Final

Environmental Impact Report
Central Region High School No. 16
SCH No. 2006061006

Prepared for:

Los Angeles Unified School District
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September 2007

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EXECUTIVE SUMMARY

INTRODUCTION

The Los Angeles Unified School District (LAUSD) proposes to construct a new high school in the City of Los Angeles (proposed project). All projects within the State of California are required to undergo an environmental review to determine the environmental impacts associated with implementation of the proposed project in accordance with the California Environmental Quality Act (CEQA).[1] The proposed project is intended to relieve school overcrowding consistent with the New School Construction Program and the *Facilities Master Plan* that are explained in Chapter 1 of this Environmental Impact Report (EIR). The proposed project would relieve overcrowding at Manual Arts High School and Santee Education Complex (formerly known as South Los Angeles Area New High School No. 1), located in LAUSD's Central Region.

PROJECT OBJECTIVES

LAUSD's *Facilities Master Plan* sets forth long-term goals for school facilities including providing a kindergarten through 12 neighborhood school seat for every student in LAUSD and reducing class sizes to agreed upon limits in all grade levels.

Implementation of the proposed project is intended to fulfill the following objectives:

- Provide a neighborhood school for grades 9 through 12 to relieve overcrowding and restore pre-2002 classroom size norms at existing schools within the Central Planning Region, specifically at Manual Arts High School and Santee Education Complex:
- Return schools to a traditional, two-semester calendar;
- Create schools that are centers of community engagement both during and outside of normal operating hours;
- Eliminate involuntary busing of students as soon as possible;
- Reduce reliance on portable classrooms as soon as possible;
- Maximize the use of limited bond funds to provide the needed classroom facilities;
- Avoid displacement of existing residences and businesses where feasible;

[1] California Environmental Quality Act (CEQA), Public Resources Code (PRC), §21000 et al., amended 2006.

- Maintain traditional classroom instruction hours for high school students from approximately 7 A.M. to 3 P.M.;
- Build and maintain schools that reflect the wise and efficient use of limited land and public resources;
- Maintain or increase existing opportunities for after-school athletic and extra-curricular activities; and
- Provide playfields for community use outside normal school operating hours.

PROJECT LOCATION AND SETTING

The proposed project site is located in the City of Los Angeles approximately five miles south of downtown Los Angeles. The proposed project site is approximately 0.6 mile east of Interstate 110 (I-110, Harbor Freeway) and approximately 2.7 miles south of Interstate 10 (I-10, Santa Monica Freeway).[2] This site is generally bounded by East 52nd Street and East 53rd Street to the north, Avalon Boulevard to the east, East 54th Street to the south, and South San Pedro Street and Towne Avenue to the west.

The proposed project site is approximately 13.4 acres in size and is "L"-shaped. The proposed project site encompasses 28 parcels, and currently includes approximately 46 single-family and multi-family units on 20 parcels. The remaining parcels are occupied by commercial businesses that include a swap meet, and other retail and service uses; and an existing LAUSD school campus, the Johnson Opportunity High School.[3] This school currently serves 140 students attending grades 9 through 12. If the project were to be approved, students presently attending Johnson Opportunity High will be absorbed by existing schools in the area. A portion of East 53rd, an east-west alley and a north-south alley will have their easements vacated as part of the proposed project.

Surrounding land uses include commercial uses to the east along Avalon Boulevard and at the corner of South San Pedro Street and East 53rd Street. Single- and multi-family residential uses are located to the north and west of the project site along East 52nd Street, East 53rd Street, and Towne Avenue. The Los Angeles County Metropolitan Transportation Authority (LACMTA) currently operates a general vehicle repair facility directly south of the project site.[4]

PROJECT DESCRIPTION

The proposed project involves approximately 200,000 square feet of new building development, including 75 classrooms, a library/media center, a multi-purpose room, gymnasium, performing arts area, administration offices, and a food service area. This new development would primarily be located on the west and southwestern areas of the site. The proposed school would be divided into four learning communities. Each classroom building would be one- to three-stories in height. Playfields would be provided along Avalon Boulevard and East 52nd Street, and would include a

[2] Rand McNally and Company, *The Thomas Guide, Los Angeles and Orange Counties*, 2005 Edition.
[3] LAUSD, *Parcel Map*, February 23, 2006.
[4] ESA, Site visit, March 2, 2006.

EXECUTIVE SUMMARY

INTRODUCTION

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Surrounding land uses include commercial uses to the east along Avalon Boulevard and at the corner of South San Pedro Street and East 53rd Street. Single- and multi-family residential uses are located to the north and west of the project site along East 52nd Street, East 53rd Street, and Towne Avenue. The Los Angeles County Metropolitan Transportation Authority (LACMTA) currently operates a general vehicle repair facility directly south of the project site.[4]

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[2] Rand McNally and Company, *The Thomas Guide, Los Angeles and Orange Counties*, 2005 Edition.
[3] LAUSD, *Parcel Map*, February 23, 2006.
[4] ESA, Site visit, March 2, 2006.

football stadium and track field facilities with bleachers. Nighttime field lighting would be provided for evening sporting events. The proposed project also includes exterior safety lighting and a public address system.

PROPOSED PROJECT IMPACTS

As allowed by CEQA, this EIR focuses only on those environmental impact categories identified by LAUSD as having "potentially significant" impacts during the notice of preparation (NOP), scoping process, and public review period for the Initial Study (IS).[5] Other environmental concerns that were found to have no impact or a less than significant impact are, therefore, not discussed in this document. Environmental factors are listed by the level of significance of their impacts below in **Table ES-1** as determined in the IS (see Appendix A).

TABLE ES-1
SIGNIFICANCE OF ENVIRONMENTAL PARAMETERS IN INITIAL STUDY

No Impact	Less than Significant Impact	Less Than Significant Impact With Mitigation	Potentially Significant Impact
Agriculture Resources	Biological Resources		Air Quality
Mineral Resources	Geology and Soils		Noise
	Hazards/Hazardous Materials		Cultural Resources
	Hydrology and Water Quality		Aesthetics
	Population and Housing		Pedestrian Safety
	Public Services		Transportation/Traffic
	Recreation and Parks		
	Utilities and Service Systems		

Unavoidable Adverse Impacts

As described in Chapter 3 of this EIR, implementation of the proposed project would not result an unavoidable and adverse impact, with the exception of impacts from project-related operational noise, and cumulative impacts to air quality and noise, summarized below.

Cumulative Impacts

As described in Chapter 3 of this EIR, a significant and unavoidable cumulative air quality impact as a result of NO_x and ROC emissions, which would still exceed the SCAQMD thresholds, would occur as a result of the project; as a result, regional construction impacts would remain cumulatively considerable. Also, as described in Chapter 3 of this EIR, significant and unavoidable project and cumulative noise impacts would occur, as a result of project-related operational noise from mobile sources and the project's contribution to cumulative noise levels.

[5] *CEQA Guidelines,* CCR, Title 14, Chapter 3, Article 5. §15063, 2006.

Growth-Inducing Impacts

The proposed project would not induce more growth, but it would accommodate the population growth that already has occurred and which will continue to occur over time. The infrastructure improvements that would occur on the proposed project site would be used for the sole purpose of serving the proposed project. The proposed project site is located within an urbanized area and is supported by existing utility infrastructure and roadways. Implementation of the proposed project would not be growth-inducing and would not create the need for additional housing or infrastructure. The intent of the proposed project is to alleviate the overcrowded conditions and redistribute the existing student population within LAUSD Local District 5 (Central Region), specifically at Manual Arts High School and Santee Education Complex. Implementation of the proposed project would not directly or indirectly result in substantial population growth in the area. No impact to population growth would occur, and no mitigation measures are required.

Mitigation Measures

A summary of the impacts, mitigation measures, and residual impacts for the proposed project is are provided in Table ES-2 at the end of this chapter.

ALTERNATIVES TO THE PROPOSED PROJECT

As discussed in Chapter 4, the alternatives to the proposed project, with the exception of the mandatory No Project Alternative, were selected due to their potential to achieve basic project objectives and to lessen or avoid significant environmental effects of the proposed project discussed in the EIR. The alternatives considered in the analysis include:

Alternative 1: No Project/No Build Alternative

Under the No Project/No Build Alternative, the proposed project would not be constructed. The current site would remain in its present condition, including single- and multi-family residences, commercial spaces, the swap meet, and LAUSD's Johnson Opportunity High School. Students living in the vicinity of the proposed project would continue to attend Manual Arts High School and Santee Education Complex. Demand for additional two-semester high school seats would not be met and overcrowding would continue at the relief schools mentioned above. In general, with fewer impacts than the proposed project, this alternative would not attain any of the project objectives provided on pages ES-1 and ES-2.

Alternative 2: No Project/Reasonably Foreseeable Development

Under this alternative, if the proposed project were not developed on the proposed site, the site could be developed with other land uses consistent with the zoning. The zoning for the site is M1-1, *Light Manufacturing*; C2-1VL, *General Commercial*; and R2-1, *Low-Medium Residential*.[6] The Reasonably Foreseeable Development Alternative would generally keep the existing land uses for the site with a slight intensification of the residential land uses, since the

[6] City of Los Angeles, *Zoning Information and Map Access System*, http://zimas.lacity.org, accessed on February 27, 2006.

need for residential land uses is occurring at a greater rate than the need for manufacturing/commercial land uses.[7] There are currently approximately 46 residential units located on the proposed project site. At full buildout, the proposed project site could be occupied by up to an additional five residential units for a total of 51 units. High school students in the Central Region Planning Area would continue to attend the relief schools, which are currently overcrowded. Additional school facilities would not be constructed elsewhere to provide relief seats. The non-residential uses including the Johnson Opportunity High School would likely remain in use. Furthermore, industrial and commercial uses would likely continue, although those buildings or structures would likely deteriorate over time with continued use without proper upkeep and maintenance. Furthermore, some industrial or commercial structures may be vacated or abandoned and might become unsafe and create hazards to the surrounding properties and the neighborhood. In general, this alternative would not attain any of the project objectives provided on pages ES-1 and ES-2.

Alternative 3: Reduced Project Alternative

Under this alternative, a smaller high school would be built on the proposed project site. The remaining project site would be open space. The Reduced Project Alternative would provide approximately 1,645 two-semester seats compared to 2,025 two-semester seats under the proposed project, which is approximately 81.25 percent of the proposed 2,025 seats. The Reduced Project Alternative would include a stadium that would not accommodate Level IV (competitive) athletics. The 400 high school students that would not be accommodated by this alternative would continue to attend the relief schools that are currently overcrowded. ***This is the environmentally superior alternative, but in general, it would attain few of the project objectives provided on pages ES-1 and ES-2.***

Alternative Site 4

In selecting potential sites for the proposed high school, LAUSD considered sites within a target search area (see Figure 4.1). Site selection is also based on whether the site would fulfill the basic project objectives and LAUSD guidelines for school site size and location.

LAUSD reviewed a total of five potential sites, of which the proposed project site was chosen as the most feasible alternative. Alternative Sites 1 through 3 were eliminated from consideration, as described in Section 4.3.1 above. Alternative Site 4 was determined to be suitable and analyzed for potential impacts. It is a 19.5-acre site generally bounded by East 53rd Street to the north, East 55th Street to the south, Avalon Boulevard to the east, and San Pedro Street located to the west. This site would include the existing Johnson Opportunity School and swap meet.

Alternative Site 4 is a site that was suggested by the community; this site includes a LACMTA maintenance facility, the existing Johnson Opportunity High School, the swap meet, and commercial land uses. As described above, Alternative Site 4 is located at the intersection of East 53rd Street and Avalon Boulevard in the southern portion of the target search area, and is

[7] Southern California Association of Governments. *2004 Regional Transportation Plan/Growth Vision: Socio-Economic Forecast Report,* June 2004.

controlled by another public agency. Additionally, East 54th Street, considered by the General Plan to be a collector street, transverses the site. This location would require abandonment of East 54th Street, which would in turn require a General Plan Amendment, and the relocation of a natural gas pipeline located under East 54th Street. In addition, this site is now being considered as the future site of the South Los Angeles Wetlands Park.

AREAS OF CONTROVERSY

The *CEQA Guidelines* require that an EIR summary identify areas of controversy known to the lead agency, including those issues raised by other agencies and the public. Some issues of concern were expressed at a public scoping meeting for the Draft EIR and through responses to the NOP:

- Potential adverse impacts of proposed project on pedestrian safety.
- Potential traffic impacts of the proposed project on nearby residences.

ISSUES TO BE RESOLVED

Section 15123(b)(3) of the *CEQA Guidelines* requires that an EIR present issues to be resolved by the lead agency.[8] These issues include the choice among alternatives and whether or how to mitigate significant impacts. The major issues to be resolved for the proposed project include decisions by the LAUSD, as the lead agency, as to whether:

- This EIR adequately describes the environmental impacts of the proposed project;
- The recommended mitigation measures should be adopted or modified;
- Additional mitigation measures need to be applied to the proposed project;
- Feasible alternatives exist that would achieve LAUSD's objectives and would reduce potentially significant environmental impacts;
- Significant unavoidable impacts would occur if the project is implemented; and
- The proposed project should or should not be approved.

[8] *CEQA Guidelines*, CCR, Title 14, Division 6, Chapter 3, §15123(b) (3), amended 2005.

