to occur between 8:00 A.M. and 6:00 P.M. Although the Project is anticipated to utilize a five-day work week, it is anticipated that certain construction activities that have the potential to impact school operations may take place on Saturdays.

Some construction activities would result in greater noise impacts than others. For example, demolition and grading activities for the North Campus would require a variety of heavy-duty, diesel-powered earthmoving vehicles such as excavators and bulldozers, while renovations to the

administrative office would require mostly electric-powered hand tools. Noise impacts for the following construction activities were modeled to ascertain the Project's potential to exceed the threshold criteria, which is a 5 dBA L_{eq} increase over baseline ambient noise levels. The following modeled construction activities were chosen because they are the activities that would have the greatest potential to result exceedances of this threshold criteria, due to considerations such as noise levels from construction equipment, distances from sensitive receptors, potential for overlap, and ambient noise levels at sensitive receptors.

North Campus – Demolition

North Campus – Grading

North Campus – Construction of pedestrian bridge

Main Campus – Parking Lot Demolition

Main Campus – Classroom Demolition

North Campus - Demolition

Demolition of existing North Campus improvements would last approximately one month. The majority of demolition activities would be characterized by excavators demolishing existing structures and placing the debris into dumpsters for removal. As excavators perform work across the approximately 4.83-acre North Campus site, their construction noise levels at sensitive receptors would fluctuate depending on these vehicles' distances from them. Noise levels would be greater when excavators are in proximity of sensitive receptors and lower when they are farther away. Most excavator activities would be concentrated near the footprint of the existing shopping center building, as demolition of this structure would be more intensive than removal of the asphalt parking lot, which would be accomplished with smaller and less-noisy equipment such as skid steer loaders. Given these considerations, the noise impact associated with the demolition of North Campus improvements has been evaluated by modeling noise levels that would result from two excavators demolishing a half-acre portion of the existing shopping center building in proximity to nearby sensitive receptors.

Table XIII-3 shows the estimated noise increases that would result from the Project's demolition activities on the North Campus. As shown, noise increases at Melba Street Cul-de-Sac Residences and Bobbyboyar Avenue Residences could exceed the 5 dBA L_{eq} threshold of significance for daytime construction activities lasting more than 10 days in a three-month period. Here, without mitigation, the Project's construction noise impacts from demolition activities could be significant. Impacts to other sensitive receptors would not exceed the 5 dBA L_{eq} threshold of significance.

As shown in Table XIII-2, demolition activities on the North Campus would not overlap with any other construction activities, meaning there is no potential for simultaneous construction activities to result in combined noise levels that exceed the values shown in Table XIII-3.

Table XIII-3
Construction Noise Levels – North Campus Demolition (Unmitigated)

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase
23309 Saticoy Street Residence	65.2	66.3	68.8	2.5
Saticoy Street Residences – South of North Campus	58.8	68.6	69.0	0.4
Melba Street Cul-de-Sac Residences	69.1	53.9	69.3	15.4
Bobbyboyar Avenue Cul-de-Sac Residences	69.1	53.9	69.3	15.4
Woodlake Avenue Residences	59.9	67.2	67.9	0.7
Source: Noise Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, contained in Appendix G of this IS/MND.				

North Campus - Grading

Grading of the North Campus would involve grading for the proposed surface parking lot, pedestrian bridge abutments/landing, and athletic field facilities. Some trenching would also be required to install utilities. Overall, daily activities would be rather limited due to the fact that the North Campus site is already relatively level. Grading would require only approximately 720 cubic yards of export and would result in less than four haul truck trips per day, on average. An excavator or backhoe may be utilized to trench for utility connections and baseball field dugouts. A grader may be utilized to establish proper slopes and drainages for the surface parking lot and athletic field. A roller may be utilized to compact soils. A bulldozer may assist in moving soils across the site. Overall, the loudest noise impacts would be associated with a grader “finish” grading the North Campus Site. Graders operate by driving across a site while utilizing a blade to form level surfaces. As a grader works across the approximately 4.83-acre North Campus site, its construction noise level at sensitive receptors would fluctuate depending on its distances from sensitive receptors. Noise levels would be greater when operating in proximity of sensitive receptors and lower when farther away. Given these considerations, the noise impact associated with grading of the North Campus has been evaluated by modeling noise levels that would result from a grader “finish” grading a half-acre parcel in proximity to nearby sensitive receptors.

Table XIII-4 shows the estimated noise increases that would result from the Project’s “finish” grading activities on the North Campus. As shown, noise increases at Melba Street Cul-de-Sac

Residences and Bobbyboyar Avenue Residences could exceed the 5 dBA L_{eq} threshold of significance for daytime construction activities lasting more than 10 days in a three-month period. Here, without mitigation, the Project's construction noise impact from grading activities could be significant. Impacts to other sensitive receptors would not exceed the 5 dBA L_{eq} threshold of significance.

As shown in Table XIII-2, grading activities on the North Campus would not overlap with any other construction activities, meaning there is no potential for simultaneous construction activities to result in combined noise levels that exceed the values shown in Table XIII-4.

Table XIII-4
Construction Noise Levels – North Campus Grading (Unmitigated)

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase
23309 Saticoy Street Residence	69.2	66.3	71.0	4.7
Saticoy Street Residences – South of North Campus	60.6	68.6	69.2	0.6
Melba Street Cul-de-Sac Residences	69.2	53.9	69.3	15.4
Bobbyboyar Avenue Cul-de-Sac Residences	69.2	53.9	69.3	15.4
Woodlake Avenue Residences	60.6	67.2	68.1	0.9
Source: Noise Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix G of this IS/MND.				

North Campus – Construction of Pedestrian Bridge

The loudest construction equipment associated with construction of the pedestrian bridge would be a bore/drill rig, which would be utilized to install foundations for the pedestrian bridge on either side of Saticoy Street. Daily activity by this equipment would be limited, as there are only three locations for the bridge's foundations. Noise impacts associated with operations of a bore/drill rig has been evaluated by modeling noise levels that would result from a bore/drill rig operating at the foundation location that is nearest to surrounding sensitive receptors.

Table XIII-5 shows the estimated noise increases that would result from bore/drill rig activities. As shown, noise increases at 23309 Saticoy Street Residence, Melba Street Cul-de-Sac Residences, and Bobbyboyar Avenue Cul-de-Sac Residences could exceed the 5 dBA L_{eq} threshold of significance for daytime construction activities lasting more than 10 days in a three-month period. Here, without mitigation, the Project's construction noise impact from grading

activities could be significant. Impacts to other sensitive receptors would be far below the 5 dBA L_{eq} threshold of significance.

As shown in Table XIII-2, construction of the pedestrian bridge would not overlap with any other construction activities, meaning there is no potential for simultaneous construction activities to result in combined noise levels that exceed the values shown in Table XIII-5.

Table XIII-5
Construction Noise Levels – North Campus Construction of Pedestrian Bridge (Unmitigated)

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase
23309 Saticoy Street Residence	74.0	66.3	74.7	8.4
Saticoy Street Residences – South of North Campus	61.9	68.6	69.4	0.8
Melba Street Cul-de-Sac Residences	71.9	53.9	72.0	18.1
Bobbyboyar Avenue Cul-de-Sac Residences	60.0	53.9	61.0	7.1
Woodlake Avenue Residences	54.0	67.2	67.4	0.2
Source: Noise Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, included in Appendix G of this IS/MND.				

Main Campus – Parking Lot Demolition

Demolition of the upper-level parking lot would utilize smaller equipment such as a skid steer loader or mini-excavator to remove asphalt, hardscape, and landscaping. These activities would last no more than several workdays. Noise impacts associated with demolition of the upper-level parking lot have been evaluated by modeling noise levels that would result from two skid steer loaders demolishing a half-acre portion of the parking lot in proximity to nearby sensitive receptors.

Table XIII-6 shows the estimated noise increases that would result from demolition of the upper-level parking lot. As shown, demolition of the upper-level parking lot could expose Atron Avenue Cul-de-Sac Residences to noise increases in excess of the 5 dBA L_{eq} threshold of significance for daytime construction activities lasting more than 10 days in a three-month period. Without mitigation, this impact could be significant.

Table XIII-6
Construction Noise Levels – Main Campus Parking Lot Demolition
(Unmitigated)

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase
Atron Avenue Cul-de-Sac Residences	60.6	48.6	60.9	12.3
Covello Street Cul-de-Sac Residences	51.9	49.5	53.9	4.4
Source: Noise Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, contained in Appendix G of this IS/MND.				

Main Campus – Classroom Demolition

Demolition of classroom buildings on the Main Campus would last up to three weeks and would utilize excavators to demolish approximately 30,284 square feet of classroom building area. Debris would be placed into dumpsters for removal. Noise impacts associated with demolition of the classroom buildings have been evaluated by modeling noise levels that would result from two excavators demolishing a half-acre portion of the classroom buildings in proximity to nearby sensitive receptors.

Table XIII-7 shows the estimated noise increases that would result from demolition of the classroom buildings. As shown, demolition of the classroom buildings could expose Atron Avenue Cul-de-Sac Residences, Covello Street Cul-de-Sac Residences, and Chaminade Avenue Residences to noise increases in excess of the 5 dBA L_{eq} threshold of significance for daytime construction activities lasting more than 10 days in a three-month period. Without mitigation, this impact could be significant.

Table XIII-7
Construction Noise Levels – Main Campus Classroom Demolition
(Unmitigated)

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase
Atron Avenue Cul-de-Sac Residences	60.3	48.6	60.6	12.0
Covello Street Cul-de-Sac Residences	61.8	49.5	62.1	12.6
Chaminade Avenue Residences	57.5	51.9	58.6	6.7
Source: Noise Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, contained in Appendix G of this IS/MND.				

LAMC Section 112.05 Threshold Analysis

Section 112.05 of the LAMC establishes a noise limit of 75 dBA L_{eq} for powered equipment and hand tools operated within 500 feet of residential zones between the hours of 7:00 A.M. and 10:00 P.M. As the Project is located within 500 feet of numerous residential-zoned properties, this regulation would apply to the Project's construction noise levels. As shown in Table XIII-3 through Table XIII-7, construction of the Project would not expose nearby residential uses to noise levels in excess of 75 dBA L_{eq}. Therefore, the Project's construction noise levels would be consistent with the LAMC Section 112.05 noise limit, and this impact would be less than significant.

Construction Noise Mitigation Measures

To ensure that the Project's construction-related noise increases at sensitive receptors do not exceed the 5 dBA L_{eq} threshold of significance for daytime construction activities lasting more than 10 days in a three-month period, the following mitigation measures are required:

NOI-1 For construction activities occurring on the North Campus, sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected to shield 23309 Saticoy Street Residences, Melba Street Cul-de-Sac Residences, and Bobbyboyar Avenue Cul-de-Sac Residences from on-site construction noise activities. Sound barriers shall be at least 15 feet in height and composed of materials rated to achieve a transmission loss of at least 25 dBA, which would correlate with the required 15 dBA of sound attenuation.

NOI-2 For construction activities occurring on the Main Campus, sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected to shield Atron Avenue Cul-de-Sac Residences, Covello Street Cul-de-Sac Residences, and Chaminade Avenue Residences from on-site construction noise activities. Sound barriers shall be at least 15 feet in height and composed of materials rated to achieve a transmission loss of at least 25 dBA, which would correlate with the required 15 dBA of sound attenuation.

Construction Noise Impacts After Mitigation

<u>North Campus - Demolition</u>

Table XIII-8 shows the estimated noise increases that would occur at Melba Street Cul-de-Sac Residences and Bobbyboyar Avenue Cul-de-Sac Residences after implementation of Mitigation Measure NOI-1. As shown, implementation of noise barriers pursuant to Mitigation Measure NOI-1 would ensure that demolition-related noise increases at these receptors are below the 5 dBA L_{eq} threshold of significance. As a result, with mitigation, the Project's North Campus demolition-related noise impact from on-site construction sources would be less than significant.

Table XIII-8
Construction Noise Levels – North Campus Demolition (Mitigated)

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase
Melba Street Cul-de-Sac Residences	54.1	53.9	57.0	3.1
Bobbyboyar Avenue Cul-de-Sac Residences	54.1	53.9	57.0	3.1
Source: Noise Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, contained in Appendix G of this IS/MND.				

North Campus - Grading

Table XIII-9 shows the estimated noise increases that would occur at Melba Street Cul-de-Sac Residences and Bobbyboyar Avenue Cul-de-Sac Residences after implementation of Mitigation Measure NOI-1. As shown, implementation of noise barriers pursuant to Mitigation Measure NOI-1 would ensure that grading-related noise increases at these receptors are below the 5 dBA L_{eq} threshold of significance. As a result, with mitigation, the Project's North Campus grading-related noise impact from on-site construction sources would be less than significant.

Table XIII-9
Construction Noise Levels – North Campus Grading (Mitigated)

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase
Melba Street Cul-de-Sac Residences	54.2	53.9	57.1	3.2
Bobbyboyar Avenue Cul-de-Sac Residences	54.2	53.9	57.1	3.2
Source: Noise Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, contained in Appendix G of this IS/MND.				

