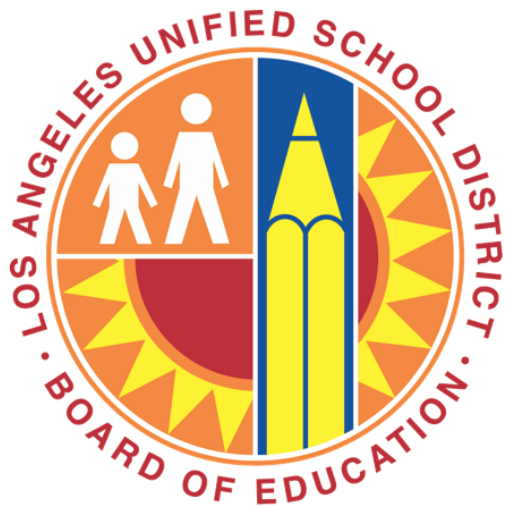


October 2020 | Initial Study/Mitigated Negative Declaration



ABRAHAM LINCOLN HIGH SCHOOL

Comprehensive Modernization Project

Prepared for:

Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, California 90017
Contact: Eimon Smith, CEQA Project Manager
213.241.3417

Prepared by:

Tetra Tech
3475 East Foothill Boulevard
Pasadena, CA 91107



October 2020 | Initial Study/ Mitigated Negative Declaration

ABRAHAM LINCOLN HIGH SCHOOL

Comprehensive Modernization Project

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Abbreviations and Acronyms

AAQS	Ambient Air Quality Standards
AB	Assembly Bill
ALUC	Airport Land Use Commission
ANSI	American National Standards Institute
AQMP	Air Quality Management Plan
BOE	[LAUSD] Board of Education
BMP	Best Management Practices
CalEMA	California Emergency Management Agency
CALGreen	California Green Building Code
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CGS	California Geological Survey
CHPS	Collaborative for High Performance Schools
CIFF	California Important Farmland Finder
CMP	Los Angeles County Congestion Management Program
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
COC	Chemical of Concern
CO _{2e}	Carbon Dioxide Equivalent
CUPA	Certified Unified Program Agency
DPM	Diesel Particulate Matter
DSA	Division of the State Architect (under the California Department of General Services)
DTSC	Department of Toxic Substances Control
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
GHG	Greenhouse Gases
GWP	Global Warming Potential
H&SC	California Health and Safety Code
HRA	Health Risk Assessment
IPCC	Intergovernmental Panel on Climate Change

Abbreviations and Acronyms

LADOT	City of Los Angeles Department of Transportation
LADWP	City of Los Angeles Department of Water and Power
LAPD	City of Los Angeles Police Department
LAPL	Los Angeles Public Library
LASPD	Los Angeles School Police Department
LAUSD	Los Angeles Unified School District
LOS	Level of Service
LST	Localized Significance Thresholds
MBTA	Migratory Bird Treaty Act
MEP	Maximum Extent Practicable
Metro	Los Angeles County Metropolitan Transportation Authority
mgd	Million Gallons per Day
MMT	Million Metric Tons
MMTCO _{2e}	Million Metric Tons of CO _{2e}
MSL	Mean Sea Level
MT	Metric Ton
MTCO _{2e}	Metric Ton of CO _{2e}
MRZ	Mineral Recovery Zone
MUTCD	California Manual on Uniform Traffic Control Devices
MW	Megawatts
MWD	Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
NPDES	National Pollutant Discharge Elimination System
OEHS	Office of Environmental Health and Safety
OHP	Office of Historic Preservation
OPSC	California Office of Public School Construction
PDF	Project Design Features
ppm	Parts per Million
PRC	Public Resources Code
PSHA	Pipeline Safety Hazard Assessment
RCRA	Resource Conservation and Recovery Act
RWQCB	Regional Water Quality Control Board
SAB	State Allocation Board
SC	Standard Condition [of Approval]



Abbreviations and Acronyms

SCAQMD	South Coast Air Quality Management District
SCS	Sustainable Communities Strategy
SoCAB	South Coast Air Basin
SRTS	Safe Routes to School
SUP	School Upgrade Program
SWPPP	stormwater pollution prevention plan
SWRCB	State Water Resources Control Board
USFWS	United States Fish and Wildlife Service
UST	Underground Storage Tank
V/C	Volume-to-Capacity Ratio
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds

Abbreviations and Acronyms

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1. Introduction

1.1 OVERVIEW

The Los Angeles Unified School District (LAUSD or District) is proposing a comprehensive modernization of Abraham Lincoln High School (Lincoln HS), 3501 North Broadway, City of Los Angeles, Los Angeles County, California. Comprehensive modernization projects are designed to address the most critical physical needs of the building and grounds at school sites through building replacement, renovation, modernization, and reconfiguration. The proposed Lincoln HS Comprehensive Modernization Project (Project) is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This Initial Study provides an evaluation of the potential environmental consequences associated with this proposed Project.

1.2 BACKGROUND

On July 31, 2008, the LAUSD Board of Education (BOE) adopted a Resolution Ordering an Election and Establishing Specifications of the Election Order for the purpose of placing Measure Q, a \$7 billion bond measure, on the November election ballot to fund the renovation, modernization, construction, and expansion of school facilities. On November 4, 2008, the bond passed. The nationwide economic downturn in 2009 resulted in a decline in assessed valuation of real property, which restricted the District's ability to issue Measure Q bonds and the remaining unissued Measures R and Y funds. Once assessed valuation improved, the BOE could authorize the issuance of bond funds.¹

On December 10, 2013, the District refined their School Upgrade Program (SUP) to reflect the intent and objectives of Measure Q as well as the updated needs of District school facilities and educational goals.¹ Between July 2013 and November 2015, the SUP was analyzed under CEQA criteria in a Program Environmental Impact Report (Program EIR). On November 10, 2015, the BOE certified the Final SUP Program EIR.²

On December 13, 2016, the BOE approved the project definition for the Lincoln HS proposed Project to provide facilities that are safe, secure, and better aligned with the current instructional program. The proposed Project is designed to address the most critical physical concerns of the building and grounds at the Campus while providing renovations, modernizations, and reconfiguration as needed.³

¹ LAUSD Board of Education Report. 13/14 ed. Vol. 143. Los Angeles: LAUSD, 2013.

² LAUSD Board of Education Report - LAUSD Regular Meeting Stamped Order of Business. 15/16 ed. Vol. 159. Los Angeles: LAUSD, 2015.

³ LAUSD Board of Education Report - Amendment to the Facilities Services Division Strategic Execution Plan to Approve Project Definitions for 11 Comprehensive Modernization Project. 16/17 ed. Vol. 205. Los Angeles: LAUSD, 2015.

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1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by the CEQA⁴ and the State CEQA Guidelines.⁵ CEQA was enacted in 1970 by the California Legislature to disclose to decision-makers and the public the significant environmental effects of projects and to identify ways to avoid or reduce the environmental effects through feasible alternatives or mitigation measures. Compliance with CEQA applies to California government agencies at all levels: local, regional, and State agencies, boards, commissions, and special districts (such as school districts and water districts).

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

California Public Resources Code (PRC) Section 21080(a) states that analysis of a project's environmental impact is required for any "discretionary projects proposed to be carried out or approved by public agencies..." In this case, LAUSD has determined that an initial study is required to determine whether there is substantial evidence that construction and operation of the proposed Project would result in environmental impacts. An initial study is a preliminary environmental analysis to determine whether an environmental impact report (EIR), a mitigated negative declaration (MND), or a negative declaration (ND) is required for a project.⁶

When an initial study identifies the potential for significant environmental impacts, the lead agency must prepare an EIR,⁷ however, if all impacts are found to be less-than-significant or can be mitigated to a less-than-significant level, the lead agency can prepare a ND or MND that incorporates mitigation measures into the project.⁸

1.4 ENVIRONMENTAL PROCESS

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

- 1) An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100-65700.
- 2) An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.
- 3) An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies.⁹

⁴ California Public Resources Code, §21000 et seq. (1970).

⁵ California Code of Regulations, Title 14, Division 6, Chapter 3, §15000 et seq.

⁶ California Code of Regulations, Title 14, Division 6, Chapter 3, §15063.

⁷ California Code of Regulations, Title 14, Division 6, Chapter 3, §15064.

⁸ California Code of Regulations, Title 14, Division 6, Chapter 3, §15070.

⁹ California Code of Regulations § 15378[a]



1. Introduction

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

1.4.1 Initial Study

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

1.4.2 Environmental Impact Report

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

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

1.4.3 Tiering

This type of project is one of many that were analyzed in the LAUSD SUP Program EIR that was certified by the LAUSD BOE on November 10, 2015.¹⁰ LAUSD’s SUP Program EIR meets the criteria for a Program EIR under CEQA Guidelines Section 15168 (a)(4) as one “prepared on a series of actions that can be characterized as one large project and are related...[a]s individual activities carried out under the same authorizing statutory

¹⁰ Program EIR for the School Upgrade Program. <http://achieve.lausd.net/ceqa>. Los Angeles: LAUSD, 2015.

1. Introduction

or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.”

The Program EIR enables LAUSD to streamline future environmental compliance and reduces the need for repetitive environmental studies.¹⁰ The Program EIR serves as the framework and baseline for CEQA analyses of later projects through a process known as “tiering.” Under CEQA Guidelines Sections 15152(a) and 15385, “Tiering” refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a program) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.¹¹

The Program EIR is applicable to all projects implemented under the SUP. The Program EIR provides the framework for evaluating environmental impacts related to ongoing facility upgrade projects planned by the District.¹² Due to the extensive number of individual projects anticipated to occur under the SUP, projects were grouped into four categories based on the amount and type of construction proposed. The four categories of projects are as follows:¹³

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

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

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

1.4.4 Project Plan and Building Design

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

¹¹ California Code of Regulations Title 14, § 3 Article 1-15152(a).

¹² Ibid, at 4-8.

¹³ Ibid, at 1-7.



1. Introduction

impacts, such as the California Green Building Code (CALGreen Code)¹⁴, LAUSD Standard Conditions of Approval (SC), and the Collaborative for High-Performance Schools (CHPS) criteria.¹⁵

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

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

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

¹⁴ California Green Building Standards Code, Title 24, Part 11.

¹⁵ The Board of Education's October 2003 Resolution on Sustainability and Design of High Performance Schools directs staff to continue its efforts to ensure that every new school and modernization project in the District, from the beginning of the design process, incorporate CHPS (Collaborative for High Performance Schools) criteria to the extent possible.

1. Introduction

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

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

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

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

The specific CHPS prerequisite criteria and LAUSD SCs are identified in the tables under each CEQA topic.¹⁶ Federal, state, regional, and local laws, regulations, plans, and guidelines; CHPS criteria; PDFs; and SCs are considered part of the Project and are included in the environmental analysis.

1.5 IMPACT TERMINOLOGY

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

- A finding of ***no impact*** is appropriate if the analysis concludes that the Project would not affect the particular topic area in any way.
- An impact is considered ***less than significant*** if the analysis concludes that it would cause no substantial adverse change to the environment and requires no mitigation.
- An impact is considered ***less than significant with mitigation incorporated*** if the analysis concludes that it would cause no substantial adverse change to the environment with the inclusion of environmental commitments or other enforceable mitigation measures.

¹⁶ CHPS criteria are summarized. The full requirement can be found at <http://www.chps.net/dev/Drupal/California>.



1. Introduction

- An impact is considered ***potentially significant*** if the analysis concludes that it could have a substantial adverse effect on the environment. If any impact is identified as potentially significant, an EIR is required.

1.6 ORGANIZATION OF THE INITIAL STUDY

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

Chapter 1, *Introduction* identifies the purpose and scope of the EIR and supporting Initial Study and the terminology used.

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

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

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

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

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

- A. Historic Resource Assessment Report
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- C. Arborist Report
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- G. Phase I Environmental Site Assessment
- H. Preliminary Environmental Assessment-Equivalent
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1. Introduction

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2. Environmental Setting

2.1 PROJECT LOCATION

The approximately 18.6-acre Campus spans across two parcels and is separated by Lincoln Park Avenue. The Campus is located at 3501 North Broadway in the community of Lincoln Heights, in the City of Los Angeles, and in Los Angeles County. The site is identified with Assessor Parcel Numbers (APN) 5208-026-903 and 5209-010-900. Regional access to the site is from North Broadway (see Figure 1, *Regional Location*).

The Lincoln HS main Campus is generally bound by North Broadway to the south, Lincoln Park Avenue to the east, Alta Street to the northwest, and Altura Street (private) to the north. The eastern parcel and football field are located on the northeast corner of Lincoln Park Avenue and North Broadway and can be accessed directly off Altura Street. Students connect between the two sides of the Campus via an internal grade-separated pedestrian bridge over Lincoln Park Avenue.

Lincoln High School is located 1.2 miles and 0.9 mile east of the Los Angeles River and the 5 (Golden State) Freeway, respectively and 1.1 miles south of the 110 (Pasadena) Freeway (see Figure 2, *Local Vicinity*).

2. Environmental Setting

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LOS ANGELES

Lincoln High School Campus

EAST LOS ANGELES

0 750 1,500 3,000 Feet

Page 11

2. Environmental Setting

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2. Environmental Setting

Figure 2 Local Vicinity



2. Environmental Setting

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2. Environmental Setting

2.2 SURROUNDING LAND USES

Lincoln HS is located in the community of Lincoln Heights. Single- and multi-family residential and commercial uses surround the immediate vicinity of Lincoln HS.

2.3 CAMPUS HISTORY

The following Campus history summary is from the Lincoln HS Historic Resource Assessment Report prepared for Lincoln HS.¹⁷ Please refer to the complete report provided in Appendix A for a detailed history.

Early History

Lincoln HS is one of the five oldest high schools in the City of Los Angeles. It was constructed in 1913 and designed by architecture firm Needham and Cline, at the northeast corner of what is now North Broadway and Lincoln Park Avenue, in Lincoln Heights. The original school was at this location until the Long Beach earthquake of 1933, which resulted in extensive damage to the Campus. The school was reconstructed by the Public Works Administration (PWA) in 1936 and most of the Campus buildings that survived the quake were demolished during the rebuild. The portions of the Campus that remained include: the main stairway, walkway, tennis courts, and palm trees. The new Campus was built in 1936, one block west of Lincoln Park Avenue, and contained three main buildings oriented around a central landscaped courtyard off North Broadway: the administration, Science and Classroom Building (now the Administration Building), the Commerce, Home Economics and Cafeteria Building (now the Home Economics Building), and the Assembly and Music Building (now the Auditorium Building). All of these buildings were designed in the popular PWA Moderne style. The new Campus opened in September 1937. The Gymnasium was completed in 1941.

The Campus continued to be altered in the post-World War II years. By 1948, all of the buildings from the original 1913 Campus (referenced herein as the eastern parcel) had been demolished and replaced with the athletic field, running track, and bleachers. A music building was added in 1949. By 1951, a pedestrian bridge had been erected over Lincoln Park Avenue, linking the school's eastern parcel to Mechanical Arts Building No. 2 on the western parcel. In the 1950s and 1960s, a number of portable classroom buildings were added, and in 1963, a new music building was constructed. Additional classrooms were added in 1965 and during the 1970s, including the New Ceramics and Mechanical Arts Building (now the Shop Building) and a new pedestrian bridge over Lincoln Park Avenue was built. By 1982, the northernmost part of the Campus (on the western parcel) was occupied by Pueblo de Los Angeles Continuation High School (formerly Lincoln Continuation High School).

The Campus continued to change in recent years, including: repair of buildings after the 1994 Northridge Earthquake; a Campus modernization project and addition of four elevator towers; original window replacement (in-kind) at the Administration, Home Economics, and Auditorium buildings; a reconfiguration of areas to create parking lots and landscape features; and replacement of original pedestrian bridges with steel bridges.

¹⁷ Historic Resource Assessment Report for Lincoln High School. Historic Resources Group (HRG), November 18, 2018.

2. Environmental Setting

Lincoln HS and the East Los Angeles Walkouts

Lincoln HS was one of five high schools that participated in a series of student protest marches and walkouts in March 1968, demanding better educational opportunities for Mexican American students in Los Angeles schools. Known as the “1968 Walkouts” or “Chicano Blowouts,” these protests took place at Lincoln, Roosevelt, Garfield, Wilson, and Belmont High Schools, where over the course of a week an estimated 15,000 students left their classrooms and marched with supporters for better schools and a better education.

2.4 EXISTING CONDITIONS

Lincoln HS serves students in grades 9th through 12th within the framework of small learning communities. The planned enrollment for Lincoln HS is approximately 1,100 students.

Lincoln HS was founded in 1878. Following the 1933 Long Beach Earthquake, the original buildings and structures were demolished and a new Campus that spanned both the east and west side of Lincoln Park Avenue was developed in the PWA Moderne style. LAUSD assigned the Campus a California Historical Resources Status Code of 3S, for the National Register of Historic Places or California Register of Historic Resources through survey evaluation. Existing Campus buildings and features include permanent buildings (Administration Building, Home Economics Building, Auditorium Building, Physical Education Building, Lunch Pavilion, Shop Building, Pedestrian Overpass, Elevator Tower, Music Building No. 1, Music Building No. 2, Mechanical Enclosure, Gardener Storage Building (west parcel), Gardener Storage Building (east parcel), and St. John’s Well Child & Family Center), as well as non-permanent/portable buildings, hardscape, and landscape. The buildings and features are identified in Table 1 and on Figure 3, *Existing Site Plan*.¹⁸

Table 1
Campus Buildings and Features

Ref No.	Name	Architect	Style	Year Built
Buildings				
1	Administration Building	Albert C. Martin	PWA Moderne	1937
2	Home Economics Building	Albert C. Martin	PWA Moderne	1937
3	Auditorium Building (Ethel Percy Andrus Theatre)	Albert C. Martin	PWA Moderne	1937
4	Physical Education Building	Albert C. Martin	PWA Moderne	1941
5	Lunch Pavilion	(unknown)	Late Modern	1978
6	Shop Building	Robert E. Alexander and Adolfo E. Miralles	Late Modern	1976
7	Pedestrian Overpass	Robert E. Alexander and Adolfo E. Miralles	(n/a)	1976
8	Elevator Tower	(unknown)	(n/a)	2000
9	Music Building No. 2	Edward H. Fickett	Mid-Century Modern	1963

¹⁸ HRC, 2018.



2. Environmental Setting

Ref No.	Name	Architect	Style	Year Built
10	Music Building No. 1	(unknown)	Mid-Century Modern	1949
11	Building A	(unknown)	Mid-Century Modern	1965
12	Building B	(unknown)	Mid-Century Modern	1965
13	Mechanical Enclosure	(unknown)	(n/a)	2001
14	Relocatable Building	(n/a)	Vernacular	1949
15	Relocatable Storage Building	(n/a)	Utilitarian	1973
16	Gardener Storage Building (west parcel)	(n/a)	Utilitarian	1964
17	Relocatable Building	(n/a)	Utilitarian	1949
18	Relocatable Building	(n/a)	Utilitarian	1948
19	Relocatable Building	(n/a)	Utilitarian	1953
20	Relocatable Building	(n/a)	Utilitarian	1973
21	Relocatable Building	(n/a)	Vernacular	1947
22	St. John's Well Child & Family Center	(n/a)	Utilitarian	2004
23	Modular Building	(n/a)	Utilitarian	2000
24	Modular Building	(n/a)	Utilitarian	2000
25	Modular Building	(n/a)	Utilitarian	2000
26	Modular Building	(n/a)	Utilitarian	2000
27	Bleachers	(n/a)	(n/a)	1948
28	Gardener Storage Building (east parcel)	(n/a)	Utilitarian	1968
Other Features				
A	Campus Quad	Albert C. Martin	(n/a)	1936
B	Administration Courtyard	Albert C. Martin	(n/a)	1937
C	Parking Lot	(n/a)	(n/a)	c. 2010
D	Parking Lot	(n/a)	(n/a)	c. 1965
E	Parking Lot	(n/a)	(n/a)	c. 2015
F	Parking Lot	(n/a)	(n/a)	c. 2015
G	Football Field & Track	(n/a)	(n/a)	1948
H	Tennis/Basketball Courts	(n/a)	(n/a)	1913
I	Tennis/Basketball Courts	(n/a)	(n/a)	1913
J	Turf Area	(n/a)	(n/a)	1948
K	Original Campus Stairway	(n/a)	(n/a)	1913
L	Original Campus Walkway	(n/a)	(n/a)	1913
M	Palm Trees	(n/a)	(n/a)	1913

Source: HRC. Historic Resource Assessment Report Lincoln High School, November 20, 2018.

2. Environmental Setting

The main Campus which contains most of the academic and administrative buildings is roughly triangular in shape and is bound by Broadway Avenue, Lincoln Park Avenue, Alta Street, and residential units. This main Campus is terraced into different graded areas varying in elevation from approximately +390 feet to +400 feet mean sea level (MSL) and is occupied by the Auditorium, Home Economics, Administration, and Shop buildings. Between buildings are concrete ramps, stairs and intermediate paved areas. A staff parking lot to the north, which surrounds three portable buildings that are part of the continuation high school, is located at approximately +407 feet MSL.¹⁹

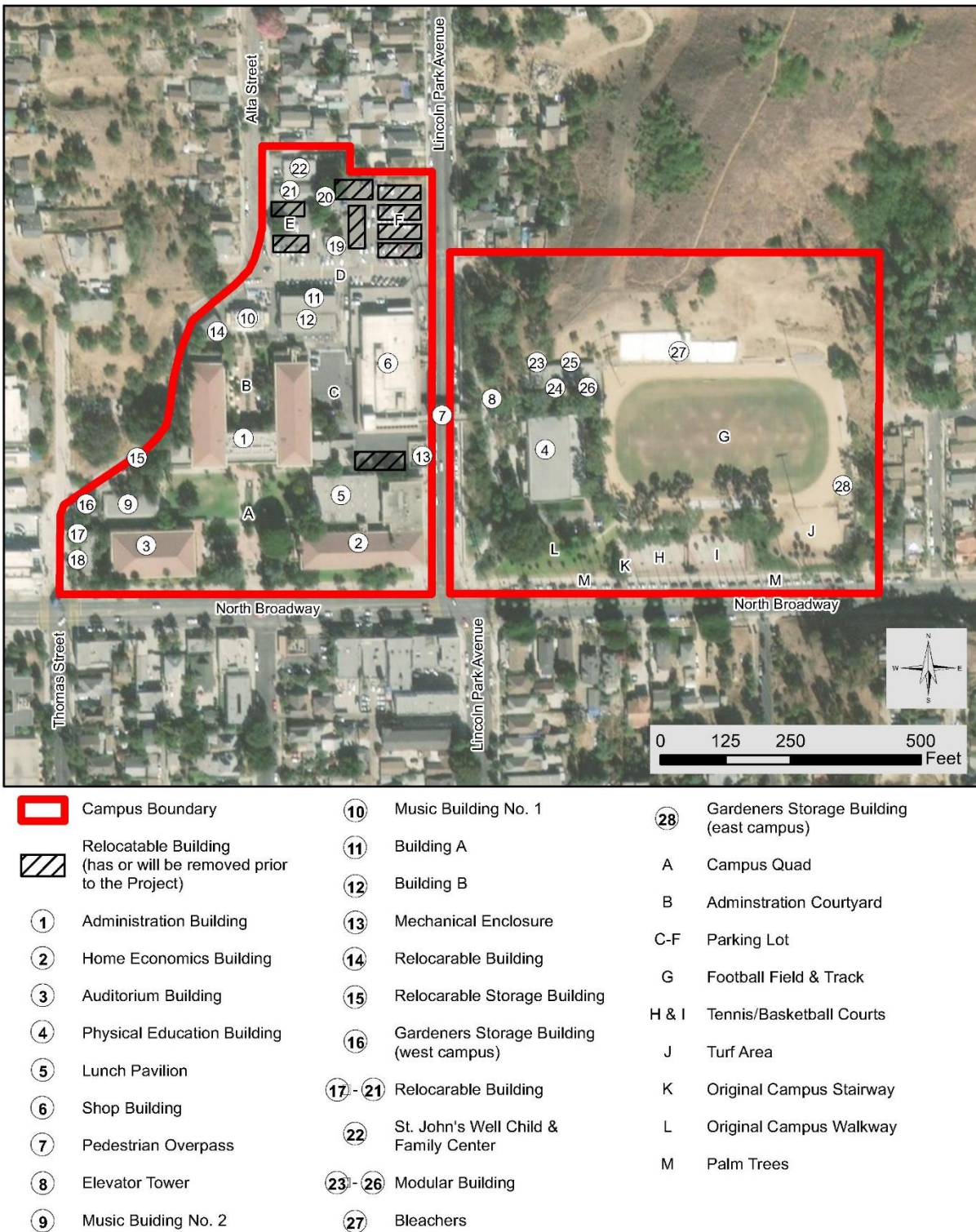
Sports facilities consisting of a Physical Education (PE) Building, athletic field, and tennis courts are located along a levelled pad on the Campus eastern parcel, across Lincoln Park Avenue. The elevation of the PE building pad and athletic field are approximately +447 feet MSL and +465 feet MSL, respectively. Other structures include an existing pedestrian bridge that connects the main Campus with the sports facilities as well as recently constructed retaining walls along the east side of Lincoln Park Avenue.¹⁹

¹⁹ Preliminary Geotechnical Investigation Lincoln High School. URS, May 20, 2017.



2. Environmental Setting

Figure 3 Existing Site Plan



Sources: ESRI, Tetra Tech

2. Environmental Setting

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2. Environmental Setting

2.5 GENERAL PLAN AND EXISTING ZONING

The Project site has a General Plan land use designation of Public Facilities and is zoned [Q]PF-1D.²⁰ The purpose of the Public Facilities (PF) zone is to provide regulations for the use and development of publicly owned land in order to implement the City's adopted General Plan, including, the circulation and service systems designations in the City's adopted district and community plans, and other relevant General Plan elements, including the circulation, public recreation and service systems elements. Public secondary schools are a permitted use within the PF zone.²¹

In addition, the Project site is located within:

- The Northeast Los Angeles Hillside Zone Ordinance (No. 180,403; effective date: January 16, 2009) established new regulations for properties in the adopted hillside area boundary in the Northeast Los Angeles Community Plan. The regulations focus on size, height, retaining walls and grading limitations.²²
- The Enterprise Zone/Employment and Economic Incentive Program Area (EZ). EZs are specific geographic areas designated by City Council resolution and have received approval from the California Department of Commerce under the Enterprise Zone Act Program or Employment and Economic Incentive Act Program. The federal, State and city governments provide economic incentives to stimulate local investment and employment through tax and regulation relief and improvement of public services.²³

The California Legislature granted school districts the power to exempt school property from local zoning requirements, provided the school district complies with the terms of Government Code Section 53094. On February 19, 2019 the LAUSD Board of Exemption Adopted a Resolution to exempt all LAUSD school sites from local land use regulations under Government Code Section 53094.²⁴

2.6 NECESSARY APPROVALS

It is anticipated that review and/or approval required for the proposed Project would include, but may not be limited to, those agencies listed below.

²⁰ City of Los Angeles. ZIMAS. <http://zimas.lacity.org>. Accessed May 2019.

²¹ City of Los Angeles Municipal Code Sec.12.04.09(b)(8).
[http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisio nsandzoning/article2specificplanning-zoningcomprehen/sec120409pfpublicfacilitieszone?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:lapz_ca\\$anc=JD_12.04.09](http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisio nsandzoning/article2specificplanning-zoningcomprehen/sec120409pfpublicfacilitieszone?f=templates$fn=default.htm$3.0$vid=amlegal:lapz_ca$anc=JD_12.04.09). Accessed May 2019.

²² City of Los Angeles. ZI No. 2399 Northeast Hillside Zone Change Ordinance. Ordinance No. 108,403 Effective Date: January 16, 2009. <http://zimas.lacity.org/documents/zoneinfo/ZI2399.pdf> Accessed, May 2019.

²³ City of Los Angeles. ZI No. 2129 Enterprise Zone/Employment and Economic Incentive Program Area (EZ). <http://zimas.lacity.org/documents/zoneinfo/ZI2129.pdf> Accessed, May 2019.

²⁴ Regular Meeting Stamped Order of Business, Board of Education Report No. 256-18/19. Los Angeles: LAUSD Board of Education, February 19, 2019.