TABLE ES-2
SUMMARY OF IMPACTS AND MITIGATION FOR
CENTRAL REGION HIGH SCHOOL NO. 16

Impact	Level of Significance Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
3A. Aesthetics			
Impact 3A1: Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.	LTS	None required	LTS
Impact 3A2: Shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9 A.M. to 3 P.M. Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9 A.M. to 5 P.M. Pacific Daylight Time (between early April and late October).	N	None required	N
Impact 3A3: Result in a cumulatively considerable aesthetic impact.	LTS	None required.	LTS
3B. Air Quality			
Impact 3B1: Violate an air quality standard or contribute to an existing or projected air quality violation.	LTS	None required.	LTS
Impact 3B2: Expose sensitive receptors to substantial pollutant concentrations.	LTS	None required.	LTS
Impact 3B3: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors).	S	**M-3B.1** *If the electrical connections are available, petroleum powered construction equipment shall utilize electricity from power poles rather than temporary diesel power generators and/or gasoline power generators.* **M-3B.2** *On-site mobile equipment shall be powered by alternative fuel sources (for example, methanol, natural gas, propane or*	S

N = No Impact
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TABLE ES-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION FOR
CENTRAL REGION HIGH SCHOOL NO. 16

			butane), as feasible.	
		M-3B.3	*All construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.*	
		M-3B.4	*Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 30 minutes. Diesel-fueled commercial motor vehicles with gross vehicular weight ratings of greater than 10,000 pounds shall be turned off when not in use for more than five minutes.*	
3C. Cultural Resources				
Impact 3C1: Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.	LTS	None required.		LTS
Impact 3C2: Result in cumulatively considerable impact with respect to cultural resources.	N	None required.		N
3D. Noise				
Impact 3D1: Expose people to or generate noise levels in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies.	S	**M-3D.1**	*LAUSD's construction contractor shall comply with Los Angeles Municipal Code Section 112.05 such that construction activities shall be performed in accordance with LAUSD's and applicable City of Los Angeles noise standards.* *Noise Ordinance Section 41.40 of the Los Angeles City Municipal Code restricts construction noise to between the hours of 7 A.M. and 9 P.M., Monday through Friday (8 a.m. to 6 p.m. on Saturday and national holidays). No construction is allowed on Sundays. No noise-intensive construction or repair work shall be performed between the hours of 9 P.M. and 7 A.M. on any weekday, or before 8 A.M. or after 6 P.M. on any Saturday, or at any time on Sundays or federal holidays.* *The Noise Ordinance, Municipal Code Section 41.40(b), also*	S

TABLE ES-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION FOR
CENTRAL REGION HIGH SCHOOL NO. 16

Impact	Level of Significance Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		permits an exception for various construction activities, including those that are "effected with the public interest." In the event that the construction contractor requires a waiver from the specifications of the Noise Ordinance, the construction contractor may in a written application request the Board of Police Commissioners to grant a waiver from the time limitations for construction activity.	
		M-3D.2 *LAUSD's construction contractor shall require all construction equipment, stationary and mobile, be equipped with properly operating and maintained muffling devices.*	
		M-3D.3 *LAUSD's construction contractor shall provide advance notification to adjacent property owners and post notices adjacent to the proposed project site with regard to the schedule of construction activities.*	
		M-3D.4 *LAUSD's construction contractor will place all stationary construction equipment and vehicle staging areas to be placed such that noise is directed away from sensitive receptors, as feasible.*	
		M-3D.5 *LAUSD's construction contractor shall implement the use of sound blankets along the northern and western portions of the proposed project's property lines located between the proposed site and the adjacent residential units. In addition, sound blankets shall be located long the proposed project's property line with Avalon Boulevard to reduce noise levels at residential units set back from Avalon Boulevard. Such attenuation*	

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			measures could be expected to reduce noise levels by 8 to 10 dBA.	
		M-3D.6	*LAUSD shall incorporate sound barriers, or other special design features, to ensure that exterior ambient noise levels do not exceed 67 dBA Leq along the portion of the project site bordering Avalon Boulevard. This feature shall include, but is not limited to, an eight-foot high wall along the portion of the project site bordering Avalon Boulevard.*	
Impact 3D2: Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the proposed project.	S	No feasible mitigation measures.		S
Impact 3D3: Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the proposed project.	LTS	See Mitigation Measures M-3D.1 through M-3D.5 above.		LTS
Impact 3D4: Expose persons to or generate excessive groundborne vibration or groundborne noise levels.	LTS	None required		LTS
Impact 3D5: Result in cumulatively considerable impact with respect to noise.	S	No feasible mitigation measures.		S
3E. Pedestrian Safety				
Impact 3E1: Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible land uses.	LTS	**M-3E.1**	*Four months prior to opening of the proposed school, LAUSD's OEHS shall contact the Los Angeles Department of Transportation (LADOT) to coordinate the installation of signage to create passenger loading zones. The signage for the passenger loading zones would state, "Passenger Loading only 6:30 A.M. – 9 A.M. and 1:30 P.M. – 4 P.M., and 2-Hour Parking 9 A.M. to 1:30 P.M.," or "15-Minute Parking 7 A.M. to 5 P.M. on School Days," or provide other notice as deemed appropriate by LAUSD. The precise locations and lengths of the restricted on-street parking zones would be jointly determined by LAUSD*	LTS

TABLE ES-2 (Continued)
SUMMARY OF IMPACTS AND MITIGATION FOR
CENTRAL REGION HIGH SCHOOL NO. 16

Impact	Level of Significance Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		and LADOT.	
Impact 3E2: Create unsafe routes for students walking from local neighborhoods.	LTS	**M-3E.2** *Four months prior to opening the proposed high school, LAUSD's OEHS shall contact LADOT to coordinate the installation of appropriate traffic controls, school warning and speed limit signs, school crosswalks, and pavement markings.* **M-3E.3** *Prior to opening the proposed high school, LAUSD~~'s OEHS shall contact LADOT to coordinate the installation of~~* ***shall install*** *a traffic signal at the intersection of Avalon Boulevard and East 52nd Street.* **M-3E.4** *Six months prior to opening of the proposed high school, LAUSD's OEHS shall contact LADOT's citywide traffic control program section for preparation of a final "Pedestrian Routes to School Plan" for the safe arrival and departure of students in accordance with the "School Area Pedestrian Safety Manual."[9] The plan shall include a "Pedestrian Routes to School Map" for distribution to all students and parents. Parents and students shall be notified to use the existing traffic safeguards. The Map shall encourage students to cross San Pedro Street at East 53rd Street for travel west of the project site.*	LTS
Impact 3E3: Result in cumulatively considerable impact with respect to pedestrian safety.	LTS	See Mitigation Measures M-3E.1 through M-3E.4, above.	LTS

[9] Caltrans, *School Area Pedestrian Safety Manual*, 1997.

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3F. Traffic

Impact 3F1: Cause a substantial increase in traffic in relation to the existing traffic load and capacity of the street system (for example, result in a substantial increase in either the number of vehicle trips, the V/C ratio on roads, or congestion at intersections).	S	**M-3F.1**	*LAUSD shall contribute impact-based fair share funding towards the installation of an ATSAC system at the intersection of Avalon Boulevard and Slauson Avenue. This mitigation measure appears to be feasible, provided that the responsible agency, LADOT, considers it and agrees to enforce it.*	LTS
		M-3F.2	*LAUSD shall coordinate with LADOT to develop a Neighborhood Traffic Management Plan for the roadway segments of East 52nd Street between San Pedro Street and Towne Avenue; Towne Avenue, north of East 52nd Street and East 53rd Street, west of San Pedro Street. This mitigation measure appears to be feasible, provided that the responsible agency, LADOT, considers it and agrees to enforce it.*	
Impact 3F2: Exceed, either individually or cumulatively, a LOS standard established by the county congestion management agency for designated roads or highways.	LTS	None required.		LTS
Impact 3F3: Result in inadequate parking capacity.	LTS	None required.		LTS
Impact 3F4: Result in a cumulatively considerable impact with respect to traffic.	LTS	See Mitigation Measures M-3F.1 and M-3F.2 above.		LTS

CHAPTER 1.0
INTRODUCTION

1.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

Los Angeles Unified School District (LAUSD) is proposing to construct a high school in the Southeast Los Angeles Community Plan area in the City of Los Angeles. In accordance with the California Environmental Quality Act (CEQA), all discretionary projects within the State of California are required to undergo environmental review to determine the potential environmental impacts associated with implementation of the project.[1] LAUSD is the Lead Agency[2] for the proposed Central Region High School No. 16 (proposed project), and, as such, is required to conduct an environmental review to analyze the potential environmental effects associated with the proposed project described in this Environmental Impact Report (EIR).

1.2 USE OF THE PROGRAM EIR

LAUSD has prepared a Program EIR (PEIR), which provides environmental review for the New School Construction Program (Program) in accordance with the requirements of CEQA.[3] The New School Construction Program is a multi-phased program. The objective of the program is to provide approximately 180,000 new classroom seats by the end of 2013.[4] On June 8, 2004, the Board of Education certified the PEIR that provides environmental review for the proposed New School Construction program in accordance with the requirements of CEQA.[5] The PEIR provides general analysis and guidance on the Program while project specific analysis is provided with later CEQA documents through a process known as "tiering."[6] The Central Region High School No. 16 EIR provides more specific, project-level analysis. This document incorporates the PEIR by reference and concentrates on site-specific issues related to the proposed project. The PEIR is available for review on the LAUSD Facilities Services Division website (http://www.laschools.org/documents).

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1 California Environmental Quality Act (CEQA), Public Resources Code (PRC), Section 21000 et seq.

2 Under the *CEQA Guidelines* Section 15367, a Lead Agency is the public agency which has the principal responsibility for carrying out or approving a project.

3 Los Angeles Unified School District (LAUSD), Office of Environmental Health and Safety (OEHS). New School Construction Program, Final Program Environmental Impact Report (PEIR) (incorporates the New School Construction Program, Draft PEIR), Published May 2004. Board Certified June 8, 2004.

4 LAUSD, *Strategic Execution Plan*, January 2007.

5 LAUSD, Office of Environmental Health and Safety (OEHS), *New School Construction Program, Final Environmental Impact Report*, Board Certified June 8, 2004.

6 *Ibid*.

The PEIR also includes standard mitigation measures and related performance standards that LAUSD will apply to the proposed project to confirm that one or more measures or standards will effectively avoid or reduce particular environmental impacts.

1.3 AVAILABILITY OF THE ~~DRAFT~~ EIR

The Draft EIR for the proposed project ***was*** ~~will be~~ directly distributed to numerous agencies, organizations, interested groups and persons for comment during the comment period. The Draft EIR was also available at the following locations:

- LAUSD Office of Environmental Health and Safety, 1055 West 7th Street, 9th Floor, Los Angeles;
- LAUSD Office of Communications, 333 South Beaudry Avenue, Los Angeles;
- LAUSD, Local District 5, 2151 North Soto Street, Los Angeles;
- Johnson Opportunity High School, 333 East 54th Street, Los Angeles;
- Manual Arts High School, 4131 South Vermont Avenue, Los Angeles;
- ***Santee Education Complex*** ~~South Los Angeles Area New High School No. 1~~, 1921 South Maple Avenue, Los Angeles;
- 49th Street Elementary School, 750 East 49th Street, Los Angeles;
- Junipero Serra Branch Library, 4607 South Main Street, Los Angeles; and
- Vernon – Leon H. Washington Jr. Memorial Branch Library, 4504 South Central Avenue, Los Angeles.

In addition, the Draft EIR is available online at the LAUSD Facilities Services Division website (www.laschools.org/find-a-school). ***This Final EIR will be distributed directly to numerous agencies, organizations, interested groups, and persons as required, and will also be available at the above locations.***

1.4 PUBLIC MEETINGS AND HEARINGS

LAUSD ~~will~~ receive***d*** public input regarding the proposed project and the Draft EIR at a meeting at 6:00 pm on June 19, 2007 at 49th Street Elementary School (located at 750 East 49th Street, Los Angeles). Comments from the community and interested parties are ~~also~~ encouraged at all public hearings before the Facilities Committee and the Board of Education.

1.5 COMMENTS ON THE DRAFT EIR

~~If this document includes information necessary for to meet any statutory responsibilities related to the proposed project, LAUSD needs to know your views regarding the scope and content of the environmental information included in this Draft EIR. City departments, for example, may need to use the environmental documents prepared by LAUSD when considering any permit or other approvals necessary to implement the proposed project.~~

The environmental topics studied by LAUSD are provided in this ***Final*** ~~Draft~~ EIR. ~~If the topics of concern have already been identified for analysis, a public agency may not need to provide a response to this document.~~ The project description, location, and the environmental issues to be addressed in ***the*** ~~this~~ EIR are contained in the Executive Summary and in other relevant sections of this document. ***As required by CEQA, the Draft EIR was circulated for review and comment by public and interested parties for a period of 45 days after publication.***[7] Due to the time limits mandated by state law, ~~your responses~~ ***comments on the Draft EIR were required for submittal*** to LAUSD ~~**at the earliest possible date but not**~~ no later than July 30, 2007, which ~~is~~ ***was*** 45 days after publication of this document.

~~**Please send your r**~~ ***Responses were sent to*****:**

Grace Estevez ~~Juliet Arroyo~~, CEQA Project Manager/Consultant
Los Angeles Unified School District
Office of Environmental Health and Safety
1055 West 7th Street, 9th Floor
Los Angeles, CA 90017

The Board Meeting to act on this Final EIR is tentatively scheduled for September 11, 2007 and the decision regarding certification date will be held September 25, 2007. Please contact the Board Secretariat Office at (213) 241-7002 to confirm the date and time of the upcoming Board meeting.

1.6 FINAL EIR ORGANIZATION

The Final EIR is organized into the following chapters so the reader can easily obtain information about the project and its specific issues:

- ***Executive Summary - Presents a summary of the proposed project and alternatives, potential impacts and mitigation measures, and impact conclusions regarding growth inducement and cumulative impacts.***

- ***Chapter 1: Introduction - Describes the purpose and use of the EIR, provides a brief overview of the proposed project, and outlines the organization of the Final EIR.***

[7] *CEQA Guidelines*, (CCR), Title 14, Chapter 3, §15105(a), 2006.