North Campus – Construction of Pedestrian Bridge

Table XIII-10 shows the estimated noise increases that would occur at 23309 Saticoy Street Residence, Melba Street Cul-de-Sac Residences, and Bobbyboyar Avenue Cul-de-Sac Residences after implementation of Mitigation Measures NOI-1. As shown, implementation of noise barriers pursuant to Mitigation Measure NOI-1 would ensure that construction of the pedestrian bridge would not expose these receptors to noise increases that are in excess of the 5 dBA L_{eq} threshold of significance. As a result, with mitigation, this specific impact would be less than significant.

Table XIII-10
Construction Noise Levels – North Campus Construction of Pedestrian Bridge (Mitigated)

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase
23309 Saticoy Street Residence	59.0	66.3	67.0	0.7
Melba Street Cul-de-Sac Residences	56.9	53.9	58.7	4.8
Bobbyboyar Avenue Cul-de-Sac Residences	45.0	53.9	54.4	0.5
Source: Noise Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, contained in Appendix G of this IS/MND.				

Main Campus – Parking Lot Demolition

Table XIII-11 shows the estimated parking lot demolition-related noise increases that would occur at Atron Avenue Cul-de-Sac Residences after implementation of Mitigation Measure NOI-2. As shown, implementation of noise barriers pursuant to Mitigation Measure NOI-2 would ensure that demolition would not expose these receptors to noise increases that are in excess of the 5 dBA L_{eq} threshold of significance. As a result, with mitigation, this specific impact would be less than significant.

Table XIII-11
Construction Noise Levels – Main Campus Parking Lot Demolition (Mitigated)

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase
Atron Avenue Cul-de-Sac Residences	45.6	48.6	50.4	1.8
Source: Noise Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, contained in Appendix G of this IS/MND.				

Main Campus – Classroom Demolition

Table XIII-12 shows the estimated classroom demolition-related noise increases that would occur at Atron Avenue Cul-de-Sac Residences, Covello Street Cul-de-Sac Residences, and Chaminade Avenue Residences after implementation of Mitigation Measure NOI-2. As shown, implementation of noise barriers pursuant to Mitigation Measure NOI-2 would ensure that demolition would not expose these receptors to noise increases that are in excess of the 5 dBA L_{eq} threshold of significance. As a result, with mitigation, this specific impact would be less than significant.

Table XIII-12
Construction Noise Levels – Main Campus Classroom Demolition (Mitigated)

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase
Atron Avenue Cul-de-Sac Residences	45.3	48.6	50.4	1.7
Covello Street Cul-de-Sac Residences	46.8	49.5	51.4	1.9
Chaminade Avenue Residences	42.5	51.9	52.4	0.5
Source: Noise Technical Modeling, Noah Tanski Environmental Consulting (NTEC), May 2023, in Appendix G of this IS/MND.				

Off-Site Construction Activities

Trucks and other construction-related vehicles would access the Project Site over the course of all construction phases. The Project's maximum truck trip generation would occur during grading for the Multistory Building on the Main Campus. During this one-month phase, up to 47 haul trucks per day (approximately 94 one-way trips) would remove approximately 18,764 cubic yards of cut soils from the Main Campus site for transportation to a regional landfill. This would translate to approximately six haul trucks per hour (12 one-way trips) over the course of a given workday. Haul trucks would immediately access Saticoy Street via existing driveways. Ultimately, this level of haul truck activity would have a minor effect on noise levels along Saticoy Street and other truck routes that would be utilized when accessing the freeway system. According to TNM 2.5 modeling, this level of haul truck activity would correlate with roadside noise levels of approximately 58 dBA L_{eq}. This is well below ambient noise levels along Saticoy Street and other major roadways that may be utilized by the Project's haul route. For example, daytime ambient noise levels east of the Project along Saticoy Street and Woodlake Avenue exceed 65 dBA L_{eq}. In these and similar ambient noise environments, noise increases related to the Project's maximum daily haul trips would be less than a 1 dBA L_{eq} increase, well below the 5 dBA L_{eq} threshold of significance and also indiscernible. Other construction phases would result in less trips haul trips. Therefore, the Project's noise impact from off-site construction sources would be less than significant.

Operation

On-Site Operational Noise

Prior to the impact analysis, it is important to discuss the City's threshold of significance for operational noise impacts, which is whether a project's operations would: (1) cause ambient noise levels to increase by 3 dBA CNEL or more to or within a sensitive receptor's "normally unacceptable" or "clearly unacceptable" noise and land use compatibility category, as defined by

the City's General Plan Noise Element; or (2) result in any 5 dBA $L_{eq\ (1\text{-}hour)}$ or CNEL noise increase to a sensitive receptor. CNEL is a 24-hour weighted average noise level that penalizes noise levels between 7:00 PM and 7:00 AM to account for people's increased noise sensitivity during these hours. L_{eq} represents the energy average noise level for a given time period, which for purposes of this operational impact analysis is a minimum of one hour. The Project's sensitive receptors for noise impact assessment are all single-family residential land uses. According to the General Plan Noise Element, noise levels between 70 and 75 dBA CNEL are considered "normally unacceptable" for these uses, and noise levels 75 dBA CNEL and above are considered "clearly unacceptable." Another way of understanding this threshold is that if the Project does not cause or contribute to noise levels of 70 dBA CNEL or greater at a sensitive receptor, then a 5 dBA CNEL increase is the appropriate threshold. If the Project may cause or contribute to noise levels of 70 dBA CNEL or greater at a sensitive receptor, then a 3 dBA CNEL increase is the appropriate threshold. Notwithstanding, any 5 dBA L_{eq} increase over an averaging period of one hour or more would also be considered significant.

The Project's potential on-site operational noise sources are identified and evaluated below:

Mechanical Equipment

The proposed Multistory Building on the Main Campus would be located over 200 feet from the nearest residential receptors. At these distances, noise from rooftop mechanical equipment would not be capable of increasing off-site noise levels by a discernable degree and are likely to be inaudible. Further, the existing classroom buildings contain mechanical equipment. Therefore, noise from mechanical equipment would not be a new source of noise at the location of the Multistory Building.

The proposed pool facilities on the North Campus would be located adjacent to Woodlake Avenue, over 50 feet from the nearest residential receptors. Given this location along a busy roadway, noise from rooftop mechanical equipment would also likely be inaudible at surrounding residential receptors. All pool equipment, including filtering and pumping equipment, would be enclosed in mechanical rooms located within the pool facility's building envelope and would not be audible at any surrounding receptors.

Parking-Related Activities

The Project would include the construction of two new surface parking lots – an 86-stall lot on the North Campus near the pedestrian bridge and a 15-stall lot on the North Campus supporting the pool facilities – as well the renovation of the existing parking lot on the southeast portion of the Main Campus, along Cohasset Street, to include 16 stalls. According to FTA equations for the prediction of parking facility noise impacts, a facility with an hourly activity of 86 vehicles (conservatively equal to the total capacity of the largest proposed parking lot) would result in a noise level of just 46 dBA L_{eq}. A facility with an hourly activity of 16 vehicles would result in a noise level of just 38 dBA L_{eq}. These noise levels are far below ambient noise conditions surrounding the proposed parking lots, which are in excess of 60 dBA L_{eq}. This demonstrates that parking-

related noises associated with the three new surfacing parking lots would have a nominal effect on surrounding noise conditions that is well below the minimum 3 dBA CNEL increase that would represent a significant impact.

Further, it is worth noting that the existing shopping center on the North Campus is associated with 2,307 daily trips, according to the Project's transportation study (contained in Appendix H of this IS/MND). This is far greater than the number of vehicles that would utilize the two North Campus parking lots on a daily basis. This suggests that parking-related noises associated with the North Campus site would likely decrease with implementation of the Project.

North Campus Athletics and Aquatic Facilities

The North Campus includes new athletics fields, to be used for soccer and baseball, and an outdoor swimming pool. Home and visitor bleachers would be located along the first and third base lines of the athletic field, providing approximately 350 seats. Bleachers are also proposed west of the pool, providing approximately 126 seats. Additionally, there would be a public address system on the new North Campus, similar to the public address system on the Main Campus.

Sports programming would remain substantially similar to existing programs with some activities/games that currently occur on the Main Campus shifting to the North Campus, except that the new outdoor pool would allow for an expanded swim program, including practices, classes, and meets, and would be made available on a limited basis to the local community. The following provides a summary of new activities at the North Campus (not including existing school events that would shift from the Main Campus to the North Campus):

- 10 high school swim competitions per year
- 10 middle school swim competitions per year
- Swim practice for other schools (limited to February through April)
- Swim lessons and water exercise classes daily
- Local community swimming (if there are no other activities at the pool)
- Local non-school athletic groups (limited to May through December)

The hours of operation for the North Campus would be more restrictive than the usage hours allowed by the school's current Conditional Use Permit for the Main Campus. The North Campus hours of operations would be:

- Athletic fields/stadium: Monday – Friday, 7:00 AM – 9:00 PM (with exception for overtime/extra inning play); Saturday, 8:00 AM – 9:00 PM; and Sunday, 9:00 AM – 8:00 PM (no more than 15 Sundays per year).

- Aquatic complex/pool: Monday – Friday, 8:00 AM – 8:00 PM; and Saturday 10:00 AM – 7:00 PM. No use is permitted on Sundays.

- Batting cage: Monday – Saturday, 7:00 AM – 8:00 PM. No use is permitted on Sundays.

Rental or lease of the North Campus athletic facilities would be subject to more restrictive day and hour limitations:

- Athletic fields/stadium: Use by community-based athletic organizations shall be limited to 36 days annually, Monday through Saturday, 8:00 AM – 6:00 PM. Use is not permitted on Sundays and national holidays. The rental or lease of the batting cages is not permitted at any time.

- Aquatic complex/pool: Use by community-based organizations, which shall travel to and from the North Campus by bus, shall be limited to daylight hours and end no later than 7:00 PM, Monday through Friday, and no later than 5:00 PM on Saturdays. For community member swim activities, use hours shall be limited to Monday through Saturday, 8:00 AM – 6:00 PM. Use is not permitted on Sundays and national holidays.

Studies show that the highest noise levels from baseball diamonds and soccr fields are associated with the amplified sound systems operated during games and not the individual sports activities/practices themselves. Similarly, the highest noise levels from aquatic facilities are associated with amplified sound systems during swim meets and not with regular pool activities like swimming. Given these considerations, the following analysis evaluates composite noise impacts that would result from a baseball game and swim meet held simultaneously on the North Campus. The composite noise levels shown in Table XIII-13 are based on individual swim meet and baseball game noise levels that were estimated in the technical memorandum included Appendix G to the IS/MND.[60] The selected receptors were chosen because they are the closest receptors to the athletic field and aquatic complex areas that would experience the most pronounced noise impacts from their operations. Table XIII-14 compares the composite noise levels estimated in Table XIII-13 with existing daytime noise levels at these receptors to determine the composite noise impact from a baseball game and swim meet held simultaneously. As shown in Table XIII-14, Melba Street Cul-de-Sac Residences could experience noise increases greater than 5 dBA L_{eq} during these occurrences.

[60] The batting cage would not be used while a baseball game is being played, so its usage does not figure into this analysis. However, batting cage noise levels were evaluated and that analysis can also be found in the technical memorandum included in Appendix G.

Table XIII-13
Composite Noise Levels – Swim Meet and Baseball Game (L_{eq} 1-hour)

Receptor	Swim Meet Noise Level (dBA L_{eq})	Baseball Game Noise Level (dBA L_{eq})	Composite Noise Level (dBA L_{eq})
23309 Saticoy Street Residence	<50.0	54.8	56.0
Saticoy Street Residences – South of North Campus	<50.0	65.2	65.3
Melba Street Cul-de-Sac Residences	53.4	55.7	57.7
Bobbyboyar Avenue Cul-de-Sac Residences	52.8	54.8	56.9
Woodlake Avenue Residences	61.3	<50.0	61.6
Source: Chaminade High School North Campus Athletic Facilities – Technical Memorandum, Noah Tanski Environmental Consulting (NTEC), April 2024, in Appendix G of this IS/MND.			

Table XIII-14
Composite Noise Level Impact at Receptors (L_{eq} 1-hour)

Receptor	Composite Noise Level From Table 4 (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Threshold (dBA L_{eq})	Increase (dBA L_{eq})[A]
23309 Saticoy Street Residence	56.0	66.3	66.7	5.0	0.4
Saticoy Street Residences – South of North Campus	65.3	68.6	70.3	5.0	1.7
Melba Street Cul-de-Sac Residences	57.7	53.9	59.2	5.0	**5.3**
Bobbyboyar Avenue Cul-de-Sac Residences	56.9	53.9	58.7	5.0	4.8
Woodlake Avenue Residences	61.6	67.2	68.3	5.0	1.1
Note A: Potential significant impacts are shown in **bold**. Source: Chaminade High School North Campus Athletic Facilities – Technical Memorandum, Noah Tanski Environmental Consulting (NTEC), April 2024, in Appendix G of this IS/MND.					