2. Environmental Setting

Responsible Agencies

A “Responsible Agency” is defined as a public agency other than the lead agency that has discretionary approval power over a project.²⁵ The Responsible Agencies, and their corresponding approvals, for individual projects to be implemented as part of the SUP may include the following:

- California Department of General Services, Division of State Architect. Approval of site-specific construction drawings.
- Los Angeles Regional Water Quality Control Board. General Construction Activity Permit, including the Storm Water Pollution Prevention Plan.
- Los Angeles County Department of Health Services. Kitchen inspection.
- Los Angeles Department of Water and Power. For improvements to the existing off-site utility connections and improvements.
- City of Los Angeles, Bureau of Engineering. Revocable permit to build new retaining wall/shoring along Lincoln Park Avenue. B-Permit for off-site work and an S-Permit for sewer & stormwater drain improvements (as necessary).
- City of Los Angeles, Public Works Department. Permit for storm water, new water lines, and sewer lines.
- City of Los Angeles, Fire Department. Approval of plans for emergency access and emergency evacuation.
- City of Angeles, Department of Building & Safety. Approval of haul route.

Trustee Agencies

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

State

- | | |
|--|--|
| ■ California Office of Historic Preservation | ■ California Department of Fish & Wildlife |
| ■ California Department of Transportation | ■ Native American Heritage Commission |

Regional

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

Local

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

²⁵ CEQA Guidelines §15381.



2. Environmental Setting

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

In conformance with Assembly Bill (AB) 52 tribal consultation requirements, LAUSD notified the Native American Tribes/Tribal representatives that are traditionally and culturally affiliated with the Project area. LAUSD sent Project notification to the following Tribes:

- Gabrieleno Band of Mission Indians- Kizh Nation;
- Gabrieleno/Tongva San Gabriel Band of Mission Indians;
- Gabrielino/Tongva Nation;
- Fernandeno Tataviam Band of Mission Indians;
- Gabrielino Tongva Indians of California Tribal Council;
- Gabrielino-Tongva Tribe (2 separate contacts)

One Native American Tribe, the Gabrieleno Band of Mission Indians- Kizh Nation, requested consultation on this Project. LAUSD has completed consultation with representatives of the Tribe. As a result of the consultation, Standard Conditions of Approval (SC-TCR-1 and SC-TCR-2) to protect potential unanticipated discoveries associated with Tribal Cultural Resources were incorporated into this Project.

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

2. Environmental Setting

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3. Project Description

3.1 BACKGROUND

The Comprehensive Modernization Projects are intended to plan and complete large-scale improvements to select LAUSD campuses to address “buildings and grounds” in the greatest need of upgrades. The proposed comprehensive modernization projects will address the most critical physical conditions and essential safety issues. This will be achieved by modernizing, repairing, reconfiguring and/or replacing existing buildings, constructing new buildings, and upgrading deteriorated and outdated site infrastructure. Projects will address seismic vulnerabilities; failing or broken building and site systems, infrastructure, and components; barriers to program accessibility; deteriorated exterior conditions; and interior classroom spaces. The projects will also significantly reduce the District’s reliance on relocatable buildings.²⁶ Emphasis is placed on seismic safety and failed building systems and components. The projects are comprehensive in nature, addressing not only the critical physical conditions of a building, but also improving the facilities to support the educational program. While the projects are comprehensive in nature, less critical items are not addressed. This approach allows the District to reach more schools with the limited funding available.²⁶

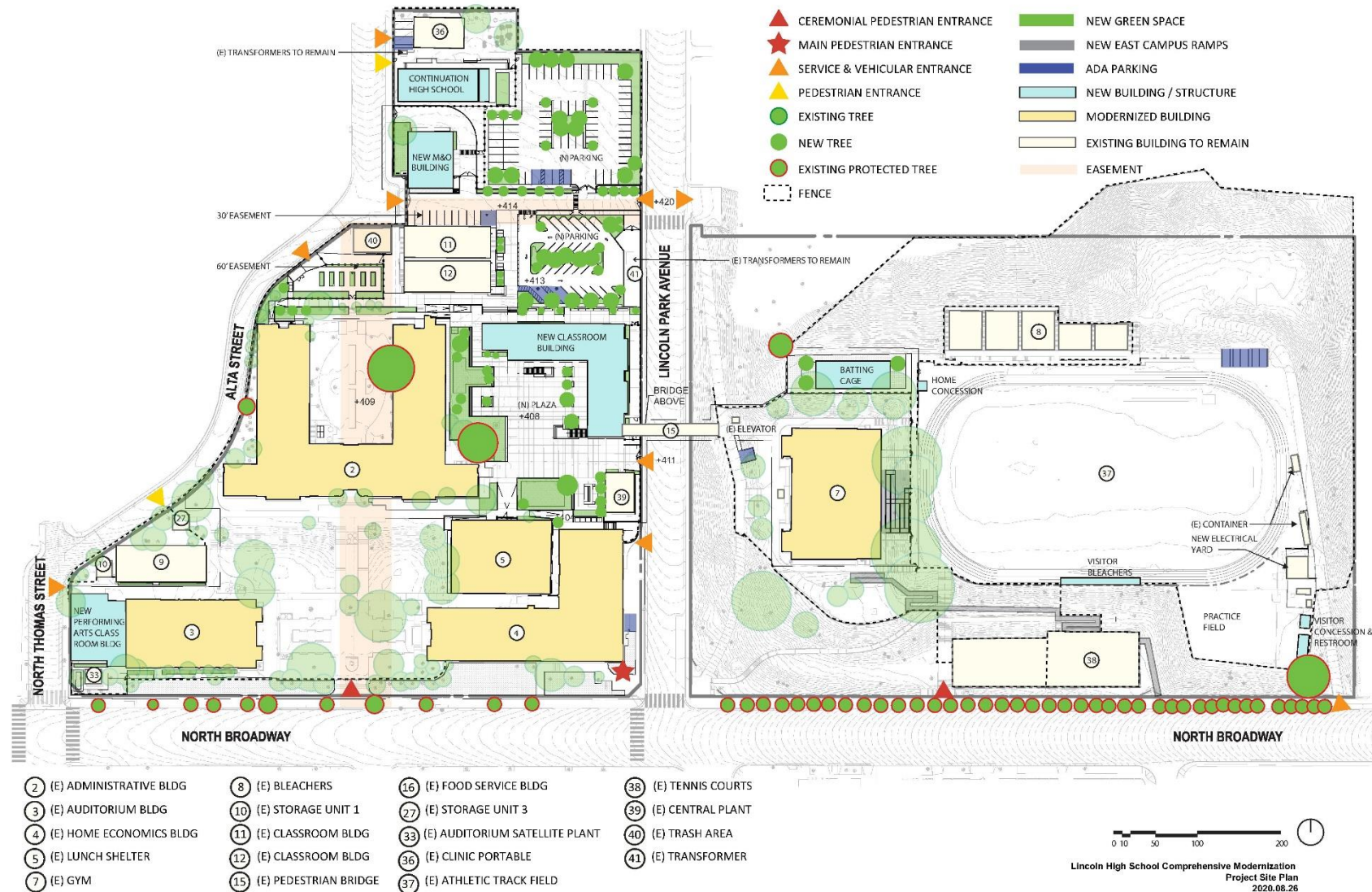
3.2 PROPOSED PROJECT

LAUSD proposes to complete a Comprehensive Modernization Project at Lincoln HS in an effort to provide facilities that are safe, secure, and aligned with the instructional program. The planned enrollment for Lincoln High School is 1,100 students and no increase in student capacity is proposed as part of the Project. On December 13, 2016, the Board approved the Project definition for Lincoln HS.²⁶ The Project is designed to address the most critical physical concerns of the building and grounds at the Campus while providing renovations, modernizations, and reconfigurations. A *Conceptual Site Plan* is provided as Figure 4.

²⁶ LAUSD Board of Education. LAUSD Board of Education Report. File #: Rep-205- 16/17, Version: 1. December 13, 2016.

3. Project Description

Figure 4 Conceptual Site Plan



3. Project Description

Improvements to meet programmatic access requirements of the Americans with Disabilities Act will be made throughout the school site. Aging and outdated site infrastructure (i.e. utilities, stormwater/sewer lines, Central Plant piping connections and rerouting, ITD (Information Technology Division) convergence systems, and other systems serving the entire school site) will also be upgraded. Various safety conditions will be improved including site lighting, fencing/gates, and/or CCTV (closed-circuit television) systems as needed. Various landscape and hardscape improvements will also be made, including new surface parking lot, curb cuts, and horticulture/garden area. Various upgrades, improvements or other mitigations to ensure compliance with local, State and/or federal facilities requirements will also be undertaken.²⁷ The Project includes, but is not limited to, the planning, design, demolition, construction, DSA certification and close-out activities associated with the following:

New Buildings

- Classroom Building(s)
 - Approximately 10 Classrooms (general and specialty classroom suites for arts and/or CTE) and associated support spaces
 - New 2-Story Performing Arts Building
 - New 2 Story Classroom Building
- Maintenance and Operations Building
- Pueblo de Los Angeles Continuation High School (modular buildings anticipated)
 - 3 general classroom buildings
 - 1 admin/parent center building
 - restroom building
- Field House Restroom Building

Building Modernization

- Administration Building #2
 - Modernization (to current District Standards to the extent feasible) – Partitions reconfigured to better accommodate standard classroom sizes (Approximately 24 Classrooms)
 - Voluntary Seismic upgrades
 - Repair roof leaks at flat roofs only; repair leaks at skylights
 - Accessibility Upgrades
 - Exterior painting/repair existing windows
 - Interior paint/finishes
 - IP Convergence
 - New HVAC system

²⁷ Program of Facilities Requirements, Lincoln Senior High School Comprehensive Modernization Project. Los Angeles: LAUSD, January 25, 2018.

3. Project Description

- Auditorium Building #3
 - Modernization (to current District Standards to the extent feasible)
 - Structural upgrades
 - Accessibility Upgrades, including new elevator to basement and stage access
 - Exterior painting
 - Interior paint/finishes
 - IP Convergence
 - New HVAC system and FS system
 - Upgrade plumbing systems, low voltage systems (including lighting systems) and fire alarm
 - New sound system and theatrical rigging
 - Provide ADA seats, keep all other existing auditorium fixed seating in place without upgrade
- Home Economics Building #4
 - Modernization (to current District Standards - to the extent feasible) – Partitions reconfigured to accommodate appropriate classroom sizes
 - Approximately 14 Classrooms
 - Structural upgrades
 - Reconfigure food service scramble and kitchen areas, as necessary
 - Repair roof leaks at flat roofs or replace roof; repair leaks at skylights
 - Accessibility Upgrades
 - Exterior painting
 - Interior paint/finishes
 - IP Convergence
 - New HVAC system, electrical system (including all LV), Plumbing, FA & FS
 - Reconfigure interior for new Campus lobby/entrance at SW corner of building
- Gymnasium Building #7
 - Structural upgrades
 - 1 Classroom (ROTC)
 - New HVAC system, Electrical system, Plumbing, FA & FS and lighting
 - Accessibility Upgrades
 - Exterior painting
 - Interior paint/finishes
 - IP Convergence
- Pedestrian Bridge # 15
 - Structural upgrades

3. Project Description

- New lighting along path of travel
- Accessibility upgrades, as necessary
- Exterior painting

Minimal Modernization

- Music Building #9 (2 Classrooms)
 - Barrier Removal Upgrades - Drinking fountain upgrade at exterior wall; door hardware replacements to be compliant with ADA; building, room, and assistive listening identification signage upgrades
 - Exterior painting
 - Interior paint/finishes
 - IP Convergence
- Federal Buildings #11 & 12 (10 Classrooms)
 - Barrier Removal Upgrades - (ground floor only) door hardware replacements to be compliant with ADA, building, and room signage upgrades; 5% min. ADA exterior locker upgrades
 - Exterior painting
 - Interior paint/finishes
 - IP Convergence
- Food Service (Serving Kiosk) Building #16
 - Barrier Removal Upgrades - Drinking fountain upgrade at exterior wall; upgrade one ADA compliant transaction counter; remove and reconstruct queue line rails to match with ADA counter; door hardware replacements to be compliant with ADA, building, room, and assistive listening identification signage upgrades
 - Exterior painting
 - IP Convergence
- Lunch Shelter
 - Fire Alarm & Fire Sprinkler upgrades as required at Lunch Shelter
 - Exterior painting

Demolition

- Music Building #1
- Storage Building #13 (
- Shop Building #14
- Portables and bungalows:
 - Building #17
 - Building #22

3. Project Description

- Building #28
 - Building # 29
 - Building #30
 - Building #31
 - Building #32
- Pueblo de Los Angeles Continuation High School:
 - Building #24
 - Building #41
 - Building #42

Site Improvements

- Site wide utilities upgrades
 - Site storage for athletic, M&O and emergency supplies
 - New Storm Water and Sewer lines
 - New water lines
 - New separate fire water lines
 - Central Plant piping connections and rerouting as required to demolished Shop Building
 - Electrical and Low voltage upgrades as required
 - IP convergence upgrades, including CCTV
 - Site lighting
 - The proposed project includes any off-site utility upgrades required to service the Project (if needed).
- West Parcel
 - Provide secured/controlled Campus entrance and ramp at SW corner of Home Economic Building
 - New surface parking lot with site lighting, new curb cuts as required
 - Secured lines of Campus (fences and gates as required)
 - Landscape and concrete path upgrades New Horticulture/garden area
 - Lincoln Park Avenue retaining wall improvements and sewer connections
 - Barrier Removal Upgrades - ADA upgrades including paths of travel, required directional signage, and permanently installed assistive listening system with all necessary support infrastructure at the bleachers.
- East Parcel
 - New ADA parking with site lighting next to Gymnasium
 - ADA Path of travel upgrades as required to go to Gymnasium, fields, courts, and right-of-way

3. Project Description

- Secured lines of Campus (fences and gates as required)
 - Landscape and concrete path upgrades as required
 - Batting Cage
 - Visitor Bleachers
 - New Concession Stands (Home and Visitor)
 - Barrier Removal Upgrades - Compliant elevator push call button panels at Elevator Tower. Path of travel upgrades as required to go to the field and tennis/basketball court from the West Parcel.
- Interpretive Program

Temporary Relocation

Glen Alta Elementary School is 3.28 acres and is located at 3410 Sierra Street in Los Angeles. This Campus is approximately 0.7-mile northeast of the Project site and would temporarily house Pueblo de Los Angeles Continuation High School (HS). Pueblo de Los Angeles Continuation HS is 0.28 acre and is located at 2506 Alta Street in Los Angeles. It occupies three portable bungalow buildings (approximately 3 classrooms). The program would temporarily be relocated within existing classroom space at Glen Alta Elementary School during construction.

3.2.1 Campus Buildings

Specifically, the proposed Project would include the changes to the Campus Buildings shown in Table 2 and Figure 4.

3. Project Description

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

Bldg. No.	Building	Demolition	Remodel/ Modernization	New Construction	Existing to Remain
1	Music Building	1,875			
2	Administration Building		66,345		11,680
3	Auditorium		27,044		1,611
4	Home Economics Building		44,949		2,409
7	Gymnasium		35,224		
9	Music Building				3,159
10	Storage Shed				1,337
11	Classroom Building A				2,864
12	Classroom Building B				2,944
13	Storage Building	360			
14	Shop Building	36,469			
15	Pedestrian Bridge		1,661		
16	Food Service Building				404
17	Portable	946			
22	Portable	960			
27	Portable				382
28	Portable	920			
29	Portable	960			
30	Portable	960			
31	Portable	960			
32	Portable	960			
36	Wellness Clinic				2,159
	2-Story Performing Arts Building			7,302	
	2 Story Classroom Building			18,015	



3. Project Description

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

Bldg. No.	Building	Demolition	Remodel/ Modernization	New Construction	Existing to Remain
	New Maintenance and Operations Building			3,371	
	Field Restroom Building			1,911	
	Pueblo de Los Angeles Continuation HS			4,395	
Pueblo de Los Angeles HS 24	Portable Restrooms	923			
Pueblo de Los Angeles HS 41	Relocatable	1,719			
Pueblo de Los Angeles HS 42	Relocatable	1,545			
	Campus Total* (does not include outdoor space)	49,557	175,223	34,994	28,949

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

* It is anticipated that the Pueblo de Los Angeles Continuation HS bungalows (3,264 sq ft) would be removed prior to the installation of interim housing.

Square footage totals may not add up exactly due to rounding and the calculations used to total the usable Campus space. All numbers are based on LAUSD Lincoln HS Comprehensive Modernization Project – Space Program. August 25, 2020.

Current total square footage = Existing + Remodel + Demolition (253,729). After project square footage = Existing + Remodel + New (239,166). Decrease in Campus square footage = 14,563 sq ft

3. Project Description

3.2.2 Site Access, Circulation, and Parking

Lincoln HS is a closed Campus, several gates restrict access and are opened only for morning and afternoon bell periods.²⁸ The proposed Project includes changes to the internal configuration of the Campus including parking, seismic and accessibility upgrades to the existing pedestrian bridge, and new hardscape and ramps (Please refer to Figure 4, Conceptual Site Plan). These improvements include upgrades to meet programmatic access requirements of the ADA throughout the school site including ADA Path of travel upgrades as required to go to the Gymnasium, fields, courts, and right-of-way.

No off-site circulation improvements are proposed as part of the Project. According to the Site Circulation Report (included in Appendix B) there are currently no designated or signed drop-off/pick-up areas on the existing Campus. Therefore drop-off/pick-up currently occurs at any available space on or adjacent to the Campus. The surrounding streets including Lincoln Park Avenue, Thomas Street, North Broadway (north side), Alta Street, and Altura Street (private) are commonly used.²⁹

No changes to Public transportation are proposed as part of this Project. Public bus transit stops and services (operators and routes) provided adjacent to Lincoln HS are as follows:³⁰

- North Broadway
 - Northwest corner of Thomas Street
 - Metro 252 (westbound), Metro 45 (westbound)
 - LADOT DASH Lincoln Heights/Chinatown (westbound)
 - Southwest corner of Lincoln Park Avenue
 - LADOT DASH Lincoln Heights/Chinatown (eastbound)
- Lincoln Park Avenue
 - Southeast corner of Altura Street
 - Metro 252 (northbound)
 - Southwest corner of Altura Street
 - Metro 252 (southbound)

3.2.3 Landscaping

The Project contains landscape improvements, including a garden to support the horticulture program. A tree inventory of the Lincoln HS Campus and its immediate vicinity, including adjacent roadways and associated street trees, was conducted. A total of 293 trees were recorded during the tree inventory; this included 5 protected native trees on the Lincoln HS Campus (District property), 54 protected street trees off the HS Campus, and 234 non-protected trees on the Campus³¹ All tree trimming and removal conducted on District

²⁸ Lin Consulting, Inc. Site Circulation Report LAUSD School Modernization Project - Abraham Lincoln High School. October 11, 2018.

²⁹ Ibid.

³⁰ Ibid.

³¹ Jan C. Scow Consulting Arborists, LLC. Tree Inventory at Lincoln High School, December 28, 2017.



3. Project Description

property will adhere to the procedures described in the LAUSD Office of Environmental Health & Safety (OEHS) *Tree Trimming and Removal Procedure*.³²

3.2.4 Construction Phasing and Equipment

Construction is anticipated to start in the *2nd Quarter 2022* and be completed by the *1st Quarter 2027* (approximately 57 months). Construction activities would include demolition, grading, building construction, building interiors, and paving. All site preparation and construction of the proposed Project would be in accordance with all federal, state, and local regulations including the California Green Building Code and work hours established in the City of Los Angeles Municipal code (LAMC). To the extent feasible, construction related activities would be scheduled to occur during daylight hours. Consistent with LAMC Section 41.40, all non-emergency construction activities would occur between 7:00 a.m. and 9:00 p.m., Monday through Friday and 8:00 a.m. to 6 p.m. on Saturdays and national holidays. Construction would be prohibited on Sundays. Table 3 summarizes the anticipated construction activities and schedule for implementation of the proposed Project.

Table 3
Construction Schedule and Equipment

Phase	Schedule	Equipment	Number
Demolition	2022 <i>June to December</i>	Excavators w/breaker	1
		Tractor/Loader/backhoes (e.g., Bobcat/Skip)	2
		Crushing Equipment	1
		Water Truck (Off-Highway Truck)	1
		Building Debris haul trips	225
		Generator Set	2
Grading	2023 <i>January to December</i>	Excavator	1
		Plate Compactor	1
		Tractor/Loader/backhoes (e.g., Skip Loader)	2
		Water Truck (Off-Highway Truck)	1
		Soil haul trips (soil export); average 14 CY bottom dump trucks	45
		Roller (e.g., Vibratory Rollers for 95% soil compaction)	2
		Trencher / Excavator	1

³² LAUSD.

<https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/135/LAUSD%20Tree%20Trimming%20Removal%20Procedure.pdf>. Accessed March 2019.

3. Project Description

Table 3
Construction Schedule and Equipment

Phase	Schedule	Equipment	Number
Building Construction	2024-2026 <i>January to December</i>	Vendor Trips/day (round trip)	17
		Bore/Drill Rig (e.g., Impact Pile Driver, Sonic Pile Driver, Crane-Mounted Auger Drill, or Crane-Suspended Downhole Vibrator)	1
		Concrete Pump	1
		Crane	1
		Forklifts/Gradalls	4
		Tractor/Loader/backhoes	2
		Water Truck (Off-Highway Truck)	1
		Welder	1
		Generator Set	1
Building Interiors	2026 <i>September to December</i>	Air Compressor	1
Asphalt Paving and Off-Site Street Work	2027 <i>January to March</i>	Tractor/Loader/backhoes (e.g., Skip Loaders)	2
		Roller	1
		Paver	1
		Vendor (i.e., Asphalt Truck) Trips/day	8
		Water Truck (Off-Highway Truck)	1

Lincoln HS would remain operational during Project construction and interim housing would be provided as necessary. The interim housing is anticipated to include portable facilities including 13 classrooms, two toilet buildings, four administration units, food services unit and lunch shelter, lockers and showers suites, one library clerical unit, one library book unit, and one M&O unit. To the extent feasible, construction-related traffic and deliveries would be scheduled to avoid student pick-up, drop-off hours, and noise during sensitive times as coordinated with the school administration. As previously noted, Pueblo de Los Angeles Continuation HS would be relocated to the Glen Alta Elementary School Campus for approximately one year during construction. Both schools would remain operational. Pueblo de Los Angeles Continuation HS would return to its previous location following the establishment of permanent space on the Lincoln HS Campus for the school.



4. Environmental Checklist and Analysis

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

On the basis of this initial evaluation:

- ☐ I find that the proposed project could not have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Carlos A. Torres

Printed Name

Date

CEQA Officer for LAUSD

Title

4. Environmental Checklist and Analysis

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

4. Environmental Checklist and Analysis

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

4. Environmental Checklist and Analysis

ENVIRONMENTAL IMPACTS

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

Explanation:

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

LAUSD Standard Conditions of Approval

SC-AE-1	LAUSD shall review all designs to ensure that demolition of existing buildings or construction of new buildings on its historic campuses are designed to ensure compatibility with the existing Campus. The School Design Guide shall be used as a reference to guide the design. School Design Guide This document outlines measures for re-use rather than destruction of historical resources. It requires the consideration of architectural appearance/consistency and other aesthetic factors during the preliminary design review for a proposed school upgrade project. Architectural quality must consider compatibility with the surrounding community.
SC-AE-2	LAUSD shall review all designs to ensure that methods from the current School Design Guide are incorporated throughout the planning, design, construction, and operation of the Project in order to limit aesthetic impacts. School Design Guide This document outlines measures to reduce aesthetic impacts around schools, such as shrubs and ground treatments that deter taggers, vandal-resistant and graffiti-resistant materials, painting, etc.
SC-AE-3	LAUSD shall assess a proposed project's consistency with the general character of the surrounding neighborhood, including any proposed changes to the density, height, bulk, and setback of a new building (including stadium), addition, or renovation. Where feasible, LAUSD shall make appropriate design changes to reduce or eliminate viewshed obstruction and degradation of neighborhood character. Such design changes could include, but are not limited to, changes to Campus layout, height of buildings, landscaping, and/or the architectural style of buildings.
SC-AE-4	<i>LAUSD shall review all designs to ensure that the installation of a school marquee complies with Marquee Signs Bulletin BUL 5004.1.</i>



4. Environmental Checklist and Analysis

	<p>Marquee Signs Bulletin BUL-5004.1</p> <p><i>This policy provides guidance for the procurement and installation of marquee signs (outdoor sign with electronic message display) on District campuses. The policy includes requirements for the design, approval, placement, operation, and maintenance of electronic school marquees erected and operated at schools. The policy also includes measures to mitigate light and glare, such as the use of "luminaries" in connection with school construction.</i></p>
SC-AE-5	<p>LAUSD shall review all designs and test new lights following installation to ensure that adverse light trespass and glare impacts are avoided.</p> <p>School Design Guide</p> <p>This document outlines Illumination Criteria, requirements for outdoor lighting and measures to minimize and eliminate glare that may impact pedestrians, drivers and sports teams, and to avoid light trespass onto adjacent properties.</p>
SC-AE-6	<p>The International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used as a guide for environmentally responsible outdoor lighting. The MLO has outdoor lighting standards that reduce glare, light trespass, and skyglow. The MLO uses lighting zones (LZ) 0 to 4, which allow the District to vary the lighting restrictions according to the sensitivity of the community. The MLO also incorporates the Backlight-Uplight-Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. The MLO establishes standards to:</p> <ul style="list-style-type: none"> • Limit the amount of light that can be used. • Minimize glare by controlling the amount of light that tends to create glare. • Minimize sky glow by controlling the amount of uplight. • Minimize the amount of off-site impacts or light trespass.

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

Less Than Significant Impact. The Program EIR states that all SUP-related projects would not have a substantial adverse effect on scenic vistas and that as a rule, existing, established public schools tend to be aesthetically compatible with the neighborhoods within which they are located and their scope, height, and mass unlikely to block, obscure, or degrade surrounding views.³³ Scenic views are typically defined as those that provide expansive views of a highly-valued landscape for the benefit of the general public. Panoramic views are usually associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. While the design of the Project was not completed at the time of the preparation of this Initial Study, implementation of the proposed Project is not anticipated to substantially alter distant views of the surrounding environment in comparison to existing conditions. The Project site is located within the community of Lincoln Heights in an urban area surrounded by single- and multi-family residential and limited commercial uses. During the June 2019 site visit, no distant mountain views were observed from the Campus. Therefore, the Project impacts on scenic vistas would be less than significant and no further analysis is required.

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

No Impact. Implementation of the proposed Project would not result in impacts to scenic resources within a designated State scenic highway based on a review of the California State Scenic Highway System Map.³⁴

³³ LAUSD. Final Environmental Impact Report School Update Program. November 10, 2015.

³⁴ California Department of Transportation. California State Scenic Highway System Map, Accessed August 2020. <https://www.arcgis.com/apps/webappviewer/index.html?id=2e921695c43643b1aaf7000dfcc19983>.

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According to the Mobility Plan, an element of the General Plan³⁵, Lincoln Boulevard (Highway Route 1) is a State Scenic Highway starting at the intersection of Venice Boulevard., which is approximately 15 miles southwest of the project site. No impacts to scenic resources along a designated scenic highway would result and no further analysis is required.

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

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

Lincoln HS is located in the community of Lincoln Heights. Situated just across the Los Angeles River and east of downtown Los Angeles, Lincoln Heights is one of the oldest neighborhoods in the city. Overwhelmingly residential, much of the neighborhood occupies hilly topography. Neighborhood streets are populated primarily with early-20th century residences, along with some late-19th century homes and more recent multi-family residential infill. Commercial streets are lined with modest, mostly one-story retail storefronts and service buildings, with some two-story commercial blocks at larger intersections. Neighborhood landmarks include Lincoln Park, the San Antonio Winery, and the Brewery Art Colony.³⁶

The visual setting of the area is generally urbanized. Surrounding visual elements include single- and multi-family residential and limited commercial uses surrounded the immediate vicinity of Lincoln HS.

Construction

Evaluation of construction impacts focuses on the short-term visual impacts resulting from the demolition and removal of current buildings, construction of the proposed Project, as well as the presence of equipment and material storage. In a visual sense, construction impacts from the proposed Project could be obtrusive, or out of character with the surrounding landscape. Construction equipment and materials, exposed dirt and unfinished buildings would temporarily impact the visual character of the Project site.

Construction is a short-term impact and construction fencing would be provided around any active construction and staging areas, for both screening and security. With implementation of SC-AE-2 and SC-AE-3, impacts to the visual character or quality of the site and its surroundings would be less than significant and no further evaluation is required.