- ***Chapter 2: Project Description and Environmental Setting - Describes the project location, project details, project setting, existing physical conditions, and the LAUSD's overall objectives for the proposed project.***

- ***Chapter 3: Environmental Analysis - Describes the existing conditions or setting before project implementation, methods and assumptions used in impact analysis, thresholds of significance, impacts that would result from the proposed project, and applicable mitigation measures that would eliminate or reduce significant impacts for each environmental issue.***

- ***Chapter 4: Alternatives Analysis - Evaluates the environmental effects of project alternatives, including the No-Project Alternative and Environmentally Superior Project Alternative.***

- ***Chapter 5: Other CEQA Considerations - Includes a discussion of issues required by CEQA that are not covered in other chapters. This includes unavoidable adverse impacts, impacts found not to be significant, irreversible environmental changes, and growth inducing impacts.***

- ***Chapter 6: Final EIR Introduction - Provides background on the review process for the NOP/IS and Draft EIR and provides guidelines about recirculation.***

- ***Chapter 7: Community Outreach and Public Review Process - Provides information related to the distribution of the NOP/IS and the Draft EIR, such as, where the documents are available, how many copies were distributed, and to whom.***

- ***Chapter 8: Response to Comments - Presents a discussion on the comments received from the Draft EIR public review period.***

- ***Chapter 9: Changes to the Draft EIR - Lists the changes made to the Draft EIR, where those changes are located, and what was changed.***

- ***Chapter 10: Mitigation Monitoring and Reporting Plan - This section provides a discussion and a table of the project impacts along with their mitigation measures. The table in this chapter provides who will be monitoring each impact to make sure the mitigation measure is being applied.***

- ***Chapter 11: Acronyms and Abbreviations - This chapter provides a list of all the acronyms and abbreviations used throughout the entire document.***

- ***Chapter 12: References - Shows a list of all the references used in each section.***

- ***Chapter 13: Report Preparation - Provides information on who participated in the production and creation of this EIR.***

- ***Appendices - Present data supporting the analysis or contents of this EIR. The appendices include the following:***

  Appendix A: ***Notice of Preparation (NOP)/ and Initial Study, and Comments Received on NOP/Initial Study***

  Appendix B: ***Air Quality Analysis***

  Appendix C: ***CO Hotspot Analysis***

  Appendix D: ***Historic Resources Assessment***

  Appendix E: ***Noise Worksheets***

  Appendix F: ***Traffic Study***

Additional documents referenced in this Final EIR that are not included in the appendices are available at LAUSD's Office of Environmental Health and Safety located at 1055 West 7th Street, 9th Floor, Los Angeles.

1.7 AGENCY COMMENTS

In compliance with CEQA Guidelines Section 15088, commenting agencies were provided with responses to their comments on the Draft EIR ten days prior to the tentatively scheduled certification date of September 25, 2007. Responses to all comments are provided in Chapter 8.0 of this Final EIR.

1.8 REVISIONS TO THE DRAFT EIR

Revisions to the Draft EIR resulting from public, agency, and staff review are summarized in Chapter 9.0. As provided in CEQA Guidelines Section 15088.5(a), the lead agency is authorized to include additional information in a Final EIR, including project modifications, changes in the environmental setting, additional data or other information. The modifications provided herein are minor in nature, and do not result in a new, substantial environmental impact or substantially increase the severity of an environmental impact already studied in the Draft EIR. The lead agency therefore determined that recirculation of the revised EIR was not required as specified in CEQA Guidelines Section 15088.5(b).

CEQA Guidelines Section 15088.5(b) does not require recirculation of an EIR as a matter of course, but only in limited circumstances, as follows:

1. ***When the new information shows a new, substantial environmental impact resulting either from the project or from a mitigated measure;***

2. ***When new information shows a substantial increase in the severity of an environmental impact (unless mitigation measures reduce the impact to insignificant);***

3. When new information shows a feasible alternative or mitigation measure that clearly would lessen environmental impacts, but it is not adopted; or

4. When the Draft EIR was so fundamentally inadequate that meaningful public review and comment were precluded.

The modifications throughout this Final EIR do not meet any of these criteria, as demonstrated in the Chapter 3.0 Environmental Analyses and supporting studies to this Final EIR.

CHAPTER 2.0

PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING

2.1 PROJECT BACKGROUND AND OBJECTIVES

Background

LAUSD is faced with a critical need to provide new school facilities to accommodate students in all grade levels. In its long-range projections for new school facilities developed in 2006, LAUSD identified a need to provide over 180,000 classroom seats. Constructing these new seats will allow LAUSD to accommodate anticipated enrollment growth and relieve overcrowding. The demand for additional classroom seats in LAUSD schools results not only from school enrollments that continue to grow and exceed two-semester capacities but also from the desire of LAUSD to: [1]

- Return all schools to a traditional, two-semester calendar;
- Eliminate involuntary busing;
- Eliminate Concept-6 elementary schools while maintaining current two-semester elementary schools on their current calendars;[2]

Objectives

The proposed project generally is intended to relieve school overcrowding. For the purposes of facilities planning, LAUSD divides the district into three planning regions, each containing one or more local districts, for a total of eight districts. The proposed project is located in the Central Planning Region, Local District 5, which encompasses portions of the City of Los Angeles. Local District 5 currently has 88 schools, including 14 high schools, 10 middle schools, and 64 elementary schools. The proposed project is intended to relieve overcrowding at Manual Arts High School and Santee Education Complex (formerly known as South Los Angeles Area New High School No. 1).

LAUSD established a target search area (see Figure 2.1) to facilitate the selection of a site for a new school particularly to relieve overcrowding at the aforementioned schools. The proposed project site was approved by the LAUSD Board of Education (LAUSD Board) as the preferred site for the proposed project on February 28, 2006.

1 LAUSD, *Strategic Execution Plan*, January 2007.

2 Concept-6 refers to multi-track, year-round instructional calendar.

SOURCE: LAUSD, 2006.

LAUSD CRHS No. 16 . 206048

Figure 2.1
Target Search Area

LAUSD's *Facilities Master Plan*[3] sets forth long-term goals for school facilities including providing a kindergarten through 12 neighborhood school seat for every student in LAUSD and reducing class sizes in all grade levels.[4]

Implementation of the proposed project is intended to fulfill the following project-specific objectives:

- Provide a neighborhood school for grades 9 through 12 to relieve overcrowding and restore pre-2002 classroom size norms at existing schools within the Central Planning Region, specifically at Manual Arts High School and Santee Education Complex;
- Return schools to a traditional, two-semester calendar;
- Create schools that are centers of community engagement both during and outside of normal operating hours;
- Eliminate involuntary busing of students as soon as possible;
- Reduce reliance on portable classrooms as soon as possible;
- Maximize the use of limited bond funds to provide the needed classroom facilities;
- Avoid displacement of existing residences and businesses where feasible;
- Maintain traditional classroom instruction hours for high school students from approximately 7 A.M. to 3 P.M.;
- Build and maintain schools that reflect the wise and efficient use of limited land and public resources;
- Maintain or increase existing opportunities for after-school athletic and extra-curricular activities; and
- Provide playfields for community use outside normal school operating hours.

2.2 PROJECT LOCATION AND SITE CHARACTERISTICS

Location

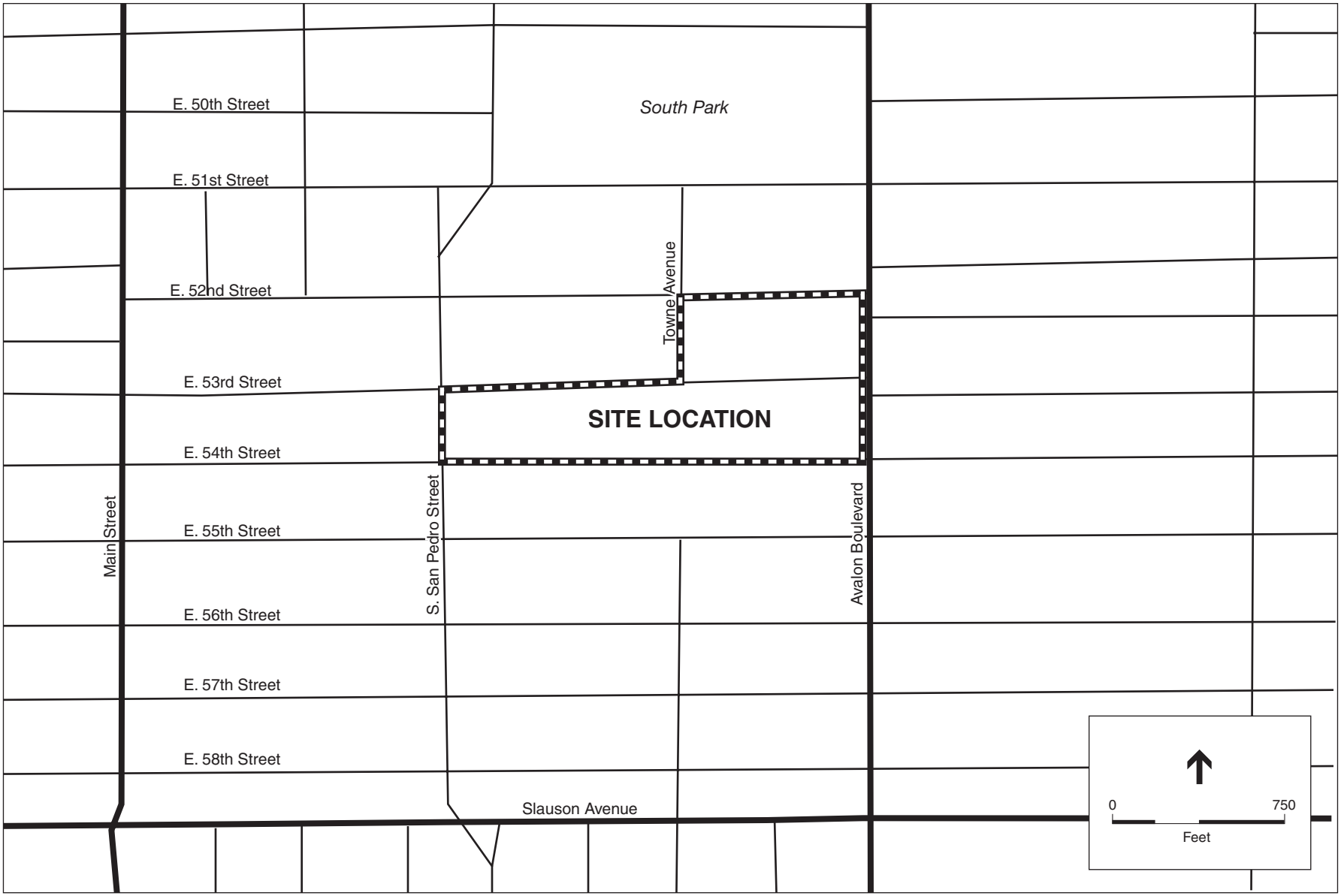
The proposed project site is located in the City of Los Angeles approximately five miles south of downtown Los Angeles. The proposed project site is approximately 0.6 mile east of Interstate 110 (I-110, Harbor Freeway) and approximately 2.7 miles south of Interstate 10 (I-10, Santa Monica Freeway).[5] Figure 2.2 depicts the regional location of the proposed project site. As shown in Figure 2.3, the proposed project site is "L" shaped and is generally bound by East 52nd Street and East 53rd Street to the north, Avalon Boulevard to the east, East 54th Street to the south, and South San Pedro Street and Towne Avenue to the west.

[3] LAUSD, *Facilities Master Plan*, December 1, 1997 (updated in June 2000).
[4] *Ibid.*
[5] Rand McNally and Company, *The Thomas Guide, Los Angeles and Orange Counties*, 2005 Edition.

SOURCE: Thomas Brothers Maps, 2006.

LAUSD CRHS No. 16 . 206048

Figure 2.2
Regional Location Map



SOURCE: Street Map USA, ESA 2006.

LAUSD CRHS No. 16 . 206048

Figure 2.3
Project Location

Existing Land Uses

The proposed project site is approximately 13.4 acres in size and is "L"-shaped. The proposed project site encompasses 28 parcels, and currently includes approximately 46 single-family and multi-family units on 20 parcels. The remaining parcels are occupied by commercial businesses, including a swap meet, and other retail and service uses; and an existing LAUSD school campus, the Johnson Opportunity High School.[6] This school currently serves 140 students attending grades 9 through 12.

If the project were to be approved, students presently attending Johnson Opportunity High will be absorbed by existing schools in the area. A portion of East 53rd, an east-west alley and a north-south alley will have their easements vacated as part of the proposed project. Figure 2.4 shows the parcel map.

Surrounding Land Uses

Surrounding land uses include commercial uses to the east along Avalon Boulevard and at the corner of South San Pedro Street and East 53rd Street. Single- and multi-family residential uses are located to the north and west of the project site along East 52nd Street, East 53rd Street, and Towne Avenue. LACMTA currently operates a general vehicle repair facility directly south of the project site.[7] Figure 2.5 shows existing and surrounding land uses.

General Plan Designation and Zoning

The proposed project site is within the Southeast Los Angeles Community Plan Area of the City of Los Angeles. The proposed project site has multiple land use designations including Residential Multiple Family, Commercial, and Industrial.8 The proposed project's site zoning designation is a mix of M1-1 (Light Manufacturing), C2-1VL (General Commercial), and R2-1 (Low-Medium 1 Residential).[9] Educational institutions are a permitted land use within a C2 zone, but not within an M1 or R2 zone. The proposed project site also is within the ZI-1941 Council District 9 Corridors Redevelopment Project area and the ZI-2128 Mid-Alameda Corridor State Enterprise Zone.[10] Educational uses have not been planned as part of either the redevelopment project area or the enterprise zone.