The composite noise levels and maximum hourly impacts shown in Table XIII-13 and Table XIII-14 are also insightful regarding the Project's potential effects on 24-hour CNELs at surrounding noise-sensitive receptors. Given that existing daytime ambient noise conditions at Melba Street Cul-de-Sac Residences and Bobbyboyar Avenue Cul-de-Sac Residences are below 55 dBA L_{eq},

it is clear that their 24-hour noise levels are below at least 65 dBA CNEL, meaning that the 5 dBA CNEL increase threshold would apply at these receptors.[61] The following analysis evaluates the potential that 5 dBA CNEL increases could occur at Melba Street Cul-de-Sac Residences and Bobbyboyar Avenue Cul-de-Sac Residences. As explained previously, the composite noise levels shown in Table XIII-13 and Table XIII-14 are representative of a worst-case scenario in which there is a simultaneous swim meet and baseball game. These events last no more than a few hours each. However, if one assumes a conservative scenario in which the worst-case composite noise levels would be generated from 3:00 PM to 9:00 PM[62], then the corresponding CNEL at Melba Street Cul-de-Sac Residences and Bobbyboyar Avenue Cul-de-Sac Residences would be 53.5 dBA and 52.7 dBA, respectively, as shown in Table XIII-15. Measured ambient noise conditions and factors such as the urbanized nature of the neighborhood and proximity to roadways show that 24-hour noise levels for Melba Street Cul-de-Sac Residences and Bobbyboyar Avenue Cul-de-Sac Residences are between 50-55 dBA CNEL. Assuming a low-end 50 dBA CNEL value, the composite CNEL figures estimated in Table XIII-15 demonstrate that operational activities on the North Campus could result in a slight exceedance of the 5 dBA CNEL increase threshold at Melba Street Cul-de-Sac Residences, as shown in Table XIII-16.

Table XIII-15
24-Hour Noise Levels – Swim Meet and Baseball Game (dBA CNEL)

Receptor	Swim Meet Noise Level (dBA CNEL)	Baseball Game Noise Level (dBA CNEL)	Composite Noise Level (dBA CNEL)
Melba Street Cul-de-Sac Residences	48.1	52.0	53.5
Bobbyboyar Avenue Cul-de-Sac Residences	47.5	51.1	52.7
Source: Chaminade High School North Campus Athletic Facilities – Technical Memorandum, Noah Tanski Environmental Consulting (NTEC), April 2024, in Appendix G of this IS/MND.			

[61] In other words, it would take more than a 5 dBA CNEL increase for their 24-hour noise levels to exceed the 70 dBA CNEL "normally unacceptable" standard.

[62] Specifically, the assumes timed periods are 3:00 PM – 9:00 PM for baseball games and 3:00 PM – 8:00 PM for swim meets, consistent with their allowable usage hours.

Table XIII-16
24-Hour CNEL Noise Level Impact at Receptors

Receptor	Composite Noise Level From Table 6 (dBA CNEL)	Existing 24-Hour Noise Level (dBA CNEL)	New Noise Level (dBA CNEL)	Threshold (dBA CNEL)	Increase (dBA CNEL)[A]
Melba Street Cul-de-Sac Residences	53.5	50.0	55.1	5.0	**5.1**
Bobbyboyar Avenue Cul-de-Sac Residences	52.7	50.0	54.6	5.0	4.6

Note A: Potential significant impacts are shown in **bold**.

Source: Chaminade High School North Campus Athletic Facilities – Technical Memorandum, Noah Tanski Environmental Consulting (NTEC), April 2024, in Appendix G of this IS/MND.

With regard to the remaining receptors, 23309 Saticoy Street Residence, Saticoy Street Residences – South of North Campus, and Woodlake Avenue Residences: Table XIII-14 shows that worst-case hourly composite noise impacts at these receptors would be below 2 dBA. As such, there is no potential that corresponding 24-hour CNEL impacts at these receptors would exceed the minimum 3 dBA increase threshold.

Before discussing the recommended mitigation measure that would reduce hourly (i.e., 5 dBA L_{eq}) and 24-hour (i.e., 5 dBA CNEL) noise impacts at Melba Street Cul-de-Sac Residences, it is important to address LAMC Section 112.01 and the effect it would have on amplified baseball game and swim meet noise levels that are at the root of the potential noise impact affecting Melba Street Cul-de-Sac Residences (and to a less than significant degree, the other selected receptors, as well). LAMC Section 112.01(b) would prohibit any amplified noises from being audible at a distance greater than 150 feet from the North Campus property line, and compliance with this regulation would necessitate that the Project's amplified noise levels are much lower than the levels predicted by this analysis. For example, Table XIII-14 shows that composite swim meet and baseball game noise levels, which are mainly caused by amplified sounds at these events, would be as high as 56.9 dBA L_{eq} at Bobbyboyar Avenue Cul-de-Sac Residences. While this is shown to result in a less than significant 4.8 dBA L_{eq} hourly noise increase at Bobbyboyar Avenue Cul-de-Sac Residences, the 56.9 dBA L_{eq} noise level indicates that amplified sounds responsible for this noise level would be clearly audible over the receptor's 53.9 dBA L_{eq} ambient noise conditions. Therefore, despite the noise increase being less than significant with respect to the 5 dBA L_{eq} increase threshold of significance (as well as the 5 dBA L_{eq} increase limit established by LAMC Section 112.01(c)), the amplified sounds emanating from swim meets and baseball games held simultaneously would still need to be reduced to achieve compliance with the LAMC Section

112.01(b) audibility standard.[63] Without mitigation, this impact related to athletic operations on the North Campus could be significant.

On-Site Operational Noise Mitigation Measures

The Project's amplified sound systems can be designed in a way that achieves Project objectives (i.e., providing amplified sound for baseball games and swim meets) while complying with LAMC Section 112.01(b). For example, large outdoor music venues are often acoustically engineered to comply with similar noise standards, despite featuring much louder sound systems than the Project would employ. Acoustical design considerations commonly include techniques such as utilizing directional speakers rather than broadcast systems, mounting speakers low and oriented away from residential areas, and instituting maximum sound level limits. The facilities themselves may also be designed to aid noise control efforts. For example, bleachers may be located so that crowd-facing speakers are directed away from sensitive residential areas, and structures may be located in a way to buffer residential areas from noise sources. In fact, the Project's site plan already features some of these considerations. For example: the baseball field is oriented so that bleachers are located along Saticoy Street, not near the quieter residential neighborhood to the north; the batting cage is oriented so that batters would also be distanced from this neighborhood; and the aquatic complex is oriented so that the parking lot and athletic field/pool house provide a buffer between the pool and this neighborhood.

As shown above in Table XIII-14, maximum hourly noise impacts at Melba Street Cul-de-Sac Residences could be as high as a 5.3 dBA L_{eq} increase over existing daytime noise conditions, which would exceed the 5 dBA L_{eq} increase threshold of significance. As shown in Table XIII-16, 24-hour noise impacts at this same receptor could be as high as a 5.1 dBA CNEL increase, which would exceed the 5 dBA CNEL increase threshold of significance for this receptor, as well. Further, all amplified noise source operations would need to comply with the audibility standard established by LAMC Section 112.01(b). Noise reductions necessary to achieve compliance with LAMC Section 112.01(b) would also achieve the noise reductions necessary to reduce noise impacts at Melba Street Cul-de-Sac Residences to less than significant levels. The following mitigation measure to achieve compliance with LAMC Section 112.01(b), which would also reduce noise increases to a less than significant impact at Melba Street Cul-de-Sac Residences, is required:

NOI-3 Amplified sound systems for the Project's baseball field/bleachers and outdoor aquatics facility/bleacers shall be acoustically engineered with the following design and performance standards:

[63] In turn, this would reduce the noise increase experienced by Bobbyboyar Avenue Cul-de-Sac Residences.

- Amplified sound levels, as measured at the northern property line of the North Campus, shall not exceed 50 dBA.
- Amplified sound systems shall not be operated outside the operational hours established for the North Campus facilities.
- Speakers shall be directional and oriented away from the northern property line of the North Campus.
- Non-Chaminade users of the facilities shall not be permitted to utilize the facilities' amplified sound systems.

On-Site Operational Noise Impacts After Mitigation

Amplified sound systems designed in accordance with the design and performance standards required by Mitigation Measure NOI-3 would achieve the noise audibility standard established by LAMC Section 112.01(b) and would also reduce noise levels at Melba Street Cul-de-Sac Residences to below the applicable 5 dBA L_{eq} and 5 dBA CNEL thresholds of significance. As discussed above, the potentially significant impacts to this receptor were based on slight exceedances of these thresholds (0.3 dBA L_{eq} exceedance and 0.1 dBA CNEL exceedance). However, compliance with Mitigation Measure NOI-3 would ensure that amplified noise levels at this receptor do not exceed 50 dBA, which is substantially lower than the unmitigated 57.7 dBA figure estimated by this analysis. Accordingly, impacts to Melba Street Cul-de-Sac Residences would be reduced to well below the 5 dBA L_{eq} and 5 dBA CNEL noise-increase thresholds of significance. Therefore, after mitigation, this impact would be considered less than significant.

Off-Site Operational Noise

According to the Project's transportation study (contained in Appendix H of this IS/MND), the Project would result in a net reduction of 1,355 daily trips. Therefore, the Project would not result in traffic-related noise increases and this impact would be less than significant.

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact.

Construction

Construction of the Project would require the use of large earthmoving equipment and bore/drill rigs. Large earthmoving vehicles such as excavators and bulldozers can produce groundborne vibration levels up to 0.089 inches per second peak particle velocity (PPV) at a reference distance of 25 feet. Drill rigs can produce similar groundborne vibration levels.

On the North Campus site, excavators, bulldozers, and other similar earthmoving vehicles would be utilized extensively to demolish the existing shopping center and grade for the Project. Vehicles

operating up to 10 feet from homes to the north of this site could expose these structures to groundborne vibration levels up to 0.244 inches per second PPV, which is less than the FTA's 0.5 inches per second significance criteria for modern residential buildings. A bore/drill rig would operate over 70 feet from the nearest homes when installing foundations for the proposed pedestrian bridge. This would expose these structures to groundborne vibration levels no greater than 0.029 inches per second PPV, which is also below the significance criteria for modern residential buildings.

On the Main Campus site, earthmoving vehicles would operate over 100 feet from surrounding residential structures located along Atron Avenue, Chaminade Avenue, Windom Street, and other nearby roadways. Thus, groundborne vibration impacts would be even lower than the levels discussed above and similarly below significance criteria for modern residential buildings. The only potentially historic building in the general vicinity is the property located at 7572 Woodlake Avenue, which was identified in SurveyLA. However, this property is not located within the immediate vicinity of the Project Site and based on the distance from the Project Site to this building, there would be no potential for construction vibration to impact this building.

Given these considerations, the Project's construction-related groundborne vibration impacts would be less than significant.

Operation

The Project would not contain any significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. The Project's related vehicle travel would not be considered a significant source of vibration, as vehicle travel rarely generates perceptible groundborne vibration. Therefore, the Project's operations-related groundborne vibration impact would be less than significant.

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

No Impact. The Project Site is not located within two miles of a public or public use airport and would not expose people residing or working in the project area to excessive noise levels from aircraft. Therefore, no impact would occur.

Cumulative Impacts

Construction

As discussed previously, the Project's construction activities would temporarily increase ambient noise levels at nearby sensitive receptors, but impacts would be considered less than significant after implementation of Mitigation Measures NOI-1 and NOI-2. Any other developments that are

built at the same time as the Project would contribute to additional increases in noise levels at sensitive receptors and result in cumulatively considerable impacts. This would occur if simultaneous construction noise from the Project and other nearby related projects results in ambient noise level increases in excess of 5 dBA L_{eq} at sensitive receptors. However, no related projects have been identified within one-half mile of the Project site. Therefore, there is no potential for nearby sensitive receptors to be exposed to potentially significant cumulative construction noise impacts.

Concerning vibration, the Project's construction activities would generate groundborne vibrations at surrounding structures that are below levels that the FTA associates with architectural or structural damages. Therefore, the Project's construction-related vibration impacts would be less than significant. As noted earlier, no related projects have been identified within one-half mile of the Project site. As such, there is no potential for related projects to expose nearby receptors to simultaneous construction-related groundborne vibrations capable of resulting in significant cumulative impacts.

Operation

The Project's on and off-site operational noise sources would have a minimal effect on surrounding ambient noise conditions that is below the minimum 3 dBA CNEL increase threshold of significance. Therefore, the Project's noise impact from operations would be less than significant. Because no related projects have been identified within one-half mile of the Project, there is no potential for on-site operational noise sources associated with the Project to be audible at sensitive receptors to any related projects (and vice versa). And because the Project would result in a net reduction of 1,355 daily trips, the Project would not contribute to increases in off-site traffic related noise levels, whether individually or cumulatively considered.

XIV. POPULATION AND HOUSING

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

No Impact. A significant impact may occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing population growth that would otherwise not have occurred as rapidly or in as great a magnitude.

Construction

The construction activities associated with the Project would create temporary construction-related jobs. Nevertheless, the work requirements of most construction activities are highly specialized, so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, construction workers would not be anticipated to relocate their residence to the Project Site area and would not induce unplanned population growth and/or require permanent housing. Therefore, the Project would result in no impact with respect to indirect unplanned population growth associated with construction activities.

Operation

The Project consists of the physical expansion of the existing high school campus. However, this expansion would serve the existing student population and would not result in an increase in the number of faculty or the maximum student enrollment. In addition, the removal of the existing commercial development on the North Campus portion of the Project Site substantially decreases employment overall. Therefore, the Project would not induce substantial population growth, either directly or indirectly, and no impact would occur.