³⁵ City of Los Angeles. Mobility Plan 2035, an Element of the General Plan, adopted by City Planning Commission on June 23, 2016 and City Council on September 7, 2016.

³⁶ HRG. Historic Resource Assessment for Lincoln High School, November 18, 2018.



4. Environmental Checklist and Analysis

Operation

Implementation of the proposed Project would result in the reduction of portable buildings on Campus and the creation of a new permanent classroom buildings, modernization of existing facilities, new landscape, and exterior paint that would provide beneficial long-term visual impacts to the area. LAUSD requires the consideration of architectural appearance/compatibility as well as other aesthetic factors during the preliminary design review.

The Program EIR states that all SUP-related projects would not substantially degrade the existing visual character or quality of the site and its surroundings.³⁷ For construction of new buildings SC-AE-1 requires that architectural quality consider compatibility with the surrounding community. SC-AE-2 incorporates reviews by LAUSD to ensure that methods from the current School Design Guide are incorporated throughout the planning, design, construction, and operation of the Project. SC-AE-3 requires analysis of views and consistency with the general character of the surrounding neighborhood. SC-AE-5 requires LAUSD to review all designs and test new lights following installation to ensure that adverse light trespass and glare impacts are avoided. Therefore, with implementation of the required measures from the LAUSD School Design Guide and SC-AE-1, SC-AE-2, SC-AE-3 and SC-AE-5, Project impacts would be less than significant and no further analysis is required.

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

Less than Significant. The two major causes of light pollution are glare and spill light. Spill light is caused by misdirected light that illuminates areas outside the area intended to be lit. Glare occurs when a bright object is against a dark background, such as oncoming vehicle headlights or an unshielded light bulb.

Lincoln HS is located within a developed urban environment. The existing Campus generates nighttime light from security lighting including parking lot and building lights (interior and exterior) and from field lights. Surrounding land uses also generate significant light from street lights, vehicle lights, parking lot lights, and building lights.

The Project would not significantly increase nighttime lighting on the Campus since new buildings would replace existing buildings and portable classrooms. Furthermore, the Project does not include any new sources of high-intensity lighting such as field lights. Nighttime illumination would be designed, arranged, directed, or shielded in accordance with existing applicable regulations and guidelines for school operations. With respect to all SUP projects, the Program EIR states SUP-related projects would not generate substantial light or glare which would adversely affect day or nighttime views.³⁷ Therefore, with implementation of the required measures from the LAUSD School Design Guide and SCs AE-4, AE-5, and AE-6, light and glare impacts would be less than significant and no further analysis is required.

³⁷ LAUSD. Final Environmental Impact Report School Update Program. November 10, 2015.

4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997, as updated) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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])?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

There are no agriculture and forestry resources LAUSD SCs.

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

No Impact. The Project site is located within a developed urban environment and there is no farmland located on or adjacent to the Project site. The site falls outside of the Natural Resources Conservation Service (NRCS) soil survey and is not mapped by the Farmland Mapping and Monitoring Program (FMMP).³⁸ Therefore, no Project impacts on important farmland would result and no further analysis is required.

³⁸ Department of Conservation. California Important Farmland Finder. Accessed May 2019.
<https://maps.conservation.ca.gov/DLRP/CIFF/>



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

No Impact. The Project site is not zoned for an agricultural use and is not under a Williamson Act Contract. The Project site is zoned PF and public secondary schools are an allowed use within the PF zone.³⁹ The Williamson Act, also known as the California Land Conservation Act of 1965, enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments which are much lower than normal because they are based upon farming and open space uses as opposed to full market value.⁴⁰ The Project site is owned by LAUSD, a public agency, and is utilized for a public high school. Therefore, no Project impacts would result and no further analysis is required.

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

No Impact. The Project site is located within a developed urban environment and there is no forestry land located on or adjacent to the Project site. The Project site is zoned PF and public secondary schools are an allowed use within the PF zone.⁴¹ Therefore, no Project impacts on forestry resources would result and no further analysis is required.

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

No Impact. The Project site is located within a developed urban environment and there is no forestry land located on or adjacent to the Project site. Therefore, no Project impacts on forestry resources would result and no further analysis is required.

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

No Impact. The Project site is located within a developed urban environment and there is no agricultural or forestry land located on or adjacent to the Project site. Therefore, the Project does not involve changes to 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 and no Project impacts would result and no further analysis is required.

³⁹ City of Los Angeles Municipal Code. City of Los Angeles Municipal Code Sec.12.04.09(b)(8).

[http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisio nsandzoning/article2specificplanning-zoningcomprehen/sec120409pfpfpublicfacilitieszone?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:lapz_ca\\$anc=JD_12.04.09](http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisio nsandzoning/article2specificplanning-zoningcomprehen/sec120409pfpfpublicfacilitieszone?f=templates$fn=default.htm$3.0$vid=amlegal:lapz_ca$anc=JD_12.04.09). Accessed May 2019.

⁴⁰ California Department of Conservation. Williamson Act Program. Accessed May 2019. <https://www.conservation.ca.gov/dlrp/wa>.

⁴¹ City of Los Angeles Municipal Code. City of Los Angeles Municipal Code Sec.12.04.09(b)(8).

[http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisio nsandzoning/article2specificplanning-zoningcomprehen/sec120409pfpfpublicfacilitieszone?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:lapz_ca\\$anc=JD_12.04.09](http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisio nsandzoning/article2specificplanning-zoningcomprehen/sec120409pfpfpublicfacilitieszone?f=templates$fn=default.htm$3.0$vid=amlegal:lapz_ca$anc=JD_12.04.09). Accessed May 2019.

4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.				
Are significance criteria established by the applicable air district available to rely on for significance determinations?		<input checked="" type="checkbox"/> Yes		<input type="checkbox"/> No
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

This analysis incorporates the air emission results for the proposed Project using the California Emissions Estimator Model (CalEEMod) prepared by Tetra Tech (see Appendix D).

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

LAUSD Standard Conditions of Approval	
SC-AQ-2	Construction Contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.
SC-AQ-3	<p>Construction Contractor shall:</p> <ul style="list-style-type: none"> • Maintain speeds of 15 miles per hour (mph) or less with all vehicles. • Load impacted soil directly into transportation trucks to minimize soil handling. • Water/mist soil as it is being excavated and loaded onto the transportation trucks. • Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site. • Minimize soil drop height into haul trucks or stockpiles during dumping. • During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks. • Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed. • Place stockpiled soil on polyethylene sheeting and cover with similar material. <p>Place stockpiled soil in areas shielded from prevailing winds.</p>
SC-AQ-4	<p>LAUSD shall analyze air quality impacts:</p> <p>If site-specific review or monitoring data of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds.</p>



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Construction bid contracts shall include protocols that reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. The Construction Contractor shall be responsible for documenting compliance with the identified protocols. Specific air emission reduction protocols include, but are not limited to, the following.

Exhaust Emissions

- Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM).
- Consolidate truck deliveries and limit the number of haul trips per day.
- Route construction trucks off congested streets, as permitted by local jurisdiction haul routes.
- Employ high pressure fuel injection systems or engine timing retardation.
- Use ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment.
- Use construction equipment rated by the United States Environmental Protection Agency as having at least Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower.
- Restrict non-essential diesel engine idle time, to not more than five consecutive minutes.
- Use electrical power rather than internal combustion engine power generators.
- Use electric or alternatively fueled equipment, as feasible.
- Use construction equipment with the minimum practical engine size.
- Use low-emission on-road construction fleet vehicles.
- Ensure construction equipment is properly serviced and maintained to the manufacturer's standards.

Fugitive Dust

- Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Replace ground cover in disturbed areas as quickly as possible.
- Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).
- Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip.
- Pave unimproved construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles.
- Pave all unimproved construction access roads for at least 100 feet from the main road to the project site.
- Enclose, cover, water twice daily, or apply non-toxic soil binders according to manufacturers' specifications to exposed piles (i.e., gravel, dirt, and sand) with a 5% or greater silt content.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph).
- Water disturbed areas of the active construction and unpaved road surfaces at least three times daily, except during periods of rainfall.
- Limit traffic speeds on unpaved roads to 15 mph or less.
- Prohibit fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD.
- Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
- Limit the amount of daily soil and/or demolition debris loaded and hauled per day.

General Construction

- Use ultra-low VOC or zero-VOC surface coatings.
- Phase construction activities to minimize maximum daily emissions.
- Configure construction parking to minimize traffic interference.
- Provide temporary traffic control during construction activities to improve traffic flow (e.g., flag person).

4. Environmental Checklist and Analysis

- | | |
|--|---|
| | <ul style="list-style-type: none"> • Prepare and implement a trip reduction plan for construction employees. • Implement a shuttle service to and from retail services and food establishments during lunch hours. • Increase distance between emission sources to reduce near-field emission impacts. |
|--|---|

Pursuant to the Clean Air Act Amendments of 1990, the USEPA has established National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and the environment. The NAAQS are classified as primary and secondary standards. Primary standards prescribe the maximum permissible concentration in the ambient air and are required to protect public health. Secondary standards specify levels of air quality required to protect public welfare, including materials, soils, vegetation, and wildlife, from any known or anticipated adverse effects. NAAQS are established for six pollutants (known as criteria pollutants): ozone (O₃), particle pollution (i.e., respirable particulate matter less than 10 microns in diameter [PM₁₀] and respirable particulate matter less than 2.5 microns in diameter [PM_{2.5}]), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead (Pb). The California Air Resources Board (CARB) has also established its own air quality standards in the state of California, known as the California Ambient Air Quality Standards (CAAQS). The CAAQS are generally more stringent than the NAAQS and include air quality standards for all the criteria pollutants listed under NAAQS plus sulfates (SO₄), hydrogen sulfide (H₂S), vinyl chloride, and visibility-reducing particulate matter.

The USEPA classifies the air quality within an Air Quality Control Region with regard to its attainment of federal primary and secondary NAAQS. An area with air quality better than the NAAQS for a specific pollutant is designated as being in attainment for that pollutant. Any area not meeting the NAAQS is classified as a nonattainment area. Where there is a lack of data for the USEPA to make a determination regarding attainment or nonattainment, the area is designated as unclassified and is treated as an attainment area until proven otherwise. Similarly, the CARB makes state area designations for the state criteria pollutants.

The proposed Project is in the City of Los Angeles within Los Angeles County, which is subject to the South Coast Air Quality Management District (SCAQMD) regulations. Pollutant concentrations within the Los Angeles County are assessed relative to both the federal and State ambient air quality standards.

The portion of Los Angeles County where the proposed Project is located is in attainment for all Federal criteria pollutants except O₃, PM_{2.5}, and Pb and in attainment for all State criteria except O₃, PM_{2.5}, and PM₁₀.⁴²

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

Less Than Significant Impact. The Project site is located within the SoCAB and is subject to the Air Quality Management Plan (AQMP) prepared by the SCAQMD. The SCAQMD has adopted the 2016 AQMP which focuses on achieving clean air standards while accommodating population growth forecasts compiled by the Southern California Association of Governments (SCAG). According to the *SCAQMD CEQA Air Quality Handbook*, a Project would have a significant impact if it conflicts with or delays implementation of the applicable AQMP. A Project is consistent with the AQMP if it meets the following criteria:

⁴² Area Designations Maps / State and National. November 2017. <http://www.arb.ca.gov/desig/adm/adm.htm>. Accessed August 2019.



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- The Project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.
- The Project will not exceed the assumptions in the AQMP or increments based on the year of Project buildout (i.e., 2027).

The Project is not intended to increase student population and its overall building square footage would decrease. Thus, the Project would not result in an increase of operations. Since the overall building footprint will decrease, operations would likely reduce as well (i.e., less energy, water and upkeep efforts would be required to run the resulting building structures). Additionally, the Project would be consistent with the Northeast Los Angeles Community Plan, which is the element of the General Plan of the City of Los Angeles and the area under which the Project is located.

The project site is within the SCAQMD, which oversees the welfare of air quality in the portion of Los Angeles County where the proposed Project is located. The SCAQMD promotes air quality improvement 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 support and implementation of measures to reduce emissions from motor vehicles.

The federal CAA requires states to develop plans, known as State Implementation Plans (SIPs), stating how they will attain or maintain NAAQS. SIPs are a compilation of new and previously approved plans, programs, district rules, state regulations and federal controls. States and local air quality management agencies prepare SIPs for approval by the USEPA. To this end, the SCAQMD in conjunction with the California Air Resources Board, the Southern California Association of Governments (SCAG) and the USEPA have prepared the Final 2016 Air Quality Management Plan (AQMP or Plan) to ensure continued progress toward clean air and reach federal and state compliance requirements over the next two decades.

The AQMP incorporates emissions projections based on growth forecasts accounted for in local and regional general plans. Local governments maintain the authority to determine the types of land use that are allowed within their jurisdiction. For example, in city general plans, each parcel of land within that city is given a land use designation (i.e., residential, industrial, etc.). Developments that do not comply with general plan designations are inconsistent with the general plan. A proposed Project that is inconsistent with a local general plan is also inconsistent with the AQMP.

Project emissions would occur during the construction of the Project. Project construction emissions would contribute to emissions emitted in the County of Los Angeles. To determine their significance Project construction emissions were calculated using the California Emissions Estimator Model (CalEEMod). CalEEMod is widely accepted to provide a uniform platform to estimate potential emissions resulting from construction and operation activities of land use projects. The model uses pre-programed algorithms to calculate emissions based on data entered. The algorithms are designed to take information such as project size; construction length; vehicle and equipment types; number of vehicle trips and lengths; and equipment operating hours to calculate emissions of criteria pollutants and greenhouse gases. Emission calculations provided in this document factor standard conditions such as those stated above (i.e., SC -AQ-2 and SC -AQ-4).

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CalEEMod input values and calculated air emission results for the proposed project are provided as Appendix D and summarized in Table 4.⁴³

Table 4
Project Construction Emissions of Criteria Pollutants (lb/day)

Project Phase	VOCs	NOx	CO	Sox	PM ₁₀	PM _{2.5}
Construction (2022)	0.58	4.71	25.26	0.05	1.40	0.30
Construction (2023)	0.44	3.09	19.15	0.04	0.50	0.13
Construction (2024)	1.00	5.89	31.40	0.07	1.29	0.41
Construction (2025)	0.98	5.85	31.21	0.07	1.29	0.41
Construction (2026)	23.21	5.98	33.33	0.07	1.49	0.47
Construction (2027)	0.34	2.16	13.53	0.03	0.36	0.12
Threshold of Significance	75	100	150	150	150	55
Maximum On-Site Construction Emissions for LST purposes	N/A	3.31	27.88	N/A	1.15	0.22
LST	N/A	74	680	N/A	5	3
Significant?	No	No	No	No	No	No

Notes: CO carbon monoxide
lb/day pounds per day
LST localized significance threshold
N/A not applicable
Nox oxides of nitrogen (nitric oxide and nitrogen dioxide)
PM₁₀ respirable particulate matter less than 10 microns in diameter
PM_{2.5} respirable particulate matter less than 2.5 microns in diameter
Sox oxides of sulfur (sulfur dioxide and sulfur trioxide)
VOC volatile organic compounds

Since the Project is consistent with the general plan, its operation emissions would not increase, and its construction emissions do not exceed the SCAQMD established daily thresholds, the Project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards nor exceed the assumptions in the AQMP or increments. Thus, the Project would not conflict with or obstruct implementation of the applicable air quality plan and would result in less than significant impacts and no further analysis is required.

⁴³ Not all CalEEMod calculated emissions are compared to LSTs.



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

Less Than Significant Impact. Short-term (i.e., construction) air pollutant emissions would potentially occur during site preparation and construction activities associated with the proposed Project. Operational emissions are expected to remain at or below current status.

CEQA defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts and the change in the environment which results from the incremental impact of the project when added to other closely related past, present, or reasonably foreseeable future projects and can result from individually minor, but collectively significant project taking place over a period of time”⁴⁴. The proposed Project would result in cumulative impacts if it exceeded daily thresholds established by SCAQMD or if it incurred an increase of emissions beyond what is planned in the City of Los Angeles’ General Plan⁴⁵.

Significance thresholds are established to assist lead agencies in determining whether a project may have a significant air quality impact. Projects with emissions below established thresholds will not have a significant impact on air quality. Projects with emissions equal to or exceeding the established significance threshold will have a potentially significant adverse impact on air quality.

Since the proposed Project is within the jurisdiction of the SCAQMD air quality significance thresholds established by the SCAQMD are used as a reference to determine its significance on the environment. A summary of construction emissions, SCAQMD air quality significance thresholds, a comparison of construction emissions versus thresholds, and significance statements are presented in Table 4. The proposed Project emissions are below established significant thresholds, and, therefore, it has a less than significant impact and no further analysis is required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Short-term air pollutant emissions will occur during site preparation and construction activities associated with the proposed Project but are not anticipated to expose sensitive receptors (e.g., students and school staff who are the primary [i.e., closest] sensitive receptors) to substantial pollutant concentrations and would have a less than significant impact. The closest off-site sensitive receptors include: residences that border the Campus to the north and west and Gates Street Elementary School located southwest of the campus across North Broadway. The following sections provide a summary of the assessment performed to arrive at the conclusion that the proposed project has a less than significant impact associated with the exposure of sensitive receptors to substantial pollutant concentrations and no further analysis is required.

Construction Localized Significance Thresholds

Localized Significance Thresholds (LST) represent the maximum emissions from a Project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality

⁴⁴ SCAQMD. 1993 CEQA Air Quality Handbook.

⁴⁵ City of Los Angeles General Plan. <https://planning.lacity.org/plans-policies/general-plan-updates>.

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standard and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor.

The methodology for analyzing localized air quality impacts from proposed projects is presented in the SCAQMD *Final Localized Significance Threshold Methodology* document⁴⁶. The methodology includes look-up tables with localized significance threshold according to source receptor area for one, two and five acre proposed projects emitting CO, Nox, PM 2.5, or PM10. The LST methodology and associated LST mass rates are not designed to evaluate localized impacts from mobile sources traveling over the roadways. Thus, mobile emissions are not considered to determine localized significance. The LST mass rates applicable to the proposed project are based on the Central Los Angeles area, which is the source receptor area where the project is located, and for a one-acre project size since the footprint of the daily area disturbed is anticipated to be within one acre. The LSTs are also based on receptors being within 25 meters from the construction emission sources. Maximum daily on-site emissions of all criteria pollutants from all construction phases calculated in CalEEMod are included in appendix A, summarized in Table 4, and compared against applicable LSTs from Appendix C of the *Final Localized Significance Threshold Methodology* document. Based on this analysis, none of the LSTs are exceeded.

Construction Emission Health Risk

Emissions of TACs associated with the proposed Project would be emitted primarily through the combustion of diesel fuel by construction equipment during the construction of the Project. These emissions are temporary and will stop once the construction phase is completed.

The SCAQMD has neither adopted nor recommended methodology for assessing health risk analysis associated with mobile sources at construction sites.

Operation Localized Significance Thresholds

Operation activities of the proposed Project are expected to remain unchanged and/or decrease overall emissions of criteria pollutants as a result of a reduction in building footprint. Thus, a localized significance analysis is not necessary and not further pursued in this document.

Carbon Monoxide Hotspots

Congested intersections have the potential to result in localized high levels of CO, which results from incomplete combustion of carbon containing fuels (e.g., gasoline and diesel). CO exposure can have a significant impact on sensitive receptors. Since operation activities of the proposed Project are expected to remain consistent with the current conditions, traffic impacts including increases in CO emissions associated with the proposed Project would not occur. Thus, a CO analysis to assess new operational CO emissions is not required.

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

No Impact. Land uses primarily associated with odorous emissions include waste transfer and recycling stations, wastewater treatment plants, landfills, composting operations, petroleum operations, food and

⁴⁶ SCAQMD. 2003 Final Localized Significant Threshold Methodology.



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byproduct processes, factories, and agricultural activities, such as livestock operations. The proposed Project does not include any of these types of land uses. In addition, the proposed Project would not be sited near any of these recognized sources of odors. Therefore, the proposed Project would have no impacts with respect to odors and no further analysis is required.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

This analysis incorporates information from the Arborist Report prepared by Jan C. Scow Consulting Arborists in 2017 (see Appendix C).

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

LAUSD Standard Conditions of Approval

SC-BIO-1	<p>An LAUSD-qualified nesting bird Surveyor or Biologist shall identify plant and animal species and habitat within and near the project site. LAUSD will conduct a literature search, which shall consider a one-mile radius beyond the project construction site and shall be performed by a qualified nesting bird Surveyor or Biologist with knowledge of local biological conditions as well as the use and interpretation of the data sources identified below. Where appropriate, in the opinion of the Biologist, the literature search shall be supplemented with a site visit and/or aerial photo analysis. Resources and information that shall be investigated for each site should include, but not be limited to:</p> <ul style="list-style-type: none"> • United States Fish and Wildlife Service (USFWS) • National Marine Fisheries Services (NMFS) • California Department of Fish and Wildlife (CDFW) • California Native Plant Society (CNPS) • County and/or city planning or environmental offices for sensitive species, habitat, and/or heritage trees that may not exist on published databases.
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- California Natural Diversity Data Base (CNDDB) California Native Plant Society (CNPS) Rare Plant Inventory
- Local Audubon Society
- Los Angeles County Department of Regional Planning for information on Significant Ecological Areas
- California Digital Conservation Atlas for District-wide location of reserves, plan areas, and land trusts that may overlap with project sites.

Biological Resources Report

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

- Information on regional setting that is critical to the assessment of rare or unique resources.
- A thorough, recent floristic-based assessment of special status plants and natural communities, following the CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. CDFW recommends that floristic, alliance- and/or association-based mapping and vegetation impact assessments be conducted at the project site and neighboring vicinity. The Manual of California Vegetation (Sawyer et al.) should also be used to inform this mapping and assessment. Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts off-site. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
- A current inventory of the biological resources associated with each habitat type on-site and within the area of potential effect. CDFW's California Natural Diversity Data Base (CNDDB) should be contacted to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
- An inventory of rare, threatened, and endangered, and other sensitive species on-site and within the area of potential effect. Species to be addressed should include all those identified in CEQA Guidelines Section 15380, including sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at appropriate time of year and time of day when sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the CDFW and USFWS.
- A discussion of the potential adverse impacts from light, noise, human activity, exotic species, and drainage. Drainage analysis should address project-related changes on drainage patterns on and downstream from the site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site.
- Discussions about direct and indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, wetland and riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas.
- Mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Measures should emphasize avoidance and reduction of biological impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be outlined. If on-site measures are not feasible or would not be biologically viable, off-site measures through habitat creation and/or acquisition and preservation in perpetuity should occur. This measure should address restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.
- Plans for restoration and vegetation shall be prepared by qualified nesting bird Surveyor or Biologist with expertise in southern California ecosystems and native plant vegetation techniques. Plans shall include, at a minimum:
 - Location of the mitigation site.
 - Plant species to be used, container sizes, and seeding rates.
 - Schematic depicting the mitigation area.
 - Planting schedule.
 - Irrigation method.
 - Measures to control exotic vegetation.
 - Specific success criteria.
 - Detailed monitoring program.

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	<ul style="list-style-type: none"> Contingency measures should the success criteria not be met. Identification of the party responsible for meeting the success criteria and providing for conservation of the site in perpetuity. <p>LAUSD shall consult with the U.S. Army Corps of Engineers, USFWS and/or the CDFW and comply with any permit conditions or directives from those agencies regarding the protection, relocation, creation, and/or compensation of sensitive species and/or habitats.</p>
SC-BIO-2	LAUSD shall protect sensitive wildlife species from harmful or disruptive exposure to light by shielding light sources, redirecting light sources, or using low intensity lighting. All exterior light fixtures shall be listed as dark sky compliant as required under SC-AE-6.
SC-BIO-3	<p>LAUSD shall comply with the following specifications related to bird and bat nesting sites. Project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates²) should occur outside of nesting season to avoid take of birds, bats, or their eggs.³</p> <p>Bird Surveys - Construction Demolition or Vegetation Removal in or adjacent to Native Habitat</p> <ul style="list-style-type: none"> For construction projects occurring in or adjacent to native habitat, a qualified LAUSD nesting bird Surveyor or qualified Biologist (Surveyor/Biologist) may determine that additional surveys are required outside of the breeding and nesting season (February 1st through August 31st, beginning January 1st for raptors) to determine if protected birds occupy the area (e.g., project site is adjacent to areas with suitable habitat for Southwestern willow flycatcher). If avoidance of the avian breeding season is not feasible, beginning 30 days prior to the initiation of the project activities, the Surveyor/Biologist with experience conducting nesting bird surveys shall conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of project activities. In areas that contain suitable habitat for listed species, species-specific surveys shall be conducted by a qualified Biologist authorized by the regulatory agencies. If a protected bird is observed, additional protocol-level surveys may be required to determine if the sighting was a transient individual or if the site is used as nesting habitat for that species. Project activities shall be delayed until there is a final determination. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests), or as determined by the Surveyor/Biologist shall be delayed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, and/or construction fencing shall be used to demarcate the boundary of the 300- or 500-foot buffer between the project activities and the nest or tree. Project personnel, including all Construction Contractors working on site, shall be instructed on the sensitivity of the area. Protective measures shall be documented to show compliance with applicable State and Federal laws pertaining to the protection of birds. If the Surveyor/Biologist determines that a narrower buffer between the project activities and active nests is warranted, a written explanation for the change shall be submitted to the LAUSD OEHS CEQA Project Manager. If approved, the Surveyor/Biologist can reduce the demarcated buffer. A Surveyor/Biologist shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain outside the demarcated buffer and that the flagging, stakes, and/or construction fencing are maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager during the grubbing and clearing of vegetation, and shall notify LAUSD immediately if project activities damage avian nests. <p>Bird Surveys - Construction, Demolition, or Vegetation Removal at Existing Campuses</p> <ul style="list-style-type: none"> If avoidance of the avian breeding season is not feasible, the Surveyor/Biologist with survey experience shall conduct a nesting bird surveys to determine if active nests are within or adjacent to the work area. The survey shall be conducted no more than 3 days prior to construction activities. A memo describing results of the survey shall be submitted to the OEHS CEQA Project Manager. If an active bird nest is observed, the Surveyor/Biologist shall determine the appropriate buffer around the nest. Buffers are determined on species-specific requirements and nest location. The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager. No construction activity shall occur within the buffer zone until nest is vacated, juveniles have fledged, and there is no evidence of a second attempt at nesting.



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	<p>Bat Surveys</p> <ul style="list-style-type: none"> Bat species inventories and habitat use studies shall be completed for demolition or new construction projects in native habitat as well as projects that require the removal of mature conifer, cottonwood, sycamore or oak trees or abandoned buildings. Bat surveys must be conducted by a qualified bat Surveyor or Biologist (Surveyor/Biologist). The Surveyor/Biologist shall use the appropriate combination of structure inspection, sampling, exit counts, and acoustic monitors to survey an area that may be affected by the project. If bats are found, the Surveyor/Biologist shall identify the species and evaluate the colony to determine potential impacts. Mitigation measures shall be determined on a project-specific basis and may include: <ul style="list-style-type: none"> Avoidance Humane exclusion prior to demolition <ul style="list-style-type: none"> Bats should not be evicted from roost sites during the reproductive period (May-September), or during winter hibernating periods to avoid direct mortality Bats should be flushed from trees prior to felling or trimming. Off-site habitat improvements shall be conducted in coordination with the California Department of Fish and Wildlife.
SC-BIO-4	<p>LAUSD shall comply with the following conditions if a new school would be located in an area containing native habitat or if a protected tree would be removed from an existing campus:</p> <p>New Construction in Native Habitat</p> <p>LAUSD shall avoid constructing new schools in areas containing mature native protected trees to the extent feasible. If site avoidance is not feasible, individual trees should be protected. If protected trees may be impacted, the following condition(s) may be required:</p> <ul style="list-style-type: none"> Translocation of rare plants is prohibited in most instances. CDFW, in most cases does not recommend translocation, salvage, and/or transplantation of rare, threatened, or endangered plant species, in particular oak trees, as compensation for adverse effects because successful implementation of translocation is rare. Even if translocation is initially successful, it will typically fail to persist over time. Permanent conservation of habitat. To ensure the conservation of sensitive plant species, the preferred method is permanent conservation of habitat containing these species; any translocation proposed shall only be an experimental component of a larger, more robust plan. Off-site acquisition of woodland habitat. Due to the inherent difficulty in creating functional woodland habitat with associated understory components, the preferred method is off-site acquisition of woodland habitat in the local area. All acquired habitat shall be protected under a conservation easement and deeded to a local land conservancy for management and protection. Creation of woodlands. Any creation of functioning woodlands shall be of similar composition, structure, and function of the affected woodland. The new woodland shall mimic the function, demonstrate recruitment, plant density, canopy, and vegetation cover, as well as other measurable success criteria before the measure is deemed a success. <ul style="list-style-type: none"> All seed and shrub sources used for tree and understory species in the new planting site shall be collected or grown from on-site sources or from adjacent areas and may be purchased from a supplier that specializes in native seed collection and propagation. This method should reduce the risk of introducing diseases and pathogens into areas where they might not currently exist. Woodland species should be replaced by planting seeds. Monitoring efforts, including the exclusion of herbivores, shall be employed to maximize seedling survival during the monitoring period. Monitoring period for woodlands shall be at least 10 years with a minimum of 7 years without supplemental irrigation. This allows the trees to go through one typical drought cycle. This should also be the minimal time needed to see signs of stress and disease and determine the need for replacement plantings. <p>LAUSD shall request CDFW review and comment on any translocation plans, habitat preservation, habitat creation and/or restoration plans.</p> <p>Removal of Protected Trees on Existing Campuses</p> <p>LAUSD shall comply with the LAUSD OEHS Tree Trimming and Removal Policy. This policy ensures the management of District trees while ensuring that District activities will not conflict with locally adopted tree preservation policies and ordinances.</p>

- Notes: 2 Substrate is the surface on which a plant or animal lives.
- 3 Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs and/or young resulting from disturbances that cause abandonment of active nests.