As permitted under Government Code Section 53094, the LAUSD Board of Education passed a resolution on October 11, 2005, exempting the proposed project from City of Los Angeles zoning ordinances.[11]

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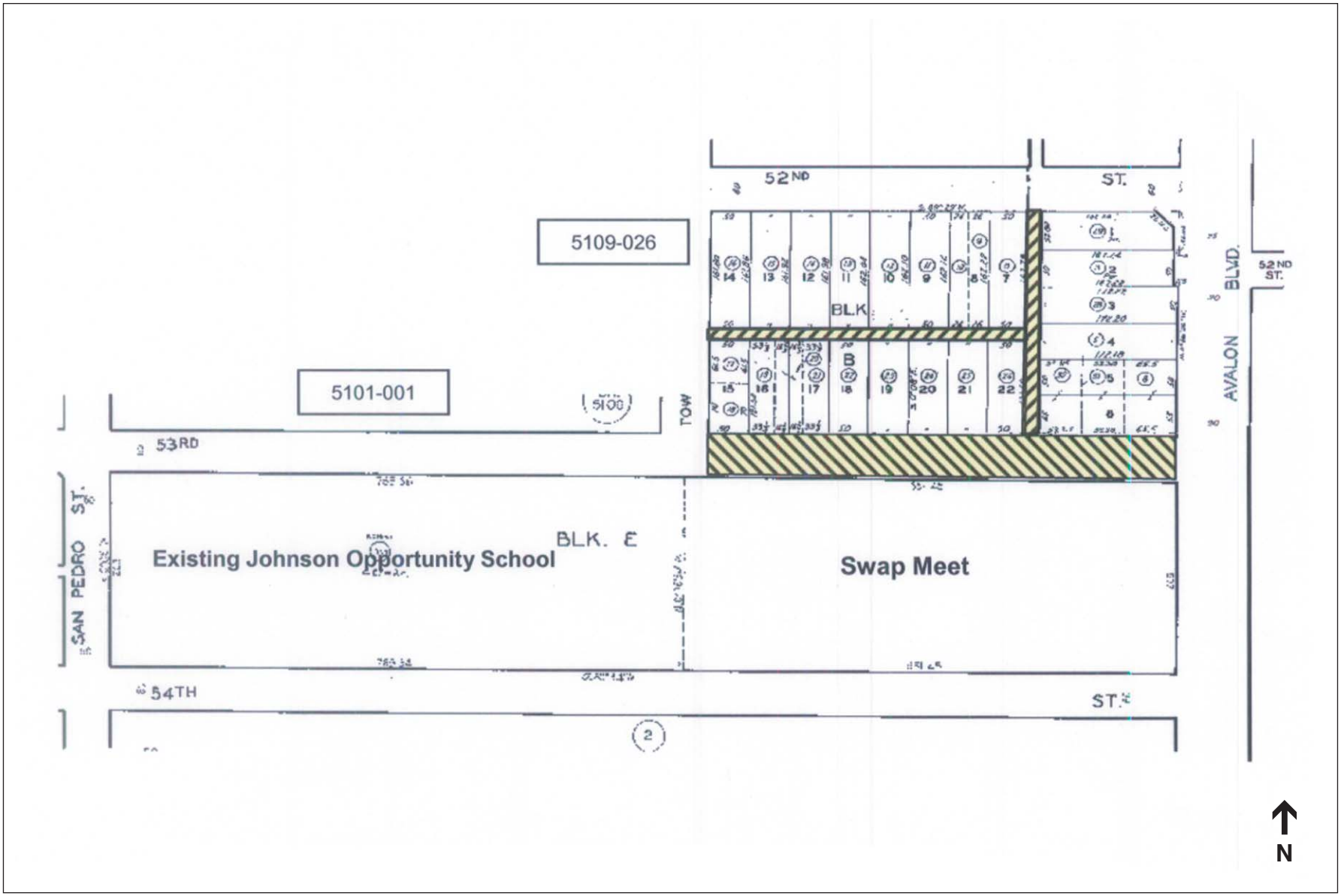
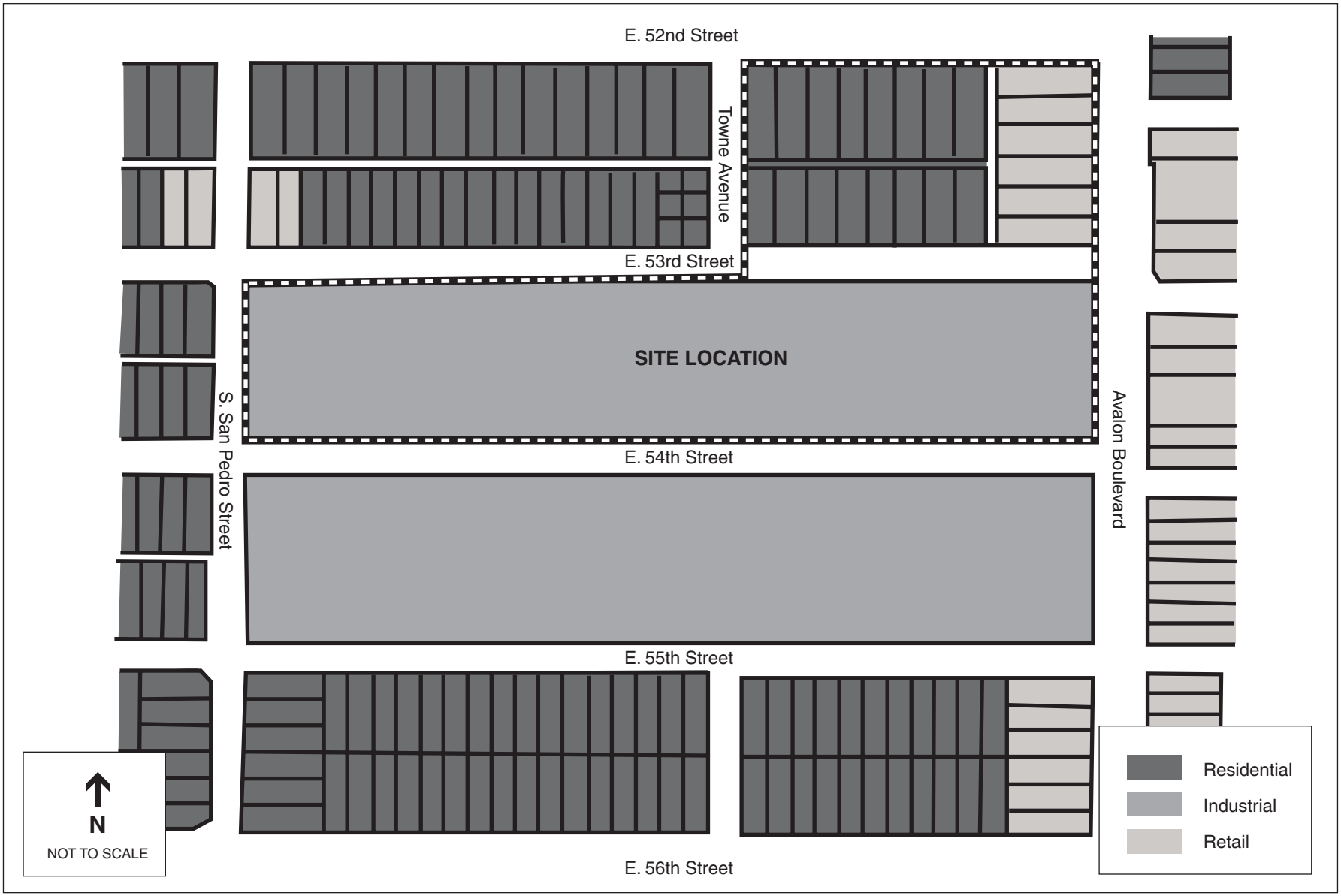
6 LAUSD, *Parcel Map*, February 23, 2006.
7 ESA, Site visit, March 2, 2006.
8 City of Los Angeles, *Southeast Los Angeles Community Plan*, March 22, 2000.
9 City of Los Angeles, *Zoning Information and Map Access System*, website http://zimas.lacity.org, accessed February 27, 2006.
10 *Ibid.*
11 LAUSD, Board of Education Revised Report No. 69-05/06: Subject: Resolution to Exempt LAUSD from Local Land Use Regulations Under Government Code Section 53094, received September 27, 2005, adopted October 11, 2005.



SOURCE: LAUSD, 2006.

LAUSD CRHS No. 16 . 206048

Figure 2.4
Parcel Map



SOURCE: Cty of Los Angeles Department of City Planning, 2006.

LAUSD CHHS No. 16 . 206048

Figure 2.5
Existing and Surrounding Land Uses

2.3 PROJECT COMPONENTS

Proposed Facilities

The proposed project involves approximately 200,000 square feet of new building development, including 75 classrooms, a library/media center, a multi-purpose room, gymnasium, performing arts area, administration offices, and a food service area. This new development would primarily be located on the west and southwestern areas of the site. The proposed school would be divided into four learning communities. Each classroom building would be one- to three-stories in height. Playfields would be provided along Avalon Boulevard and East 52nd Street. The proposed project includes a football stadium and track field facilities with bleachers. Figure 2.6 shows the proposed conceptual site plan. Nighttime field lighting would be provided for evening sporting events. The proposed project also includes exterior safety lighting and a public address system.

School Programs

Traditional High School - The proposed project would provide 2,025 two-semester seats for grades 9 through 12, and require approximately 180 full- and part-time faculty and staff. Current plans are to operate the proposed project on a traditional, two-semester, single-track calendar. The proposed project would relieve overcrowding at Manual Arts High School and Santee Education Complex. School hours would be from 8 A.M. to 3 P.M. with staff and students arriving on campus between approximately 7 A.M. and 8 A.M. and leaving between 3 P.M. and 5 P.M.

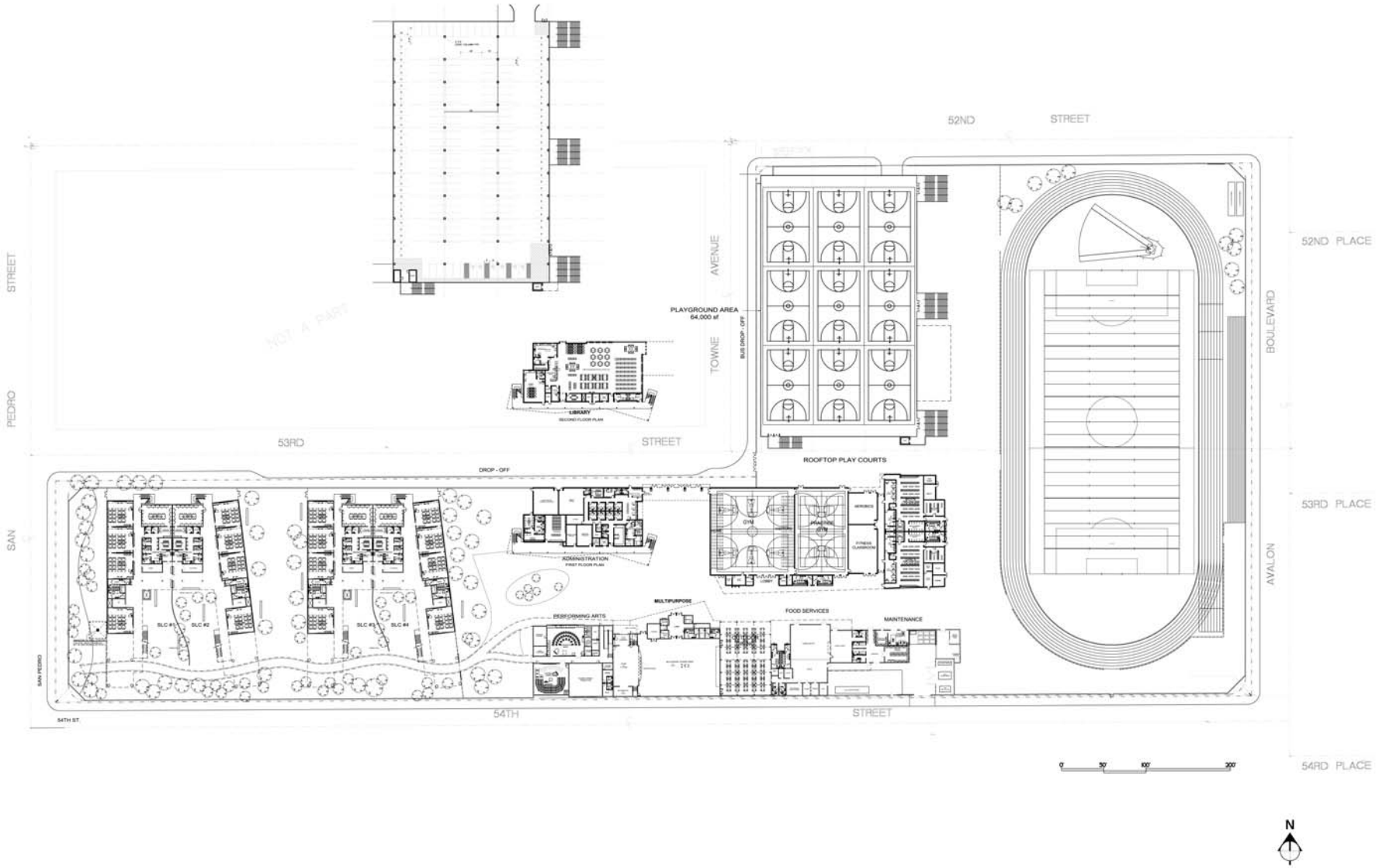
Summer School - Summer school sessions typically run between early July and mid-August from approximately 8 A.M. to 12:30 P.M. The number of students, faculty, and staff attending the summer sessions varies from year to year, depending on student need and available capacity.

Adult School - The proposed project may also potentially provide adult and continuing education programs, which would operate Monday through Thursday from 6 P.M. to 9:30 P.M., and on Saturdays from 8 A.M. to 2:30 P.M. The adult and continuing education program would not exceed the use of 15 classrooms or approximately 450 students.

School-Related Events - The proposed project would include after-school programs and extra curricular activities for the students. The proposed project may have occasional nighttime events during the school year; some of these events would be campus-wide, while others would be grade-specific using only a portion of the facilities.