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

No Impact. A significant impact may occur if a project would result in the displacement of a substantial number of existing housing units or residents, necessitating the construction of replacement housing elsewhere. The Project Site is currently developed with the existing high school (Main Campus) and shopping center and associated surface parking (North Campus). The Project would not displace any housing or residents, as there is no housing on the Project Site. Although there is no existing housing on site, the North Campus property is designated in the City's Housing Element Inventory of Sites as potentially providing a maximum of 93 housing units (Base Zoning) and a maximum of 356 housing units (Bonus Zoning). Therefore, prior to Project approval, the City must make a finding that the Housing Element's remaining sites have sufficient capacity to accommodate the remaining unmet regional housing need allocation (RHNA) by each income level. Due to the fact that the Housing Element Inventory of Sites sets a target capacity (or buffer) that is 10% higher than the RHNA for lower income units, and 15% higher than the RHNA for moderate income units, sufficient capacity remains in other Housing Element Inventory Sites, and no impact would occur.

Cumulative Impacts

As the Project includes the physical expansion of the existing school, but would not increase student enrollment, the Project would not result in unplanned growth. In addition, as discussed previously, no related projects have been identified within one-half mile of the Project Site. Thus, the Project would not have the potential to contribute to any cumulative impacts related to unplanned growth.

XV. PUBLIC SERVICES

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

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

a. Fire protection?

Less Than Significant Impact. A significant impact may occur if, as a result of LAFD not being able to adequately serve the Project with existing governmental facilities, there would be a need for a new or physically altered fire station to be constructed which would cause significant environmental impacts.[64] The need for, or deficiency in, adequate fire protection services as a result of the Project is not in and of itself is a potentially significant impact, but rather a social and/or economic impact for which CEQA does not require further analysis.[65] The ultimate determination of whether there is a significant impact to the environment related to fire protection from a project is determined by whether construction of new or expanded fire protection is a direct physical change or a reasonably foreseeable indirect change in the environment caused by the Project. To the extent the Project would result in a need for new or expanded fire facilities, based on existing zoning standards, past practices, and historical development of City fire facilities, the City makes the following assumptions: such facilities (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) would qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 and/or a Mitigated Negative Declaration.

[64] City of Hayward v. Board of Trustees of California State University (2015) 242 Cal.App.4th 833, 847.

[65] City of Hayward v. Board of Trustees of California State University (2015) 242 Cal.App.4th 833, 847.

Construction

Construction and demolition activities associated with the Project could temporarily increase demand for fire protection. Such activities may also cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources from machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. Project construction activities would comply with all applicable federal, state, and City regulations related to fire safety, including federal regulations under the Occupational Safety and Health Acts (29 Code of Federal Regulations, Part 1926 Subpart F), the California Building Code (California Code of Regulations, Title 24), and the City's Fire Code (LAMC Chapter V, Article 7). To comply with California Department of Industrial Relations, Division of Occupational Safety and Health (Cal-OSHA) and Fire and Building Code requirements, construction managers and personnel will have training in fire prevention and emergency response, and fire suppression equipment specific to construction would be maintained on-site.[66] Project demolition and construction activities would comply with all applicable codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. Construction is a regular activity in Los Angeles and, as demonstrated by past practice, the LAFD is equipped and prepared to deal with construction-related fire impacts should they occur, and no aspect of this Project raises the potential for unusual fire risks during construction to which the LAFD would be unable to respond.

Project construction could also potentially impact the provision of existing LAFD services to and within the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. However, construction activity would be contained on-site (except as may be required for improvements to the adjacent sidewalks, if applicable, off-site utility connections, and for construction of the pedestrian bridge abutments/landings) and travel lanes would be maintained in each direction on all public streets around the Project Site throughout the construction period, and emergency access would not be impeded. Further, the Project would be required to implement a Construction Traffic Management Plan (formally required as Mitigation Measure TRANS-1), which would include traffic management strategies, and ensure that adequate and safe access for LAFD remains available within and near the Project Site during construction.

Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, Project construction activities could temporarily impact emergency access and response times. However, a Construction Traffic Management Plan would be implemented to minimize disruptions to through traffic flow and maintain emergency vehicle access to the Project Site and neighboring land uses. The majority of construction-related traffic, including deliveries, hauling activities, and construction worker trips, would occur outside the typical

[66] Cal. Code of Regs., tit. 8, § 1920.

weekday commuter AM and PM peak periods, thereby reducing the potential for traffic-related conflicts and the slowing of emergency response times. In addition, temporary traffic controls would be implemented to improve traffic flow around the Project Site during the construction period, and construction activity would be contained on-site (except as may be required for improvements to the adjacent sidewalks, if applicable, off-site utility connections, and for construction of the pedestrian bridge abutments/landings).

Furthermore, Section 21055 of the California Vehicle Code (CVC) exempts drivers of authorized emergency vehicles from adherence to the rules of the road, and Section 21806 of the CVC requires drivers to yield to emergency vehicles. Finally, construction is a temporary condition which would not itself require the construction of specific new governmental facilities to maintain adequate fire protection services.

The Project is similar to other construction projects, uses standard materials and construction practices similar to such projects, and as a result, LAFD possesses sufficient equipment, knowledge, and resources to addresses any concerns related to fire protection from the Project. Furthermore, as discussed above, the Project would comply with relevant regulations for workplace safety, best management practices for material use and storage, and ensuring emergency access to the site.

Based on the above, construction of the Project would not result in substantial adverse physical impacts associated with the provision of, or need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives related to fire protection. Therefore, impacts to fire protection during Project construction would be less than significant.

Operation

The Project involves the removal of the existing shopping center and the expansion of an existing high school use. The removal of the shopping center from the North Campus would decrease the need for fire protection services, and the types of fires that could potentially occur at the expanded high school would be similar to those that could occur at the existing high school campus and would be adequately suppressed with the fire equipment found at the fire stations nearest to the Project Site.

Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features that would reduce the demand on LAFD facilities and equipment resulting from the Project are implemented during Project operation. As such, compliance with Fire Code requirements would minimize the potential for incidents requiring an emergency response by LAFD and therefore reduce the need for a new fire station, or the expansion, consolidation, or relocation of an existing fire station.

The factors that the LAFD considers in determining whether fire protection services for a project are adequate include whether the project: (1) is within the maximum response distance for the land uses proposed; (2) complies with emergency access requirements; (3) complies with fire-flow requirements; and (4) complies with fire hydrant placement.

Pursuant to LAMC Section 57.09.07, the maximum response distance is 1.5 miles for an engine and truck company. If this maximum distance is exceeded, all structures shall be constructed with automatic fire sprinkler systems. LAFD Station No. 106, located at 23004 Roscoe Boulevard, which is approximately 0.68 miles from the North Campus and approximately 0.8 miles from the Main Campus, would serve the Project Site. Station No. 106 is equipped with a truck company and an engine company. As the Project Site is within 1.5 miles of this station, automatic fire sprinklers would not be required.

Emergency vehicle access to the Project Site would continue to be provided from local and major roadways (i.e., Chaminade Avenue, Cohasset Street, Keswick Street, Saticoy Street, and Woodlake Avenue) and would be maintained at all times during both Project construction and operation. All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Department of Building and Safety and LAFD standards and requirements for design and construction.

Final fire-flow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project during LAFD's plan check building permit process. Furthermore, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project resulting from the construction or alteration of fire facilities, and the obligation to provide adequate fire protection is the responsibility of the City. The City meets this constitutional requirement by preparing for long-term growth and demographic changes. The City along with LAFD continue to monitor the demand for existing and projected fire facilities (refer to Objective 9.16 of the Framework Element, Policy 2.1.6 of the Safety Element, and Fire Protection Objective 6-1 of the Central City Community Plan), and coordinate the development of new fire facilities to be phased with growth (Objective 9.18 of the Framework Element). Further, LAFD has identified future strategies in their 2018-2020 Strategic Plan as critical goals to continue to provide excellent service and meet future needs. These strategies consist of better integration of technology in dispatch, vehicle location systems, and staffing as a key component of LAFD's strategy. LAFD is adapting more advanced technological strategies to deploy resources and address life safety issues, maximizing existing resources. LAFD continues to improve and provide for adequate fire protection services, and the Project would not trigger any requirements outlined which would necessitate the need for additional or expanded fire protection facilities. Based on this analysis, it is reasonable to conclude that Project operation would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service; such services will be provided by a local jurisdiction, and would not inhibit LAFD emergency response.

In conclusion, as described above, the Project would not result in substantial adverse physical impacts associated with the provision of, or need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives related to fire protection. Therefore, impacts to fire protection during Project operation would be less than significant.

Cumulative Impacts

No related projects have been identified within one-half mile of the Project Site. Cumulative development requires the LAFD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the Project, any other development projects in the area would be subject to the Fire Code and other applicable regulations of the LAMC including, but not limited to, automatic fire sprinkler systems for high-rise buildings and/or projects located farther than 1.5 miles from the nearest LAFD Engine or Truck Company to compensate for additional response time, and other recommendations made by the LAFD to ensure fire protection safety. Through the process of compliance, the ability of the LAFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAFD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and any other development projects would contribute. Therefore, cumulative impacts related to fire protection services would be less than significant.

b. Police protection?

Less Than Significant Impact. A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives.[67] The need for, or deficiency in, adequate police protection services as a result of the Project is not in and of itself is a potentially significant impact, but rather a social and/or economic impact for which CEQA does not require further analysis.[68] The ultimate determination of whether there is a significant impact to the environment related to police protection from a project is determined by whether construction of new or expanded police protection is a direct physical change or a reasonably foreseeable indirect change in the environment caused by the Project. To the extent the Project would result in a need for new or expanded police facilities, based on existing zoning standards, past practices, and historical development of City police facilities, the City makes the following assumptions: such facilities (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) would qualify for a

[67] City of Hayward v. Board of Trustees of California State University (2015) 242 Cal.App.4th 833, 847.

[68] City of Hayward v. Board of Trustees of California State University (2015) 242 Cal.App.4th 833, 847.

categorical exemption under CEQA Guidelines Section 15301 or 15332 and/or a Mitigated Negative Declaration.

Construction and operation of new buildings can result in additional calls for service from the Los Angeles Police Department (LAPD). The Project includes proposed construction methods and building uses currently widespread in the City of Los Angeles, which LAPD has sufficient specialized equipment and training with which to respond. LAPD dispatches resources dynamically, with officers responding from the field, patrols, or facilities depending on their location at the time. Due to the nature of dispatching police calls for service, facilities are not the limiting factor in responding to calls for service, but rather equipment and staffing as police are infrequently in one location for extended periods of time. LAPD continually evaluates their equipment and staff levels, making adjustments as necessary, with a focus towards advanced technology, operational efficiencies, community involvement, and advanced training to maximize current resources community involvement, as outlined in the LAPD Strategic Plan, *LAPD 2020 & Beyond.* [69] Due to the unpredictable nature of deploying resources, developments such as advanced equipment in vehicles, improved access to digital resources in vehicles, and advanced mobile phone capabilities all allow for a more mobile and dynamically deployed workforce. These advances, such as in car computers, mobile phone advancements, mapping and navigation improvements, and dispatch center advancements allow for resources to be deployed from the field rather than a static office or station.

The Project would not introduce physical obstructions, inhibiting the LAPD, nor would the uses contain novel activities that would require new police facilities to adequately ensure public safety. In addition, the Project involves the removal of the existing shopping center from the North Campus, which would decrease the need for police protection services, as the need for police protection services on the North Campus would be similar to the need already occurring for the existing high school on the Main Campus. Further, the Project would not increase the maximum student enrollment beyond what is currently permitted. The Project would also comply with relevant laws, as well as industry standards in securing the property during both construction and operation. The Project would include security measures during operation, such as secured access, closed circuit video surveillance, security alarm systems, and ample lighting. The Main Campus would retain the existing eight-foot tall fence, gates, and block wall currently securing the campus perimeter. In addition, new fencing and vehicular gates, to be located along the northwest drive aisle and parent drop-off area along Chaminade Avenue and at the southeastern access point along Cohasset Street, would be provided on the Main Campus to complete the perimeter security. A new 10-foot high ornamental fence would be provided around the perimeter of the North Campus. The Project would not constitute a novel arrangement of uses or use type which would require the construction of altered or new specialized facilities.

The Project Site is served by the City of Los Angeles Police Department's (LAPD) Valley Bureau, which oversees LAPD operations in the Devonshire, Foothill, Mission, North Hollywood, Topanga,

[69] http://lapd-assets.lapdonline.org/assets/pdf/Strategic%20Plan%202019-2021.pdf

Van Nuys, and West Valley areas, and would be served by the Topanga Community Police Station, located at 21501 Schoenborn Street.[70] The Valley Bureau service area is 226 square miles in size has approximately 1.8 million residents. LAPD has identified the need for more reserve officers in its Strategic Plan, and identifies staffing needs yearly during the budgeting process. New staffing is subject to approval by the City Council and is based on a complex set of socio-economic factors, which are outside the purview of CEQA. Changes in LAPD staffing levels do not typically result in substantial adverse physical impacts on the environment. The Project would not introduce population to an area not served by a police station or an area otherwise not currently served by existing police services, and would not result in an increase in maximum student enrollment beyond what is currently permitted. Therefore, the Project would not require new facilities or staffing requiring dedicated facilities.

Furthermore, the protection of the public safety is the responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services. Based on this analysis, it is reasonable to conclude that Project operation would not require the addition of a new police station or the expansion, consolidation, or relocation of an existing facility in order to maintain service; such services will be provided by a local jurisdiction, and would not inhibit LAPD emergency response. In conclusion, as described above, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for police protection. Therefore, Project impacts would be less than significant.