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

Less Than Significant Impact with Mitigation Incorporated. The proposed Project consists of improvements and upgrades to the existing Lincoln HS Campus. The improvements associated with the proposed Project include new buildings, existing building modernization, demolition, and general site improvements. The Project site is located in an urbanized area, surrounded primarily by residential development. However, to the northeast, the Project site is directly adjacent to an isolated/fragmented area of vacant natural land, consisting primarily of non-native grassland and various ornamental tree and shrub escapes. In compliance with SC-BIO-1, a query of the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB)⁴⁷ and California Native Plant Society (CNPS) Rare Plant Program⁴⁸ was conducted to determine the known locations of any special-status species or habitats within and surrounding the Project site. This query included the City of Los Angeles, as the site is located within the Los Angeles quadrangle, and the eight adjacent quadrangles (Table 5). Special-status species are defined herein as plant and wildlife species holding a status of sensitive, threatened, endangered, rare, or candidate as defined by the CDFW, U.S. Fish and Wildlife Service (USFWS), or the Bureau of Land Management. The special-status species presented in Table 5 are those with potential to occur within or adjacent to the Project site based on regional occurrence records and habitat present on the Project site.⁴⁹ In accordance with SC-BIO-1, a Project-specific biological site visit was conducted on June 7, 2019. The biological site visit focused on assessing the Project site for potential occurrence of special-status species identified during the CNDDDB database query and habitats that could support those species.

Table 5
Special-Status Wildlife Species with Potential to Occur

Common Name	Scientific Name	Federal Status / State Status	Other Status	Potential to Occur
Birds				
burrowing owl	<i>Athene cunicularia</i>	- / -	S, SSC	Low – There is one CNDDDB occurrence from the year 1921 documented within 5 miles of the Project site. No suitable burrows or habitat observed on-site; species could occur in open space adjacent to the northeast portion of the Project site if surrogate burrows are present, however the quality of the adjacent habitat is poor, and there

⁴⁷ California Department of Fish and Wildlife (CDFW). 2019. California Natural Diversity Database. Version 5.2.14. Burbank, Pasadena, Mt. Wilson, Hollywood, Los Angeles, El Monte, Inglewood, South Gate, Whittier Quadrangles. <http://www.wildlife.ca.gov/Data/BIOS/>. Accessed May 16, 2019.

⁴⁸ California Native Plant Society (CNPS). 2019. Rare Plant Program. Inventory of Rare and Endangered Plants of California (online edition, v8-03 0.45). <http://www.rareplants.cnps.org>. Accessed May 16, 2019.

⁴⁹ California Department of Fish and Wildlife (CDFW). 2019. California Natural Diversity Database. Version 5.2.14. Burbank, Pasadena, Mt. Wilson, Hollywood, Los Angeles, El Monte, Inglewood, South Gate, Whittier Quadrangles. <http://www.wildlife.ca.gov/Data/BIOS/>. Accessed May 16, 2019.



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Common Name	Scientific Name	Federal Status / State Status	Other Status	Potential to Occur
				are no recent documented occurrences in the area.
Swainson's hawk	<i>Buteo swainsoni</i>	- / T	S	Low – this species does not frequently occur in the Los Angeles/Orange County area, and is more commonly found in the central valley, especially for nesting; additionally, the Project site does not contain preferred habitat.
American peregrine falcon	<i>Falco peregrinus anatum</i>	FD / SD	FP	Moderate – this species may utilize urban areas containing tall buildings/trees and prey including rodents and common urban birds.
Mammals				
pallid bat	<i>Antrozous pallidus</i>	- / -	S, SSC	Low – while this species may utilize urban structures as roosting habitat, it is not highly tolerant of human disturbance to roosting sites ⁵⁰ .
Townsend's big-eared bat	<i>Corynorhinus townsendii</i>	- / -	S, SSC	Low – while this species may utilize urban structures as roosting habitat, this species is extremely sensitive to human disturbance to roosting sites ⁵⁰ .
western mastiff bat	<i>Eumops perotis californicus</i>	- / -	S, SSC	Low – while this species has been documented roosting in buildings within the Los Angeles area ⁵¹ , there is a lack of preferred habitat on site; not highly tolerant of urban areas.
western red bat	<i>Lasiurus blossevillei</i>	- / -	SSC	Low – lack of preferred roosting and foraging habitat on or adjacent to the Project site.

Notes: Results based on CNDDDB query for nine regional quadrangles (Burbank, Pasadena, Mt. Wilson, Hollywood, Los Angeles, El Monte, Inglewood, South Gate, Whittier).

FD Federally Delisted

FP CDFW Fully Protected

S BLM Sensitive Species

SD State Delisted

SSC CDFW Species of Special Concern

T Threatened

⁵⁰ Bat Conservation International. U.S. and Canadian Bat Species Which Use Human-Made Structures. <http://www.batcon.org/why-bats/bats-are/bats-are-important/132-resources-issues/for-specific-issues/bats-in-buildings-cat>. 2019.

⁵¹ Placeworks. Final Environmental Impact Report. School Upgrade Program, Los Angeles Unified School District. September 2015.

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The Project site is an existing active high school Campus; therefore, sensitive species that have potential to occur on site are limited to birds and bats that may utilize buildings/urban vegetation (Table 5). Due to the developed nature of the Project site, the plant list established during the general biological survey, and the tree species reported on the Arborist Report (2017), it has been determined that there is no potential for special-status plant species to occur on site. There are no native vegetation communities on site.

With the exception of the American peregrine falcon (*Falco peregrinus anatum*), which is considered tolerant of urban environments, all wildlife species included in Table 4 have a low potential to occur. The preferred native vegetation communities of the Swainson's hawk (*Buteo swainsoni*) are not present on or within the vicinity of the site. The four bat species included in Table 4 (pallid bat [*Antrozous pallidus*], Townsend's big-eared bat [*Corynorhinus townsendii*], western mastiff bat [*Eumops perotis californicus*], and western red bat [*Lasiurus blossevillei*]) could potentially roost in buildings or surrounding trees, however, there is high human activity on and adjacent to the Project site; therefore, any potential bat roosting sites are likely disturbed frequently and the potential for protected bat species to occur on site is low.

Non-native grasslands, scrublands, and ruderal spaces can be considered suitable habitat for burrowing owl (*Athene cunicularia*), dependent upon the presence of burrowing mammals or suitable surrogate burrows; non-native grassland is adjacent to the northeast portion of the Project site. There is one CNDDDB documented burrowing owl occurrence from the year 1921 within 5 miles of the Project site (the exact location is not known). No burrows, sedentary above ground pipes, sedentary rip rap, etc. that could serve as suitable burrow habitat for burrowing owl were observed on site during the biological survey. The non-native grassland adjacent to the northeast portion of the Project site is considered poor quality habitat; this area is densely vegetated with non-native grasses, and the trees and shrubs present are primarily escaped ornamentals. Minimal open ground was observed within this area. Therefore, the potential for burrowing owl to occur on the Project site is low.

Aside from the species presented in Table 5, while unlikely, special status bird species that do not necessarily have documented regional occurrences near the Project site could also occur. These species would be considered transients and would not be expected to have long term use of the site.

While vegetated areas are present on and adjacent to the Project site, the species observed include primarily non-natives and are ornamental in nature. The native plant species observed on site include coast live oak (*Quercus agrifolia*), western sycamore (*Platanus racemosa*), California fan palm (*Washingtonia filifera*), California black walnut (*Juglans californica*), blue elderberry (*Sambucus nigra*), and toyon (*Heteromeles arbutifolia*). Native plant species observed consisted of isolated individuals therefore did not make up a native vegetation community. Native wildlife species observed on site during the biological survey included: house finch (*Haemorhous mexicanus*), cabbage white (*Pieris rapae*), black phoebe (*Sayornis nigricans*), Anna's hummingbird (*Calypte anna*), hooded oriole (*Icterus cucullatus*), mourning dove (*Zenaida macroura*), Cassin's kingbird (*Tyrannus vociferans*), California ground squirrel (*Spermophilus beecheyi*), western fence lizard (*Sceloporus occidentalis*), and native mourning cloak (*Nymphalis antiopa*). Non-native wildlife species observed on site during the biological survey included: house sparrow (*Passer domesticus*), rock pigeon (*Columba livia*), and European starling (*Sturnus vulgaris*).

Vegetation and structures within and surrounding the Project site could support bird nesting and bat roosting activity. Multiple active house finch nests were observed in the eaves of existing buildings on site during the biological survey. Therefore, direct removal of structures/vegetation, use of heavy machinery, and/or significant ground disturbance has the potential to disturb nesting birds or roosting bats, including special status



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species, if present. The proposed Project will implement the SCs referenced at the beginning of this section; the requirements of SC-BIO-1 have already been performed; SC-BIO-2, which protects sensitive wildlife species from harmful or disruptive exposure to light, will be implemented; and SC-BIO-3, which requires LAUSD to comply with the specifications related to bird and bat nesting sites, will be implemented. Protection of the critical root zone (CRZ) of protected trees is further discussed in response to (e) below. With incorporation of SC-BIO-1 through SC-BIO-4 and Mitigation Measure (MM)-BIO-1, Project impacts would be less than significant and no further analysis is required.

Protection of the CRZ of oaks is particularly important, as compaction of soil can create anaerobic conditions that slowly suffocate mycorrhizal fungi that oak trees rely on to fixate nitrogen. Therefore, with the incorporation of SC-BIO-4 and MM-BIO-1, Project impacts would be less than significant and no further analysis is required.

MM-BIO-1: Prior to Project commencement, an LAUSD qualified arborist/biologist shall delineate the critical root zone (CRZ) of protected trees within or near to the area of work. No work shall occur within the delineated CRZ; this includes staging and access routes. CRZ delineation can be conducted in conjunction with the nesting bird survey, if timing and personnel are appropriate.

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

No Impact. The CNDDDB query identified seven habitat types within a nine quadrangle search around the Project site (CDFW 2019a)⁵²:

- California Walnut Woodland
- Open Engelmann Oak Woodland
- Riversidian Alluvial Fan Sage Scrub
- Southern Coast Live Oak Riparian Forest
- Southern Cottonwood Willow Riparian Forest
- Southern Sycamore Alder Riparian Woodland
- Walnut Forest

The Project site consists of the existing Lincoln HS Campus. The Project site is located in an urbanized area, surrounded primarily by residential development. None of the sensitive habitats listed above were found on site or were observed adjacent to the Project site during the biological survey. The proposed Project would not impact potential habitat located outside of the defined impact area. The portions of the Project site which are not paved consist primarily of non-native plant species and are ornamental in nature; no native vegetation

⁵² California Department of Fish and Wildlife (CDFW). 2019. California Natural Diversity Database. Version 5.2.14. Burbank, Pasadena, Mt. Wilson, Hollywood, Los Angeles, El Monte, Inglewood, South Gate, Whittier Quadrangles. <http://www.wildlife.ca.gov/Data/BIOS/>. Accessed May 16, 2019:

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communities were observed during the general biological survey conducted on June 7, 2019. Therefore, the proposed Project would have no impacts on any riparian habitat or other sensitive natural community and no further analysis is required.

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

No Impact. The U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory identifies the nearest wetland waters occurring approximately 0.5 mile to the south of the Project site at Lincoln Park, which is characterized as a freshwater pond.⁵³ During the general biological survey conducted on June 7, 2019, no potential wetlands or jurisdictional areas were identified on the Project site. A concrete culvert and underground drainage were identified on the site during the biological survey, but these areas are outside of the planned impact areas and no surface water or wetland vegetation was present. Re-routing of site drainage is not part of the proposed Project, and no impact to the identified drainage areas would occur. The proposed Project would not impact any areas outside of the defined impact area; as such, no impacts to protected wetlands would occur. Therefore, no Project impacts would result and no further analysis is required.

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

Less Than Significant Impact. The Project site consists of the existing Lincoln HS Campus. The Project site is in an urbanized area, surrounded primarily by residential development, and is not located within or directly adjacent to any known or mapped wildlife corridors or nursery sites.^{54,55} However, vegetation and structures within and surrounding the Project site could support wildlife movement and has potential for bird nesting and bat roosting activity. Therefore, direct removal of structures/vegetation, use of heavy machinery, and/or significant ground disturbance has the potential to disturb nesting birds or roosting bats, including migratory species, if present. The proposed Project would implement SC-BIO-3 that requires LAUSD to comply with the specifications related to bird and bat nesting sites. With incorporation of SC-BIO-3, Project impacts would be less than significant and no further analysis is required.

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

Less Than Significant Impact with Mitigation Incorporated. All tree trimming and removal conducted on District property is required to adhere to the procedures described in the *LAUSD OEHS Tree Trimming and Removal Procedure*. This Procedure applies to activities that may impact native trees, healthy mature non-protected trees, and activities that impact any tree that is located on LAUSD property. This includes removal, relocation, root trimming, heavy equipment working within the dripline, or any act that may inflict damage to the tree or

⁵³ U.S. Fish and Wildlife Service (USFWS). 2019. National Wetlands Inventory. Surface Waters and Wetlands. <https://www.fws.gov/wetlands/data/mapper.html>. Accessed July 2, 2019.

⁵⁴ Placeworks. Final Environmental Impact Report. School Upgrade Program, Los Angeles Unified School District. September 2015.

⁵⁵ City of Los Angeles. Conservation Element of the City of Los Angeles General Plan. September 26. <https://planning.lacity.org/cwd/gnpln/consvelt.pdf>. 2001.



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root system, including changing the natural grade of the land.⁵⁶ Compliance with this Procedure will ensure that District activities will not conflict with any tree preservation policies.⁵⁷

Specified southern California native trees and identified street trees are protected within the City of Los Angeles in accordance with the Los Angeles Municipal Code, Ordinance No. 177404, including valley oak (*Quercus lobata*), coast live oak (*Quercus agrifolia*), canyon live oak (*Quercus chrysolepis*), mesa oak (*Quercus engelmannii*), interior live oak (*Quercus wislizeni*) (does not include scrub oak [*Q. dumosa*]), California black walnut (*Juglans californica*), western sycamore (*Platanus racemosa*), and California bay (*Umbellularia californica*).⁵⁸

In compliance with the District's requirements, a tree inventory report was prepared by a certified arborist and is included in Appendix C. A total of 293 trees was recorded during the tree inventory; this included 5 protected native trees on the Lincoln HS Campus (District property), 54 protected street trees, and 234 non-protected trees.⁵⁹ No protected trees are planned for removal as part of the proposed Project. However, indirect effects to the CRZ of these trees could occur, which may result in tree mortality, and therefore impacts to protected trees. Impacts to the CRZ of protected trees could occur due to staging or use of heavy equipment within the CRZ. The CRZ is commonly defined as a circular area around a tree trunk with a radius equivalent to one foot for each inch of diameter at breast height (DBH). Protection of the CRZ of oaks is particularly important, as compaction of soil can create anaerobic conditions that slowly suffocate mycorrhizal fungi that oak trees rely on to fixate nitrogen. The LAUSD OEHS *Tree Trimming and Removal Procedure* requires that after completing the Project design, results of the tree inventory will be used to determine impacts to trees located within the work area. A Tree Impact Report will be required and will contain the results of the tree inventory, including the proposed disposition (preserve or remove), as well as a Tree Protection Plan. The Tree Protection Plan would apply to all trees within the Project site during construction. If the Project impacts protected tree(s), the Tree Protection Plan would also include recommended mitigation measures, general replacement guidelines and mitigation ratios.⁶⁰ Therefore, with the incorporation of SC-BIO-4 and MMBIO-1, and compliance with LAUSD OEHS *Tree Trimming and Removal Procedure*, Project impacts would be less than significant and no further analysis is required.

⁵⁶ Los Angeles Unified School District (LAUSD). Office of Environmental Health and Safety Tree Trimming and Removal Procedure, revised December 15, 2018.

⁵⁷ Los Angeles Unified School District (LAUSD). Tree Trimming and Removal Procedure. Office of Environmental Health and Safety. Accessed August 6, 2019.
https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/135/LAUSD_Tree_Protection.pdf. n.d.

⁵⁸ Los Angeles Municipal Code. 2006. Ordinance No. 177404 – Protected Tree Ordinance. April 23.
https://planning.lacity.org/Code_Studies/Other/ProtectedTreeOrd.pdf.

⁵⁹ Jan C. Scow Consulting Arborists, LLC. Arborist Report, Lincoln High School. December 19, 2017.

⁶⁰ Los Angeles Unified School District (LAUSD). Office of Environmental Health and Safety Tree Trimming and Removal Procedure, revised December 15, 2018.

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

No Impact. The Project site is not included in any State, regional, or local habitat conservation plans,⁶¹ is not part of any Los Angeles Major Conservation Area,⁶² and is not directly referenced within the conservation element of the General Plan.⁶³ Therefore, no Project impacts would occur and no further analysis is required.

⁶¹ California Department of Fish and Wildlife (CDFW). April. California Natural Community Conservation Plans. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline/>. 2019.

⁶² Placeworks. Final Environmental Impact Report. School Upgrade Program, Los Angeles Unified School District. September. 2015.

⁶³ City of Los Angeles. Conservation Element of the City of Los Angeles General Plan. September 26. <https://planning.lacity.org/cwd/gnlpln/consvelt.pdf>. 2001.



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

Explanation:

This analysis incorporates information from the Historic Resources Assessment Report for Lincoln HS prepared by Historic Resources Group (see Appendix A) and the results of the cultural resources records search (see Appendix E).

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

LAUSD Standard Conditions of Approval

SC-CUL-1	<p>Historic Architect</p> <p>For projects involving structural upgrades to historic resources, the Design Team shall include a qualified Historic Architect with demonstrated project-level experience in historic projects.</p> <p>For campuses with qualifying historical resources under CEQA, the Design Team shall include a LAUSD-qualified Historic Architect. The Historic Architect/s shall meet the Secretary of the Interior's Professional Qualifications Standards and the standards described on page 8 of the LAUSD Design Guidelines and Treatment Approaches for Historic Schools.</p> <p>Throughout the project design progress the Historic Architect shall provide input to ensure compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD requirements and guidelines for the treatment of historical resources.</p> <p>Role of the Historic Architect</p> <p>The tasks of the Historic Architect on the Design Team shall include, but are not limited to:</p> <ul style="list-style-type: none"> The Historic Architect shall work with the Design Team (including the Structural Engineer) and LAUSD to ensure that project components, including new construction and modernization of existing facilities, comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The Historic Architect shall work with the Design Team and LAUSD throughout the design process to develop project options that facilitate compliance with the applicable historic preservation standards. For new construction, the Historic Architect shall work with the Design Team and LAUSD to identify options and opportunities for: (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors, and (2) ensuring that new construction is designed and sited in such a way that reinforces and strengthens, as much as feasible, character-defining site plan features, landscaping, and circulation corridors throughout Campus. For modernization and upgrade projects involving contributing (significant) buildings or features, the Historic Architect shall work with the Design Team and LAUSD to ensure that specifications for design and implementation of projects comply with the applicable historic preservation standards.
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	<ul style="list-style-type: none"> The Historic Architect shall participate in Design Team meetings during all phases of the project through 100% construction drawings, pre-construction, and construction phases, as applicable. The Historic Architect shall prepare a memo at the 50% and at the 100% construction drawings stages, demonstrating how principal project components and treatment approaches comply with applicable historic preservation standards, including the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The memos shall be submitted to LAUSD OEHS for review. The Historic Architect shall participate in pre-construction and construction monitoring activities, as appropriate, to ensure continuing conformance with Secretary's Standards and/or avoidance of a material impairment of the historical resources. The Historic Architect shall provide specifications for architectural features or materials requiring restoration or removal, maintaining and protecting relevant features in place, or on-site storage. Specifications shall include detailed drawings or instructions where historic features may be impacted. The Design Team and Historic Architect shall be responsible for incorporating LAUSD's recommended updates and revisions during the design development and review process.
SC-CUL-2	<p>LAUSD shall follow the guidelines outlined in these documents to the maximum extent practicable when planning and implementing projects and adjacent new construction involving historical resources.</p> <p>The Design Team, Historic Architect, and Construction Contractor shall apply LAUSD School Design Guide and LAUSD Design Guidelines and Treatment Approaches for Historic Schools and the Secretary's Standards for all new construction and modernization projects. In keeping with the District's adopted policies and goals, historical resources shall be reused rather than destroyed, where feasible.</p> <p>General guidelines include:</p> <ul style="list-style-type: none"> Retain and preserve the character of historic resources. Repair rather than remove, replace, or destroy character-defining features; if replacement is necessary, replace in-kind to match materials, dimensions, and appearance. Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity. Where practical, conceal reinforcement required for structural stability or the installation of life safety or mechanical systems. Where necessary to halt deterioration and after the preparation of a condition assessment, undertake surface cleaning, preparation of surfaces, and other projects involving character-defining features using the least invasive, gentlest means possible. Avoid using any abrasive materials or methods including sandblasting and chemical treatments.
SC-CUL-3	<p>Prior to any major alteration to or adjacent to a historic resource that may potentially damage historic resources (or previously identified historic features), the Historic Architect shall develop a Temporary Protection Plan that identifies potential risks to the historic resource. The Temporary Protection Plan shall be prepared in coordination with the Construction Contractor and LAUSD prior to demolition or construction. The Temporary Protection Plan may include, but not be limited to, the following components:</p> <ul style="list-style-type: none"> Notation of the historic resource on construction plans. Pre-construction survey to document the existing physical condition of the historic resource. Procedures and timing for the placement and removal of temporary protection features, around the historic resource. Monitoring of the installation and removal of temporary protection features by the Historic Architect, or designee. Post-construction survey to document the condition of the historic resource after Project completion. <p>Preparation of a technical memorandum documenting the pre-construction and post-construction conditions of the historic resource and compliance with protective measures outlined Temporary Protection Plan.</p>
SC-CUL-4	<p>Prior to significant alteration or demolition of a historical resource, LAUSD shall retain an Architectural Photographer and/or a Historian or Architectural Historian who meet the Secretary of the Interior's Professional Qualifications Standards and who shall prepare a HABS-like Historic Documentation Package (Package).</p> <p>The Package shall include photographs and descriptive narrative. Documentation will draw upon primary- and secondary-source research including available studies prepared for the property (measured drawings are not required). The specifications for the Package include:</p>



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	<ul style="list-style-type: none"> • Photographs: Photographic documentation shall focus on the historical resources/features proposed to be significantly altered or demolished, with overview and context photographs for the Campus and adjacent setting. A professional-quality camera will be used to take photographs of interior and exterior features of the buildings. Photographs will include context views, elevations/exteriors, architectural details, overall interiors, and interior details (if warranted). Digital photographs will be in black and white (as well as in color or as requested by the District) and provided in an electronic format. • Descriptive and Historic Narrative: The Historian or Architectural Historian shall prepare descriptive and historic narrative of the historical resources/features. Physical descriptions will detail each resource, elevation by elevation, with accompanying photographs and information on how the resource fits within the broader Campus during its period of significance. The historic narrative will include available information on the Campus design, history, architect/contractor/designer as appropriate, history of the area, and historic context. In addition, the narrative will include a methodology section specifying the name of researcher, date of research, and sources/archives visited, as well as a bibliography. Within the written history, statements shall be footnoted as to their sources, where appropriate. • Historic Documentation Package Submittal: Upon completion of the descriptive and historic narrative, all materials will be compiled in electronic format and presented to LAUSD for review and comment. Upon approval, one electronic copy and one hard copy shall be submitted to LAUSD OEHS. Photographs will be individually labeled and provided to LAUSD in electronic format.
SC-CUL-5	LAUSD shall comply with Design Specification 01 3591, Historic Treatment Procedures, as applicable. This Specification requires the Construction Contractor to submit a Historic Treatment Plan to the District for the protection, repair, and replacement of historic materials and features.
SC-CUL-6	<p>LAUSD shall retain a qualified Archaeologist to be available on-call. The Archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology.</p> <p>To reduce impacts to previously undiscovered buried archaeological resources, following completion of the final grading plan and prior to any ground disturbance, a qualified archaeologist shall prepare an Archaeological Monitoring Program as described under SC-CUL-7.</p>
SC-CUL-7	<p>The Construction Contractor shall halt construction activities within a 30 foot radius of the find and shall notify the LAUSD.</p> <ul style="list-style-type: none"> • LAUSD shall retain an Archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology. • The Archaeologist shall have the authority to halt any project-related construction activities that could impact potentially significant resources. • The Archaeologist shall be afforded the necessary time to recover and assess the find. Ground-disturbing activities shall not continue until the discovery has been assessed by the Archaeologist. With monitoring, construction activities may continue on other areas of the project site during evaluation and treatment of historic or unique archaeological resources. • If the find is determined to be of value, the Archaeologist shall prepare an Archaeological Monitoring Program and shall monitor the remainder of the ground-disturbing activities. • Significant archaeological resources found shall be curated as determined necessary by the Archaeologist and offered to a local museum or repository willing to accept the resource. • Archaeological reports shall be submitted to the South Central Coastal Information Center at the California State University, Fullerton. • The Archaeological Monitoring Plan shall include: <ul style="list-style-type: none"> ○ Extent and duration of the monitoring based on the grading plans ○ At what soil depths monitoring of earthmoving activities shall be required ○ Location of areas to be monitored ○ Types of artifacts anticipated ○ Procedures for temporary stop and redirection of work to permit sampling, including anticipated radius of

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	<p>suspension of ground disturbances around discoveries and duration of evaluation of discovery to determine whether they are classified as unique or historical resources</p> <ul style="list-style-type: none"> ○ Procedures for maintenance of monitoring logs, recovery, analysis, treatment, and curation of significant resources ○ Procedures for archaeological resources sensitivity training for all construction workers involved in moving soil or working near soil disturbance, including types of archaeological resources that might be found, along with laws for the protection of resources. The sensitivity training program shall also be included in a worker's environmental awareness program that is prepared by LAUSD with input from the Archaeologist, as needed. ○ Accommodation and procedures for Native American monitors, if required. ○ Procedures for discovery of Native American cultural resources. <p>The construction manager shall adhere to the stipulations of the Archaeological Monitoring Plan.</p>
SC-CUL-8	Cultural resources sensitivity training shall be conducted for all construction workers involved in ground-disturbing activities. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources and shall be included in a worker's environmental awareness program that is prepared by LAUSD with input from a qualified Archaeologist, as needed.
SC-CUL-9	LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. If feasible, the Archaeologist shall prepare a Phase III Data Recovery/Mitigation Program to outline procedures to recover a statistically valid sample of the archaeological remains and to document the site and reduce impacts to be less than significant. All documentation shall be prepared in the standard format of the ARMR Guidelines, as prepared by the OHP. Once a Phase III Data Recovery/Mitigation Program is completed, an Archaeological Monitor shall be present to oversee the ground-disturbing activities to ensure that construction proceeds in accordance with the Program.
SC-CUL-10	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified Archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.