Community Use - When the school facilities are not scheduled for school- or District-related events, the community may obtain a permit from the District to use the school facilities by means of the Civic Center Act.[12],[13] Events may include use of the athletic fields, gymnasium, multi-purpose room, and classrooms. Operation of the school facilities for community use may occur outside normal school operating hours, generally between 3 P.M. and 10 P.M., Monday through Friday and all day on Saturdays and Sundays. Community uses may vary depending on the community's needs and applications for permits.

[12] California Education Code, Section 38130 et seq., 2006.
[13] Application for permits can be obtained from LAUSD website, http://www.lausd.k12.ca.us/lausd/offices/btb/civic.html, accessed May 15, 2007.



SOURCE: Converse Consultants, 2006.

LAUSD CRHS No. 16 . 206048

Figure 2.6
Conceptual Site Plan

Access and Parking

The main access to the proposed project site is from East 53rd Street, including a curb-cut for student drop-off and pick-up. Vehicles would come from South San Pedro Street, flow eastbound onto East 53rd Street, continue north on Towne Avenue, and exit onto East 52nd Street or continue north on Towne Avenue. The bus drop-off would be located along Towne Avenue while the student drop-off would be located on the south-side curb of East 53rd Street. Up to three small school buses would be provided for students with special needs.

Parking for full- and part-time faculty and staff would be provided in a parking structure located at the southeast corner of East 52nd Street and Towne Avenue; the structure would provide approximately 188 parking spaces. The parking structure would be a single story up to approximately 14 feet in height with the top level used for play-courts. Access to the parking structure is currently proposed to be provided from East 52nd Street. There would be no visitor or student parking on-site. On-street parking is available to accommodate visitors to or students of the proposed school.

2.4 CONSTRUCTION

Construction of the proposed project would take approximately 30 months to complete. Construction is proposed to start in 2009 and to be completed in 2011. School occupancy is scheduled for the third quarter of 2011.

Upon acquisition, existing structures on the site would be demolished and existing vegetation cleared. If the removal of vegetation occurs during bird breeding season, the proposed project will comply with requirements of the Migratory Bird Treaty Act (16 U.S.C. §§ 703-712).[14] Existing building materials will be tested for the presence of asbestos and lead-based paint to determine the need for any special disposal requirements. If asbestos or lead is found, the material will be abated in accordance with SCAQMD Rule 1403.[15] Uncontaminated materials will, to the extent feasible, be recycled. Remaining debris will be disposed of at an approved landfill. Soil remediation, if necessary, would be completed under oversight by the Department of Toxic Substances Control (DTSC). Construction of the proposed project cannot commence until DTSC issues a letter of No Further Action.

After demolition and site clearance, the construction site and staging areas will be clearly marked and barriers installed. The proposed project site will be excavated, graded and compacted, followed by completion of necessary trenching (e.g., for utility hookups to buildings). The building foundations, buildings, and utilities will then be constructed. Finally, the area surrounding the buildings will be covered with concrete and asphalt; curb-cuts and driveways will be added; sidewalks located along the perimeter of the project site will be improved where necessary; and landscaping, site fencing, and any final work will be completed.

[14] Migratory Bird Treaty Act. Title 16, Chapter 7. Protection of Migratory Game and Insectivorous Birds. (16 U.S.C. §§ 703-712)., available: http://www4.law.cornell.edu/uscode/html/uscode16/usc_sup_01_16_10_7.html

[15] South Coast Air Quality Management District, Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities. available: http://www.arb.ca.gov/DRDB/SC/CURHTML/R1403.HTM.

2.5 PROJECT DESIGN FEATURES

Collaborative for High Performance Schools (CHPS) Criteria

LAUSD is the first school district in the United States to adopt and implement the Collaborative for High Performance Schools (CHPS) Criteria.[16] CHPS recommends flexible standards to promote energy efficiency, water efficiency, site planning, materials, and indoor environmental quality. The Board adopted a Resolution on High Performance School Facilities requiring new schools to be certified according to the CHPS.[17] These measures are considered beneficial to improving environmental quality by preventing or mitigating impacts. LAUSD has incorporated these into the project design and operation in accordance with federal, state and local regulations, as well as standard LAUSD practices. In the assessment of impacts, these measures were assumed to be part of the New School Construction Program and are not included as mitigation measures.

The proposed project will include a minimum of 32 CHPS criteria points, the minimum required to be considered as a certified CHPS school. CHPS recommends flexible standards to promote energy efficiency, water efficiency, site planning, materials, and indoor environmental quality. Certain CHPS points are mandatory and are identified below. Not all of the following features would be included in the proposed project.

LAUSD Design Standards

Some of the following design standards are included as part of the New School Construction Program Design Best Management Practices (BMPs) as they may be applied to this specific project.

Noise/Acoustics - An analysis of the acoustical environment of the project site (such as traffic) and characterization of planned building components (such as heating, ventilation, and air conditioning [HVAC]) shall be conducted to achieve a classroom acoustical performance with 45 dBA Leq background noise level (unoccupied) or better.[18] Where excessive noise from operation of the new or expanded school site could disturb adjacent residential uses, the proposed project might incorporate buffers, such as masonry walls, between playgrounds and adjacent residential uses.

Geological Hazards - A Seismic Hazard Evaluation will be completed for each new school construction project, where appropriate, to satisfy state requirements.[19, 20, 21]

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16 CHPS, *High Performance Schools Best Practices Manual, Volume III Criteria*, website http://www.chps.net/manual/index.htm#vol3, accessed December 12, 2006.

17 Los Angeles City Board of Education Resolution, *Sustainability and the Design and Construction of High Performance Schools*, October 28, 2003.

18 Since the human ear is not equally sensitive to all frequencies within the entire spectrum, noise measurements are weighted more heavily within those frequencies of maximum human sensitivity in a process called "A-weighting," referred to as dBA. Leq is defined as the time variation in noise exposure that is typically expressed in terms of the average energy over time, or alternatively, as a statistical description of the sound level that is exceeded over some fraction of a given period of time.

19 CCR, Title 24, 2006.

20 California Department of Mining and Geology (CDMG), *Guidelines for Evaluating and Mitigating Seismic Hazards in California*, State Mining and Geology Board Special Publication 117, 2003.

Light and Glare - All "luminaries" or lighting sources in connection with school projects shall be installed in such a manner as to minimize glare for pedestrians and drivers, and to minimize light spilling onto adjacent properties.

Water Supply - LAUSD shall coordinate with the City of Los Angeles Department of Water and Power or other appropriate jurisdiction and department prior to the relocation or upgrade of any water facilities to reduce the potential for disruptions in service. With respect to outdoor systems, CHPS require the landscape and ornamental water use budget to conform to any applicable local Water Efficient Landscape Ordinance. If no local ordinance is applicable, then the water use budget must conform to the landscape and ornamental budget outlined by the California Department of Water Resources.

Reuse of Historical Resources - Where feasible, LAUSD shall require its construction contractor to re-use rather than destroy historical resources, as identified in the project-specific Historic Resources Survey.

LAUSD shall require its construction contractor to take the following steps when dealing with historical resources:

- Retain and preserve the historic character of a building, structure, or site where feasible.
- Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity where feasible.
- Conceal reinforcement required for structural stability or the installation of life safety or mechanical systems wherever feasible.
- Undertake surface cleaning of historic structures with the gentlest means possible. Avoid sandblasting and chemical treatments.

Fire Protection - LAUSD shall reduce impacts to fire protection services in connection with new construction projects, by doing the following:

- Having local fire jurisdictions review all site plans prior to the State Fire Marshal's final approval.
- Providing a full site plan for the local review, including the location of the proposed buildings, fences, drive gates, retaining walls, and other construction affecting Fire Department access, with unobstructed fire lanes for access indicated.

Energy Efficiency - Under CHPS, new school designs must exceed the California energy efficiency standards by 10 percent, or the following prescriptive package energy conservation measures must be included in the design:[22]

[21] CDMG, *California Geological Survey Checklist for the Review of Geological/Seismic Reports for California Public Schools, Hospitals, and Essential Services Buildings,* 2003.

[22] California Building Standards Commission, Title 24, California Energy Efficiency Standards, 2001.

- Energy efficient lighting with occupancy controls.

- Economizers on package equipment.

Waste Reduction and Efficient Material Use - Under CHPS, the proposed project must meet local ordinance requirements for recycling space and provide an easily accessible area serving the entire school that is dedicated to the separation, collection, and storage of materials for recycling including—at a minimum—paper (white ledger, mixed, and cardboard), glass, plastics, and metals.

Indoor Air Quality - Under CHPS, the proposed project must meet the performance requirements of California Occupational Safety and Health Administration (Cal/OSHA) Minimum Ventilation Standard which requires the design of building ventilation systems to: a) ensure that the continuous delivery of outside air is no less than the governing design standard; and b) at all times rooms are occupied. The design must ensure that the supply operates in continuous mode and is not readily defeated during occupancy periods.

Thermal Comfort - Under CHPS, the proposed project must comply with the American Society of Heating, Refrigeration and Air-Conditioning Engineers (ASHRAE) Standard for thermal comfort standards, including humidity control within established ranges per climate zone.[23] Indoor design temperature and humidity conditions for general comfort applications shall be determined in accordance with appropriate American National Standards Institute (ANSI) or ASHRAE standards.[24, 25]

Construction Best Management Practices

LAUSD's construction contractor would comply with all applicable rules and regulations in carrying out the construction of the proposed project. The proposed project will also comply with LAUSD Construction BMPs, which are established and refined as part of LAUSD's current building efforts.

Relocation Assistance Program - LAUSD shall provide relocation assistance to eligible residences and businesses in accordance with its Relocation Assistance Advisory Program and Commercial Assistance Advisory Program. LAUSD shall comply with all items identified in Paragraph 6040 of Title 25 of the California Code of Regulations.

Water Quality and Hydrology - LAUSD's construction contractor shall obtain a National Pollution Discharge Elimination System (NPDES) permit from the Los Angeles Regional Water Quality Control Board (RWQCB) with requirements for discharge, BMPs and Storm Water Pollution Prevention Program (SWPPP). LAUSD's construction contractor shall properly discharge any water accumulation within the excavation pit in accordance with BMPs and a dewatering plan that must be developed and approved prior to construction as part of the NPDES General Construction Stormwater Permit.

[23] ASHRAE Standard 55-1992, Addenda 1995.
[24] ANSI Standards /ASHRAE 55, 1992.
[25] ASHRAE 55-1992 or Chapter 8 of the ASHRAE Handbook, 1993, Fundamentals volume.

Construction Traffic - LAUSD shall require its construction contractors to submit a construction worksite traffic control plan to the City of Los Angeles, Department of Transportation (LADOT) for review prior to construction. The plan shall show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties.

Construction Air Emissions - LAUSD shall require its construction contractors to comply with all applicable SCAQMD rules and regulations in carrying out its Program. To reduce the potential for significant hazardous emissions during a removal action, LAUSD or its construction contractor shall do the following:

- Maintain slow speeds with all vehicles.
- Load impacted soil directly into transportation trucks to minimize soil handling.
- During dumping, minimize soil drop height into transportation trucks or stockpiles.
- During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks.
- Place stockpiled soil in areas shielded from prevailing winds.

Construction Noise - LAUSD shall require the construction contractor to keep properly functioning mufflers on all internal combustion and vehicle engines used in construction. LAUSD shall require its construction contractor to provide advance notice of the start of construction to all noise sensitive receptors, businesses, and residences adjacent to the project area and provide contact information for filing noise complaints. During construction activities, the construction contractor shall locate portable equipment and shall store and maintain equipment as far as possible from the adjacent residents, as feasible. LAUSD shall require its construction contractors to comply with all applicable noise ordinances of the affected jurisdiction. LAUSD shall include the City of Los Angeles noise ordinance in all construction contracts.

Hazardous Materials - LAUSD shall assess and remediate hazardous materials at the proposed project site under supervision of the DTSC.

Sewer Services - LAUSD shall require its construction contractor to coordinate with the City of Los Angeles Department of Public Works, Bureau of Sanitation, and Bureau of Engineering or other appropriate jurisdictions and departments prior to the relocation or upgrade of any sewer facilities to reduce the potential for disruptions in service.

Waste Management - To ensure optimal diversion of solid resources generated by a project, LAUSD shall require its construction contractors to reuse, recycle, salvage, or dispose of non-hazardous waste materials generated during demolition and/or new construction (Construction & Demolition Waste), as appropriate and feasible, to foster material recovery and reuse and to minimize disposal in landfills.

2.6 REQUIRED PERMITS AND APPROVALS

As required by the *CEQA Guidelines*,[26] this section provides, to the extent the information is known, a list of agencies that are expected to use this EIR in their decision making and a list of permits and other approvals required to implement the proposed project.

2.6.1 LEAD AGENCY APPROVAL

This EIR is intended to provide environmental review for the proposed project in accordance with the requirements of CEQA. The Final EIR must be certified by the Board of Education as to its adequacy in complying with the requirements of CEQA before taking any action on the proposed project. The Board of Education will consider the information contained in the EIR in making a decision to approve or deny the proposed project. The analysis in the EIR is intended to provide environmental review for the whole of the proposed project, including planning of the proposed project, site clearance, excavation and grading of the proposed project site, construction of school buildings and associated facilities, and the ongoing operation of the school and associated school programs in accordance with CEQA requirements.

2.6.2 OTHER REQUIRED PERMITS AND APPROVALS

A public agency other than the lead agency that has discretionary approval power over a project is known as a "Responsible Agency," as defined by the *CEQA Guidelines*.[27] The Responsible Agencies, and their corresponding approvals, for this project include the following:

State of California

- California Department of Education
  - School Facilities Planning Division (Approval of Final Site and Final Plans)
- Department of General Services
  - Division of the State Architect (Approval of Construction Drawings)
  - Office of Public School Construction (Approval of Funding)
- California Environmental Protection Agency
  - Department of Toxic Substances Control (Determination of No Further Action)
- California State Allocation Board (Approval of Funding)

City of Los Angeles

- Department of Public Works
  - Bureau of Engineering (Off-site Improvements Permit or "B-Permit")
- Department of Transportation (Approval of Intersection Improvements)
- Fire Department (Plan Approval for Emergency Access)

[26] *California Environmental Quality Act (CEQA)*, Code of California Regulations (CCR), Title 14, Article 6, Chapter 3, Section §15124(d), 2006.
[27] *CEQA Guidelines*, CCR, Title 14, Article 6, Chapter 3, §15381, 2006.