Cumulative Impacts

No related projects have been identified within one-half mile of the Project Site. Cumulative development requires the LAPD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the Project, any other development projects in the area would be subject to the site plan review and approval requirements, recommendations of the LAPD related to crime prevention features, and other applicable regulations of the LAMC. Through the process of compliance, the ability of the LAPD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and any other development projects would contribute. Therefore, cumulative impacts related to police protection services would be less than significant.

[70] LAPD, Valley Bureau: http://www.lapdonline.org/valley_bureau

c. Schools?

No Impact. The Project includes the physical expansion and improvements to the existing high school. Thus, the Project would not result in the direct demand for school services. Additionally, pursuant to the California Government Code Section 65995, the Project Applicant would be required to pay school fees established by the Los Angeles Unified School District (LAUSD), payment of which in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for any potential direct and indirect impacts to schools as a result of the Project. Therefore, no impact would occur.

Cumulative Impacts

No related projects have been identified within one-half mile of the Project Site. In addition, the Project would not result in the demand for school services, as the Project involves the expansion of an existing high school. Regardless, and similar to the Applicant of the Project, the applicants of any other development projects would be required to pay the applicable school fees to the LAUSD to ensure that no significant impacts to school services would occur. Therefore, cumulative impacts to school services would be less than significant.

d. Parks?

No Impact. A significant impact to parks would occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts. The Project includes the physical expansion of the existing high school campus, including new athletic fields and an outdoor swimming pool, which would provide additional recreational space for students, but would not result in an increase in maximum student enrollment. Therefore, it is expected that the recreational needs of the students would be satisfied through the provision of on-site recreational facilities, and the Project would not result in additional demand for parks and recreational facilities. As such, no impact would occur.

Cumulative Impacts

No related projects have been identified within one-half mile of the Project Site. In addition, the Project would not result in the demand for parks and recreational facilities, as the Project includes new recreational space that would serve the needs of its students. Any other development projects that include residential uses could result in an increase demand for parks and recreational services, and the applicants of any such development projects would be required to meet LAMC open space requirements and would be subject to the park fees pursuant to LAMC Section 12.33, ensuring that any potential impacts to parks and recreational facilities would be less than significant. As stated previously, the Project would not result in any impacts related to parks and recreational facilities. Therefore, cumulative impacts to park and recreational facilities would be less than significant.

e. Other public facilities?

No Impact. The Project includes the physical expansion and improvements to the existing high school, and does not increase the maximum student enrollment beyond what is currently permitted. The Project would not create a residential population that could then create the need for additional library facilities. As the Project is a high school, students would be supplied with textbooks and other supplemental materials for their classes. In addition, students would have access to a new library contained within the new Multistory Building and it is also likely that the students would have individual access to internet service, which provides information and research capabilities that studies have shown to reduce demand at physical library locations.[71],[72] As such, the Project would not necessitate the need for a new library facility, and no impact would occur.

Cumulative Impacts

No related projects have been identified within one-half mile of the Project Site. In addition, the Project would not result in the demand for library facilities, as the Project includes a new library within the new Multistory Building. Any other development projects that include residential uses could result in an increase demand for library services. The anticipated revenue to the General Fund generated by any other development projects through business taxes and other revenue sources would help offset any increase in demand for library services and fund necessary library improvements. As such, the demand for library services created by any other development projects could be accommodated, and impacts would be less than significant. As stated previously, the Project would not result in any impacts related to library services. Therefore, cumulative impacts to library services would be less than significant.

[71] "To Read or Not To Read", see pg. 10: "Literary reading declined significantly in a period of rising Internet use": http://www.nea.gov/research/toread.pdf.

[72] "How and Why Are Libraries Changing?" Denise A. Troll, Distinguished Fellow, Digital Library Federation: http://old.diglib.org/use/whitepaper.htm.

XVI. RECREATION

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

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

No Impact. As discussed in response to Checklist Question XV(d) (Public Services – Parks), the Project includes physical upgrades to and the expansion of the existing high school campus, including new athletic fields, an outdoor swimming pool, and new parking facilities which would provide and allow for additional recreational space for students, but would not result in an increase in maximum student enrollment. Therefore, it is expected that the recreational needs of the students would be satisfied through the provision of on-site recreational facilities, and as such, no impact would occur.

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

Less Than Significant Impact. A significant impact may occur if a project includes the construction or expansion of park facilities, the construction of which could have a significant adverse effect on the environment. While the Project includes the construction of new athletic fields and an outdoor swimming pool on the North Campus and the resurfacing of the existing baseball field on the Main Campus to be used as a softball field, as demonstrated throughout this IS/MND, the construction of these facilities would not have an adverse physical effect on the environment. Further, as the Project would not result in additional demand for parks and recreational facilities, the Project would not require the construction or expansion of recreational facilities, and this impact would be less than significant.

Cumulative Impacts

Refer to discussion of cumulative impacts related to parks and recreational facilities under response to Checklist Question XV(d) (Public Services – Parks). As discussed therein, cumulative impacts related to parks and recreational facilities would be less than significant.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
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?	☐	☐	☒	☐

This section is based on the following items, which are included in Appendix H of this IS/MND:

- Transportation Assessment Report, Armen Hovanessian Transportation Consulting, May 4, 2023.
- Transportation Assessment Letter, Los Angeles Department of Transportation, May 16, 2023.

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

Less Than Significant Impact. A significant impact would occur if a project conflicts with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. The Project would not conflict with the relevant City plans, policies, and programs and does not include any features that would preclude the City from completing and complying with these guiding documents and policy objectives. The Project will not conflict with any plans or policies that govern the public right-of-way, such as the Los Angeles Department of Transportation's (LADOT) Manual of Policy and Procedures (MPP) Section 321, Driveway Design. The Project has been found to be consistent with the GHG reduction targets forecasted in the SCAG RTP/SCS as it would result in a decrease of 1,355 net daily vehicle trips

when compared to existing conditions. Additionally, the Project has been found to be consistent with the transportation-related elements of the Plan for a Healthy Los Angeles (Healthy LA), Vision Zero, the Mobility Hubs Reader's Guide, the City's Walkability Checklist, and the Canoga Park – Winnetka – Woodland Hills – West Hills Community Plan. Therefore, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities, and the impact would therefore be less than significant.

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?

No Impact. This question was revised to address consistency with CEQA Guidelines Section 15064.3, subdivision (b), which relates to use of vehicle miles traveled (VMT) as the methodology for evaluating traffic impacts. The Los Angeles Department of City Planning (LADCP) and LADOT updated the Transportation Section of the City's CEQA Thresholds Guide to comply with and implement Senate Bill 743 (SB 743).

On September 27, 2013, Governor Brown signed SB 743. Under SB 743, the focus of transportation analysis pursuant to CEQA shifts from driver delay, or Level of Service (LOS), to reduction in VMT, reduction in GHG emissions, creation of multimodal networks, and promotion of mixed-use developments. In December 2018, the California Natural Resources Agency certified and adopted amendments to the CEQA Guidelines implementing SB 743 with a target implementation date of July 1, 2020. City staff presented the CEQA Appendix G environmental checklist update to the City Council, which led to the adoption of new VMT-based significance thresholds and its subsequent incorporation into the City's CEQA Threshold Guide. In the course of this update, LADOT has developed a VMT Calculator tool to "screen" projects to determine if a VMT analysis is required, and if so, then to estimate project specific daily household VMT per capita and daily work VMT per employee for land use development projects. This tool is intended to be used for the development projects within the City, and the VMT methodology is tailored to the Transportation Assessment Guidelines (TAG).

LADOT's VMT Calculator, version 1.3, was used to determine whether the Project would exceed any of the Transportation Impact Assessment criteria, which would require further transportation impact analysis. The VMT Calculator sheets are included in Appendix 5 of the Transportation Assessment Report (which is included as Appendix H-1 of this IS/MND) and demonstrate that the Project would result in a net decrease of daily vehicle trips when compared to existing conditions.[73] This reduction is the result of demolishing an existing shopping center which is a high trip-generating use and replacing it with athletic and ancillary facilities for a high school. Based on the results using the City's VMT Calculator, a formal VMT assessment is not required

[73] The VMT calculator sheets included in Appendix 5 of the Transportation Assessment Report show a decrease of 1,179 net daily trips, and the trip generation analysis provided in Table 8 of the Transportation Assessment Report show a decrease of 1,355 net daily trips.

to be performed because the Project does not exceed the daily trip threshold of 250 net new daily vehicle trips established as the screening criteria in the TAG. Accordingly, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), and no impact with respect to VMT would occur.

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

Less Than Significant Impact with Mitigation. A significant impact may occur if a project were to include a new roadway design, introduce a new land use or project features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project access or other features were designed in such a way as to create hazardous conditions.

Construction

Trucks and other construction-related vehicles would access the Project Site over the course of all construction phases. The Project's maximum truck trip generation would occur during grading and hauling operations for the Multistory Building on the Main Campus. During this one-month phase, up to 47 haul trucks per day (approximately 94 one-way trips) would remove cut soils for transportation to a regional landfill. The Project also requires a haul route approval for the export of approximately 17,800 cubic yards from the Main Campus and approximately 720 cubic yards of export from the North Campus. The proposed haul route would exit the school Project Site and travel west on Saticoy Street (which then turns into Ingomar Street), south on Valley Circle Boulevard, and west on Long Valley Road to the Ventura Freeway (US-101) on-ramps. Empty trucks returning to the Project Site would exit the Ventura Freeway at Mulholland/Valley Circle, travel east on Calabasas Road, north on Valley Circle Boulevard, east on Ingomar Street, and east on Saticoy Street. Saticoy is designated as an Avenue II Street generally improved to an 85-foot width with sufficient capacity for the haul trucks. Valley Circle Boulevard is a generally commercial street designated Avenue I in this location improved up to100 feet.

As part of the Project approvals, the Advisory Agency will approve the haul route for the haul trucks. In addition, LADOT requires implementation of worksite traffic control plans to ensure that any construction-related effects are minimized to the greatest extent possible. To be conservative, a Construction Traffic Management Plan (CTMP) will be implemented (see TRAN-MM-1), which would ensure that construction related traffic impacts are less than significant.

Operation

The Transportation Assessment Report (included in Appendix H-1 of this IS/MND) addresses traffic anticipated to be generated by the Project. As the Project would not increase student enrollment or faculty or staff, it would not result in any new trips as a result of students or employees traveling to and from the Project Site. However, new trips would be generated by new special events and activities associated with the new outdoor pool on the North Campus. The

following provides a summary of new events and activities at the North Campus (not including existing school events that would shift from the Main Campus to the North Campus):

- 10 high school swim competitions per year
- 10 middle school swim competitions per year
- Swim practice for other schools (limited to February through April)
- Swim lessons and water exercise classes daily
- Local community swimming (if there are no other activities at the pool)
- Local non-school athletic groups (limited to May through December)

When taking into account the removal of the existing shopping center on the North Campus portion of the Project Site, the Project would result in no net new AM peak hour trips, 292 net new PM peak hour trips, and a reduction of 1,355 daily trips. The net new PM peak hour trips would be generated by the activities at the North Campus that are listed above.

The Project would not substantially increase hazards due to a geometric design feature. Vehicular access to the Project Site would be provided via Chaminade Avenue, Cohasset Street, Keswick Street, Saticoy Street, and Woodlake Avenue. The Project would not add or shift any access points on the Main Campus. For the North Campus, there are currently four access points along Saticoy Street which would be reduced to the two access points for the Project. There are also currently two access points along Woodlake Avenue which would be reduced to one access point at the approximate location of the existing north access point. The Project driveways (existing and new) will meet the standards set forth by LADOT and BOE.

In addition, the Transportation Assessment Report (included as Appendix H-1 of this IS/MND) included an access, safety, and circulation evaluation to determine whether Project traffic would cause or substantially extend queueing at nearby intersections. As shown in Table 15 of the Transportation Assessment Report, with the addition of Project traffic, the queueing length would only increase by less than one car length. Further, the Project would include a Traffic Management Plan (TMP), formally provided as PDF-2 in Section 3, Project Description. The purpose of this plan is to establish operational procedures to improve traffic circulation, student safety, maximize the efficiency of drop-off and pick-up operations, and reduce delays during those time periods. Therefore, the Project would not create hazardous conditions and this impact would be less than significant.

Mitigation Measure

TRANS-1 Construction Traffic Management Plan

Prior to the start of construction, a Construction Traffic Management Plan (CTMP) shall be submitted to LADOT for review and approval. The CTMP will include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicycles, and pedestrians. The CTMP will include, but not limited to, the following measures:

- Maintaining access for land uses in the vicinity of the Project Site during construction.
- Schedule construction materials deliveries during off-peak periods to the extent practical.
- Organize deliveries and staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to surrounding roadways.
- Coordinate deliveries to ensure trucks do not wait to unload or load and impact surrounding roadways, and if needed, utilize an off-site staging area.
- Control truck and vehicle access to the Project Site with flagmen.
- Limit lane closures to the maximum extent possible and avoid peak period hours to the extent possible. Where such closures are necessary, the Worksite Traffic Control Plan will identify the location of lane closures and identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity.
- Parking for construction workers will be provided either on-site or at off-site, off-street locations.

d. Result in inadequate emergency access?