Existing Conditions

Historic Period

Lincoln HS is one of the five oldest high schools in the City of Los Angeles. It was constructed in 1913 and was designed by architecture firm Needham and Cline, at the northeast corner of what is now North Broadway and Lincoln Park Avenue, in the Lincoln Heights community. The original school was at this location until the Long Beach earthquake of 1933, which resulted in extensive damage to the Campus. The school was reconstructed by the Public Works Administration (PWA) in 1936 and most of the Campus buildings that survived the quake were demolished during the rebuild. The portions of the Campus that remained include: the main stairway, walkway, tennis courts, and palm trees. The new Campus was built in 1936, one block west of Lincoln Park Avenue, and contained three main buildings oriented around a central landscaped courtyard off North Broadway: the administration, Science and Classroom Building (now the Administration Building), the Commerce, Home Economics and Cafeteria Building (now the Home Economics Building), and the Assembly and Music Building (now the Auditorium Building). All of these buildings were designed in the popular PWA Moderne style. The new Campus opened in September 1937. The Gymnasium was completed in 1941.



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The Campus continued to be altered in the post-World War II years. By 1948, all of the buildings from the original 1913 Campus (referenced herein as the eastern parcel) had been demolished and replaced with the athletic field, running track, and bleachers. A music building was added in 1949. By 1951, a pedestrian bridge had been erected over Lincoln Park Avenue, linking the school's eastern parcel to Mechanical Arts Building No. 2 on the western parcel. In the 1950s and 1960s, a number of portable classroom buildings were added, and in 1963, a new music building was constructed. Additional classrooms were added in 1965 and during the 1970s, including the New Ceramics and Mechanical Arts Building (now the Shop Building) and a new pedestrian bridge over Lincoln Park Avenue was built. By 1982, the northernmost part of the Campus (on the western parcel) was occupied by Pueblo de Los Angeles Continuation HS (formerly Lincoln Continuation High School).

The Campus continued to change in recent years, including: repair of buildings after the 1994 Northridge Earthquake; a Campus modernization project and addition of four elevator towers; original window replacement (in-kind) at the Administration, Home Economics, and Auditorium buildings; a reconfiguration of areas to create parking lots and landscape features; and replacement of original pedestrian bridges with steel bridges.

Lincoln HS and the 1968 Walkouts

Lincoln HS was one of five high schools that participated in a series of student protest marches and walkouts in March 1968, demanding better educational opportunities for Mexican American students in Los Angeles schools. Known as the "1968 Walkouts," these protests took place at Lincoln, Roosevelt, Garfield, Wilson, and Belmont High Schools,⁶⁴ where over the course of a week an estimated 15,000 students left their classrooms and marched with supporters for better schools and a better education.

Previous Evaluation

The information presented in this section below, is taken from Historic Resources Group's 2018 *Historic Resources Assessment Report for Lincoln High School, 3501 No. Broadway, Los Angeles*. This report is included in Appendix A.

In 1995, the Lincoln HS Campus was evaluated as part of a larger effort to survey properties damaged by the 1994 Northridge earthquake. At that time, the original buildings of the reconstructed post-1933 Long Beach earthquake Campus were identified collectively as a historic district consisting of four contributors: the Administration Building (1937), the Home Economics Building (1937), the Auditorium Building (1937), and the Physical Education Building (1941), all of which were designed by noted Los Angeles architect Albert C. Martin. The Lincoln High School Historic District was formally determined eligible for the National Register of Historic Places and the California Register of Historical Resources. The listing for Lincoln HS does not identify the criteria under which the historic district was determined to be eligible; however, it is presumed to have been evaluated under Criterion C/3 for its architectural merit and as the work of a master architect. LAUSD assigned the Campus a California Historical Resources Status Code of 3S, for the National Register of Historic Places or California Register of Historic Resources through survey evaluation.

In 2018, Historic Resources Group prepared a Historic Resources Assessment Report for Lincoln HS and reassessed the property, including buildings constructed after the original period to determine eligibility for

⁶⁴ Simultaneous protests also occurred at several other supporting District campuses.

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listing in the California Register of Historical Resources, the National Register of Historic Places, and the City of Los Angeles Historic-Cultural Monument. The 2018 assessment used criteria and eligibility requirements outlined in the 2014 *LAUSD Historic Context Statement, 1870-1969* as well as several additional historic contexts. Historic Resources Group identified three overlapping historic districts, and five distinct reasons for historic significance. Each identified historic district has its own period of significance, boundary, and contributing and non-contributing buildings and features. Two historic districts were identified as significant under Criterion A/1/1, one for its association with early-20th century school development in Los Angeles, including remnant features from when the school was initially established on the site in 1913; and the other for its association with the 1968 Walkouts. Two historic districts were identified as significant under Criterion B/2/2, one for its association with longtime Lincoln HS principal Ethel Percy Andrus, and the other for its association with Lincoln HS teacher Sal Castro. Finally, one historic district was identified as significant under Criterion C/3/3 as an excellent example of PWA Moderne architecture and the work of prominent Los Angeles architect Albert C. Martin.

In summary, the 2018 Historic Resources Assessment Report recommended a total of four Campus buildings and seven additional features (i.e., landscapes, hardscapes, athletic facilities) as contributing to one or more identified historic district(s). The assessment concluded that the Lincoln HS Campus is eligible for listing in the National Register of Historic Places and the California Register of Historical Resources, and for local designation as a Historic-Cultural Monument. Table 6 lists the contributing buildings, the year they were constructed, and the historic district(s) to which they are contributors at Lincoln HS.

Table 6
Historic Districts and Contributing Buildings⁶⁵

Name	Year Built	District Status
Administration Building	1937	Contributor to Historic Districts #1, #2, #3
Home Economics Building	1937	Contributor to Historic District #1, #2, #3
Auditorium Building (Ethel Percy Andrus Theater)	1937	Contributor to Historic District #1, #2, #3
Physical Education Building	1941	Contributor to Historic District #1, #3
Campus Quad	1936	Contributor to Historic Districts #1, #2, #3
Administration Courtyard	1937	Contributor to Historic District #1, #3
Tennis/Basketball Courts (2 locations)	1913	Contributor to Historic District #1
Original Campus Stairway	1913	Contributor to Historic District #1
Original Campus Walkway	1913	Contributor to Historic District #1
Palm Trees	1913	Contributor to Historic District #1

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

Less Than Significant Impact. There are three overlapping historic districts (historical resources) within the Lincoln HS Campus that are eligible for listing in the California Register of Historical Resources (CRHR) under

⁶⁵ HRG. Historic Resource Assessment Report for Lincoln High School, November 18, 2018.



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Criteria 1, 2, and 3, according to the Historic Resources Assessment prepared in 2018 (Appendix A). The Project includes demolition of the Music Building (Building 1), Storage Shed (Building 10), Storage Building (Building 13), Shop Building (14) and Portables (Buildings 17, 22, 24, 27, 28, 29, 30, 31, and 32), as well as the Pueblo de Los Angeles Continuation HS bungalows and the construction of new permanent structures as shown in Table 2 and Figure 4. Demolition of these buildings and structures that are not contributors to the historic districts but are within historic district boundaries have the potential to adversely impact historical resources because construction of new buildings and structures within the historic district can diminish the historic integrity of the district.

Remodel and modernization of historic resources that are contributors to historic districts, such as the Administration (Building 2), Auditorium (Building 3), Home Economics (Building 4), Gymnasium (Building 7), Music (Building 9), and Food Service Building (Building 16) as well as the Pedestrian Bridge (Building 15), have the potential to cause a substantial adverse change. Adverse change can occur if modifications due to the proposed Project (including seismic retrofitting) impact the characteristics of the historical resources to the extent that it renders them no longer eligible for the CRHR. Site improvements can also result in adverse change to historical resources if proposed Project activities will diminish the historic integrity of the design and layout of the district, such that it no longer retains sufficient integrity to continue to be listed in the CRHR.

Throughout the proposed Project, LAUSD shall implement processes and professionals who meet the Secretary of the Interior's Professional Qualifications Standards to ensure compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD requirements and guidelines for the treatment of historical resources. Implementation of SC-CUL-1, SC-CUL-2, SC-CUL-3, SC-CUL-4, and SC-CUL-5 contain processes that ensure the proposed Project conforms to the Secretary of the Interior's Standards for the Treatment of Historic Properties and incorporate features that reduce impacts to the proposed Project to less than significant. Therefore, the proposed Project will have a less than significant impact on the historic resources and no further analysis is required.

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

Less Than Significant Impact. On September 19, 2019, a literature and record search was conducted of the cultural resource site and file collection through the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System (Appendix E – non confidential). As part of the record search, the SCCIC database of survey reports and overviews, was reviewed and the cultural resources were documented. Additionally, the search included a review of the following publications and lists: California Office of Historical Preservation (OHP) Historic Properties Directory/National Register of Historic Properties, OHP Archaeological Determinations of Eligibility, California Inventory of Historical Resources/California Register of Historic Resources, California Points of Historical Interest, California Historical Landmarks, Caltrans Bridge Survey, historical literature, and local historic resource inventories. The record search focused specifically on the project site (area of potential effects or APE) and a one-mile buffer around the Project site (study area).

The record search revealed one previous cultural resource investigation (LA-13239) has been conducted within the Project site. This study was completed in 2017 and is a record search that maps the linear boundary of a historic water conveyance system (Zanja Madre: an earthen ditch/aqueduct). A total of 44 previous cultural resource investigations have been conducted within one-mile of the Project site. These cultural studies were conducted between 1990 and 2017 and consist of record searches, archaeological and architectural surveys,

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visual impact assessments, and cultural monitoring. The SCCIC records search also revealed two previously recorded historic archaeological sites P-19-003473 (CA-LAN-003473H), refuse scatter; and P-19-003659 (CA-LAN-003659H), refuse scatter associated with a single-family property, within one mile of the APE. Site P-19-003659 is not eligible for listing to the CRHR and P-19-003473 has not been evaluated. In addition, historic aerial photographs dating from 1948, 1952, 1964, 1967, 1972, 1980⁶⁶ and USGS historic maps dating from 1928 and 1956 illustrate only structures (i.e., school buildings) located within the APE were reviewed. No CRHR eligible archaeological sites are recorded within or near the Project site.

Project activities can cause a substantial adverse change in the significance of an archaeological resource if construction of new buildings or other activities take place below ground at depths that reach native soils. The surficial deposits within the area of potential ground disturbance have been subjected to previous ground disturbance. The entire Project site has been historically used as a school with associated facilities. The geotechnical study for the project identified 0 to 12 feet of fill across the site, specifically the western and central portion of the Project site contains fill deposits and the eastern portion of the project contains non-fill alluvium (native soils).⁶⁷

If construction ground disturbance depths range within native soils, there would be a potential to impact previously unrecorded subsurface cultural resources. Compliance with existing regulations SC-CUL-8 requires that cultural resource sensitivity training be conducted for workers involved in ground disturbance, and existing regulation SC-CUL-10 stop work for an inadvertent discovery of an archaeological find. Therefore, Project impact would be less than significant and no further analysis is required.

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

Less Than Significant Impact. The Project site is a public school and no formal cemetery exists on the Project site. The Project site has been subject to past subsurface disturbance associated previous construction of school facilities. Existing regulations require that if human remains and/or cultural items defined by the Health and Safety Code, Section 7050.5, are inadvertently discovered, all work in the vicinity of the find would cease and the Los Angeles County Coroner would be contacted immediately.

If the remains are found to be Native American as defined by Health and Safety Code, Section 7050.5, the coroner will contact the NAHC by telephone within 24 hours. The NAHC shall immediately notify the person it believes to be the Most Likely Descendant (MLD) as stipulated by California Public Resources Code (PRC), Section 5097.98. The MLD(s), with the permission of the landowner and/or authorized representative, shall inspect the site of the discovered remains and recommend treatment regarding the remains and any associated grave goods. The MLD shall complete their inspection and make their recommendations within 48 hours of notification by the NAHC. Any discovery of human remains would be treated in accordance with Section 5097.98 of the PRC and Section 7050.5 of the Health and Safety Code.

In addition to compliance with existing regulations, SC-CUL-8 requires that cultural resources sensitivity training shall be conducted for all construction workers involved in ground-disturbing activities. Therefore, with compliance with existing regulations and SC-CUL-8, Project impact would be less than significant and no further analysis is required.

⁶⁶ Netronline. Historical Aerials. <https://www.historicaerials.com/viewer>. Accessed January 2020.

⁶⁷ URS. Preliminary Geotechnical Investigation, Lincoln High School, 3501 N. Broadway Avenue, Los Angeles. May 2017.



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

Explanation:

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

LAUSD Standard Conditions of Approval	
SC-GHG-3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.
SC-GHG-5	LAUSD shall ensure that the designed time dependent valued energy shall be at least 10%, with a goal of 20% less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the Division of the State Architect.

Explanation:

This section describes the proposed Project's potential to affect energy resources. Sustainment of day to day operations within communities relies significantly on the availability and use of energy which comes in many renewable and nonrenewable forms including electricity, natural gas, gasoline, diesel, solar, and wind. The efficient use and reduction of energy is closely related to air and GHG reductions. Thus, efforts to curtail emissions of air emissions and GHG in many ways contribute to the efficient use and reduction of energy consumption.

Energy used in the United States comes primarily from fossil fuels (i.e., petroleum, coal, and natural gas) and is primarily consumed in five sectors: electric power, transportation, industrial, residential, and commercial.⁶⁸

California is among the states with the lowest energy consumption per capita, ranking at 48 with 199 million British Thermal Units per capita.⁶⁸

The US Environmental Protection Agency (EPA) plays a key role in the conservation and efficient use of energy in the United States. In this regard, the US EPA has established renewable energy and energy efficiency programs aimed at reducing energy use in all sectors and providing technical information for state policy makers and energy providers. US EPA renewable energy programs include energy efficiency programs such as ENERGY STAR, a joint program of the US EPA and the Department of Energy (certifies energy efficient products (e.g., detergents and appliances), techniques for energy savings at home, certifies energy efficient new homes, and provides energy strategies for buildings and plants), AgStar (promotes the use of biogas recovery systems to reduce methane emissions from livestock waste), Combined Heat and Power Partnership (a

⁶⁸ U.S. Energy Information Administration. 2017 State Total Rankings. <https://www.eia.gov/state/?sid=US>. Accessed July 2019.

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voluntary program aimed at reducing environmental impact of power generation), and Green Power Partnership (a voluntary program that encourages organizations to use green power).

The California Energy Commission (CEC) is the State's regulatory agency responsible for creating energy policy and planning for the State's energy system as a whole. Core responsibilities of the CEC consists of achieving energy efficiency, advancing state energy policy, developing renewable energy, investing in energy innovation, overseeing energy infrastructure, preparing for energy emergencies and transforming transportation. The CEC also partners with other agencies to implement the Clean Energy and Pollution Reduction Act, Senate Bill 350, which establishes clean energy, clean air, and GHG reduction goals. SB 350 establishes a goal to increase California's renewable energy from 33 percent by 2020 to 50 percent by 2030. To this end, the CEC has deployed its Renewable Portfolio Standard (RPS) for the advancement of renewable energy. Thus, the RPS requires all load-servicing entities in California to produce a portion of their electricity sales from eligible renewable resources certified by the CEC. SB 350 also requires the State to double statewide energy efficiency savings in electricity and natural gas by 2030. SB 350 also requires state agencies to conduct studies to identify and assess barriers to, and opportunities for, solar photovoltaic energy generation.⁶⁹

California's energy efficiency efforts associated with construction of buildings are codified in Title 24 of the California Code of Regulations (CCR). The CEC provides guidance for the implementation of the building energy efficiency standards through the 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings.

Appliance efficiency regulations are codified in Title 20 of the CCR. California's appliance efficiency regulations set minimum efficiency levels for consumer electronics, household appliances and plumbing equipment. Manufacturers of regulated appliances are required to comply with energy and water efficiency State or federal standards and certify appliance performance. This information is available to the public through the Modernized Appliance Efficiency Database.⁷⁰

The City of Los Angeles has developed the L.A.'s Green New Deal, a four-year update to the 2015 Sustainable City Plan, which includes guidance to reduce building energy use per square foot for all types of buildings.

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

Less Than Significant Impact. The proposed Project is intended to provide facility improvements to the existing Lincoln HS Campus. The proposed Project is designed to comply with California requirements for energy conservation standards codified in CCR Title 24, Part 6.

Short-Term Energy Use

The construction phase is temporary, and it ends once the proposed Project is built and construction activities are completed. During the construction phase energy consumption would result primarily from fuel used to power off-road construction equipment, material delivery and removal trucks, and vehicles used by employees to travel to the job site. Construction equipment and trucks would be subject to applicable regulations which

⁶⁹ California Energy Commission. 2019 Clean Energy and Pollution Reduction Act – SB 350. <https://www.energy.ca.gov/rules-and-regulations/energy-suppliers-reporting/clean-energy-and-pollution-reduction-act-sb-350>. Accessed July 2019.

⁷⁰ Ibid.



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include anti-idling measures and use of efficient engines. These measures would prevent the unnecessary use of energy and inefficient equipment. There are no identified aspects of the proposed Project that would incur unnecessary or inefficient use of energy. Thus, the construction of the proposed Project is not anticipated to result in wasteful, inefficient or unnecessary use of energy.

Long-Term Energy Use

Operation activities of the proposed Project would remain unchanged once the Project is completed. The proposed Project would continue to require energy to conduct day to day operations. Energy consumption at the Project site would result from the use of electricity and natural gas use to power various assets including appliances, equipment, light fixtures, landscape controls and equipment. Energy consumption would also result from vehicles such as delivery trucks, school buses, and personal owned vehicles used by school staff and to drop off and pick up students.

The proposed Project is required to comply with CCR Title 24, Part 6 and specific design standards and sustainable building practices such as the California Green Building Code (CALGreen Code). The CALGreen Code is a statewide green building standards code and is applicable to residential and non-residential buildings throughout California, including schools. The CALGreen Code was developed to reduce GHG from buildings; promote environmentally responsible, cost-effective, healthier places to live and work; reduce energy and water consumption; and respond to the environmental directives of the Department of Housing and Community Development.

No unnecessary consumption of energy resources is anticipated during operation of the proposed Project. Therefore, Project energy impacts would be less than significant and no further analysis is required.

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

Less than Significant Impact. The proposed Project design is consistent with the LAUSD and is not anticipated to obstruct neither State energy plans, the L.A.'s Green New Deal, nor the City of Los Angeles' General Plan for renewable energy or energy efficiency. Therefore, Project impacts would be less than significant and no further analysis is required.

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

Explanation:

This analysis incorporates information from the Preliminary Geotechnical Investigation that was prepared for the Lincoln HS site by URS in May 2017⁷¹ (see Appendix F). The Preliminary Geotechnical Investigation evaluated geologic and soil conditions at and in the immediate vicinity of the Lincoln HS site and with the included Seismic Hazard Analysis (in Appendix C of the report) meets the requirement to prepare a Geohazard Assessment in accordance with SC-GEO-1.

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

⁷¹ URS. Preliminary Geotechnical Investigation, Lincoln High School, 3501 North Broadway Avenue, Los Angeles. May 20, 2017.



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LAUSD Standard Conditions of Approval	
SC-GEO-1	LAUSD shall prepare a Geohazard Assessment for the construction of any new school or applicable school addition.
SC-HWQ-1	The Stormwater Technical Manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). These guidelines meet current postconstruction Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. The guidelines address the mandated post-construction element of the NPDES program requirements.
SC-HWQ-2	The Compliance Checklist for Storm Water Requirements at Construction Sites has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.
SC-CUL-11	<p>LAUSD shall retain a Paleontological Monitor to oversee specific ground-disturbing activities as determined by the scope of work and final grading plan. The Monitor shall provide the construction crew(s) with a brief summary of the sensitivity, the rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources.</p> <p>If paleontological resources are uncovered, the Construction Contractor shall halt construction activities within a 30 foot radius of the find and shall notify the LAUSD.</p> <ul style="list-style-type: none"> • Ground-disturbing activities shall not continue until the discovery has been assessed by the Paleontologist. • The paleontologist shall have the authority to halt construction activities to allow a reasonable amount of time to identify potential resources. • Significant resources found shall be curated as determined necessary by the Paleontologist.

- a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to CGS Special Publication 42.)

No Impact. According to the Preliminary Geotechnical Investigation Lincoln High School (Preliminary Geotech Investigation),⁷² the closest known active fault to the site with evidence of surface rupture is the Raymond Fault which is located approximately 2.9 miles (4.7 kilometers) to the north.⁷³ It extends southwesterly from the Sierra Madre Fault zone at the base of the San Gabriel Mountains through San Marino and Pasadena to the Raymond Hill area of South Pasadena. The review of regional faults identified no known active or potentially active faults with well-defined fault traces delineated by the California Geological Survey (CGS; consistent with the requirements of the Alquist-Priolo Fault Zoning Act) that have been recognized as crossing or projecting toward the Lincoln HS site. Therefore, there would be no impacts associated with rupture of a known earthquake fault and no further analysis is required.

⁷² Ibid.

⁷³ Ibid.

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ii. Strong seismic ground shaking?

Less Than Significant Impact. There were 24 faults identified within approximately 33 miles of the Lincoln HS site that are capable of producing earthquakes of magnitude 6.0 or greater, but three faults were recognized to have the greatest potential to produce strong seismic ground motion at the Lincoln HS site. These are the Upper Elysian Park Thrust (0.5 mile north), the Raymond Fault (2.9 miles north), and the Puente Hills Blind Thrust (3.3 miles).

The CGS has estimated that the Upper Elysian Park Thrust, Raymond Fault, and Puente Hills Blind Thrust can produce earthquakes with maximum magnitudes of 6.4, 6.55, and 6.92, respectively.⁷⁴ The Raymond Fault produced the magnitude 5.0 Pasadena earthquake in 1988, while the Upper Elysian Park Thrust has not produced recent earthquakes. Earthquake magnitude on the Upper Elysian Park Thrust is estimated from geomorphic evidence from fold growth. The Puente Hills Blind Thrust fault is part of a system that extends eastward from downtown Los Angeles to Brea and includes three north-dipping segments, the Coyote Hills, the Santa Fe Springs, and the Los Angeles segments. The Preliminary Geotechnical Investigation reported that researchers believe the Santa Fe segment is responsible for the Whittier Narrow earthquake in 1987, making the Puente Hills Blind Thrust fault an active system capable of producing future earthquakes up to moment magnitude 7.1 beneath the Los Angeles Basin.

The new buildings would be designed in accordance with the California Building Code, the CGS “Special Publication 117A Guidelines for Evaluating and Mitigating Seismic Hazards in California” and the CGS “Checklist for the Review of Geologic/Seismic Reports for California Schools, Hospitals, and Essential Services Buildings.” The Project also requires review from the DSA for compliance with design and construction and accessibility standards and codes, including seismic requirements. LAUSD, with oversight from DSA, would comply with these requirements in the design and construction of the new buildings. Seismic ground shaking impacts would be less than significant and no further analysis is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Permanent ground displacement from ground lurching or liquefaction can occur in response to seismic shaking. Lurching occurs on slopes with strong topographic relief near the earthquake source. Lurching is typically observed as permanent ground cracks extending several feet, and up to tens of feet below the surface, with vertical ground displacement occurring between the cracks. Lurching can sometimes be confused with surface rupture of the affected fault. Strong seismic motion near the Lincoln HS site does not pose a significant lurching hazard to existing structures.

Liquefaction occurs when water saturated shallow soils with low inter-grain cohesion are subjected to strong seismic shaking. The strong shaking increases the pore pressure between sediment grains to reduce soil shear strength and stiffness causing the material to liquify and flow. Liquefaction can cause differential settlement of structures built atop at-risk soils and greatest risk occurs for structures where groundwater is less than 50 feet from the surface.

⁷⁴ Ibid.



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CGS has mapped the Lincoln HS site within a Liquefaction Hazard Zone. However, because predominantly clayey soils with high cohesion are present at the Lincoln HS site the risk from liquefaction was considered low. Therefore, there would be less than significant impacts associated with rupture of a known earthquake fault and no further analysis is required.

iv. Landslides?

Less Than Significant Impact. The Lincoln HS site does not lie in an area designated at risk for seismically induced landslides by CGS. Based upon their site reconnaissance and review of geologic maps it was determined that the slopes at the site do not present a significant hazard from seismically induced landslides because the geologic materials are not considered to be adversely oriented; and existing and proposed retaining walls and features (e.g., the concrete stadium seating at the site) further reduce risk. Therefore, there would be less than significant impacts associated with seismically induced landslides and no further analysis is required.

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

Less Than Significant Impact. Compliance with SC-HWQ-1 and SC-HWQ-2 during construction and operation would result in less than significant impact and no further analysis is required.

Construction Phase

The proposed Project would include grading and earthmoving activities at the Lincoln HS site that could expose soils to erosion from heavy winds, rainfall, or runoff. As the Lincoln HS site construction would disturb more than one acre of soil, the prime contractor would be required to comply with SC-HWQ-1 Stormwater Technical Manual, including obtaining a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (NPDES General Permit). In compliance with the NPDES General Permit and implementing SC-HWQ-2 Compliance Checklist for Storm Water Requirements at Construction Sites, the prime contractor would be required to implement a Stormwater Pollution Prevention Program (SWPPP), which would stipulate specific Per SC-HWQ-2, construction contractors will then be responsible for implementation of the SWPPP and documenting compliance with monitoring requirements in SC-HWQ-2 throughout the construction period to erosion control, sediment control, and best management practices (BMPs) to minimize loss of topsoil or substantial erosion. With implementation of SWPPP requirements and associated BMPs, erosion impacts related to construction activities would be less than significant.

Operational Phase

With implementation of SC-HWQ-1, once operational, disturbed areas would be protected by coverings such as structures, pavement, concrete, or vegetation and would result in less than significant impacts on soil erosion.

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

Less than Significant Impact. Hazards arising from liquefaction, lateral spreading, and landslides would be less than significant, as discussed above in Sections VIIa.(ii) and (iii).

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Subsidence. The major cause of ground subsidence is withdrawal of groundwater. The Project would not withdraw groundwater. Soils that are particularly subject to subsidence include those with high silt or clay content. The school is not in an area of known ground subsidence. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the site or in the general site vicinity. There is little or no potential for ground subsidence due to withdrawal of fluids or gases at the site. Project implementation would not pose substantial hazards to people or structures due to ground subsidence, and impacts would be less than significant.

Differential seismic settlement occurs when seismic shaking causes one type of soil to settle more than another type. It may also occur within a soil deposit with relatively homogeneous properties if the seismic shaking is uneven, which could occur due to variable geometry, for example, and variable depth of the soil deposit. The potential of differential seismically-induced settlement is considered low because of the bedrock and the overlying clayey fills are not subject to seismic settlement and impacts would be less than significant and no further analysis is required.

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

Less Than Significant Impact. Expansive soils are fine-grained soils that can undergo a significant increase in volume with an increase in water content and a significant decrease in volume with a decrease in water content. Changes in the water content of an expansive soil can result in severe distress to structures constructed upon the soil. According to the Preliminary Geotechnical Investigation there are high plasticity clays with medium expansion potential beneath portions of the Lincoln HS site. The report has provided foundation design recommendations to offset the risk of expansive soils.

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

No Impact. The proposed Project does not include septic tanks or alternative wastewater disposal systems and the Lincoln HS site will continue use of the municipal sewer system after modernization. Therefore there are no Project impacts and no further analysis is required.

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

Less Than Significant Impact. The surface of the Lincoln HS site has been graded since first construction at the Campus in 1913. Therefore, it is unlikely that unique paleontological resources would remain within previously graded soils at the site. According to the paleontology collection records search conducted for the proposed Project by the Natural History Museum of Los Angeles County, shallow excavations are unlikely to uncover a significant paleontological resource. However, deeper excavations that extend down into the Puente Formation, or any excavations in the Puente Formation exposed in the more elevated terrain of the proposed Project, has the potential to uncover significant to highly significant vertebrate fossil remains. Implementation of SC-CUL-11, which requires a Paleontological Monitor to oversee specific ground-disturbing activities, would reduce potential impacts potentially uncovered paleontological resources. There are no recognized unique geologic features at the Lincoln HS site. Therefore, with incorporation of SC-CUL-11, Project impacts to unique paleontological resources and unique geologic features would be less than significant and no further analysis is required.