Regional Agencies

- Los Angeles Regional Water Quality Control Board (NPDES permit; issuance of waste discharge requirement; construction storm water run-off permits).

2.6.3 REVIEWING AGENCIES

Reviewing Agencies include those agencies that do not have discretionary powers, but that may review the EIR for adequacy and accuracy. Potential Reviewing Agencies include the following:

State of California

- California Highway Patrol
- Department of Conservation
- Department of Fish and Game
- Caltrans
- Native American Heritage Commission
- Office of Historic Preservation
- Resources Agency
- State Lands Commission

City of Los Angeles

- Community Redevelopment Agency
- Department of City Planning
- Department of Environmental Affairs
- Department of Parks and Recreation
- Department of Water and Power
- Police Department

Regional Agencies

- Los Angeles County Metropolitan Transportation Authority (LACMTA)
- Southern California Association of Governments (SCAG)
- South Coast Air Quality Management District (SCAQMD)

2.7 CUMULATIVE SCENARIO

Cumulative impacts refer to the combined effect of project impacts with the impacts of other, present and reasonably foreseeable future projects.[28] Both CEQA and the *CEQA Guidelines* require that cumulative impacts be analyzed in an EIR. As set forth in the *CEQA Guidelines*,[29] the discussion of cumulative impacts must reflect the severity of the impacts, as well as the likelihood

[28] *CEQA Guidelines*, CCR, Article 9, § 15130, 2007.
[29] *CEQA Guidelines*, CCR, Title 14, Article 6, Chapter 3, §15130(b), 2006.

of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone. As stated in CEQA, "a project may have a significant effect on the environment if the possible effects of a project are individually limited but cumulatively considerable."[30]

According to the *CEQA Guidelines*:

"Cumulative impacts" refer to two or more individual effects which, when considered together, are considerable and which compound or increase other environmental impacts.

(a) The individual effects may be changes resulting from a single project or a number of separate projects.

(b) The cumulative impact from several projects is the change in the environment, which results from the incremental impact of the proposed project when added to other closely related past, present, and reasonable foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.[31]

In addition, as stated in the *CEQA Guidelines*, it should be noted that:

> The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable.[32]

Cumulative impact discussions for each issue area are provided in the technical analyses contained within Chapter 3 (Environmental Analysis).

As previously stated, and as set forth in the *CEQA Guidelines*, related projects consist of, "closely related past, present, and reasonable foreseeable probable future projects that would likely result in similar impacts and are located in the same geographic area."33 Specific projects proposed or currently under development were identified by the City of Los Angeles. These related projects are listed in **Table 2-1**.

[30] CEQA, Public Resources Code (PRC), Title 14, §21083(b), 2006.
[31] *CEQA Guidelines*, CCR, Title 14, Article 6, Chapter 3, §15355, 2006.
[32] *Ibid*, §15064(h)(4).
[33] *Ibid*, §15355.

TABLE 2-1
LIST OF RELATED PROJECTS

No.	Project Name	Location
1	Fast food restaurant	5837 Vermont Avenue and Slauson Avenue
2	Fast food restaurant	4405 Avalon Boulevard and Vernon Avenue
3	Los Angeles County office park	Slauson Avenue and Los Angeles Street
4	Fast food restaurant	4380 Broadway and Vernon Avenue
5	Private high school	100 49th Street and Main Street
6	Shopping center	944 Slauson Avenue and Central Avenue
7	LAUSD – SRHS #3	860 Slauson Avenue and Menlo Avenue
8	LAUSD – CRES #16	57th Street and Main Street
9	Private school expansion	5506 Vermont Avenue and 55th Street
10	LAUSD – CRES #17	Jefferson Boulevard and Griffith Avenue
11	South Los Angeles Wetlands Park	5413 Avalon Boulevard

SOURCE: Katz, Okitsu & Associates, *Traffic Study for Los Angeles Unified School District Central Region High School #16, Los Angeles, CA,* May 8, 2007.

It is noted that cumulative impacts analyzed in this EIR (impacts from related projects in conjunction with the proposed project) would likely represent a "worst-case" scenario for the following reasons:

- Not all of the related projects will be approved and/or built. Further, it is also likely that several of the related projects will not be constructed at the same time as the proposed project or opened until after the proposed project has been built and occupied.

- Impact projections for related projects would likely be, or have been, subject to unspecified mitigation measures, which would reduce potential impacts.

- Many related projects are expressed in terms of gross square footage or are conceptual plans such as master plans that assume complete development; in reality, such projects may be smaller (for example, the net new development) because of the demolition or removal of existing land uses resulting from the development of the related project.

CHAPTER 3.0
ENVIRONMENTAL ANALYSIS

3.1 ENVIRONMENTAL ISSUES ADDRESSED

An Initial Study (IS) Checklist was prepared for the proposed project in May 2006 (refer to Appendix A). Based on the findings of the IS Checklist, LAUSD determined that an EIR would be required for the proposed project. LAUSD used the IS Checklist, as well as agency and public input received during the Notice of Preparation (NOP) comment period and the public scoping meeting to determine the scope of the evaluation for the EIR. Based on the findings made during the IS and NOP period, LAUSD analyzed the environmental issues listed below along with their corresponding subchapter.

- 3A Aesthetics
- 3B Air Quality
- 3C Cultural Resources
- 3D Noise
- 3E Pedestrian Safety
- 3F Traffic

Chapters 3A through 3F provide a detailed discussion of the environmental setting, applicable project design features, impacts associated with the proposed project, cumulative impacts, and mitigation measures designed to reduce significant impacts.

3.2 ORGANIZATION OF ENVIRONMENTAL ANALYSIS

To assist the reader in comparing information about the various environmental issues, each chapter contains the following information.

- Introduction
- Existing Environmental Setting
- Applicable Regulations
- Impacts and Mitigation
  - Methodology
  - Criteria for Determining Significance
  - Project Impacts

- Mitigation Measures
- Residual Impacts
  - Cumulative Impacts
- Mitigation Measures
- Residual Impacts

3.3 TERMINOLOGY USED IN THIS ANALYSIS

For each impact identified in the EIR, a statement of the level of significance of the impact is provided. Impacts are categorized in the following categories:

- A designation of *no impac*t is given when no adverse changes in the environment are expected.
- A *less than significant impact* would cause no substantial adverse change in the environment.
- A *potentially significant (but mitigable) impact* would have a substantial adverse effect on the environment but could be reduced to a less than significant level with incorporation of mitigation measure(s).
- A *significant and unavoidable impact* would cause a substantial adverse effect on the environment, and no feasible mitigation measures would be available to reduce the impact to a less than significant level.
- A *residual impact*, as used throughout this EIR, refers to the level of remaining impact, if any, following implementation of all feasible mitigation measures.

CHAPTER 3A
AESTHETICS

3A.1 INTRODUCTION

This chapter evaluates the potential impacts of the proposed project in regards to shading and shadow, lighting, and/or glare created by the proposed project that would adversely affect day or nighttime views in the area.

3A.2 EXISTING ENVIRONMENTAL SETTING

In general, urban and suburban residential land uses dominate much of the land area within Los Angeles County. Additionally, commercial and industrial land uses are prevalent along freeway and railway rights-of-way and major urban roadways such as boulevards and streets. The proposed project site is located in a highly urbanized area of the City of Los Angeles, in the community of Southeast Los Angeles. The area surrounding the project site is characterized by residential, commercial, and industrial land uses.

The proposed project site includes single- and multi-family residences, commercial land uses, and the Johnson Opportunity High School.[1] The existing high school was built in the 1970s and is of no architectural significance***. The site includes*** ~~with~~ modern institutional buildings painted a light brown color and ***is*** surrounded by streets lined with trees and utility poles with overhead wires.[2] Ornamental trees and shrubs are located throughout the proposed project site, including a number of *Eucalyptus* trees, but no oak trees are present.[3] The proposed project site is across the street from one- to two-story single- and multi-family residential houses along San Pedro Street, East 53rd Street, Towne Avenue, and East 52nd Street. These residences use general nighttime lighting such as porch lights.

3A.3 APPLICABLE REGULATIONS

The City of Los Angeles General Plan establishes goals and policies for the protection of scenic resources and the City's Community Plans generally provide goals for protection from light and glare.

1 ESA, Site visit, March 6, 2006
2 Kaplan Chen Kaplan, *LAUSD Central Region High School No. 16 Site Historic Evaluation,* May 11, 2007.
3 ESA, Site visit, March 6, 2006.

3A.4 IMPACTS AND MITIGATION

3A.4.1 METHODOLOGY

Light and glare impacts are determined through a comparison of the existing light sources with the proposed lighting plan. If the project has the potential to generate spill light on adjacent sensitive receptors, or generate glare to receptors in the vicinity of the site, mitigation measures would be required to reduce potential impacts.

Shadow is generally calculated using three factors: time, geographic location, and object dimension. In general, shadow analyses are conducted using a 3D modeling program (similar to AutoCAD) that creates simulated light and shade figures based on geographic location and object dimension for specific points in time. In general, shadow effects are analyzed for representative times of day (9 A.M., 12 P.M. [noon], and 3 P.M.) during the four seasons of the year:

- December, on the winter solstice, when the sun is at its lowest and shadows are at their longest.[4]
- March, at the spring equinox, when shadows are midway through a period of shortening;
- September, at the fall equinox, when shadows are midway through a period of lengthening; and
- June, on the summer solstice, when the sun is at its highest and shadows are at their shortest;

Shadows on any other day of the year would be within the range of shadows presented during the seasons and times of day described above.

3A.4.2 CRITERIA FOR DETERMINING SIGNIFICANCE

The criteria used to determine the significance of an impact related to light and glare are based on Appendix G of the *CEQA Guidelines*, and LAUSD's *Draft Protocol for Shadow Analysis in CEQA Documents for Proposed School Sites.*[5] The proposed project may result in a significant aesthetics impact if it would:

- Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area;
- Shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9 A.M. to 3 P.M. Pacific Standard Time (between late October

[4] LAUSD, *Draft Protocol for Shadow Analysis in CEQA Documents for Proposed School Sites*, February 28, 2007. Under this Draft Protocol, shadow on the winter solstice is assumed to be the worst-case scenario because shadows are the longest of the year. The Draft Protocol states that if there is a shadow impact on the winter solstice, then shadow diagrams will be prepared for the spring/fall equinox (March 24/September 24), and summer solstice (June 22) between 9 A.M. and 5 P.M. In the case of Central Region High School No. 16, only the shadow diagrams for the winter solstice are needed. (See the analysis below.)

[5] *Ibid.*

and early April), or for more than four hours between the hours of 9 A.M. to 5 P.M. Pacific Daylight Time (between early April and late October).[6]

- Result in a cumulatively considerable impact with respect to aesthetic resources.

3A.4.3 PROJECT IMPACTS

The environmental impact analysis presented below is based on the determinations made in the Initial Study for issues that were potentially significant (see Appendix A).

Impact 3A1: Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

Impacts to day or nighttime views in the area would be less than significant.

Light and Glare Impacts

The proposed project site is located in a highly urbanized area of the City of Los Angeles, and is currently developed with a high school, commercial buildings, and single- and multi-family units.[7] The existing high school contains general nighttime building lighting, security lighting, and landscape lighting.

The proposed project would include construction of one- to three-story buildings up to approximately 45 feet tall. The proposed project facilities would require general nighttime lighting, and would include high-intensity evening athletic lights located in the eastern area of the proposed project site. Because athletic lighting poles would exceed the heights of nearby residences, nighttime lighting could affect surrounding land uses located across the street from the proposed project site on the west side of Towne Avenue, along the north side of East 52nd Street, and the west side of Avalon Boulevard, which are primarily residential. The lighting poles would be positioned to face the proposed project site. Nonetheless, these lights have the greatest potential to affect existing nearby residents, because they would be visible from the residences. The proposed project could therefore result in spillover lighting that could impact these residences.

LAUSD recognizes that impacts due to new sources of lighting can be intrusive to surrounding residences and has developed design guidelines with measures that minimize lighting impacts. LAUSD also follows best management practices that reduce lighting intensity from the new sources on adjacent residents to no more than two foot-candles above ambient levels measured at the residential property line. In order to achieve this result, LAUSD may utilize hoods, filtering louvers, glare shields, and/or landscaping as necessary to achieve this standard.[8] The lamp enclosures and poles shall also be painted to reduce the potential for glare. Implementation of LAUSD design guidelines would ensure a less than significant spillover lighting impact.

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6 *Ibid*.
7 ESA, Site visit, March 2, 2006.
8 LAUSD, OEHS, *New School Construction Program, Final Program Environmental Impact Report*, Board Certified June 8, 2004.

The proposed project would not be expected to create unusual or isolated glare. The proposed buildings would be composed of materials with minimal potential for generating glare. The materials may include stucco or other materials that are non-reflective. Glass incorporated into the building facades would either be composed of low-reflectivity glass or would be finished with a non-glare coating, as necessary. Landscaping, paving, and other surface areas within the project site would not increase or create reflective conditions.

Impact 3A2: Shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9 A.M. to 3 P.M. Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9 A.M. to 5 P.M. Pacific Daylight Time (between early April and late October).

Shadow impacts would be less than significant.

For the purposes of this analysis, LAUSD's threshold guidelines from its *Draft Protocol for Shadow Analysis in CEQA Documents for Proposed School Sites* were used to determine the potential impact of the proposed project on nearby residences.[9]

As previously stated, the existing buildings in the project vicinity are one- to two-stories in height. The proposed project would include the development of classroom buildings that would be approximately one- to three-stories or up to approximately 45 feet in height. In order to ascertain potential shadows impacts under the most conservative scenario, a height of 45 feet is assumed for all but one of the proposed school buildings. The parking garage with roof-top basketball court is assumed to have a height of approximately 14 feet.