Less Than Significant Impact. A significant impact would occur if a project would significantly impede emergency vehicle response times. Emergency vehicular access to the Project Site would be maintained from all Project driveways, and the Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access both during construction as well as after completion of the Project. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access and fire lanes, would be

confirmed as part of LAFD's fire/life safety plan review and inspection required in Section 57.118 of the LAMC. The Project also would not include the installation of barriers that could impede emergency vehicle access both during and operation. The Transportation Assessment Report (included in Appendix H-1 of this IS/MND) demonstrates that the Project would result in a decrease of daily vehicle trips when compared to existing conditions, and therefore Project traffic will not impact surrounding roadways or impede emergency vehicles from access adjacent streets. Emergency access to the Project Site and surrounding area would be maintained both during Project construction and operation. Therefore, the Project would not result in inadequate emergency access during construction or operation, and impacts to emergency access during construction and operation of the Project would be less than significant.

Cumulative Impacts

Pursuant to the TAG, each of the plans, programs, ordinances, and policies to assess potential conflicts with proposed projects should be reviewed to assess cumulative impacts that may result from the Project in combination with other nearby development projects. A cumulative impact could occur if the Project, with other future development projects located on the same block were to cumulatively preclude the City's ability to serve transportation user needs as defined by the City's transportation policy framework. As stated above, no related projects have been identified within one-half mile of the Project Site. Therefore, cumulative impacts would be less than significant.

As described above, a formal VMT assessment is not required to be performed for the Project because the forecast of net new daily vehicle trips does not exceed the daily trip threshold of 250 net new daily vehicle trips established as the screening criteria in the TAG, and the Project was determined to result in no impact related to VMT as it results in a decrease of 1,355 net daily vehicle trips when compared to existing conditions. As identified in the TAG, development projects that do not exhibit significant VMT impacts are considered to align with the long-term VMT and greenhouse gas reduction goals of both the City and regional SCAG transportation plans. Therefore, since the Project itself does not result in VMT impacts, it is also deemed to have a less than significant cumulative VMT impact.

Pursuant to the TAG, the potential for cumulative impacts related to hazardous design features should be determined by reviewing project site access plans for cumulative development projects with access points proposed along the same block(s) as a proposed project. As stated above, no related projects have been identified within one-half mile of the Project Site. Therefore, there would be no cumulative impacts related to substantially increasing hazards due to geometric design features or incompatible uses, and this impact would be less than significant.

Finally, similar to the Project, all ingress/egress and access associated with any other development projects would be designed and constructed in conformance to all applicable requirements, including the City Building Code, City Fire Code, LAMC, and other LAFD standards and requirements for design and construction. As all projects, including the Project and any other

development projects, would be required to comply with existing regulations related to access, cumulative impacts with respect to emergency access would be less than significant.

XVIII. TRIBAL CULTURAL RESOURCES

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

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

The analysis in this section is based on the following, which are included in Appendix I of this IS/MND:

- Tribal Cultural Resources Technical Memorandum, SWCA Environmental Consultants, March 9, 2023.
- AB 52 Letter, City of Los Angeles, June 6, 2023.

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

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

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

Less Than Significant with Mitigation Incorporated. A significant impact would occur if the project would 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, which is Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).

Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources (TCRs), as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation of an MND or EIR on or after July 1, 2015. PRC Section 21084.2 now establishes that a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment. To help determine whether a project may have such an effect, PRC Section 21080.3.1 requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. As a result of AB 52, the following must take place: 1) prescribed notification and response timelines; 2) consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and 3) documentation of all consultation efforts to support CEQA findings for the administrative record.

Under AB 52, if a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that impact. PRC Section 21074 provides a definition of a TCR. In brief, in order to be considered a TCR, a resource must be either: 1) listed, or determined to be eligible for listing, on the national, State, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the State register of historic resources or City Designated Cultural Resource. In applying those criteria, a lead agency shall consider the value of the resource to the tribe.

As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt

of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. An informational letter (included in Appendix I-2 of this IS/MND) was mailed to a total of 10 Tribes known to have resources in this area, on June 6, 2023, describing the Project and requesting any information regarding resources that may exist on or near the Project Site.

On June 9, 2023, staff received an email from Sarah Brunzell, on behalf of the Cultural Resources Management (CRM) Division of the Fernandeño Tatviam Band of Mission Indians (FTBMI), requesting a Tribal Consultation meeting for the Project. The Tribal representative requested that the Applicant submit a FTBMI Project Intake Form, in order to further evaluate the Project's impacts related to Tribal Cultural Resources. On June 27, 2023, the Tribal representative indicated that the Project is categorized as Medium Sensitivity and directed the Applicant to complete a new consultation form. On June 29, 2023, the Planning staff had a meeting with the Tribal representative to discuss the Project's potential impacts to Tribal Cultural Resources in the region. During that meeting, the Tribal representative provided the following information. The Tribal representative stated that the Project is in close proximity to a number of Tribal Cultural Resource Sites, some of which have also been documented as Cultural Resources (CA-LAN-413, CA-LAN-0834, etc). The Tribal representative also stated that the village of Jucayunga is also near the proposed undertaking as well as Rancho El Escorpion, a site that is both historic and prehistoric in nature. Although the Project location has been previously developed, the construction occurred prior to AB 52 presumably with no Tribal Monitor(s) present and the current proposed undertaking will disturb native soil. The FTBMI CRM Division requested the following: that prior to the initiation of ground-disturbing activities, the Project to retain a professional Native American monitor procured by the Fernandeño Tataviam Band of Mission Indians; that the Lead Agency and/or applicant shall, in good faith, consult with the FTBMI on the disposition and treatment of any Tribal Cultural Resource encountered during all ground disturbing activities; and if human remains or funerary objects are encountered during any activities associated with the Project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted.

According to the tribal cultural resources technical memorandum (included in Appendix I-1 of this IS/MND), no resources that could qualify as tribal cultural resources were identified in a CHRIS records search within the Project Site or a half-mile radius. The results of the sacred lands file (SLF) search conducted by the Native American Heritage Commission (NAHC) indicated that there are known tribal cultural resources in the vicinity of the Project Site. A review of ethnographic literature and historical maps document significant Native American villages and sites nearby. The Chumash village known as *Atavsanga* (also known as *Ataguama* or *Totongna*) is the closest ethnographically documented village to the Project Site, located approximately two miles to the southwest. The Tatavian village known as *Momonga* is located approximately 3.5 miles to the north (near present-day Chatsworth), and the Gabrielino village known as *Siutcanga* is located approximately 8.4 miles to the southeast (near present-day Encino). These villages are often correlated with the later Spanish and Mexican period ranchos, as ranchos developed around existing Native American settlements. *Atavsanga* and *Siutcanga* are both believed to have been

located within the boundaries of Ranchos El Escorpion and Encino, respectively.

The Project Site (both the Main and proposed North Campuses) was developed in the early 1960s with the Main Campus buildings and sports field, and a multi-tenant mini shopping center and paved parking lot within the proposed North Campus. The shopping center was expanded in 1981 to its current size. The development of the Project Site and its prior use as agricultural fields is likely to have substantially compromised the integrity of the physical setting and likely destroyed or displaced any tribal cultural resources that may have been deposited on the surface or shallowly buried. Furthermore, the surficial geology of the Project Site has been identified as late to middle Pleistocene old alluvial fan deposits. According to the paleontological resources study conducted for this Project (contained in Appendix E of this IS/MND), the depth to the underlying, previously undisturbed sediments is unknown, but likely very shallow (e.g., three feet below ground surface). These types of sediments are naturally less likely to contain buried archaeological resources.

Archaeological remains that are tribal cultural resources can occur below paved surfaces within developed urban settings. While the CHRIS records search results did not identify any such archaeological resources within the Project Site or vicinity, most of the Project Site was not inspected for archaeological resources before being developed. SWCA (the preparer of the tribal cultural resources technical memorandum) considers the greater region of the Project Site as having moderate sensitivity for tribal cultural resources. However, the Project Site consists of a comparatively small area within the greater region and has been subject to multiple episodes of ground disturbances. As a result, archaeological materials once located on the surface or in shallow deposits are very unlikely to have been preserved within the Project Site, and though more deeply buried deposits could exist, SWCA considers the sensitivity for archaeological resources to decrease within the Project Site. Based on the Historic period developments within the Project Site and SWCA's interpretation of the sediment profiles across the entire Project Site, the sensitivity for tribal cultural resources within the near-surface is considered low.

While there are known significant Native American village sites located in the general vicinity of the Project Site, such as *Atavsanga* and *Momonga*, the Project Site is not located near or in a comparable environmental setting to suggest an increased likelihood for associated tribal cultural resources to be discovered within the Project Site. The Project Site is set within what has been a broad floodplain of the Los Angeles River for which there are only generalized indicators of former use by Native Americans such that substantial material deposits are likely to have occurred. These generalized indicators include a reasonable proximity to former stream courses and important natural resources that occur in higher densities near waterways. Two intermittent streams are located in the vicinity of the Project Site: Dayton Creek formed approximately 0.6 mile to the north, and Bell Creek is approximately 0.7 miles to the south. Dayton Creek connects to Chatsworth Creek, which is located approximately 0.7 miles east of the Project Site. Both Chatsworth and Bell Creeks connect to the south-flowing Los Angeles River, currently located approximately 2.1 miles southeast of the Project Site. The proximity to these streams could suggest the area was more intensively used by Native Americans, such that there would be a

corresponding increase in the potential for a tribal cultural resource to be present.

Overall, late to middle Pleistocene old alluvial fan deposits below the artificial fill within the Project Site are naturally less likely to contain buried archaeological resources. The depth to the depth to the underlying, previously undisturbed sediments is unknown, but likely very shallow (e.g., three feet below ground surface). Additionally, the impacts to the near-surface from Historic period agricultural use and developments further decreases the likelihood of encountering any buried archaeological resources due to the compromised integrity of the physical setting. Based on these findings, SWCA considers the sensitivity for tribal cultural resources to be low.

Nevertheless, should tribal cultural resources be inadvertently encountered, the Project would comply with Mitigation Measures MM-TCR-1 through MM-TCR-3, provided below, regarding the discovery and handling of any potential resources. With implementation of MM-TCR-1 through MM-TCR-3, impacts with respect to tribal cultural resources would be less than significant.

Cumulative Impacts

Impacts related to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The Project's impacts with respect to tribal cultural resources would be less than significant with implementation of Mitigation Measures MM-TCR-1 through MM-TCR-3. In addition, no related projects have been identified within one-half mile of the Project Site. As such, the Project would not contribute to any potential cumulative impacts related to tribal cultural resources, cumulative impacts related to tribal cultural resources would be less than significant.

Mitigation Measures

MM-TCR-1 Prior to commencing any ground disturbance activities at the Project Site, the Applicant, or its successor, shall retain one (1) tribal monitor that is qualified to identify subsurface tribal cultural resources. Ground disturbance activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity at the Project Site. The qualified tribal monitor shall be approved by the Fernandeño Tataviam Band of Mission Indians.

If cultural resources are discovered during Project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be retained by the Applicant, or its successor, to assess the find. A qualified archaeologist/archaeological monitor shall be identified as principal personnel who must meet the Secretary of the Interior's Standards and Guidelines for Archeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in Southern California. The archaeologist shall ensure that all other personnel associated with and hired for the archaeological monitoring are appropriately trained and qualified. Work on the

portions of the Project outside of the buffered area may continue during this assessment period. The Fernandeño Tataviam Band of Mission Indians shall be contacted about any pre-contact and/or post-contact finds and be provided information after the archaeologist makes their initial assessment of the nature of the find, to provide Tribal input with regards to significance and treatment.

MM-TCR-2 The Lead Agency and/or Applicant shall, in good faith, consult with the Fernandeño Tataviam Band of Mission Indians on the disposition and treatment of any Tribal Cultural Resource encountered during all ground disturbing activities.

MM-TCR-3 If human remains or funerary objects are encountered during any activities associated with the Project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code shall be enforced for the duration of the Project.

XIX. UTILITIES AND SERVICE SYSTEMS

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

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

Less Than Significant Impact. As discussed below, Project impacts related to these issues would be less than significant.

Water

Local water conveyance infrastructure in the vicinity of the Project Site is maintained and operated by the Los Angeles Department of Water and Power (LADWP). As shown on Table XIX-1, the Project would consume approximately 2,663,284 gallons of water per year, or approximately 7,297 gallons of water per day. This is a conservative estimate that does not take into account

the water consumed by the existing shopping center on the North Campus, which would be removed as part of the Project.

Table XIX-1
Estimated Water Consumption and Wastewater Generation[1]

Land Use	Total (gallons/year)[2]
High School Expansion	2,299,554
Recreational Swimming Pool	363,730
Total	**2,663,284**

1 Conservatively assumes that all water converts to wastewater.
2 Calculated via CalEEMod. Refer to Appendix B of this IS/MND and conservatively does not take credit for the removal of the existing shopping center uses on the North Campus.