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

Explanation:

This analysis incorporates the air emission results for the proposed Project using the California Emissions Estimator Model (CalEEMod) prepared by Tetra Tech (see Appendix D).

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

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

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

Less Than Significant Impact. Since the proposed Project would reduce the overall existing area, greenhouse gas (GHG) emissions associated with the operation of the proposed Project are expected to decrease, would not have a significant impact on the environment, and are, therefore, not further discussed. GHG emissions would result primarily during the construction of the proposed Project.

On December 5, 2008, pursuant to state law (i.e., CEQA Guidelines 15064.7) the SCAQMD Governing Board adopted a proposal for an interim GHG significance threshold for projects where the SCAQMD is lead agency. The significance threshold is applicable for stationary sources and can be used for determining significant impacts for proposed projects (SCAQMD 2008). Under the interim significance thresholds projects can emit up to 10,000 metric tons (MT) per year of CO₂eq before being deemed as having significant air quality impacts. GHG thresholds are not established for temporary sources (e.g., construction emissions) and there are no other federally, State, or regionally established significance thresholds to support impact assessments of GHG

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emissions from proposed projects construction emissions. While the threshold for stationary sources does not relate to temporary construction sources, it is referenced in this analysis to gage the potential significant impact resulting from the proposed Project.

GHG emissions from the construction activities of the proposed Project were calculated using CalEEMod. Detailed CalEEMod input values and output results are included in Appendix D. The total calculated GHG emissions resulting from the construction activities, significant thresholds, and assessment of significance are summarized in Table 7.

Table 7
Project GHG Construction Emissions

Calendar Year	Annual MT CO ₂ e
2022	330
2023	421
2024	760
2025	753
2026	764
2027	71
Maximum	764
Threshold of Significance	10,000
Significant?	No

Notes: GHG greenhouse gas
MT CO₂e metric tons of carbon dioxide equivalent

As presented in Table 7, GHG emissions from construction activities do not exceed annual interim emissions threshold and, therefore, represent less than significant impacts. No further analysis is required.

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

Less than Significant. GHG emissions would result in an adverse impact if the proposed Project conflicts with any of the plans, policies or regulations adopted for the purpose of reducing GHG emissions in the City of Los Angeles.

The City of Los Angeles does not have a specific greenhouse plan element in its General Plan, but it has strategies aimed at reducing GHGs. Since the proposed Project does not add long term emissions of GHG and its land use would not change, it is not anticipated to interfere with the City of Los Angeles GHG policies. Therefore, Project impacts would be less than significant and no further analysis is required.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation:

This analysis incorporates the Draft Phase I Environmental Site Assessment (Phase I ESA) prepared for the Lincoln HS site in September 2017 (see Appendix G) and the Preliminary Environmental Assessment-Equivalent (PEA-E) prepared for the Lincoln HS site in December 2019(see Appendix H).^{75,76}

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

LAUSD Standard Conditions of Approval

SC-HAZ-4	<p>Impacted Soil: The Construction Contractor shall comply with the following OEHS Site Assessment practices and requirements (as applicable):</p> <ul style="list-style-type: none"> District Specification Section 01 4524, Environmental Import / Export Materials Testing. Removal Action Workplan or Remedial Activities Workplan. South Coast Air Quality Management District Rule 1466. . Guidelines and Procedures to Address Polychlorinated Biphenyls (PCBs) in Building Materials - particularly applicable to buildings that were constructed or remodeled between 1959 and 1979.
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⁷⁵ Alisto Engineering Group, 2017. Phase I Environmental Site Assessment, Abraham Lincoln High School, 3501 North Broadway, Los Angeles. CA. September 2017.

⁷⁶ Alisto Engineering Group, 2019. Final Preliminary Environmental Assessment – Equivalent Report, Abraham Lincoln High School, 301 North Broadway, Los Angeles, CA. December 18, 2019.

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	<ul style="list-style-type: none"> Lead and asbestos abatement requirements identified by the Facilities Environmental Technical Unit (FETU) in the Phase I / Phase II, or abatement plan(s).
SC-AQ-2	Construction Emissions—diesel powered equipment: Construction Contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.
SC-AQ-3	<p>Construction Emissions—Ground disturbing activity during construction or remedial action: Construction Contractor shall:</p> <ul style="list-style-type: none"> Maintain speeds of 15 miles per hour (mph) or less with all vehicles. Load impacted soil directly into transportation trucks to minimize soil handling. Water/mist soil as it is being excavated and loaded onto the transportation trucks. Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site. Minimize soil drop height into haul trucks or stockpiles during dumping. During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks. Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed. Place stockpiled soil on polyethylene sheeting and cover with similar material. Place stockpiled soil in areas shielded from prevailing winds.

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. Daily operation of the Lincoln HS site will not involve use of hazardous materials. However, the PEA-E identified from past uses and subsequent investigations of soil that arsenic is present at the Lincoln HS site above DTSC-adopted background screening level (SL) of 12 milligrams per kilogram (mg/kg) and lead is present above the DTSC-modified SL of 80 mg/kg. The pesticide, chlordane, was detected in one soil sample a concentration equal to the SL of 1,700 mg/kg. The PEA-E determined the lateral extent of these chemicals of concern (COCs) have been adequately defined and recommended that LAUSD implement a removal action during construction to mitigate the presence of arsenic, lead, and chlordane detected at or above the DTSC SLs in site soil. With adherence to SC-HAZ-4, the Project impacts would be less than significant with completion of the recommended removal action and no further analysis is required.

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

Less Than Significant Impact. The PEA-E recommended that LAUSD implement a removal action during construction to mitigate the presence of arsenic, lead, and chlordane detected at or above the DTSC SLs in site soil. The District's Standard Conditions for SC-HAZ-4 Impacted Soil require preparation of a Removal Action Workplan that should include addendums for air emissions, waste transportation, and disposal practices when contaminated soils are removed from the Lincoln HS site. With adherence to SC-HAZ-4 Impacted Soil, the Project impacts would be less than significant and no further analysis is required. .

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

Less Than Significant Impact. With the exception of construction emissions from remedial action and construction activities for the Project, there are no sources for hazardous emissions or handling of acutely hazardous materials, substances, or waste at the site. During operation, limited amounts of District-approved materials and substance will continue to be used at the Project site for cleaning, painting, and standard maintenance in accordance with the manufacturers' and the District specifications. Additionally, adherence to



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SC-HAZ-4 Impacted Soil, and compliance with conditions of SC-AQ-2 Construction Emissions and SC-AQ-3 Construction Emissions would reduce the Project impacts to less than significant and no further analysis is required.

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

Less Than Significant Impact. The Cortese list is the list of hazardous materials sites compiled and maintained by DTSC pursuant to Government Code Section 65962.5. The Cortese list aggregates data from several sources. According to the Phase I ESA, the Lincoln HS site was not included on the Cortese list. However, the PEA-E identified arsenic to be present at the Lincoln HS site above DTSC-adopted background SL of 12 mg/kg and lead to be present above the DTSC-modified SL of 80 mg/kg. Chlordane was detected in one sample at a concentration equal to the SL of 1,700 mg/kg. The PEA-E determined the lateral extent of these COCs have been adequately defined. The other COCs identified in the Phase I were not found or was found at concentrations below DTSC action limits. The PEA-E recommended that LAUSD implement a removal action during construction to mitigate the presence of arsenic and lead detected above the DTSC action levels. With implementation of a removal action per SC-HAZ-4 Impacted Soil, the Project impacts would be less than significant and no further analysis is required.

Phase I Environmental Site Assessment

Findings of the Phase I ESA indicated the potential presence of the following constituents of concern (COCs): metals (including lead and asbestos in building materials), organochlorine pesticides (OCPs), polychlorinated biphenyls (PCBs), volatile organic compounds, petroleum hydrocarbons from gasoline, diesel and motor oil, and naphthalene. These COCs were used or stored at the Lincoln HS site in the Shop Building, in flammables storage lockers in the North Parking Lot, in a firing range in the Auditorium Building basement, at a historical gasoline service station located on the property between 1929 and 1933, and from the past use of pesticides. The Phase I ESA also identified data gaps in the Phase I ESA that included a lack of asbestos and lead based paint survey information, a lack of information or investigation of a historical gasoline service station present at the Lincoln HS site between 1929 and 1933, and a lack of information on the abandonment or investigation of an oil-water separator at the Shop Building.

Phase II Environmental Site Assessment

A PEA-E was completed for the Lincoln HS site to investigate the presence of COCs identified by the Phase I ESA. The PEA-E identified arsenic to be present at the Lincoln HS site above DTSC-adopted background SL of 12 mg/kg and lead to be present above the DTSC-modified SL of 80 mg/kg. Chlordane was detected in one sample at a concentration equal to the DTSC-SL of 1,700 mg/kg. Other COCs identified in the Phase I (other metals, OCPs, PCBs, VOCs, petroleum hydrocarbons from gasoline, diesel and motor oil, and naphthalene) were not detected in soil samples collected for the PEA-E or were detected at concentrations below the applicable SLs. The PEA-E determined the lateral extent of COCs detected above DTSC-SLs have been adequately defined. The PEA-E recommended that LAUSD implement a removal action during construction to mitigate the presence of arsenic and lead detected above the DTSC action levels.

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Additional Site Assessment

The findings of the PEA-E indicated that additional site assessment was not warranted for the Lincoln HS site. The PEA-E recommended the District proceed to a removal action during construction to remove soil containing arsenic, lead and chlordane at concentrations greater than DTSC SLs. Approximately 20 cubic yards of impacted soil were identified for removal. There is no direct exposure potential to students and staff as all impacted soil is currently covered by either grass or in planter areas and also partially covered in asphalt in some areas.

Los Angeles Regional Water Quality Control Board Response

The Lincoln HS site has not been listed in GeoTracker as a Los Angeles RWQCB response site.

- 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?**

Less Than Significant Impact. There are no airports located within 2 miles of the Lincoln HS site, based on a review of area maps of Los Angeles County. The nearest public airport is San Gabriel Valley Airport (formerly known as El Monte Airport), located approximately 10 miles east of the Lincoln HS site at 4233 North Santa Anita Avenue, El Monte, California. Therefore, the proposed Project would not expose people residing or working in the area to excessive noise levels or increased safety hazards related to an airport and Project impacts would be less than significant and no further analysis is required.

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

Less Than Significant Impact. Emergency preparedness and response planning and coordination would be coordinated through LAUSD's Office of Emergency Services. The existing school currently has an emergency school evacuation plan in compliance with District's "safe school plans."

The emergency response plans in effect in the City of Los Angeles are the City's Emergency Operations Plan⁷⁷ and the Los Angeles County Operational Area Emergency Response Plan (ERP) approved by the County Board of Supervisors in 2012.⁷⁸ The ERP identifies County agencies and other agencies that would be involved in emergency responses; threat summaries and assessments; and procedures for responding agencies, as well as listing County agencies that would be involved in coordinating and managing responses. The ERP is focused on emergencies beyond the scope of the normal operations of public safety agencies, such as extraordinary emergencies requiring multi-agency and/or multi-jurisdictional responses.

The City of Los Angeles also implements the City of Los Angeles Local Hazard Mitigation Plan (HMP). A comprehensive update to the HMP was prepared in 2017. The final HMP was published in January 2018.⁷⁹ The proposed Project would comply with the District's protocols and would not interfere with any other existing

⁷⁷ City of Los Angeles. Emergency Operations Plan. November 2017.

⁷⁸ County of Los Angeles. Los Angeles County Operational Area Emergency Response Plan (ERP). July 2012.

⁷⁹ Tetra Tech. City of Los Angeles 2018 Local Hazard Mitigation Plan. January 2018.



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emergency response plans or emergency evacuation plans. Therefore, Project impacts would be less than significant and no further analysis is required.

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

Less Than Significant Impact. Lincoln HS is located within a Very High Fire Hazard Severity Zone established by the Los Angeles Fire Department (LAFD) according to the City of Los Angeles Zone Information and Map Access System (ZIMAS).⁸⁰ However, the proposed Project is an existing school and no changes in use or student capacity are proposed. The proposed Project would also not result in any changes to the existing roadway network that could impact emergency response. Therefore, implementation of the proposed Project would not result in a new or increased impacts related to wildland fire and no further analysis is required.

⁸⁰ City of Los Angeles, Department of City Planning. Zone Information and Map Access System Parcel Report for 3501 North Broadway, Los Angeles. <http://zimas.lacity.org/>. July 31, 2019.

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



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Explanation:

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

LAUSD Standard Conditions of Approval	
SC-HWQ-1	<p>LAUSD shall design and construct the project to meet or exceed the current and applicable stormwater guidelines.</p> <p>Stormwater Technical Manual</p> <p>This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). These guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) and the mandated post-construction element of the NPDES program requirements.</p>
SC-HWQ-2	<p>LAUSD shall implement the applicable stormwater requirements during construction activities.</p> <p>Compliance Checklist for Storm Water Requirements at Construction Sites</p> <p>This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.</p>
SC-HWQ-3	<p>LAUSD shall implement the following programs and procedures, as applicable:</p> <ul style="list-style-type: none"> • Environmental Training Curriculum – a qualified environmental Monitor shall provide a worker's environmental awareness program that is prepared by LAUSD for the project. • Hazardous Waste Management Program (Environmental Compliance/Hazardous Waste). • Medical Waste Management Program. • Environmental Compliance Inspections. • Safe School Inspection Program. • Integrated Pest Management Program. • Fats Oil and Grease Management Program. • Solid Waste Management Program. • Other related programs overseen by OEHS.

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

Less than Significant Impact. During construction the proposed Project could potentially result in water quality impacts during the short-term construction process. The grading and excavation required for Project implementation would result in exposed soils that may be subject to wind and water erosion. The Project impact area would involve more than one acre. For construction sites of one acre or more, LAUSD contractors must prepare a Permit Registration Document (PRD) demonstrating compliance and coverage under the Los Angeles Regional Water Quality Control Board (RWQCB) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ; NPDES No. CAS000002).

LAUSD has a program-wide stormwater pollution prevention plan (SWPPP), developed in consultation with the Los Angeles RWQCB, that ensures that the aggregate stormwater runoff from school construction projects does not create a condition of pollution, contamination, or nuisance as defined in California Water Code Section 13050. The proposed Project would also be required to comply with local ordinances and local erosion and sediment control requirements.

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In addition, the proposed Project's sitewide utilities upgrades includes the construction of new stormwater lines to replace aging and outdated site stormwater infrastructure. These improvements would ensure that appropriate stormwater reduction and treatment elements are included to the maximum extent practicable, reducing any post-construction impacts pertaining to stormwater runoff.

The proposed Project would be completed in accordance with LAUSD SC-HWQ-1 through SC-HWQ-3 and applicable regulations pertaining to stormwater runoff. Impacts would be less than significant and no mitigation measures or further evaluation is required.

During long-term project operations, the proposed Project may create additional sources of non-point source or stormwater pollution from vehicular-related contaminants washing into the drainage system during wet weather. However, the Project involves replacing existing uses and pervious and impervious ground coverage and would be constructed in areas that already produce non-point source pollutants. The LAUSD Stormwater Technical Manual guidelines are intended to ensure that appropriate stormwater reduction and treatment elements are included in SUPs to the maximum extent practicable. LAUSD's stormwater runoff control programs and standard conditions, including SC-HWQ-1 through SC-HWQ-3, would mitigate impacts associated with proposed Project operation activities and therefore, would not violate any water quality standards or waste discharge requirements. Impacts would be less than significant and no mitigation measures or further evaluation are required.

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. Groundwater was encountered at the Project site at depths ranging from 38.5 to 58.5 feet below existing ground surface.⁸¹ The Project does not involve the extraction of groundwater. The Project site currently contains impervious surfaces, including buildings and hardscape features. The proposed Project would result in a slight increase in the amount of impervious surfaces through the construction of hardscape improvements; however, this increase would be small and any associated decrease in percolation of water from the site into groundwater would be insignificant. In addition, Project design features would include mechanisms to control runoff from the newly impervious areas, and promote on-site percolation. The proposed Project would not significantly impact groundwater recharge capability.

The proposed Project does not include any increase in student capacity. Water usage by the school, including water supplied through groundwater, is not expected to change. Therefore, the proposed Project would not result in an increase in demand for groundwater supplies.

Project compliance with applicable laws, regulations, and LAUSD Standards including SC-HWQ-1 through SC-HWQ-3 would ensure that impacts associated with groundwater supplies are less than significant. No mitigation measures or further evaluation is required.

⁸¹ URS. Preliminary Geotechnical Investigation, Lincoln High School, 3501 North Broadway Avenue, Los Angeles. May 20, 2017.



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

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

Less Than Significant Impact. The Project is located in an urbanized area and is developed with school facilities. There are no streams or rivers on or near the Project site. The majority of the west parcel is covered with buildings and hardscape. While there will be some change in building locations, these changes are not expected to significantly change the drainage patterns on the Project site. There will be a slight increase in hardscaping on the east parcel however, this increase would be small and any associated changes in drainage patterns would be insignificant. During construction of the Project, erosion would be controlled with implementation of a site-specific SWPPP and utilization of applicable BMPs. The operational phase of the proposed project will incorporate, as feasible, features outlined in the LAUSD Technical Manual to reduce the impact of erosion and siltation.

LAUSD's stormwater runoff control programs and standard conditions, including SC-HWQ-1 through SC-HWQ-3, would mitigate impacts associated with changes in drainage patterns and therefore, would not result in substantial on- or off-site erosion or siltation. Impacts would be less than significant and no mitigation measures or further evaluation is required.

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

Less Than Significant Impact. As discussed above, changes in drainage patterns would be insignificant. Stormwater runoff from the Project site currently drains into the surrounding street storm drains. The proposed Project includes the construction of new stormwater lines throughout the Project site to replace aging and outdated site stormwater infrastructure. These improvements would ensure that appropriate stormwater reduction and treatment elements are included to the maximum extent practicable, reducing any post-construction impacts pertaining to stormwater runoff. With these improvements, the proposed Project would not increase the risk of flooding in the surrounding area.

LAUSD's stormwater runoff control programs and standard conditions, including SC-HWQ-1 through SC-HWQ-3, would mitigate impacts associated with changes in drainage patterns and therefore, would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Impacts would be less than significant and no mitigation measures or further evaluation are required.

- 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. As discussed above, changes in drainage patterns would be insignificant. During construction of the Project, erosion would be controlled with implementation of a site-specific SWPPP and utilization of applicable BMPs. The operational phase of the proposed Project would incorporate, as feasible, features outlined in the LAUSD Technical Manual to reduce the impact of polluted

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runoff. Compliance with LAUSD's stormwater runoff control programs and standard conditions, including SC-HWQ-1 through SC-HWQ-3, would mitigate impacts associated with changes in drainage patterns.

The proposed Project's sitewide utilities upgrades includes the construction of new stormwater lines to replace aging and outdated site stormwater infrastructure. These improvements would ensure that appropriate stormwater reduction and treatment elements are included to the maximum extent practicable, reducing any post-construction impacts pertaining to stormwater runoff. With these improvements, the Proposed project would not 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 increase the risk of flooding in the surrounding area. Impacts would be less than significant and no mitigation measures or further evaluation is required.

iv) Impede or redirect flood flows?

No Impact. The Project site is not located within a 100-year or 500-year floodplain.⁸² The Project site and the surrounding areas are in FEMA Flood Zone X area that is determined to be outside the 0.2 percent annual chance floodplain. The Project would not place structures in a flood hazard area or result in a change in drainage that would impede or redirect flood flows. No impacts are expected and no mitigation measures or further evaluation are required.

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

No Impact. The Project site is not located within a 100-year or 500-year floodplain.⁸² The Project site and the surrounding areas are in FEMA Flood Zone X area that is determined to be outside the 0.2 percent annual chance floodplain. The Project site is located approximately 17 miles from the Pacific Ocean and is not located adjacent to any bodies of water; therefore, the Project site is not at risk for seiche or tsunami. The Project would not release pollutants as the result of floods, tsunami, or seiche. No impacts are expected and no mitigation measures or further evaluation are required.

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

No Impact. Please refer to Response X.a) and X.b) above. Development of the Project would include requirements for complying with applicable laws, regulations, and LAUSD Standards, including SC-HWQ-1 through SC-HWQ-3, to minimize the potential for water quality impacts during construction. In addition, the Project would include requirements for complying with applicable laws, regulations, and LAUSD Standards, including SC-HWQ-1 through SC-HWQ-3, to minimize impacts to groundwater supplies. The Project site is within the Los Angeles Department of Water and Power (LADWP) Urban Water Management Plan (UWMP) area.⁸³ The 2015 UWMP serves as the City of Los Angeles's master plan for reliable water supply and resources management. The proposed Project does not include activities that could obstruct the future water projects. No impacts are expected and no mitigation measures or further evaluation is required.

⁸² Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, City of Santa Ana, California, Map Number 06037C1629F, effective date September 26, 2008.

<https://msc.fema.gov/portal/search?AddressQuery=brooklyn%2C%20ny#searchresultsanchor>. Accessed August 19, 2019.

⁸³ Los Angeles Department of Water and Power (LADWP) Urban Water Management Plan 2015, Adopted July 1, 2016.



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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation:

There are no land use and planning SCs.

a) Physically divide an established community?

No Impact. The Project site is an existing public high school located within a developed urban environment. The Project would take place within the Campus boundaries and no changes to the public street system are proposed as part of the Project. Therefore, the Project would not physically divide an established community and no Project impacts would result. No further analysis is required.

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

Less Than Significant Impact. The Project site is zoned PF and public secondary schools are an allowed use within the PF zone.⁸⁴ The Project is currently utilized as a public high school and would continue to do so with implementation of the Project. No change in land use would result. On February 19, 2019 the LAUSD Board of Education Adopted a Resolution to exempt all LAUSD school sites from local land use regulations under Government Code Section 53094. Therefore, Project impacts are less than significant and no further analysis is required.

⁸⁴ City of Los Angeles Municipal Code. City of Los Angeles Municipal Code Sec.12.04.09(b)(8).
[http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisionsandzoning/article2specificplanning-zoningcomprehen/sec120409pfpublicfacilitieszone?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:lapz_ca\\$anc=JD_12.04.09](http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisionsandzoning/article2specificplanning-zoningcomprehen/sec120409pfpublicfacilitieszone?f=templates$fn=default.htm$3.0$vid=amlegal:lapz_ca$anc=JD_12.04.09).
Accessed May 2019.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation:

LAUSD has not developed SCs for minimizing impacts to the environment associated with mineral resources.

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

No Impact. Minerals are defined as any naturally occurring chemical elements or compounds formed from inorganic processes and organic substances. The California Surface Mining and Reclamation Act of 1975 (SMARA) requires that all cities address significant mineral resources, classified by the State Geologist and designated by the State Mining and Geology Board, in their General Plans.

According to the City of Los Angeles General Plan, the primary mineral resources within the City are gravel, rock, and sand deposits. The Project site is not within a known mineral resource area; important mineral resources generally occur near water bodies and courses within the City, such as the Los Angeles River flood plain and coastal plain.⁸⁵

According to the California Department of Conservation the Project site is in a Mineral Resource Zone (MRZ) MRZ-3. MRZ-3 zones are defined as areas containing known or inferred aggregate resources of undetermined significance.⁸⁶ The State Mining and Geology Board designates Mineral Resource Zones (MRZ) and areas in which minerals have been found in substantial quantities. MRZ-2 areas are defined as areas where there are, or there is likely to be, mineral deposits. There are no MRZ-2 areas within the Project site boundary. Additionally, mining operations are not considered a compatible use with school land uses, and the Project site is currently an active high school Campus. Therefore, no Project impacts to mineral resources would result and no further analysis is required.

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

No Impact. The Project site has a General Plan land use designation of Public Facilities and is currently used for a public school.⁸⁷ The primary mineral resources within the City are gravel, rock, and sand deposits according to the City of Los Angeles General Plan. As previously noted, the Project site is not located within a Mineral Resources Zone-2 area. Unlike the Project site, MRZ-2 sites within the City contain potentially significant sand

⁸⁵ City of Los Angeles. Conservation Element of the General Plan. September 2001.

⁸⁶ California Department of Conservation CGS. Generalized Mineral Land Classification Map of Los Angeles County – South Half. OFR_94-14_Plate1B. Russell V. Miller. 1994. <https://maps.conservation.ca.gov/cgs/informationwarehouse/mlc/>.

⁸⁷ City of Los Angeles. ZIMAS. <http://zimas.lacity.org>. Accessed May 2019.



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and gravel deposits which are to be conserved.⁸⁸ Therefore, the proposed Project would not result in the loss of availability of a locally important mineral resource recovery site and the no Project impact would result. No further analysis is required.

⁸⁸ City of Los Angeles. Conservation Element of the General Plan. September 2001.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE. Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation:

This analysis incorporates the noise emission results for the proposed Project prepared by Tetra Tech (see Appendix I).

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

LAUSD Standard Conditions of Approval	
SC-N-1	LAUSD shall design new buildings and other noise-generating sources to include features such as sound walls, building configuration, and other design features that attenuate exterior noise levels on a school campus to less than 67 dBA L_{eq} .
SC-N-2	<p>LAUSD shall analyze the acoustical environment of the site (such as traffic) and the characteristics of planned building components (such as Heating, Ventilation, and Air Conditioning [HVAC]), and designs shall achieve interior classroom noise levels of less than 45 dBA L_{eq} with a target of 40 dBA L_{eq} (unoccupied), and a reverberation time of 0.6 seconds. Noise reduction methods shall include, but are not limited to, sound walls, building and/or classroom insulation, HVAC modifications, double-paned windows, and other design features.</p> <ul style="list-style-type: none"> • New construction should achieve classroom acoustical quality consistent with the current School Design Guide and CHPS (California High Performance Schools) standard of 45 dBA L_{eq}. • New HVAC installations should be designed to achieve the lowest possible noise level consistent with the current School Design Guide. HVAC systems shall be designed so that noise from the system does not cause the ambient noise in a classroom to exceed the current School Design Guide and CHPS standard of 45 dBA L_{eq}. • Modernization of existing facilities and/or HVAC replacement projects should improve the sound performance of the HVAC system over the existing system. • The District's purchase of new units should give preference to HVAC manufacturers that sell the lowest noise level units at the lowest cost. <p>Existing HVAC units operating in excess of 45 dBA L_{eq} inside classrooms should be modified.</p>
SC-N-3	<p>LAUSD shall incorporate long-term permanent noise attenuation measures between new playgrounds, stadiums, and other noise-generating facilities and adjacent noise-sensitive land uses, to reduce noise levels to meet jurisdictional standards or an increase of 3 dB or less over ambient.</p> <p>Operational noise attenuation measures include, but are not limited to:</p> <ul style="list-style-type: none"> • Buffer zones; • Berms;



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	<ul style="list-style-type: none"> • Sound barriers; • Buildings; • Masonry walls; • Enclosed bleacher foot wells; and/or • Other site-specific project design features.
SC-N-4	LAUSD or its Construction Contractor shall consult and coordinate with the school principal or site administrator, and other nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. Coordination between the school, nearby land uses and the Construction Contractor shall continue on an as-needed basis throughout the construction phase of the project to reduce school and other noise sensitive land use disruptions.
SC-N-5	LAUSD shall require the Construction Contractor to minimize blasting for all demolition and construction activities, where feasible.
SC-N-6	For projects where pile driving activities are required within 150 feet of a structure, a detailed vibration assessment shall be provided by an acoustical engineer to analyze potential impacts related to vibration to nearby structures and to determine feasible mitigation measures to eliminate potential risk of architectural damage.
SC-N-7	<p>LAUSD shall meet with the Construction Contractor to discuss alternative methods of demolition and construction for activities within 25 feet of a historic building to reduce vibration impacts. During the preconstruction meeting, the Construction Contractor shall identify demolition methods not involving vibration-intensive construction equipment or activities. For example: sawing into sections that can be loaded onto trucks results in lower vibration levels than demolition by hydraulic hammers.</p> <ul style="list-style-type: none"> • Prior to construction activities, the Construction Contractor shall inspect and report on the current foundation and structural condition of the historic building. • The Construction Contractor shall implement alternative methods identified in the preconstruction meeting during demolition, excavation, and construction, such as mechanical methods using hydraulic crushers or deconstruction techniques. • The Construction Contractor shall avoid use of vibratory rollers and packers adjacent to the building. • During demolition, the Construction Contractor shall not phase any ground-impacting operations near the building to occur at the same time as any ground impacting operation associated with demolition and construction. <p>During demolition and construction, if any vibration levels cause cosmetic or structural damage to the building or structure, a "stop-work" order shall be issued to the Construction Contractor immediately to prevent further damage. Work shall not restart until the building is stabilized and/or preventive measures to relieve further damage to the building are implemented.</p>
SC-N-8	<p>Projects within 500 feet of a non-LAUSD sensitive receptor, such as a residence, shall be reviewed by OEHS to determine what, if any, feasible project specific noise reduction measures are needed.</p> <p>The Construction Contractor shall implement project specific noise reduction measures identified by OEHS. Noise reduction measures may include, but are not limited to, the following:</p> <p><u>Source Controls</u></p> <ul style="list-style-type: none"> • Time Constraints – prohibiting work during sensitive nighttime hours. • Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential: only between 7:00 AM and 7:00 PM). • Equipment Restrictions – restricting the type of equipment used. • Substitute Methods – using quieter methods and/or equipment. • Exhaust Mufflers – ensuring equipment has quality mufflers installed. • Lubrication & Maintenance – well maintained equipment is quieter. • Reduced Power Operation – use only necessary size and power. • Limit Equipment On-Site – only have necessary equipment on-site. • Noise Compliance Monitoring – technician on site to ensure compliance. • Quieter Backup Alarms – manually-adjustable or ambient sensitive types. <p><u>Path Controls</u></p> <ul style="list-style-type: none"> • Noise Barriers – semi-permanent or portable wooden or concrete barriers. • Noise Curtains – flexible intervening curtain systems hung from supports. • Enclosures – encasing localized and stationary noise sources.