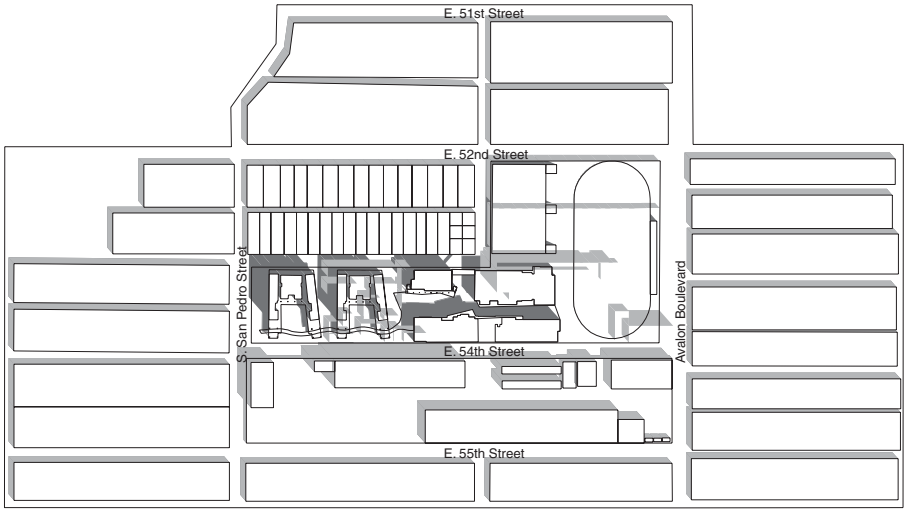
Winter (December 21)

In the morning hours (9 A.M.), winter shadows would be the longest and widely cast of all seasons and times of day. **Figure 3A.1** shows that most of East 53rd Street would be in shadow cast by the project buildings. No shadow would fall onto the residential land uses north of the proposed project site for a duration of three hours or more. Shadow would also be cast onto East 52nd Street, but not on any buildings outside of the project site.

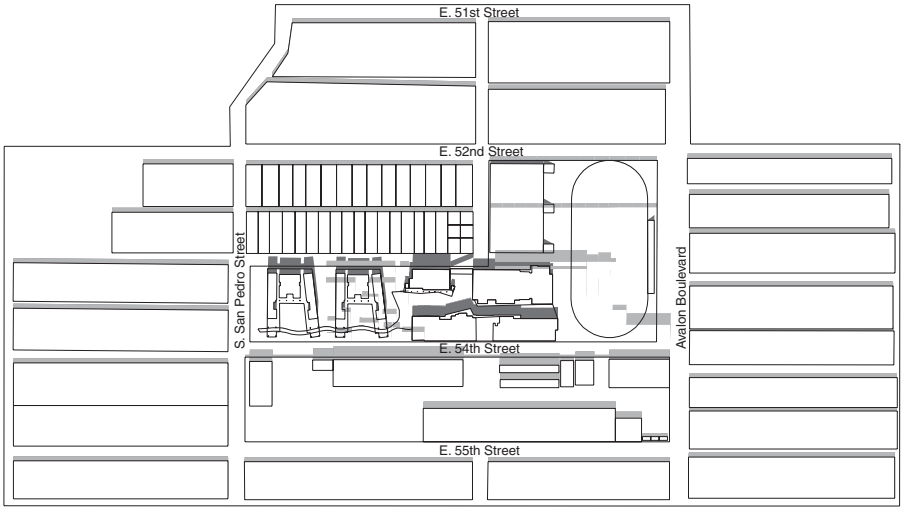
By noon (12 P.M.), shadow would be significantly reduced. **Figure 3A.1** shows that the shadow cast by the proposed buildings would cast slight shadows to the north, with some shadow extending onto the southern side of East 53rd Street. No shadow would be cast onto residential structures on the north side of East 53rd Street.

Figure 3A.1 shows that during afternoon hours (noon to 3 P.M. and beyond), shadows would lengthen slightly and fall directly northeast. Shadows cast by the new school buildings would remain on the project site.

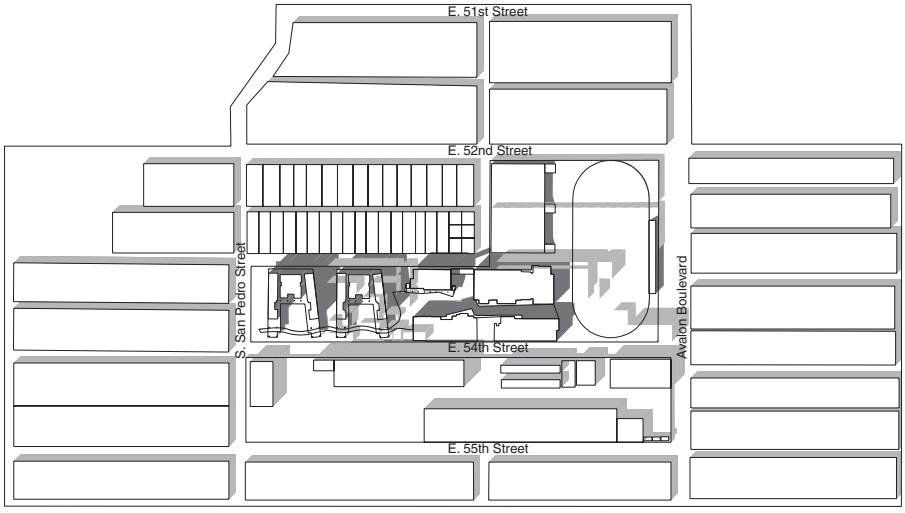
[9] LAUSD, OEHS, *Draft Protocol for Shadow Analysis in CEQA Documents for Proposed School Sites*, February 28, 2007.



9:00 am



12:00 noon



3:00 pm

Existing Shadow
New Shadow

N

SOURCE: ESA 2007.

LAUSD CRHS No. 16 . 206048

Figure 3A.1
December 21st Shadow Patterns

Conclusion

This analysis accounted for the worst-case scenario in terms of building heights of up to three stories (45 feet) in height for most proposed buildings. The longest shadow cast under proposed project conditions would occur in the mornings (9 A.M.) of the winter solstice (December 21). No shadow would fall onto the residential land uses north of the proposed project site for a duration of three hours or more. Due to existing structures on the proposed project site, some shading within the proposed project site and on the surrounding land uses currently exists. Therefore, no shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9 A.M. to 5 P.M. Pacific Daylight Time at any time.

This would result in no impact.[10]

Mitigation Measures

No mitigation measures are required.

Residual Impacts

As no project-related shadows would be cast onto adjacent residential uses at any time of the year, no impact would result.

3A.4.4 CUMULATIVE IMPACTS

Impact 3A3: Result in a cumulatively considerable aesthetic impact.

Implementation of the proposed project would not result in a cumulatively considerable impact to aesthetics.

Projects in the area include four retail/commercial facilities, a public facility (the proposed South Los Angeles Wetlands Park), and five schools. Aesthetic impacts are typically unique and localized (for example, impair views, create light or glare), the addition of related projects in conjunction with the proposed project would not cause a cumulative aesthetic impact to the community.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Impacts would not be cumulatively considerable.

[10] *Ibid.*

CHAPTER 3B
AIR QUALITY

3B.1 INTRODUCTION

This section evaluates the potential impacts on air quality resulting from construction and operation of the proposed Central Regional High School No.16 project. The air quality evaluation in this EIR was prepared in accordance with the requirements of CEQA to determine if significant air quality impacts are likely to occur in conjunction with the development of the proposed project. The analysis in this section is based on the methodology and criteria provided in the SCAQMD CEQA Air Quality Handbook (Handbook) and emissions calculations for air quality modeling can be found in Appendix B of this EIR.

3B.2 EXISTING ENVIRONMENTAL SETTING

Air quality is affected by both the amount and location of pollutant emissions and by meteorological conditions that influence movement and dispersal of pollutants. Atmospheric conditions such as wind speed, wind direction, and air temperature gradients, along with local topography, provide the link between air pollutant emissions and air quality.

The project site is located in the South Coast Air Basin (SCAB).[1] The SCAB incorporates approximately 12,000 square miles within four counties—all of Orange County, most of Los Angeles and Riverside Counties and the western portion of San Bernardino County—including some portions of what was previously known as the Southeast Desert Air Basin. The distinctive climate of the SCAB is determined by its terrain and geographical location. The basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the southwest and high mountains around its remaining perimeter. The general region lies in the semi-permanent high pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The usually mild climatological pattern is interrupted occasionally by periods of extremely hot weather, winter storms, or Santa Ana winds.[2]

The vertical dispersion of air pollutants in the Los Angeles Basin is hampered by the presence of persistent temperature inversions.[3] High-pressure systems, such as the semi-permanent high-pressure zone regularly occur with the SCAB. Usually the high pressure zones are characterized by an upper layer of dry air that warms as it descends restricting the mobility in the formation of subsidence inversions. Such inversions restrict the vertical dispersion of air pollutants released

[1] SCAQMD, *2003 Air Quality Management Plan,* August 1, 2003. p. 1-3.
[2] SCAQMD, *CEQA Air Quality Handbook,* April 1993. p. A8-1.
[3] SCAQMD, *2003 Air Quality Management Plan,* August 1, 2003. p. 1-3.

into the marine layer and, together with strong sunlight, can produce worst-case conditions for the formation of photochemical smog.

The atmospheric pollution potential of an area is largely dependent on winds, atmospheric stability, solar radiation and terrain. The combination of low wind speeds and low inversions produces the greatest concentration of air pollutants. On days without inversions, or on days of winds averaging over 15 miles per hour (mph), smog potential is greatly reduced.[4]

The closest climate monitoring station to the proposed project site is located at the Los Angeles Civic Center, approximately four miles north from the site.[5] Data from this climate monitoring station were used to characterize the study area climate conditions. As summarized in **Table 3B-1**, the average summer (August) high temperature is 83.2 and the average summer (June) low temperature is 59.8. The average winter (December) high temperature is 67.6 and the average winter (January) low temperature is 48.4.[6]

In contrast to a very steady pattern of temperature, rainfall is seasonally and annually highly variable. Almost all rain falls from November through April. Summer rainfall is normally restricted to widely scattered thundershowers near the coast, with slightly heavier shower activity in the east and over the mountains. According to the Western Regional Climate Center, the average annual rainfall is 14.8 inches near the proposed project site.[7]

TABLE 3B-1
AVERAGE TEMPERATURES IN THE VICINITY OF THE PROPOSED PROJECT SITE

	Average Maximum (°F)	Average Minimum (°F)
January	66.4	48.4
February	67.4	49.7
March	68.9	51.2
April	71.0	53.5
May	73.0	56.6
June	77.1	59.8
July	82.4	63.1
August	83.2	64.0
September	81.8	62.7
October	77.5	58.8
November	72.9	53.3
December	67.6	49.3
Annual	**74.1**	**55.9**

SOURCE: Western Regional Climate Center. *Comparative Data for the Western States.* http://www.wrcc.dri.edu/CLIMATEDATA.html, accessed July 5, 2006.

[4] SCAQMD, *CEQA Air Quality Handbook*, April 1993. p. A8-1.
[5] Western Regional Climate Center, *Comparative Data for the Western States*, website http://www.wrcc.dri.edu/CLIMATEDATA.html, accessed July 5, 2006.
[6] *Ibid*.
[7] *Ibid*.

The closest wind monitoring station to the proposed site is also located at the Civic Center in downtown Los Angeles.[8] Data from this wind station were used to characterize study area wind conditions. Wind patterns in the proposed project vicinity trend in a west-southwesterly direction and average wind speeds vary from a low of 0.7 mph during the winter months to 2.3 mph during the spring and summer months.[9]

Although the SCAB has a semiarid climate, the air near the surface is typically moist because of the presence of a shallow marine layer. Except for infrequent periods when dry, continental air is brought into the SCAB by offshore winds known as "Santa Anas," the ocean effect is dominant. Periods of heavy fog, especially along the coastline, are frequent; and low stratus clouds, often referred to as "high fog," are a characteristic climatic feature. Annual average humidity is 70 percent at the coast and 57 percent in the eastern portions of the SCAB.

3B.2.1 EXISTING AIR QUALITY

The air pollutants emitted into the ambient air by stationary and mobile sources are regulated by federal and state law. These regulated air pollutants are known as "criteria air pollutants" and are categorized as primary and secondary pollutants. Primary air pollutants are those that are emitted directly from sources. Carbon monoxide (CO), reactive organic gases (ROG), nitrogen oxides (NO_X), sulfur dioxide (SO_2), and most fine particulate matter (PM_{10}, $PM_{2.5}$), including lead (Pb) and fugitive dust, are primary air pollutants. Of these, CO, SO_2, PM_{10}, and $PM_{2.5}$ are criteria pollutants. ROG and NO_X are criteria pollutant precursors and go on to form secondary criteria pollutants through chemical and photochemical reactions in the atmosphere. Ozone (O_3) and nitrogen dioxide (NO_2) are the principal secondary pollutants. Presented below is a description of each of the primary and secondary criteria air pollutants and their known health effects.

Other pollutants, such as carbon dioxide, a natural byproduct of animal respiration that is also produced in the combustion process, have been linked to such phenomena as global warming. These emissions are unregulated, and there are no thresholds for their release. These pollutants do not jeopardize the attainment status of the SCAB and are omitted from further discussion.

The SCAQMD maintains an air quality monitoring station (Source Receptor Area No. 1 - Downtown Los Angeles) at 1630 North Main Street in the City of Los Angeles. The monitoring station is approximately five miles northeast of the proposed high school.[10] Criteria pollutants monitored at this station include ozone (O3), carbon monoxide (CO), nitrogen dioxide (NO_2), particulate matter (PM_{10} and $PM_{2.5}$), and sulfur dioxide (SO_2). A five-year summary (2001 to 2005) of data collected at this station is shown in **Table 3B-2** and is compared with the corresponding state ambient air quality standards.