As part of the permitting process for the Project, the Project Applicant would be required to coordinate with the LADWP Water Service Organization to determine if the existing water supply infrastructure maintains sufficient capacity to accommodate the Project's demand for water, which is done through a Service Advisory Request (SAR). When completed, the SAR provides information regarding the range of flows and pressures that can be expected at the requested service location. The type and cost of improvements are also provided in the SAR. A project developer will then be required to participate in the cost of any necessary new water main extensions and/or replacements required to serve a project. In the event LADWP is unable to perform required installations and replacements in a timely manner, the project developer can have the work performed by a private contractor, in consultation with LADWP.[74] Water main and related infrastructure upgrades would not be expected to create a significant impact to the physical environment because: (1) any disruption of service would be of a short-term nature; (2) replacement of the water mains would be within public and private rights-of-way; and (3) the existing infrastructure would be replaced with new infrastructure in areas that have already been significantly disturbed. For these reasons, the Project would not require or result in relocation or the construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. Therefore, Project impacts related to water facilities would be less than significant.

Cumulative Impacts

As described previously, no related projects have been identified within one-half mile of the Project Site. Nevertheless, implementation of the Project in conjunction with other development projects could result in an increased impact on water conveyance infrastructure. As with the Project, any other development projects would be subject to review by LADWP to ensure that existing infrastructure would be adequate to meet the water demand requirements for each project. All development in the City is subject to LADWP and City requirements regarding potential infrastructure improvements need to meet respective water infrastructure needs. Additionally, all

74 *Los Angeles Department of Water and Power,* Guide to Water Services.

development in the City is required to comply with Fire Code requirements for fire flow and other fire protection requirements and are subject to ongoing evaluations by LADWP, the City's Department of Public Works, and the Los Angeles Fire Department to ensure water conveyance infrastructure is adequate. Compliance with existing regulations would ensure that cumulative impacts related to water infrastructure would be less than significant.

Wastewater

LA Sanitation (LASAN) operates and maintains the wastewater treatment, reclamation and collection facilities serving most of the City of Los Angeles incorporated areas as well as several other cities and unincorporated areas in the Los Angeles basin and San Fernando Valley. The collection infrastructure consists of over 6,700 miles of local, trunk, mainline and major interceptor sewers, five major outfall sewers, and 46 pumping plants. The wastewater generated by the Project would ultimately flow to the Hyperion Treatment Plant (HTP) System. The existing design capacity of the Hyperion Service Area is approximately 550 mgd and the existing average daily flow for the system is approximately 300 mgd.[75] Thus, there is approximately 250 mgd of available capacity within the Hyperion Service Area. As identified on Table XIX-1, above, the Project would generate approximately 2,663,284 gallons of wastewater per year, or approximately 7,297 gallons of wastewater per day. This is a conservative estimate that does not take into account the wastewater generated by the existing shopping center on the North Campus, which would be removed as part of the Project. With a remaining daily capacity of 250 mgd, the Hyperion Service Area would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

Regarding sewer infrastructure capacity, the City has a codified regulatory process to confirm that there is sufficient infrastructure capacity to serve a project. The LAMC includes regulations that require the City to assure available sewer capacity for new projects and to collect fees for improvements to the infrastructure system. LAMC Section 64.15 requires that the City perform a Sewer Capacity Availability Review (SCAR) when an applicant seeks a sewer permit to connect a property to the City's sewer system, proposes additional discharge through their existing public sewer connection, or proposes a future sewer connection or future development that is anticipated to generate 10,000 gallons or more of sewage per day. A SCAR provides a preliminary assessment of the capacity of the existing municipal sewer system to safely convey a project's newly generated wastewater to the appropriate sewage treatment plant.

LAMC Sections 64.11 and 64.12 require approval of a sewer permit, also called an "S" Permit, prior to connection to the wastewater system. LAMC Sections 64.11.2 and 64.16.1 require the payment of fees for new connections to the City's sewer system to assure the sufficiency of sewer infrastructure. New connections to the sewer system are assessed a Sewerage Facilities Charge. The rate structure for the Sewerage Facilities Charge is based upon wastewater flow strength as

[75] City of Los Angeles Department of Public Works, LA Sanitation, Sewer System Management Plan, Hyperion Sanitary Sewer System, January 2019.

well as volume. The determination of wastewater flow strength for each applicable project is based on City guidelines for the average wastewater concentrations of two parameters, biological oxygen demand and suspended solids, for each type of land use. Sewerage Facilities Charge fees are deposited in the City's Sewer Construction and Maintenance Fund for sewer and sewage-related purposes, including, but not limited to, industrial waste control and water reclamation purposes. As the Project would comply with the City's codified regulatory process to ensure adequate sewer capacity, Project impacts with respect to wastewater infrastructure would be less than significant.

Cumulative Impacts

As described previously, no related projects have been identified within one-half mile of the Project Site. Nevertheless, implementation of the Project combined with other development projects in the area could increase the need for wastewater treatment. As with the Project, other development projects would be subject to review by the Bureau of Sanitation to ensure that existing infrastructure would be adequate to meet the requirements for each project. All development in the City is subject to City requirements regarding potential infrastructure improvements need to meet respective wastewater infrastructure needs. Further, with a remaining treatment capacity of approximately 250 mgd, the Hyperion Service Area would have adequate capacity to accommodate the wastewater treatment requirements of cumulative development, and no new or upgraded treatment facilities would be required. Therefore, the cumulative wastewater treatment impacts would be less than significant.

Storm Water Drainage

As discussed in response to Checklist Question X(c)(iii) (Hydrology and Water Quality – Storm Drain Capacity), Project impacts related to storm drainage facilities would be less than significant.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic X (Hydrology and Water Quality).

Electrical Power

As discussed in response to Checklist Questions VI(a) and (b) (Energy), Project impact related to electric power facilities would be less than significant.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic VI (Energy).

Natural Gas

As discussed in response to Checklist Question VI(a) and (b) (Energy), Project impact related to natural gas facilities would be less than significant.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic VI (Energy).

Telecommunications

In the Project Site area, existing telephone, cable television, and internet service is available from a variety of providers, including AT&T, Spectrum, and Frontier. The Project Site could be served by existing telecommunications facilities that are available in the Project Site area and would not require new or expanded facilities. Therefore, Project impacts related to telecommunications facilities would be less than significant.

Cumulative Impacts

As described previously, no related projects have been identified within one-half mile of the Project Site. Nevertheless, like the Project, any other development projects would represent infill development served by existing utilities, including telecommunications infrastructure. As with the Project, any other development projects would likely require project- or site-specific infrastructure to connect to the existing infrastructure, would not require new or expanded facilities. Therefore, cumulative impacts related to telecommunications infrastructure would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California, which is obtained from the Colorado River Aqueduct. These sources, along with recycled water, are expected to supply the City's water needs in the years to come. As concluded in LADWP's 2020 Urban Water Management Plan (UWMP), projected water demand for the City would be met by the available supplies during an average year, single dry year, and multiple dry year in each year from 2025 to 2045. LADWP's 2020 UWMP also includes a drought risk assessment, which shows that there would be no water shortages over the five-year drought, which started in 2021.[76]

[76] Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, page 11-13.

As shown on Table XIX-1, above, the Project would consume approximately 2,663,284 gallons of water per year, or approximately 7,297 gallons of water per day. According to LADWP, if a project is consistent with the City's General Plan, the projected water demand associated with that project is considered to be accounted for in the most recently adopted UWMP, which is prepared by the LADWP to ensure that existing and projected water demand within its service area can be accommodated. As discussed previously in response to Checklist Question XI(b) (Land Use and Planning), the Project is consistent with the City's General Plan land use designation for the Project Site. As discussed in previously in response to Checklist Question III(a) (Air Quality), the Project would not result in an increase in student enrollment beyond the currently permitted maximum enrollment and therefore the Project would be within the population projections contained in SCAG's RTP/SCS, upon which the current UWMP was based. Thus, the Project's demand for water could be accommodated by LADWP's existing and projected water supplies. As such, the Project would not require new or additional water supply or entitlements, and impacts related to water supply would be less than significant.

Cumulative Impacts

As described previously, no related projects have been identified within one-half mile of the Project Site. Nevertheless, implementation of the Project in conjunction with other development projects could increase demand for water services provided by the City's water supply system. LADWP (through its UWMP) anticipates that its projected water supplies will meet demand through the year 2040. In terms of the City's overall water supply condition, any project that is consistent with the City's General Plan has been taken into account in the planned growth of the water system. In addition, any project that conforms to the demographic projections from SCAG's RTP/SCS and is located in the service area is considered to have been included in LADWP's water supply planning efforts so that projected water supplies would meet projected demands. For projects that meet the requirements established pursuant to SB 610, SB 221, and Sections 10910-10915 of the State Water Code, a water supply assessment demonstrating sufficient water availability is required on a project-by-project basis. Similar to the Project, any other development projects would be required to comply with City and State water code and conservation programs for both water supply and infrastructure.

Both the Project and any other development projects would be subject to the water conservation measures outlined in the City's Green Building Code, which would partially offset the cumulative demand for water. LADWP undertakes expansion or modification of water service infrastructure to serve future growth in the City as required in the normal process of providing water service. For these reasons, cumulative impacts related to water would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. As discussed in subsection (a), above, with a remaining daily capacity of approximately 250 mgd, the Hyperion Service Area would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

Cumulative Impacts

For a full discussion of cumulative impacts with respect to wastewater treatment, please see subsection (a), above. As discussed therein, cumulative impacts related to wastewater treatment would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste or impair the attainment of solid waste reduction goals. The landfills that serve the City and the capacity of these landfills are shown in Table XIX-2, below. As shown, the landfills have an approximate available daily intake of 19,957 tons.

Table XIX-2
Landfill Capacity

Landfill Facility	Estimated Remaining Life (years)	Estimated Remaining Disposal Capacity (million tons)	Permitted Intake (tons/day)	2019 Average Daily Disposal (tons/day)	Available Daily Intake (tons/day)
Antelope Valley	10	10.97	5,548	2,079	3,469
Chiquita Canyon	28	56.99	12,000	5,436	6,564
Lancaster	22	9.95	5,100	357	4,743
Sunshine Canyon	18	55.16	12,100	6,919	5,181
				Total	**19,957**
Source: County of Los Angeles, Countywide Integrated Waste Management Plan, 2019 Annual Report, September 2020.					

As shown on Table XIX-3, the Project would generate approximately 125.1 tons of solid waste per year, or approximately 0.34 tons of solid waste per day. This is a conservative estimate that does not take into account the solid waste generated by the existing shopping center on the North Campus, which would be removed as part of the Project. With a remaining daily intake capacity

of approximately 19,957 tons of solid waste per day, the four Class III landfills serving the City that accept commercial solid waste could accommodate the Project's increase of approximately 0.34 tons of solid waste per day. Further, pursuant to AB 939, each city and county in the state must divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. Therefore, Project impacts related to solid waste would be less than significant.

Table XIX-3
Estimated Solid Waste Generation

Land Use	Total (tons/year)[1]
High School Expansion	90.0
Recreational Swimming Pool	35.1
Total	**125.1**

[1] Calculated via CalEEMod. Refer to Appendix B of this IS/MND and conservatively does not take credit for the removal of the existing shopping center uses on the North Campus.

Cumulative Impacts

As described previously, no related projects have been identified within one-half mile of the Project Site. Nevertheless, the Project in combination with any other development projects could generate additional solid waste. As shown in Table XIX-2, above, the landfills serving the City have an approximate available daily intake of 19,957 tons. Therefore, the facilities serving the Project area would have adequate capacity to accommodate the solid waste generated by cumulative development. Similar to the Project, any other development projects would be required by the City to participate in regional source reduction and recycling programs pursuant to AB 939, which would further reduce the amount of solid waste to be disposed of at the landfills. Thus, cumulative development would not create the need for new or expanded landfills, and cumulative impacts with respect to solid waste service would be less than significant.

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

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): 1) source reduction; 2) recycling and composting; and 3) environmentally safe transformation and land disposal. In addition to AB 939, SB 1374 requires that the Project implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Additionally, the City is currently implementing its "Zero-Waste-to-Landfill" goal to achieve zero waste to landfills by 2025 to enhance the Solid Waste Integrated Resources Planning Process. The Project would comply with the applicable regulations associated with solid waste, including AB 939, SB 1374, and the Construction and Demolition Waste Recycling Ordinance (Ordinance No. 181,519), which requires all mixed construction and demolition waste generated within City limits be taken to City certified construction and demolition

waste processors. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, a less than significant impact would occur.

Cumulative Impacts

All development in the City, including the Project and any other development projects, would be required to comply with the City's recycling programs. Therefore, cumulative impacts related to this issue would be less than significant.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

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

No Impact. The Project Site is not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone.[77] Therefore, no impact would occur.

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

No Impact. The Project Site is not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone.[78] In addition, the Project Site is not located in a hillside zone. Therefore, no impact would occur.

[77] City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, June 13, 2023.

[78] City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, June 13, 2023.

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

No Impact. The Project Site is not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone.[79] Therefore, no impact would occur.

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

No Impact. The Project Site is not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone.[80] Therefore, no impact would occur.

Cumulative Impacts

The Project vicinity is not within or near a very high fire severity zone, and the Project would not result in any impacts related to wildfire. In addition, no related projects have been identified within one-half mile of the Project Site. Therefore, no cumulative impacts related to wildfire would occur.

[79] City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, June 13, 2023.

[80] City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, June 13, 2023.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

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

Less Than Significant with Mitigation Incorporated. As discussed under Checklist Topics IV (Biological Resources) and V (Cultural Resources), the Project would not 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. As discussed under Checklist Topic VII (Geology and Soils, Paleontological Resources), with implementation of mitigation, the Project would not have the potential to eliminate important examples of the major periods of California history or prehistory related to paleontological resources. As discussed under Checklist Topic XVIII (Tribal Cultural Resources), with implementation of mitigation (MM-TCR-1 through MM-TCR-3), the Project would

not have the potential to eliminate important examples of the major periods of California history or prehistory related to tribal cultural resources. Therefore, these impacts would be less than significant.