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	<ul style="list-style-type: none"> Increased Distance – perform noisy activities farther away from receptors, including operation of portable equipment, storage and maintenance of equipment. <p><u>Receptor Controls</u></p> <ul style="list-style-type: none"> Window Treatments – reinforcing the building's noise reduction ability. Community Participation – open dialog to involve affected residents. Noise Complaint Process – ability to log and respond to noise complaints. Advance notice of the start of construction shall be delivered to all noise sensitive receptors adjacent to the project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the Construction Contractor and the District. In the event of noise complaints noise shall be monitored from the construction activity to ensure that construction noise is not obtrusive.
SC-N-9	<p>Construction Contractor shall ensure that LAUSD interior classroom noise and exterior noise standards are met to the maximum extent feasible, or that construction noise is not disruptive to the school environment, through implementation of noise control measures, as necessary.⁸⁹ Noise control measures may include, but are not limited to:</p> <p><u>Path Controls</u></p> <ul style="list-style-type: none"> Noise Attenuation Barriers⁹⁰ – Temporary noise attenuation barriers installed blocking the line of sight between the noise source and the receiver. Intervening barriers already present, such as berms or buildings, may provide sufficient noise attenuation, eliminating the need for installing noise attenuation barriers. <p><u>Source Controls</u></p> <ul style="list-style-type: none"> Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential areas: only between 7:00 AM and 7:00 PM). Substitute Methods – using quieter methods and/or equipment. Exhaust Mufflers – ensuring equipment has quality mufflers installed. Lubrication & Maintenance – well maintained equipment is quieter. Reduced Power Operation – use only necessary size and power. Limit Equipment On-Site – only have necessary equipment on-site. Quieter Backup Alarms – manually-adjustable or ambient sensitive types. <p>If OEHS determines that the above noise reduction measures will not reduce construction noise to below the levels permitted by LAUSD's noise standards LAUSD shall mandate that construction bid contracts include the following receptor controls:</p> <p><u>Receptor Controls</u></p> <ul style="list-style-type: none"> Temporary Window Treatments – temporarily reinforcing the building's noise reduction ability. <p>Temporary Relocation – in extreme otherwise unmitigable cases, students shall be moved to temporary classrooms / facilities away from the construction activity.</p>

Existing Conditions

The existing noise environment consists of vehicle noise from local street traffic on North Broadway, Lincoln Park Avenue, Alta Street, nature sounds, and community sounds. The on-site ambient environment is also influenced by the daily high school operations. According to the City of Los Angeles Municipal Code, Section

⁸⁹ The need for noise control measures depends on the type and quantity of equipment being used, the work being performed, and the proximity of the construction activity to active exterior use areas (e.g., playgrounds, athletic fields, etc.) or classrooms. For example, the need for noise control measures may be required if a major construction project (e.g., demolition of a building and/or construction of a new building) takes place on an active LAUSD campus.

⁹⁰ While the height and Sound Transmission Class (STC) rating of the Noise Attenuation Barrier needed will depend on the project specific conditions, an example of the specifications for a Noise Attenuation Barrier would be: Noise Attenuation Barriers shall be a minimum height of 12 feet and have a minimum Sound Transmission Class rating of 25 (STC-25).



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111.03 Table 2, the ambient noise level at the site will range from 50 – 60 dBA in the day and 40 - 55 dBA at night.

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

Less Than Significant Impact. The City of Los Angeles Noise ordinance⁹¹ and CEQA Thresholds Guide⁹² identify a project to have a significant impact if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;
- Construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use;
- Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or at any time on Sunday;
- Project operations cause the ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL, or above 70 dB CNEL.

The City of Los Angeles CEQA Thresholds Guide identifies land use compatibility standard for noise-sensitive land uses as a CNEL of 55 dBA to 70 dBA as conditionally acceptable.⁹³ The guide also established a significant impact if the project contributes to a 5 dBA increase in ambient levels. The following section calculates the potential noise emissions associated with the temporary construction activities and long-term operations of the proposed Project and compares the noise levels to the LAUSD, City, and County standards.

Construction-Related Noise

Construction of the proposed Project is planned to start in the 2nd quarter 2022. All Project construction activities are anticipated to be completed within 57 months. The Project construction activities are anticipated to occur in phases that include demolition, grading, building construction, paving, building interiors, and asphalt paving and off-site street work. The proposed Project would result in short-term temporary noise impacts associated with construction activities. Construction of the proposed Project would have a minimal impact on daily traffic volumes in the project vicinity associated with construction vehicles, and thus would have minimal impact on traffic noise conditions.

Acoustic emission levels for activities associated with Project construction were based upon typical ranges of energy equivalent noise levels at construction sites, as documented by the USEPA⁹⁴ and the USEPA's

⁹¹ County of Los Angeles Noise Ordinance. 1995.

⁹² City of Los Angeles. L.A. CEQA Threshold Guide. 2006.

⁹³ USEPA. 1971. Technical Document NTID300.1, Noise from Construction Equipment and Operations, US Building Equipment, and Home Appliances. Prepared by Bolt Beranek and Newman for USEPA Office of Noise Abatement and Control, Washington, DC. December.

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“Construction Noise Control Technology Initiatives”.⁹⁵ The USEPA methodology distinguishes between type of construction and construction phase. Using those energy equivalent noise levels (L_{eq}) as input to a basic propagation model, construction noise levels were calculated at the nearest residences. The basic model assumed spherical wave divergence from a point source. Furthermore, the model conservatively assumed that all pieces of construction equipment associated with an activity would operate simultaneously for the duration of that activity. An additional level of conservatism was built into the construction noise model by excluding potential shielding effects due to intervening structures and buildings along the propagation path from the site to receiver locations.

The construction activities would require a variety of equipment. Typical construction equipment would not be expected to generate noise levels above 90 dBA at 50 feet, and most equipment types would typically generate noise levels of less than 85 dBA at 50 feet. The highest noise levels during construction are normally generated during site grading and building construction phases. Grading equipment would be the loudest equipment used at the site. These two phases are expected to generate noise levels ranging from 67 to 75 dBA L_{eq} at the clinic 100 feet north of the Project site, 67 to 76 dBA L_{eq} dBA at the homes located 100 feet west from the Project on Alta St, 63 to 72 dBA L_{eq} at the homes 150 feet south of the Project on North Broadway, 63 to 72 dBA L_{eq} to the east of the Project on Lincoln High Drive, and 67 to 76 dBA L_{eq} to the east of the Project on Lincoln Park Ave. Lincoln HS would remain operational during Project construction and would be impacted by the construction noise at levels during all construction phases. Exterior construction equipment noise levels at school buildings within 25 feet of the construction activities are expected to range from 79 to 88 dBA L_{eq} . The construction noise levels at nearby residential homes and at Lincoln HS would be loud enough to temporarily interfere with speech communication outdoors and indoors with the windows open.

Project construction will need to adhere to LAUSD standard conditions SC-N-4, which limits scheduling of high noise activities, SC-N-5, which limits blasting for demolition, SC-N-8, which provides mitigation measures for off-site receptors, and SC-N-9, which provides mitigation measures for on-site receptors. Due to the infrequent nature of loud construction activities at the site, the limited hours of construction, and the implementation of LAUSD standard conditions, the temporary increase in noise due to construction Would result in less than significant impacts and no further analysis is required.

Operational-Related Noise

The proposed Project would consist of implementation and operation of new buildings and modernization features at the Campus. However, development of the proposed Project would not result in an increase in employee or student capacity at the school. As such, operational noise analysis has been limited to potential noise impacts to the proposed school buildings and potential noise impacts from reconfiguration of on-site Campus activities.

The City of Los Angeles CEQA Thresholds Guide limits Project operations to result in an increase to the existing ambient noise level of 3 dBA at the property line of the affected uses or above 70 dBA CNEL. The proposed facility will include four new buildings, which include rooftop HVAC and exhaust fan units. Among

⁹⁵ USEPA 1980. Construction Noise Control Technology Initiatives. Technical Report No. 1789. Prepared by ORI, Inc. Prepared for USEPA, Office of Noise Abatement and Control. September 1980. <http://www.nonoise.org/epa/Roll5/roll5doc22.pdf>.



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the existing structures, four existing buildings will be renovated with new HVAC and exhaust fans units as well. The classrooms would be designed and constructed to have an interior CNEL of 45 dBA or less.

The proposed Project would utilize the existing roadway network. The proposed Project would not increase student capacity which would not increase vehicle miles traveled (VMT) and result in increased noise. Therefore, Project impacts from traffic generated noise would be less than significant as part of long-term operation and no further analysis is required.

To determine potential noise effects of the proposed Project during the daily operations of the facility, a noise model was constructed to evaluate the effects of the proposed Project related noise sources on the environment. Modeling of the project site and surrounding environment was accomplished using CadnaA (Computer Aided Noise Abatement), which is a model-based computer program developed for predicting noise impacts in a wide variety of conditions. CadnaA allows for the input of project information such as noise source data, barriers, structures, and topography to create a detailed CAD model, and uses the most up-to-date calculation standards to predict outdoor noise impacts to property lines and adjacent surrounding areas. The results are included in Appendix I, Noise Modeling Results.

The mechanical design for the HVAC and exhaust fan units has not been currently prepared. Therefore, this noise analysis assumed that HVAC units sound power rating would be 74 dBA and the exhaust fans sound power rating would be 64 dBA to account for a “worst case” analysis. In total the Project was assumed to include a total of 31 new HVAC units and 31 new exhaust fans. Given the elevated rooftop height for the mechanical equipment and assuming the rooftop mechanical equipment operates simultaneously (i.e., in the worse-case scenario), the noise levels from the operation of all the rooftop mechanical equipment would range from 34 dBA L_{eq} at the clinic located to the north of the Project; 36 dBA L_{eq} at the residential homes located directly west of the Project on Alta Street; 37 dBA L_{eq} at the homes directly south of the Project along North Broadway; 36 dBA L_{eq} at the residential homes across Lincoln Park Avenue to the east; and 29 dBA L_{eq} at the residential homes across Lincoln High Drive to the east. The noise impacts from the rooftop mechanical equipment are less than the predicted current ambient noise levels at the Project site and would result in a 2 dBA or less increase to the existing ambient noise levels. Therefore, the noise levels generated by the proposed Project as part of long-term operations would be in compliance of SC-N-3 that requires new noise generating facilities on LAUSD campuses be designed to either meet the local jurisdictions noise standards or be limited to a 3 dB or less increase over the existing conditions. Therefore, the Project impacts would be considered less than significant and no further analysis is required.

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

Less Than Significant Impact. Operation of the proposed Project would not expose persons to or cause the generation of excessive groundborne vibration or groundborne noise levels as part of regular school activities. However, temporary Project construction activities including construction of the classroom buildings, site grading as well as infrastructure improvements and utility connections would require the use of equipment that could generate vibration. Possible sources of vibration may include bulldozers, dump trucks, backhoes, rollers, and other construction equipment that produces vibration. No blasting will be required at the Project site.

Project construction activities would occur within approximately 100 feet from the nearest single-family residence and approximately 25 feet from the nearest school building. According to the Federal Transit Administration (FTA) guidelines, a vibration level of 65 VdB (Vibration Velocity Level) is the threshold of

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perceptibility for humans. For a significant impact to occur, vibration levels must exceed 80 VdB during infrequent events.⁹⁶ Based on the levels published by the FTA⁹⁷ and the type of equipment proposed for use at the proposed Project, coupled with the distance to the existing identified noise sensitive receptors, the vibration levels would range from 35 VdB to 76 VdB at the nearest single-family residences. The analysis shows that the vibration levels maybe perceptible at the nearest sensitive receptors, but will be below the maximum vibration level of 80 VdB. This vibration level is considered acceptable for impacts to sensitive receptors.

Project construction will also occur directly adjacent to the school buildings and will result in vibration levels up to 94 VdB, which will exceed the 80 VdB level at the school. This would be a significant impact to students and personnel on Campus based on their proximity to the construction activities. However, with the implementation of SC-N-4 that limits scheduling, and SC-N-8 and SC-N-9, the temporary increase in vibration due to construction is considered to result in less than significant impacts and no further analysis is required.

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

Less Than Significant Impact. There are no airports located within 2 miles of the Lincoln HS site based on a review of area maps of Los Angeles County. The nearest private airport is the LAPD Hooper Heliport which is located approximately 1.9 miles southwest of the Campus at 555 Ramirez Street, Los Angeles. The nearest public airport is San Gabriel Valley Airport (formerly known as El Monte Airport), located approximately 10 miles east of the Lincoln HS site at 4233 North Santa Anita Avenue, El Monte. Therefore, the proposed Project would not expose people residing or working in the area to excessive noise levels related to an airport and no adverse Project impacts would result. No further analysis is required.

⁹⁶ Federal Transit Administration. Transit Noise and Vibration Impact Assessment (FTA-VA-90-1003-06). May 2006.

⁹⁷ Ibid.

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

Explanation:

This analysis incorporates the Site Circulation Report prepared by Lin Consulting (see Appendix B).

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

LAUSD Standard Conditions of Approval	
SC-PED-1	<p>LAUSD shall participate in the Safe Routes to School (SR2S) program.</p> <p>Caltrans SR2S Program. LAUSD is a participant in the SR2S program administered by Caltrans, local law enforcement, and transportation agencies. OEHS provides pedestrian safety evaluations as a component of traffic studies conducted for new school projects. This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25-mile radius of a proposed school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic.</p>
SC-PED-2	<p>LAUSD shall implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program.</p> <p>OEHS Traffic and Pedestrian Safety Program. LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for: student drop-off areas, vehicle access, and pedestrian routes to school. School traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.</p>
SC-PED-3	<p>LAUSD shall implement the applicable sidewalk requirements outlined in the School Design Guide. LAUSD shall also coordinate with the responsible traffic jurisdiction/agency to implement infrastructure improvements prior to the opening of a school. Improvements shall include, but are not limited to:</p> <ul style="list-style-type: none"> Clearly designate passenger loading areas with the use of signage, painted curbs, etc. Install new walkway and/or sidewalk segments where none exist. Substandard walkway/sidewalk segments shall be improved to a minimum of eight feet wide. <p>Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades.</p>
SC-PED-4	<p>LAUSD shall design the project to comply with the traffic and pedestrian guidelines in the School Traffic Safety Reference Guide.</p>

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	<p>School Traffic Safety Reference Guide REF- 4492.1. This Reference Guide replaces Reference Guide 4492.0, School Traffic Safety, September 30, 2008. Updated information is provided, including new guidance on passenger loading zones and the Safety Valet Program. This guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.</p>
SC-PED-5	<p>LAUSD shall design new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide.</p> <p>School Design Guide. The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.</p>
SC-T-1	<p>LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process.</p> <p>Traffic and Pedestrian Safety Requirements for New Schools. Requirements identify performance requirements for the selection and design of school sites to minimize potential pedestrian safety risks:</p> <ul style="list-style-type: none"> • Site Selection • Bus and Passenger Loading Areas • Vehicle Access • Pedestrian Routes to School <p>Requirements also state school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.</p>
SC-T-2	<p>LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process.</p> <p>School Design Guide. Vehicular access and parking shall comply with the Vehicular Access and Parking guidelines of the School Design Guide. The Design Guide contains the following regulations related to traffic:</p> <ul style="list-style-type: none"> • Parking Space Requirements • General Parking Guidelines • Vehicular Access and Pedestrian Safety • Parking Structure Security
SC-T-3	<p>LAUSD shall coordinate with the local City or County jurisdiction and agree on the following:</p> <ul style="list-style-type: none"> • Compliance with the local jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project. • Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds. • Implementation of SR2S, traffic control and pedestrian safety devices. • Fair share contribution and/or other mitigation measures for potential traffic impacts. • Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events. • Traffic study will use the latest version of Institute of Transportation Engineer's (ITE) Trip Generation manual (or comparable guidelines) to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility and the specific school type (e.g., Magnet, Charter, etc.), unless otherwise required by local jurisdiction.



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	Loading zones will be analyzed to determine the adequacy as pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.
SC-T-4	LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.

Existing Conditions

Bicycle and Pedestrian Facilities

No bicycle racks are provided on school grounds. In the *Mobility Plan 2035*, Lincoln Park Avenue is listed as part of the Neighborhood Enhanced Network, which consists of slow-moving, locally-serving streets that promote safety of all roadway users. North Broadway is listed as part of the proposed Bicycle Lane Network, a network of arterial streets prioritizing bicycle movement, within the school zone.⁹⁸

Sidewalks exist on both sides of North Broadway, Thomas Street, and Lincoln Park Avenue within the school zone. Sideways terminate on Thomas Street north of Alta Street. A sidewalk exists on the south side of Alta Street. Altura Street does not contain any sidewalks. In the *Mobility Plan 2035*, North Broadway is listed as a Pedestrian Enhanced District; which are areas where pedestrian improvements are prioritized relative to other modes, within the school zone.

Walk Audit

Internal student circulation within the Lincoln HS Campus appears to be generally sufficient, with some notable exceptions. An ADA path of travel is marked on the Campus leading from the main parking lot and internal parking lots, although a steep grade exists between the two lots that may be difficult to use for people with disabilities. Additionally, students walk through the main parking lot, and are not separated from vehicular traffic. Students connect between Campuses via a grade-separated pedestrian bridge over Lincoln Park Avenue. This is the only non-emergency access/egress point for the classroom building on the east Campus. While a long-sloped ramp and staircase exists from the surface streets to the east Campus, these appear to be seldom used.

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

Less Than Significant Impact. The proposed Project would utilize the existing roadway network. As indicated in the Circulation Report, there are currently no designated or signed pick-up/drop-off areas for the Campus. The Project would not increase student enrollment. Therefore, the Project would not result in a significant increase in vehicular trips associated with implementation of the Project.

Operation of the proposed Project would be similar to existing conditions. However, the Project does include on-site path of travel improvements, ADA upgrades, and changes to the parking configuration. These improvements include ADA path of travel upgrades as required to go to the Gymnasium, fields, courts, and

⁹⁸ Lin Consulting, Inc. Site Circulation Report LAUSD School Modernization Project - Abraham Lincoln High School. October 11, 2018.

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right-of-way. LAUSD has SCs for minimizing impacts to pedestrian safety and implementation of SC-PED-1, SC-PED-2, SC-PED-3, SC-PED-4, SC-PED-5, SC-T-1, SC-T-2, and SC-T-3 would result in a less than significant impact.

During construction, temporary portable student classrooms would be placed as far as possible from construction areas. Upgrades to the elevated pedestrian bridge over Lincoln Park Avenue may temporarily require an alternative route between east and west Campus during Project construction. This may include utilizing the signalized intersection of Lincoln Park Avenue and North Broadway. Under SC-T-4, LAUSD's construction contractor would prepare a Construction Worksite Traffic Control Plan for review by OEHS prior to commencement of construction. This plan would establish methods to avoid conflicts between the construction traffic and the existing vehicle, pedestrian, and bicycle traffic on Campus and in the neighborhood. Implementation of SC-T-4 would reduce construction related impacts to less than significant and no further analysis is required.

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

Less Than Significant Impact. The Project includes improvements to the existing Lincoln HS Campus and does not include changes to the off-site circulation network. The OEHS Traffic and Pedestrian Safety Program includes performance guidelines to minimize potential pedestrian safety risks to students, visitors, faculty and staff. These performance guidelines include the requirements for: student drop-off areas, vehicle access, and pedestrian routes to school. Therefore, with implementation of SC-PED-2 requiring compliance with the OEHS Traffic and Pedestrian Safety Program, Project impacts would be less than significant and no further analysis is required.

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

Less Than Significant Impact. North Broadway is an east-west roadway classified as an Avenue I with two lanes in each direction within the school zone. The posted speed limit is 35 mph within the school zone; and 25 mph when children are present in accordance with California Vehicle Code.⁹⁹ As indicated in the Circulation Report, there are currently no designated or signed pick-up/drop-off areas for the Campus. Therefore drop-off/pick-up currently occurs at any available space on or adjacent to the Campus. No changes to the off-site circulation network are proposed as part of the proposed Project. Implementation of SC-PED-1, SC-PED-2, SC-PED-3, SC-PED-4, SC-PED-5, SC-T-2, and SC-T-3 would result in a less than significant impacts and no further analysis is required.

During Project construction, upgrades to the elevated pedestrian bridge over Lincoln Park Avenue may temporarily require an alternative route between east and west Campus. This may include utilizing the signalized intersection of Lincoln Park Avenue and North Broadway. However, with implementation of SC-T-4 that requires a Construction Worksite Traffic Control Plan. Project impacts would be less than significant and no further analysis is required.

⁹⁹ Ibid.



4. Environmental Checklist and Analysis

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

Explanation:

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

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

No Impact. LAUSD proposes to complete the Project at Lincoln HS in an effort to provide facilities that are safe, secure, and aligned with the instructional program. No increase in student capacity is proposed and no changes to the public roadways are proposed as part of the Project. Therefore, no Project impacts would result related to population growth and no further analysis is required.

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

No Impact. The Project site is the existing Lincoln HS Campus and no housing is located on-site. Therefore, the Project would not displace people or housing requiring replacement housing elsewhere. No Project impacts would result and no further analysis is required.

4. Environmental Checklist and Analysis

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

Explanation:

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

LAUSD Standard Conditions of Approval

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

a) Fire protection?

Less Than Significant Impact. Fire protection services are provided by the Los Angeles Fire Department (LAFD). The nearest Fire Station to the Project site is Station 1, located approximately one mile to the west at 2230 Pasadena Avenue.¹⁰⁰ The proposed Project would not increase student capacity. Therefore, the range of service calls generated by the operation of the proposed Project would be similar to existing conditions and the proposed Project would not require the construction of new or expanded fire stations.

The LAFD Schools, Churches and Institution Units are responsible for the inspection of all public, private and charter schools in the City of Los Angeles.¹⁰⁰ The proposed Project would be designed and constructed to meet required fire standards including adequate emergency vehicle access. In accordance with SC-PS-1, as necessary, LAUSD would have the local fire jurisdiction review construction and site plans prior to the State Fire Marshal's approval. Therefore, the Project's impacts on fire protection services would be less than significant and no further analysis is required.

¹⁰⁰ Los Angeles Fire Department. LAFD Webpage. <https://www.lafd.org/fire-prevention/schools-churches-institutions>. Accessed August 2019



4. Environmental Checklist and Analysis

b) Police protection?

Less Than Significant Impact. Police protection services are provided by the Los Angeles Police Department (LAPD). Lincoln HS is a closed Campus with several gates that restrict access. The gates are generally opened only at the start and end of the school day, for morning and afternoon bell periods. Since no increase in student capacity is proposed as part of the Project, the range of service calls generated by the operation of the proposed Project would be similar to existing conditions. The Project may cause a slight increase in demand for police protection services during construction from possible trespass, theft, and/or vandalism. However, active construction areas would be fenced and any increase in demand would be temporary and would not require the construction of new or expanded police facilities. Therefore, the Project's impacts on police protection services would be less than significant and no further analysis is required.

c) Schools?

Less Than Significant Impact. The environmental effects of the construction and operation of the proposed Project are considered throughout the environmental analysis in this Initial Study. The proposed Project consists of facility improvements to the existing Campus that would result in a beneficial impact to public school facilities. The proposed Project would not increase student capacity nor would it create a substantial number of new jobs that could result in increased demand for school services as part of long-term operations.

As previously noted, Pueblo de Los Angeles Continuation HS would be relocated to the Glen Alta Elementary School Campus for approximately one year during construction. Both schools would remain operational. Pueblo de Los Angeles Continuation HS would return to its previous location following the establishment of permanent space on the Lincoln HS Campus for the school. Therefore, the Project would have less than significant impacts on public school facilities and no further analysis is required.

d) Parks?

Less Than Significant Impact. The City of Los Angeles Department of Recreation and Parks provides park and recreation services in the City. The nearest parks to the Project site are Lincoln Park located to the south of the Project site at 3501 Valley Boulevard, Los Angeles and East Los Angeles Park located to the northwest of the Project Site at 2500 North Eastlake Avenue, Los Angeles. The proposed Project is not dependent upon City parks for student recreational needs as part of long-term project operations. During short-term Project construction activities, students may use public recreational facilities. Use of public parks would be short term and temporary, and therefore would not result in substantial physical deterioration of off-site public recreational facilities.

Demand for park and recreational facilities are typically linked to an increase in population growth in the area through the development of new housing units or the generation of new jobs. The proposed Project does not include housing, would not increase student capacity, nor would it create a substantial number of new jobs that could result in increased demand for recreational facilities. The proposed Project would not physically alter any existing parks or generate a need for new park facilities as part of long-term project operations. Therefore, the Project would have no impacts on park facilities and no further analysis is required.

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e) Other public facilities?

Less Than Significant Impact. The proposed Project would not result in impacts associated with the need for new or physically altered public facilities such as libraries or hospitals. No increase in student capacity is proposed as part of the Project. Therefore, the Project's impacts would have a less than significant impact on other public facilities and no further analysis is required.

4. Environmental Checklist and Analysis

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

Explanation:

There are no recreation LAUSD SCs that apply to this Project.

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

Less Than Significant Impact. The City of Los Angeles Department of Recreation and Parks provides park and recreation services in the City. The nearest parks to the Project site are Lincoln Park located to the south of the Project site at 3501 Valley Boulevard, Los Angeles and East Los Angeles Park located to the northwest of the Project Site at 2500 North Eastlake Avenue, Los Angeles. The proposed Project is not dependent upon City parks for student recreational needs as part of long-term project operations. During short-term Project construction activities, students may use public recreational facilities. Use of public parks would be short term and temporary, and therefore would not result in substantial physical deterioration of off-site public recreational facilities.

The proposed Project is not anticipated to result in a substantial increase in use of area parks as part of long-term project operations since recreational facilities are provided on Campus to support the students' recreational needs. Demand for park and recreational services is typically linked to an increase in population growth in the area through the development of new housing units or the generation of new jobs. The proposed Project would not increase student capacity and thereby would not induce substantial population growth that could result increased demand for recreational facilities. Therefore, the Project impacts would be less than significant and no further analysis is required.

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

Less Than Significant Impact. The proposed Project includes facility improvements to the existing Lincoln HS Campus including a new field restroom building, batting cage, home and visitor concessions, and visitor bleachers (Please refer to Figure 4, Conceptual Site Plan) and modernization of the existing Gymnasium building. These recreational facility upgrades are intended to better meet the recreational needs of students on-site and would not substantially expand facilities or use of Campus recreational facilities in comparison to existing conditions. While not included in the current project, LAUSD planning efforts indicate that a new gym may be needed on Campus in the future.

4. Environmental Checklist and Analysis

During short-term Project construction activities, students may use public recreational facilities. Use of public parks would be short term and temporary, and therefore would not result in substantial physical deterioration of off-site public recreational facilities.

Potential environmental impacts associated with the proposed project, including recreational areas, are discussed by environmental resources topic throughout this Initial Study. The proposed Project would not increase student capacity and thereby would not increase demand for recreational facilities. Therefore, the Project impacts would be less than significant and no further analysis is required.

4. Environmental Checklist and Analysis

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

Explanation:

This analysis incorporates the Site Circulation Report prepared by Lin Consulting (see Appendix B). LAUSD has SCs for minimizing impacts to transportation and circulation. Applicable SCs related to transportation and circulation impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-T-1	<p>LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process.</p> <p>Traffic and Pedestrian Safety Requirements for New Schools Requirements identify performance requirements for the selection and design of school sites to minimize potential pedestrian safety risks:</p> <ul style="list-style-type: none"> • Site Selection • Bus and Passenger Loading Areas • Vehicle Access • Pedestrian Routes to School <p>Requirements also state school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.</p>
SC-T-2	<p>LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process.</p> <p>School Design Guide Vehicular access and parking shall comply with the Vehicular Access and Parking guidelines of the School Design Guide. The Design Guide contains the following regulations related to traffic:</p> <ul style="list-style-type: none"> • Parking Space Requirements • General Parking Guidelines • Vehicular Access and Pedestrian Safety • Parking Structure Security
SC-T-3	<p>LAUSD shall coordinate with the local City or County jurisdiction and agree on the following:</p> <ul style="list-style-type: none"> • Compliance with the local jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project.

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	<ul style="list-style-type: none"> • Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds. • Implementation of SR2S, traffic control and pedestrian safety devices. • Fair share contribution and/or other mitigation measures for potential traffic impacts. • Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events. • Traffic study will use the latest version of Institute of Transportation Engineer's (ITE) Trip Generation manual (or comparable guidelines) to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility and the specific school type (e.g., Magnet, Charter, etc.), unless otherwise required by local jurisdiction. • Loading zones will be analyzed to determine the adequacy as pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.
SC-T-4	LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.

Existing Conditions

Study Area Roadways

Lincoln Park Avenue is a north-south roadway classified as a Collector street with one travel lane in each direction within the school zone. Curb parking is allowed all day north of Altura Street, except Wednesdays from 12:30 pm and 2:30 pm on the east side, and Tuesdays 12:30 pm and 2:30 pm on the west side (for street sweeping). The posted speed limit is 30 mph, and 25 mph when children are present in accordance with California Vehicle Code. U-turns are prohibited along Lincoln Park Avenue north of North Broadway within the school zone.¹⁰¹

North Broadway is an east-west roadway classified as an Avenue I with two travel lanes in each direction within the school zone. The posted speed limit is 35 mph within the school zone; and 25 mph when children are present in accordance with California Vehicle Code. Curb parking is allowed all day on the south side, with a 1-hour restriction from 8:00 am to 6:00 pm. No stopping/parking is permitted on the north side between 7 am and 5 pm, with the exception of a 15-minute parking zone west of the Lincoln HS main gate, which can accommodate 1 to 2 vehicles.¹⁰²

Altura Street is a former street segment between Alta Street and Lincoln Park Avenue (on the Lincoln HS Campus), and also serves as a driveway onto the eastern portion of the Lincoln HS Campus east of Lincoln Park Avenue. A separate portion of Altura Street extends part way to the Lincoln HS football field to the east and leads to a gate to the facilities located on the eastern parcel of the Campus. It is located on school grounds and is currently used only for school operations. There is no posted speed limit. Parking is allowed in the lots adjacent to the street (school faculty and visitor parking only).¹⁰³

¹⁰¹ Lin Consulting, Inc. Site Circulation Report LAUSD School Modernization Project - Abraham Lincoln High School. October 11, 2018.

¹⁰² Ibid.

¹⁰³ Ibid.



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Alta Street is a north-south roadway classified as a Local (standard) street with one travel lane in each direction within the school zone. Alta Street between Thomas Street and Altura Street is closed to the public. There is no posted speed limit. Curb parking is allowed all day north of Altura Street, except Wednesdays from 12:30 pm and 2:30 pm on the east side, and Tuesdays 12:30 pm and 2:30 pm on the west side (for street sweeping). Curb parking is prohibited on the southeast side between Thomas Street and Altura Street, except between 6:30 am and 3:30 pm on school days, and prohibited at all times on the northwest side.¹⁰⁴

Thomas Street is a north-south roadway classified as a Local (standard) street with one travel lane in each direction within the school zone. There is no posted speed within the school zone. Curb parking is allowed all day between North Broadway and Alta Street on the east side and prohibited on Wednesdays between 7:00 am and 10:00 pm on the west side. Curb parking is prohibited on both sides north of Alta Street. Trucks over 6,000 pounds are prohibited north of North Broadway.¹⁰⁵

Study Area Intersections

Lincoln Park Avenue & North Broadway is a signalized offset intersection with permissive left turn signal phasing for both directions of North Broadway, and split signal phasing on Lincoln Park Avenue. The intersection operates under semi-actuated signal timings, with North Broadway as the coordinated street.

Lincoln Park Avenue & Altura Street is an unsignalized intersection with stop control on all movements.

Alta Street & Thomas Street is an unsignalized T-intersection with stop control on Alta Street.

North Broadway & Thomas Street is a signalized intersection with permissive left turns on all movements. Pedestrian phase recall occurs along Thomas Street, with the pedestrian signal phase leading the through signal phase. The intersection operates under semi-actuated signal timings, with North Broadway as the coordinated street.¹⁰⁶

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

Less Than Significant Impact. No off-site circulation improvements are proposed as part of the Project. The proposed Project would utilize the existing roadway network and would not increase student capacity. Therefore, implementation of the Project would be similar to existing conditions and would not result in a significant increase in average daily trip or peak trips associated with implementation of the Project.

The proposed Project includes changes to the internal configuration of the Campus including ADA parking, and new hardscape and ramps as shown of Figure 4, Conceptual Site Plan. In addition, the Project includes improvements to meet programmatic access requirements of the Americans with Disabilities Act (ADA) throughout the school site. This includes ADA Path of travel upgrades as required to go to the Gymnasium, fields, courts, and right-of-way. LAUSD has SCs for minimizing impacts to transportation and circulation and implementation of SC-T-1, SC-T-2, and SC-T-3 would ensure that the Project is designed and implemented in compliance with applicable requirements.

¹⁰⁴ Ibid.

¹⁰⁵ Ibid.

¹⁰⁶ Ibid.

4. Environmental Checklist and Analysis

During Project construction there would be a temporary increase in vehicle trips including haul trips associated with construction activities. Implementation of SC-T-4 would reduce construction related impacts to less than significant. Additionally, as described in Section XIV, Impact (a), implementation of SC-PED-1, SC-PED-2, SC-PED-3 SC-PED-4, and SC-PED-5 would reduce potential impacts associated with pedestrians and other forms of transportation to less than significant and no further analysis is required.

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

Less Than Significant Impact. CEQA Guidelines Section 15064.3(b) describes specific criteria for analyzing transportation impacts. Currently, vehicles miles traveled (VMT) is the appropriate measure of transportation impacts. VMT refers to the amount and distance of automobile travel attributable to a project. A lead agency has the discretion to choose the most appropriate methodology to evaluate a project's VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure.

During construction, the Pueblo de Los Angeles Continuation HS program would temporarily be relocated within existing classroom space at Glen Alta Elementary School. Glen Alta Elementary School is located at 3410 Sierra Street in Los Angeles and is approximately 0.7-mile northeast of the Project site. Thereby, vehicle trips associated with Pueblo de Los Angeles Continuation HS would temporarily be distributed to Glen Alta Elementary School.

As part of long-term Project operations, the proposed Project would not increase student capacity thereby it would not substantially increase VMT. Therefore, VMT with implementation of the proposed Project is anticipated to be similar to existing conditions. Project impacts would be less than significant and no further analysis is required.

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

Less Than Significant Impact. Incompatible uses for a school would include industries such as agricultural operations where soil tilling and/or pesticides use creates air pollution, or a logistic distribution centers that have large tractors, semi-trailer trucks, and oversized equipment consistently traveling on local roadways that may create a hazard to cars or pedestrians; or hazardous industrial uses. Circulation design that would result in vehicular and/or pedestrian safety hazards would be sharp curves or dangerous intersections. The proposed Project includes facility upgrades to the existing Lincoln HS Campus with no increase in student capacity. Implementation of SC-T-1, SC-T-2, and SC-T-3 would ensure that that the Project is designed and implemented in compliance with applicable requirements including safety standards. Therefore, the Project impacts would be less than significant and no further analysis is required.

d) Result in inadequate emergency access?

Less Than Significant Impact. The proposed Project includes facility improvements to the existing Lincoln HS Campus. During construction SC-T-4, requires a Construction Worksite Traffic Control Plan that includes applicable transportation related safety measures as required by local and State agencies.

The access and circulation features at the Campus would continue to accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. All access features are subject to and



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must satisfy Los Angeles Fire Department design requirements. Implementation of SC-T-1, SC-T-2, and SC-T-3 would ensure that the Project is designed and implemented in compliance with applicable requirements including safety standards. Therefore, the Project impacts are less than significant and no further analysis is required.

4. Environmental Checklist and Analysis

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Impact

XIX. TRIBAL CULTURAL RESOURCES.

Has a California Native American Tribe requested consultation in accordance with Public Resources Code section 21080.3.1(b)?

☒ Yes ☐ No

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

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation:

This analysis incorporates information from the Historic Resources Assessment Report for Lincoln HS prepared by Historic Resources Group (see Appendix A) and the results of the cultural resources records search (see Appendix E).

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

LAUSD Standard Conditions of Approval

SC-TCR-1	All work shall stop within a 30 foot radius of the discovery. Work shall not continue until the discovery has been assessed by a qualified Archaeologist. Based on this initial assessment the affiliated Native American Tribal representative has contacted and consulted to provide as-needed monitoring or to assist in the accurate assessment, recordation, and if appropriate, recovery of the resources, as required by the District.
SC-TCR-2	<p>In the event that Tribal cultural resources are identified, the Archaeologist will retain a Native American Monitor to begin monitoring ground disturbance activities. The Native American Monitor shall be approved by the District and must have at least one or more of the following qualifications:</p> <ul style="list-style-type: none"> At least one year of experience providing Native American monitoring support during similar construction activities. Be designated by the Tribe as capable of providing Native American monitoring support. Have a combination of education and experience with Tribal cultural resources. <p>Prior to reinitiating construction, the construction crew(s) will be provided with a brief summary of the sensitivity of Tribal cultural resources, the rationale behind the need for protection of resources, and information on the initial identification of Tribal cultural resources. This information shall be included in a worker's environmental awareness program that is prepared by LAUSD for the project (as applicable).</p> <p>Subsequently, the Monitor shall remain on-site for the duration of the ground-disturbing activities to ensure the protection of any other potential resources.</p>



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The Native American Monitor will complete monitoring logs on a daily basis. The logs will provide descriptions of the daily activities, including construction activities, locations, soil, and any Tribal cultural resources identified.

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

Less Than Significant Impact. The Historic Resources Assessment Report for Lincoln HS concluded that the Lincoln HS Campus is eligible for listing in the National Register, California Register and for local designation as a historic-cultural monument but did not identify any known tribal cultural resources.

As discussed in Section V. Cultural Resources, a record search was conducted at the SCCIC to identify any previously recorded cultural or tribal resources. The record search revealed one previous cultural resource investigation (LA-13239) has been conducted within the Project site and no previously recorded CRHR eligible historical resources are recorded within or near the Project site.

As part of the record search, the Native American Heritage Commission (NAHC) was contacted on September 4, 2019 to request a Sacred Lands file search. The NAHC responded on September 13, 2019 that the results are positive for Native American tribal cultural resources as being within the proposed Project study area (Appendix E). The NAHC recommended contacting the Gabrieleño Band of Mission Indians – Kizh Nation for more information. The NAHC also provided a list of 5 Native American contacts.

As noted in Section 2, Environmental Setting, in conformance with AB 52 tribal consultation requirements, LAUSD notified the Native American Tribes/Tribal representatives that are traditionally and culturally affiliated with the Project area. LAUSD sent Project notification to the following Tribes:

- Gabrieleño Band of Mission Indians- Kizh Nation;
- Gabrieleno/Tongva San Gabriel Band of Mission Indians;
- Gabrielino/Tongva Nation;
- Fernandeno Tataviam Band of Mission Indians;
- Gabrielino Tongva Indians of California Tribal Council;
- Gabrielino-Tongva Tribe (2 separate contacts)

One Native American Tribe, the Gabrieleño Band of Mission Indians- Kizh Nation, requested consultation on this Project. LAUSD has completed consultation with representatives of the Tribe. As a result of the consultation, SC-TCR-1 and SC-TCR-2 to protect potential unanticipated discoveries associated with Tribal Cultural Resources were incorporated into this Project.

Therefore, Project impacts would be less than significant and no further analysis is required.

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

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

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

1. The old Spanish and Mexican ranchos of Los Angeles County (Gerald 1937)
2. Kirkman-Harriman Pictorial and Historical Map of Los Angeles County 1860-1937 (Kirkman 1938)
3. Official map of the County of Los Angeles, California (Wright 1898)
4. Excerpt describing the location of a village
5. Excerpt describing habitations (Southwest Museum Leaflet)
6. Excerpt describing the number of huts in a rancheria

A review of these documents did not find substantial evidence of an existing TCR within the Project site. No supporting documents indicated why the Project site should be considered to have a high potential for containing TCRs; therefore, Native American monitoring for TCRs during all ground disturbances is not required. In the unlikely event that construction-related ground disturbance results in the discovery of potential TCRs, compliance with SC-TCR-1 and SC-TCR-2 would ensure that potential impacts to TCRs are avoided.

The Project would comply with SC-TCR-1, which requires all construction activities to stop should tribal cultural resources be uncovered during ground disturbing activities. SC-TCR-2 also requires monitoring should tribal cultural resources be identified during grading. With implementation of SC-TCR-1 and SC-TCR-2, Project impacts to unknown potential tribal cultural resources would be less than significant. Impacts would be less than significant and no further analysis is required.



4. Environmental Checklist and Analysis

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

Explanation:

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

LAUSD Standard Conditions of Approval	
SC-USS-1	<p>Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities:</p> <p>School Design Guide. Establishes a minimum non-hazardous construction and demolition (C&D) debris recycling requirements of 75% by weight. Construction and demolition waste shall be recycled to the maximum extent feasible.</p> <p>Construction & Demolition Waste Management. This document outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of non-hazardous waste materials generated during demolition and/or new construction to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling, salvaging and/or reusing a minimum of 75% of the C&D waste generated by weight.</p>
SC-USS-2	LAUSD shall coordinate with the City of Los Angeles Department of Water and Power or other appropriate jurisdictions and departments prior to relocating or upgrading any water facilities to reduce the potential for disruptions in service.
SC-USS-3	LAUSD shall provide an easily accessible area that services the entire school and is dedicated to the collection and storage of materials for recycling, including (at a minimum) paper, cardboard, glass, plastics, metals, and landscaping waste. There shall be at least one centralized collection point (loading dock), and the capacity for separation of recyclables where waste is disposed of for classrooms and common areas such as cafeterias, gyms, or multi-purpose rooms.

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SC-GHG-1	Implementation of SC-GHG-1.
SC-GHG-2	Implementation of SC-GHG-2.
SC-GHG-3	Implementation of SC-GHG-3.

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

Less Than Significant Impact. The facility upgrades proposed as part of the Project would not significantly change the existing conditions of the Project site. No increase in student capacity is proposed as part of the Project, therefore demand on water, wastewater treatment, electric power, and telecommunication facilities would be similar to existing conditions. Site drainage changes are not part of the proposed Project, therefore stormwater drainage on the site will remain consistent with existing conditions. Additionally, aging and outdated site infrastructure (i.e., utilities, stormwater/sewer lines, Central Plant piping connections and rerouting, ITD convergence systems, and other systems serving the entire school site) will be upgraded as part of the proposed Project; these upgrades will likely serve as a benefit to existing service providers by improving the manner and/or efficiency in which services are delivered to the site, as opposed to increasing the demand on existing facilities. The proposed Project will be required to comply with SC-USS-2, which requires that LAUSD coordinate with the City of Los Angeles Department of Water and Power (LADWP) or other appropriate jurisdictions and departments prior to relocating or upgrading any water facilities. The proposed Project will utilize existing utility lines (with proposed upgrades described above) and providers. Therefore, the proposed Project will not require the relocation or construction of new or expanded utilities facilities, and Project impacts would be less than significant and no further analysis is required.

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

Less Than Significant Impact. The Project site falls within the LADWP service area; the LADWP service area receives water from four primary sources: the Los Angeles Aqueducts, local groundwater supplies, the State Water Project, and the Colorado River Aqueduct. These primary sources are being supplemented by recycled water, which is becoming a larger part of the LADWP water supply portfolio. In 1991, LADWP began implementing water conservation measures, which despite the continued population growth in the City of Los Angeles, have been successful in reducing overall water demand levels. According to the LADWP 2015 Urban Water Management Plan (UWMP)¹⁰⁷, LADWP will be able to reliably provide water to its customers through the 25-year period covered by the 2015 UWMP through current water supplies, planned future water conservation, and planned future water supplies.¹⁰⁸ The renovations, modernizations, and reconfigurations proposed as part of the Project would not significantly change the existing conditions of the Project site. No increase in student capacity is proposed as part of the Project, therefore the proposed Project would generate a water demand similar to existing conditions. Furthermore, the proposed Project would be required to comply with LAUSD Standard Conditions of Approval SC-GHG-1, SC-GHG-2, and SC-GHG-3, which are designed to minimize water loss. Therefore, sufficient water supplies are available to serve the Project and reasonably

¹⁰⁷ City of Los Angeles Department of Water and Power (LADWP). 2015 Urban Water Management Plan (UWMP), 2015.

¹⁰⁸ Ibid.



4. Environmental Checklist and Analysis

foreseeable future development during normal, dry, and multiple dry years, and Project impacts would be less than significant and no further analysis is required.

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

No Impact. Wastewater from the Project site is processed through the City of Los Angeles Collection Systems, Hyperion Sewershed.¹⁰⁹ The renovations, modernizations, and reconfigurations proposed as part of the Project would not significantly change the existing conditions of the Project site. No increase in student capacity is proposed as part of the Project, therefore demand on the existing sewer system, and percentage of the wastewater treatment providers capacity utilized by the high school would be similar to existing conditions. Additionally, site wide utilities upgrades include new sewer lines, which will likely improve the existing sewer system as opposed to degrading it. Therefore, since the Project site is an existing active high school Campus which is already served by the Hyperion Sewershed, the proposed Project would not increase the wastewater output of the high school site, and site wide utility upgrades are part of the proposed Project, the Project would have no impacts and no further analysis is required.

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

Less Than Significant Impact. Los Angeles Sanitation (LASAN) is responsible for the collection and removal of all solid waste products including refuse, recyclables, yard trimmings, horse manure, and bulky items, within the City of Los Angeles; refuse is sent to landfills, recyclables proceed to recycling centers, and green waste is turned into mulch, which is given away free of cost to City residents. Before refuse is sent to a landfill, it is first sent to the Central L.A. Recycling and Transfer Station (CLARTS). All City owned landfills are closed, therefore all landfill waste within the City proceeds from CLARTS to private landfills.¹¹⁰ The renovations, modernizations, and reconfigurations proposed as part of the Project would not significantly change the existing conditions of the Project site. No increase in student capacity is proposed as part of the Project, therefore the operation of the proposed project will likely generate solid waste at a level similar to existing conditions. Additionally, the proposed Project would comply with LAUSD Standard Conditions of Approval SC-USS-1 and SC-USS-3, which are designed to reduce solid waste during both construction/demolition and operation of the Project. Therefore, the proposed project would not generate solid waste in excess of State or local standards, in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Project impacts would be less than significant and no further analysis is required.

¹⁰⁹ City of Los Angeles. Sewer System Management Plan. Version 3.0. LA Sanitation and Environment. January. <https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf>. Accessed August 19, 2019

¹¹⁰ City of Los Angeles. Solid Resources. City of Los Angeles LA Sanitation and Environment website. https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s?_adf.ctrl-state=ymlflpief_226&_afzLoop=7503733362677689#!. Accessed August 19, 2019

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

Less Than Significant Impact. The proposed Project would not generate substantial amounts of solid waste and the Project would comply with applicable federal, State, and local statutes and regulations related to solid waste. No increase in student capacity is proposed as part of the Project, therefore the operation of the proposed Project will likely generate solid waste at a level similar to existing conditions; the proposed Project would comply with SC-USS-3, which requires an easily accessible area that services the entire school and is dedicated to the collection and storage of materials for recycling, including (at a minimum) paper, cardboard, glass, plastics, metals, and landscaping waste. The proposed Project would generate previously unaccounted for waste associated with construction and demolition, however construction would also comply with SC-USS-1 which requires the recycling, salvaging and/or reusing a minimum of 75% of the construction/demolition waste generated by weight. Therefore, Project impacts would be less than significant and no further analysis is required.

4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. WILDFIRE.				
Is the project located in or near state responsibility areas or lands classified as high fire hazard severity zones?				
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation:

LAUSD has not developed SCs for minimizing impacts to the environment associated with wildfire, as this resource topic was added to Appendix G of the CEQA Guidelines for use beginning in 2019.

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

Less Than Significant Impact. The proposed Project is not located in or near a State Responsibility Area.¹¹¹ However, the site is located within the incorporated City of Los Angeles Local Responsibility Area and is within a Very High Fire Hazard Severity Zone (VHFHSZ) CalFire recommendation area.¹¹² The Project site would continue to be used as a public school. The proposed Project would not impair an adopted emergency response plan or emergency evacuation plan since no increase in student capacity is proposed and no changes to existing site access and circulation are proposed as part of the Project. Thereby, while the Project site is within a local responsibility area VHFHSZ, impacts would be similar to existing conditions. Therefore, Project impacts would be less than significant and no further analysis is required.

¹¹¹ CalFire. 2007. California Department of Forestry and Fire Protection (CalFire). Fire and Resource Assessment Program (FRAP). Fire Hazard Severity Zones in State Responsibility Area (SRA), Los Angeles County. <https://osfm.fire.ca.gov/divisions/wildfire-prevention-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/>. Accessed August 16, 2019.

¹¹² CalFire. 2011. California Department of Forestry and Fire Protection (CalFire). Very High Fire Hazard Severity Zones in LRA, as recommended by CalFire. Los Angeles. https://osfm.fire.ca.gov/media/5830/los_angeles.pdf. Accessed August 16, 2019.

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- 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?**

Less Than Significant Impact. The Project site is located on a hillside within the incorporated City of Los Angeles local responsibility area and is within a VHFHSZ CalFire recommendation area.¹¹³ The main Campus is terraced into different graded areas varying in elevation from approximately +390 feet to +400 feet MSL. The Campus eastern parcel, across Lincoln Park Avenue, ranges from approximately +447 feet MSL to +465 feet MSL. The Campus improvements as part of the Project would not significantly change the existing conditions of the site in regard to slope, prevailing winds, or other factors that could exacerbate wildfire risks. Additionally, the proposed Project includes site wide utilities upgrades such as new separate fire water lines and electrical and low voltage upgrades that would likely decrease the wildfire risk associated with the Project site. Therefore, the Project would not exacerbate wildfire risks. Project impacts would be less than significant and no further analysis is required.

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

Less Than Significant Impact. The existing school Campus is located within a developed urban environment and no increase in student capacity is proposed nor would there be changes to the existing street network as part of the Project. No new infrastructure installation such as roads, fuel breaks, emergency water sources, power lines, are proposed as part of the Project that could increase fire risk. Therefore, Project impacts would be less than significant and no further analysis is required.

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

Less Than Significant Impact. The Project site is located on a hillside, but site drainage changes are not part of the proposed Project. The Project site is located within the Northeast Los Angeles Hillside Zone Ordinance (No. 180,403; effective date: January 16, 2009) which established new regulations for properties in the adopted hillside area boundary in the Northeast Los Angeles Community Plan. These regulations focus on size, height, retaining walls and grading limitations.¹¹⁴ Additionally, various safety conditions will be improved, landscape and hardscape improvements will be made, and site wide utilities upgrades will be installed as part of the proposed Project. Therefore, with compliance with existing regulations and proposed site improvements and upgrades, the Project would not increase the exposure of people or structure to significant risks such as flooding or landslides. Project impacts would be less than significant and no further analysis is required.

¹¹³ CalFire. 2011. California Department of Forestry and Fire Protection (CalFire). Very High Fire Hazard Severity Zones in LRA, as recommended by CalFire. Los Angeles. https://osfm.fire.ca.gov/media/5830/los_angeles.pdf. Accessed August 16, 2019.

¹¹⁴ City of Los Angeles. ZI No. 2399 Northeast Hillside Zone Change Ordinance. Ordinance No. 108,403 Effective Date: January 16, 2009. <http://zimas.lacity.org/documents/zoneinfo/ZI2399.pdf>. Accessed May 2019.



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

Explanation:

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

Less Than Significant Impact With Mitigation Incorporated. As discussed in Section IV, Biological Resources, the Project site is an existing active high school Campus; therefore, sensitive species that have the potential to occur onsite are limited to birds and bats that may utilize buildings/urban vegetation. In general, the habitat quality for native wildlife and plant species on site is poor. With the implementation of SC-BIO-1 through SC-BIO-4 and MM-BIO-1, the Project would not have a significant adverse impact on a wildlife or plant species or community.

As noted in Section V, Cultural Resources, the Project site is located within three historic districts. No CRHR eligible archaeological sites are recorded within or near the Project site. As part of the record search, the Native American Heritage Commission (NAHC) was contacted on September 4, 2019 to request a Sacred Lands file search. The NAHC responded on September 13, 2019 that the results are positive for Native American tribal cultural resources as being within the proposed Project study area. However, with the implementation of SC-CUL-1 through SC-CUL-5, SC-CUL-8, SC-CUL-10, SC-CUL-11, SC-TCR-1 and SC-TCR-2 Project impacts would be less than significant and no further analysis is required.

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- 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 with Mitigation Incorporated. The potential for cumulative impacts was previously evaluated in the SUP Program EIR that is applicable to all projects implemented under the SUP including the proposed Project. The proposed Project, along with all other SUP-related projects, are required to comply with specific design standards and sustainable building practices. Certain standards assist in reducing environmental impacts, such as the California Green Building Code (CALGreen Code)¹¹⁵, LAUSD SC, and the Collaborative for High-Performance Schools (CHPS) criteria.¹¹⁶

The proposed Project includes upgrades to an existing public school and no change in student capacity would result from implementation of the proposed Project. As identified in the preceding analysis in Section 4, with implementation of the SCs (as identified by resource topic, in the previous response as well as in Section 4 above), MM-BIO-1, and compliance with existing regulations, the proposed Project would not result in any significant adverse impacts which could contribute to a cumulatively considerable impact. Therefore, Project contribution to cumulative impacts would be less than significant and no further analysis is required.

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

Less Than Significant Impact. The Project includes upgrades to an existing public school and no change in student capacity would result from implementation of the proposed Project. As described and analyzed throughout this document, the proposed Project would have a less than significant impact regarding factors that could directly or indirectly cause substantial adverse effects on human beings. Impacts would be less than significant. No mitigation or further analysis is required.

¹¹⁵ California Green Building Standards Code, Title 24, Part 11.

¹¹⁶ The Board of Education’s October 2003 Resolution on Sustainability and Design of High Performance Schools directs staff to continue its efforts to ensure that every new school and modernization project in the District, from the beginning of the design process, incorporate CHPS (Collaborative for High Performance Schools) criteria to the extent possible.



5. List of Preparers

5.1 LEAD AGENCY

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

Gwenn Godek, CEQA Adviser, Contract Professional

Eimon Smith, CEQA Project Manager, Contract Professional

Christy Wong, Assistant CEQA Project Manager, Contract Professional

5.2 CEQA CONSULTANT

Tetra Tech

Randy Westhaus, P.E.

Renee Longman, AICP, LEED AP

Jim Steele, P.G., C.E.G., C.H.G.

Monique O’Conner

Victor Velazquez

Kevin Fowler, INCE

Julia Mates

Jenna Farrell

Steve Dodson, P.G.

Paula Fell

Michelle Burson

Chris Hulik

5. List of Preparers

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Appendix

Appendices are on CD

- A. Historic Resource Assessment Report
- B. Site Circulation Report
- C. Arborist Report
- D. Air Quality: CalEEMod Emission Results
- E. Cultural Resources Record Search
- F. Preliminary Geotechnical Investigation
- G. Phase I Environmental Site Assessment
- H. Preliminary Environmental Assessment- Equivalent
- I. Noise Modeling Results

Appendix

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