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

Less Than Significant Impact. Based on the analysis contained in this IS/MND, the Project's contribution to cumulative impacts would not be 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. Based on the analysis contained in this IS/MND, the Project would not result in any direct or indirect adverse effects on human beings, and all Project impacts would be less than significant.

MITIGATION MONITORING PROGRAM

1. INTRODUCTION

This Mitigation Monitoring Program (MMP) has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a "reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." In addition, Section 15097(a) of the State CEQA Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions that are required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6, and Section 15097 of the State CEQA Guidelines.

The City of Los Angeles (City) is the Lead Agency for the Project and therefore, is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation. However, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

A Mitigated Negative Declaration (MND) has been prepared to address the potential environmental impacts of the Project. Where appropriate, the MND identified mitigation measures to avoid or reduce potentially significant environmental impacts of the Project. This MMP is designed to monitor the implementation of the mitigation measures identified for the Project.

2. ORGANIZATION

As shown on the pages below, each identified mitigation measure and/or Project Design Feature (PDF) for the Project is listed and categorized by environmental issue area, with accompanying discussion of the following:

Enforcement Agency – the agency with the power to enforce the mitigation measure and/or PDF.

Monitoring Agency – the agency to which reports involving feasibility, compliance, implementation, and development are made, or who physically monitors the Project for compliance with the mitigation measure and/or PDF.

Monitoring Phase – the phase of the Project during which the mitigation measure and/or PDF shall be monitored. Examples include the following general categories:

- Pre-Construction, including the design phase

- Construction
- Pre-Operation
- Operation (Post-construction)

Monitoring Frequency – the frequency of which the mitigation measure and/or PDF shall be monitored.

Action Indicating Compliance – the action of which the enforcement or monitoring agency indicates that compliance with the required mitigation measure and/or PDF has been implemented.

The Project Applicant shall be responsible for implementing all mitigation measures and/or PDFs unless otherwise noted and shall be obligated to provide documentation concerning the implementation of the listed mitigation measures and/or PDFs to the appropriate monitoring agency and the appropriate enforcement agency. All departments listed in the MMP are within the City unless otherwise noted. It is noted that while certain agencies outside of the City may be listed as the monitoring/enforcement agencies for individual mitigation measures and/or PDFs listed in this MMP, the City, as the Lead Agency for the Project, is responsible for overseeing and enforcing implementation of the MMP as a whole.

3. ADMINISTRATIVE PROCEDURES AND ENFORCEMENT

This MMP shall be enforced throughout all phases of the Project. The Project Applicant shall be responsible for implementing each mitigation measure and/or PDF and shall be obligated to provide certification, as identified below, to the appropriate monitoring agency and the appropriate enforcement agency that each mitigation measure and/or PDF has been implemented. The Project Applicant shall maintain records demonstrating compliance with each mitigation measure and/or PDF. Such records shall be made available to the City upon request.

4. PROGRAM MODIFICATION

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made subject to City approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The Project shall be in substantial conformance with the mitigation measures and/or PDFs contained in this MMP. The enforcing departments or agencies may determine substantial conformance with the mitigation measures and/or PDFs in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a mitigation measure and/or

PDF may be modified or deleted, if the enforcing department or agency or the decision maker for a subsequent discretionary Project-related approval finds that the modification or deletion complies with CEQA, including State CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modification to or deletion of mitigation measures and/or PDFs. Any addendum or subsequent CEQA clearance that may be required in connection with the modification or deletion shall explain why the mitigation measure and/or PDF is no longer needed, not feasible, or the other basis for modifying or deleting the mitigation measure and/or PDF. Under this process, the modification or deletion of a mitigation measure and/or PDF shall not in and of itself require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the mitigation measures and/or PDFs results in a substantial change to the Project or the non-environmental conditions of approval.

5. MMP

5.1 MITIGATION MEASURES

Air Quality

MM-AQ-1 All off-road diesel-powered construction equipment shall meet, at a minimum, USEPA Tier 4 Interim off-road emissions standards, or if such equipment is not commercially available for lease or short-term rental within 50 miles of the Project Site, USEPA Tier 3 off-road emissions standards.

Enforcement Agency: South Coast Air Quality Management District (SCAQMD)

Monitoring Agency: Department of City Planning; Department of Building and Safety

Monitoring Phase: Pre-construction; Construction

Monitoring Frequency: Once at Project plan check; Periodic field inspection

Action Indicating Compliance: Field inspection sign-off

Geology and Soils

MM-GEO-1 The Project Applicant shall implement the following best practices with respect to paleontology:

- **Retain a Qualified Professional Paleontologist:** The Project Applicant shall retain a Qualified Professional Paleontologist (Project Paleontologist), who meets or

exceeds the SVP standards, to oversee all regulatory compliance measures and protocols related to paleontological resources.

- **Conduct Worker Training:** The Project Paleontologist should develop a Worker Environmental Awareness Program (WEAP) to train the construction crew on the legal requirements for preserving fossil resources, as well as the procedures to follow in the event of a fossil discovery. This training program would be given to the crew before ground-disturbing work commences and would include handouts to be given to new workers as needed.

- **Monitor for Paleontological Resources:** Ground disturbances greater than or equal to 3 feet below ground surface with the potential to impact late to middle Pleistocene old alluvial fan deposits (Qof) and/or late Miocene Modelo Formation (Tm) should be monitored full-time. Monitoring should be reduced or ceased once over-excavations into the underlying previously undisturbed deposits have been completed, or if Recent to late Holocene artificial fill (Qaf) is the only geologic units encountered during earthwork activities. Ground disturbances in previously disturbed sediments should not be monitored, regardless of depth.

  Monitoring should be conducted by a paleontological monitor who meets the standards of the SVP (2010) working under the supervision of the Project Paleontologist. The Project Paleontologist may periodically inspect construction activities to adjust the level of monitoring in response to subsurface conditions. In consultation with the lead agency and the Project Applicant, monitoring efforts can be increased, reduced, or ceased entirely if determined adequate by the Project Paleontologist. Paleontological monitoring should include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments. The monitor should have authority to temporarily divert activity away from exposed fossils to evaluate the significance of the find and, should the fossils be determined significant, professionally and efficiently recover the fossil specimens and collect associated data. Paleontological monitors should record pertinent geologic data and collect appropriate sediment samples from any fossil localities.

- **Prepare a Paleontological Resources Monitoring Report:** Upon conclusion of ground-disturbing activities, the Project Paleontologist overseeing paleontological monitoring should prepare a final Paleontological Resources Monitoring Report (PRMR) that documents the paleontological monitoring efforts for the Project and describes any paleontological resources discoveries observed and/or recorded during the life of the Project. If paleontological resources are curated, the final PRMR and any associated data pertinent to the curated specimen(s) should be submitted to the designated repository. A copy of the final PRMR should be filed with the lead agency.

Enforcement Agency: Department of City Planning

Monitoring Agency: Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance: Field inspection sign-off

Hazards and Hazardous Materials

MM-HAZ-1 Prior to the issuance of a grading permit, the shallow PCE-impacted soil vapor shall be remediated using soil vapor extraction (SVE) as the primary means of remediation. An SVE remediation system shall be installed consisting of 17 vapor extraction wells. Each vapor extraction well would have a 10-foot screened interval, from five to 15 feet below ground surface, and the wells would be connected to the SVE unit via sub-grade PVC-piping. The soil vapor shall be remediated to the satisfaction of the Los Angeles Fire Department and the Department of Building and Safety.

Enforcement Agency: Department of Building and Safety; Los Angeles Fire Department

Monitoring Agency: Department of Building and Safety

Monitoring Phase: Prior to issuance of grading permit

Monitoring Frequency: Once during field inspection

Action Indicating Compliance: Issuance of grading permit

Noise

MM-NOI-1 For construction activities occurring on the North Campus, sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected to shield 23309 Saticoy Street Residences, Melba Street Cul-de-Sac Residences, and Bobbyboyar Avenue Cul-de-Sac Residences from on-site construction noise activities. Sound barriers shall be at least 15 feet in height and composed of materials rated to achieve a transmission loss of at least 25 dBA, which would correlate with the required 15 dBA of sound attenuation.

Enforcement Agency: Department of City Planning

Monitoring Agency: Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance: Field inspection sign-off

MM-NOI-2 For construction activities occurring on the Main Campus, sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected to shield Atron Avenue Cul-de-Sac Residences, Covello Street Cul-de-Sac Residences, and Chaminade Avenue Residences from on-site construction noise activities. Sound barriers shall be at least 15 feet in height and composed of materials rated to achieve a transmission loss of at least 25 dBA, which would correlate with the required 15 dBA of sound attenuation.

Enforcement Agency: Department of City Planning

Monitoring Agency: Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance: Field inspection sign-off

MM-NOI-3 Amplified sound systems for the Project's baseball field/bleachers and outdoor aquatics facility/bleacers shall be acoustically engineered with the following design and performance standards:

- Amplified sound levels, as measured at the northern property line of the North Campus, shall not exceed 50 dBA.
- Amplified sound systems shall not be operated outside the operational hours established for the North Campus facilities.
- Speakers shall be directional and oriented away from the northern property line of the North Campus.
- Non-Chaminade users of the facilities shall not be permitted to utilize the facilities' amplified sound systems.

Enforcement Agency: Department of City Planning

Monitoring Agency: Department of City Planning

Monitoring Phase: Construction; Operation

Monitoring Frequency: Once during Project plan check; Field inspection once amplified sound systems have been installed

Action Indicating Compliance: Field inspection sign-off

Transportation

MM-TRANS-1 Construction Traffic Management Plan

Prior to the start of construction, a Construction Traffic Management Plan (CTMP) shall be submitted to LADOT for review and approval. The CTMP will include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicycles, and pedestrians. The CTMP will include, but not limited to, the following measures:

- Maintaining access for land uses in the vicinity of the Project Site during construction.
- Schedule construction materials deliveries during off-peak periods to the extent practical.
- Organize deliveries and staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to surrounding roadways.
- Coordinate deliveries to ensure trucks do not wait to unload or load and impact surrounding roadways, and if needed, utilize an off-site staging area.
- Control truck and vehicle access to the Project Site with flagmen.
- Limit lane closures to the maximum extent possible and avoid peak period hours to the extent possible. Where such closures are necessary, the Worksite Traffic Control Plan will identify the location of lane closures and identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity.

- Parking for construction workers will be provided either on-site or at off-site, off-street locations.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Once at Project plan check; periodic field inspection

Action Indicating Compliance: Plan approval; field inspection sign-off

Tribal Cultural Resources

MM-TCR-1 Prior to commencing any ground disturbance activities at the Project Site, the Applicant, or its successor, shall retain one (1) tribal monitor that is qualified to identify subsurface tribal cultural resources. Ground disturbance activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity at the Project Site. The qualified tribal monitor shall be approved by the Fernandeño Tataviam Band of Mission Indians.

If cultural resources are discovered during Project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be retained by the Applicant, or its successor, to assess the find. A qualified archaeologist/archaeological monitor shall be identified as principal personnel who must meet the Secretary of the Interior's Standards and Guidelines for Archeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in Southern California. The archaeologist shall ensure that all other personnel associated with and hired for the archaeological monitoring are appropriately trained and qualified. Work on the portions of the Project outside of the buffered area may continue during this assessment period. The Fernandeño Tataviam Band of Mission Indians shall be contacted about any pre-contact and/or post-contact finds and be provided information after the archaeologist makes their initial assessment of the nature of the find, to provide Tribal input with regards to significance and treatment.

Enforcement Agency: Department of City Planning

Monitoring Agency: Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance: Field inspection sign-off

MM-TCR-2 The Lead Agency and/or Applicant shall, in good faith, consult with the Fernandeño Tataviam Band of Mission Indians on the disposition and treatment of any Tribal Cultural Resource encountered during all ground disturbing activities.

Enforcement Agency: Department of City Planning

Monitoring Agency: Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance: Field inspection sign-off

MM-TCR-3 If human remains or funerary objects are encountered during any activities associated with the Project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code shall be enforced for the duration of the Project.

Enforcement Agency: Department of City Planning

Monitoring Agency: Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance: Field inspection sign-off

5.2. PROJECT DESIGN FEATURES

PDF-1 The Project will adhere to the construction sequence shown in Table 3-2, except:

- Construction of the new surface parking lot on the North Campus and construction of the pedestrian bridge may interchange in the overall sequence of construction activities, but shall not overlap with each other; and
- Demolition of parking lots on the Main Campus and demolition of classroom buildings on the Main Campus may interchange in the overall sequence of construction activities, but shall not overlap with each other.

Enforcement Agency: Department of City Planning

Monitoring Agency: Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance: Field inspection sign-off

PDF-2 The Project will prepare a Traffic Management Plan (TMP) to establish operational procedures for traffic flow around the school related to self-driving students and student drop-off and pick-up operations. The purpose of the plan will be to establish operational procedures to improve traffic circulation utilizing the enhanced access points and parking areas, improve student safety, maximize the efficiency of drop-off and pick-up operations, and reduce delays during those time periods.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: Operation

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance: Field inspection sign-off