[8] *Ibid*.
[9] *Ibid*.
[10] SCAQMD, *Air Quality Data Summaries*, 2001-2005.

TABLE 3B-2
PROJECT AREA AIR POLLUTANT SUMMARY, 2001-2005[a]

Pollutant	Standard[b]	2001	2002	2003	2004	2005
Ozone (O_3)						
Highest 1-hr average, ppm[c]	0.09	0.12	0.12	0.15	0.11	0.12
Number of standard exceedance[d]		8	8	11	7	2
Highest 8-hr average, ppm[c]	0.07	0.10	0.08	0.09	0.09	0.10
Number of standard exceedance[d]		N/A	N/A	N/A	7	2
Carbon Monoxide (CO)						
Highest 1-hr average, ppm[c]	20	6	5	6	4	4
Number of standard exceedance[d]		0	0	0	0	0
Highest 8-hr average, ppm[c]	9.0	4.6	4.0	4.6	3.2	2.9
Number of standard exceedance[d]		0	0	0	0	0
Nitrogen Dioxide (NO_2)						
Highest 1-hr average, ppm[c]	0.25	0.14	0.14	0.16	0.16	0.13
Number of standard exceedance[d]		0	0	0	0	0
Sulfur Dioxide (SO_2)						
Highest 1-hr average, ppm[c]	0.25	0.01	0.02	0.01	0.01	0.07
Number of standard exceedance[d]		0	0	0	0	0
Particulate Matter-10 Micron (PM_{10})						
Highest 24-hr average, $\mu g/m^3$ [c]	50	97	65	81	72	N/A
Number of standard exceedance[d,e]		20	8	6	5	N/A
Annual Geometric Mean, $\mu g/m^3$ [c]	30	40	38	N/A	38	N/A
Violation		Yes	Yes	N/A	Yes	N/A
Particulate Matter-2.5 Micron ($PM_{2.5}$)						
Annual Arithmetic Mean, $\mu g/m^3$ [c]	12	23	22	21	20	N/A
Violation		Yes	Yes	Yes	Yes	N/A

NOTE: Underlined values indicate an excess of applicable standard.
n/a = not available

a. Data is from the SCAQMD monitoring station (No. 1 – Downtown Los Angeles) located at 1630 North Main Street in the City of Los Angeles.
b. State standard, not to be exceeded.
c. ppm - parts per million; $\mu g/m^3$ - micrograms per cubic meter.
d. Refers to the number of days in a year during which at least one exceedance was recorded.
e. Measured every six days.

SOURCE: SCAQMD, *Air Quality Data Summaries*, 2001-2005.

Ozone (O_3) - The SCAB is in non-attainment for both the federal and state O_3 standards.[11] O_3 is a secondary pollutant produced through a series of photochemical reactions involving reactive organic compounds (ROC) and nitrogen oxides (NO_x). O_3 creation requires ROC and NO_x to be available for approximately three hours in a stable atmosphere with strong sunlight. O_3 is a regional air pollutant because it is not directly emitted by sources, but is formed downwind of sources generating ROC and NO_x emissions.

[11] SCAQMD, *2003 Air Quality Management Plan*, August 1, 2003.

O_3 effects include eye and respiratory irritation, reduction of resistance to lung infection and possible aggravation of pulmonary conditions in persons with lung disease. O_3 is also damaging to vegetation and untreated rubber. As shown in **Table 3B-2**, the state one-hour O_3 standard was exceeded between two and 11 times per year at the Downtown Los Angeles (Source Receptor Area No. 1) monitoring station from 2001 through 2005.[12] The state eight-hour O_3 standard was exceeded seven times in 2004 and two times in 2005 at the Downtown Los Angeles (Source Receptor Area No. 1) monitoring station.[13] While the O_3 standards were exceeded from 2001 to 2005, the downward trend displayed in **Table 3B-2** indicates that O_3 levels in SCAB are improving.

Carbon Monoxide (CO) - The SCAB is in attainment for both federal and state CO standards.[14] CO is a non-reactive pollutant that is a product of incomplete combustion. Ambient CO concentrations usually follow the spatial and temporal distributions of vehicular traffic and are also influenced by meteorological factors such as wind speed and atmospheric mixing. Under inversion conditions, CO concentrations may be distributed more uniformly over an area out to some distance from vehicular sources. As shown in **Table 3B-2**, the one-hour and eight-hour average CO standards were not exceeded at the Downtown Los Angeles (Source Receptor Area No. 1) monitoring station in the five–year period from 2001 to 2005.

Nitrogen Dioxide (NO_2) - There are two oxides of nitrogen (NO_x) that are important in air pollution: nitric oxide (NO) and nitrogen dioxide (NO_2), which are both emitted from motor vehicle engines, power plants, refineries, industrial boilers, aircraft, and railroads. NO_2 is primarily formed when NO reacts with atmospheric oxygen. NO_2 gives the air the "whiskey brown" color associated with smog. The SCAB is in attainment for the state NO_2 standard. Since NO_x emissions contribute to O_3 generation, NO_x emissions are regulated through the O_3 attainment plans. As shown in **Table 3B-2**, the state one-hour standard was not exceeded at the Downtown Los Angeles (Source Receptor Area No. 1) monitoring station in the five-year period from 2001 to 2005.

Sulfur Dioxide (SO_2) - SCAB is in attainment for the federal and state SO_2 standards.[15] SO_2 is primarily produced by the burning of high sulfur coal in industrial operations and power plants. In some parts of the state, elevated levels can also be due to natural causes, such as wind-blown dust and sea salt spray. Suspended sulfates contribute to overall particulate concentrations in ambient air which, if high enough, are suspected to be a cause of premature death in individuals with pre-existing respiratory disease. The one-hour SO_2 standard was not exceeded at the Downtown Los Angeles (Source Receptor Area No. 1) monitoring station in the five-year period from 2001 to 2005.

Particulate Matter (PM_{10}) - SCAB is in non-attainment for the federal and state PM_{10} standard.[16] PM_{10} is particulate matter that is smaller than 10 microns in diameter. PM_{10} can be inhaled deep into the lungs and cause adverse health effects. PM_{10} in the atmosphere results from

[12] SCAQMD, *Air Quality Data Summaries*, 2001-2005.
[13] *Ibid.*
[14] SCAQMD, *2003 Air Quality Management Plan*, August 1, 2003.
[15] *Ibid.*
[16] SCAQMD, *2003 Air Quality Management Plan*, August 1, 2003.

many kinds of dust- and fume-producing industrial and agricultural operations, fuel combustion, and atmospheric photochemical reactions. Some sources of particulate matter, such as demolition and construction activities, are more local in nature, while others such as vehicular traffic, have a more regional effect.

Particulate matter contributes to pollution through fugitive dust and exhaust emissions. Fugitive dust is produced from activities that disturb soil such as grading, digging, or just driving on an unpaved road. Particulate matter from exhaust gases is produced from incomplete combustion, resulting in soot formation. Both forms of particulate matter are accounted for in calculations performed in this analysis. As shown in **Table 3B-2**, the one-hour PM_{10} standards have been exceeded between five and 20 times per year at the Downtown Los Angeles (Source Receptor Area No. 1) monitoring station in the five-year period from 2001 to 2005.[17] The annual geometric mean was exceeded in 2001, 2002, and 2004 at the Downtown Los Angeles (Source Receptor Area No. 1) monitoring station.

Particulate Matter ($PM_{2.5}$) - The SCAB is classified as a non-attainment for the Federal $PM_{2.5}$ standard. It refers to particles that are 2.5 microns or less. A state standard of 12 micrograms per cubic meter ($\mu g/m_3$) has been promulgated but the state has not yet determined $PM_{2.5}$ attainment status. $PM_{2.5}$ is mostly derived from combustion sources, such as automobiles, trucks, and other vehicle exhaust, as well as from stationary combustion sources. The particles are either directly emitted or are formed in the atmosphere from the combustion of gases, such as NO_X and SO_X combining with ammonia. Components from material in the earth's crust, such as dust, are also present, with the amount varying in different locations. As shown in **Table 3B-2**, the state annual arithmetic standard was exceeded every year from 2001 to 2004 at the Downtown Los Angeles (Source Receptor Area No. 1) monitoring station.[18]

Reactive Organic Compounds (ROC) - There is currently no ambient air quality standard for ROC. ROC are any reactive compounds of carbon, excluding methane, carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, ammonium carbonate, and other exempt compounds. ROC is a precursor of ozone and as such is regulated under the SCAQMD ozone attainment plan.[19] However, since there is no ambient air quality standard for ROC, exceedances of such a standard are not possible. In this analysis, ROC includes Volatile Organic Compounds (VOCs).

Lead - Lead concentrations historically exceeded the state and federal air quality standards by a wide margin but have not exceeded the standards at any regular monitoring station since 1982. Though special monitoring sites immediately downwind of lead sources recorded localized violations of the state standard in 1994, no violations were recorded at these stations in 2005. Consequently, the SCAB is designated as an attainment area for lead. Airborne ambient lead is no longer a health issue in the SCAB, and the SCAQMD does not require an emissions analysis unless the project is typically associated with lead emissions. The proposed project would not result in lead emissions and, and such, lead emissions are not quantified in this analysis.

[17] SCAQMD. *Air Quality Data Summaries*, 2001-2005.
[18] *Ibid.*
[19] SCAQMD. *2003 Air Quality Management Plan*. August 1, 2003.

Sulfates - The entire state of California is designated as attainment for sulfates. Sulfates are monitored at a handful of stations in the SCAB and the last recorded exceedance was in 2001. In California, emissions of sulfur compounds primarily occur from the combustion of petroleum-derived fuels (for example, gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized to SO_2 during the combustion process and subsequently converted to sulfate compounds in the atmosphere. As SO_2 is a precursor to sulfates, the SCAQMD recommends analyzing SO_2 as an indicator of sulfates. As such, sulfate emissions are not quantified in this analysis.

Toxic Air Contaminants (TACs) - The public's exposure to various toxic air contaminants (TACs) is a significant environmental health issue in California. In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health. The Health and Safety Code defines a TAC as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health." Any substance that is listed as a hazardous air pollutant (HAP) pursuant to subsection (b) of Section 112 of the federal act (42 USC Sec. 7412[b]) is a toxic air contaminant. Under State law, the California Environmental Protection Agency, acting through the California Air Resources Board (CARB), is authorized to identify a substance as a TAC if it determines the substance is an air pollutant that may cause or contribute to an increase in mortality or to an increase in serious illness, or that may pose a present or potential hazard to human health.

California regulates TACs primarily through AB 1807 (Tanner Air Toxics Act) and AB 2588 (Air Toxics "Hot Spot" Information and Assessment Act of 1987). The Tanner Air Toxics Act sets forth a formal procedure for CARB to designate substances as TACs. Once a TAC is identified, CARB adopts an "airborne toxics control measure" for sources that emit designated TACs. If there is a safe threshold for a substance (a point below which there is no toxic effect), the control measure must reduce exposure to below that threshold. If there is no safe threshold, the measure must incorporate toxics best available control technology (T-BACT) to minimize emissions. CARB has, to date, established formal control measures for 11 TACs, all of which are identified as having no safe threshold.

Air toxics from stationary sources are also regulated in California under the Air Toxics "Hot Spot" Information and Assessment Act of 1987. Under AB 2588, toxic air contaminant emissions from individual facilities are quantified and prioritized by the air quality management district or air pollution control district. High priority facilities are required to perform a health risk assessment and, if specific thresholds are exceeded, are required to communicate the results to the public in the form of notices and public meetings.

To date, the CARB has designated nearly 200 compounds as TACs. Additionally, the CARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control. The majority of the estimated health risks from TACs can be attributed to a relatively few compounds, one of the most important in the southern California being particulate matter from diesel-fueled engines.

In 1998, the CARB identified particulate emissions from diesel-fueled engines (diesel PM) as a TAC. Previously, the individual chemical compounds in the diesel exhaust were considered as TACs. Almost all diesel exhaust particle mass is in the fine particle range of 10 microns or less in diameter. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung.

In 2000, the SCAQMD conducted a study on ambient concentrations of TACs and estimated the potential health risks from air toxics. The results showed that the overall risk for excess cancer from a lifetime exposure to ambient levels of air toxics was about 1,400 in a million. The largest contributor to this risk was diesel exhaust, accounting for 71 percent of the air toxics risk.

Other Effects of Air Pollution

Just as humans are affected by air pollution, so are plants and animals. Animals must breathe the same air and are subject to the same types of negative health effects. Certain plants and trees may absorb air pollutants that can stunt their development or cause premature death. There are also numerous impacts to our economy, including lost workdays due to illness, a desire on the part of business to locate in areas with a healthy environment, and increased expenses from medical costs. Pollutants may also lower visibility and cause damage to property. Certain air pollutants are responsible for discoloring painted surfaces, eating away at stones used in buildings, dissolving the mortar that holds bricks together, and cracking tires and other items made from rubber.

In conformance with the requirements of the Clean Air Act Amendments, the United States Environmental Protection Agency (USEPA) has prepared a monetary cost/benefit analysis related to implementation requirements. By the year 2010, the USEPA estimates that its emissions reductions programs would cost approximately 27 billion dollars. The programs are estimated to result in a savings benefit of 110 billion dollars, for a net benefit of 83 billion dollars.[20] While these values are for the nation as a whole, a net benefit ratio of about 4:1 is noted and a similar ratio could be expected for the City of Los Angeles and its residents.

Another direct cost/benefit issue relates to federal funding. Areas that do not meet the federal air quality standards may lose eligibility for federal funding for road improvements and other projects that require federal or California Department of Transportation approval.

Cleaner air also yields benefits to ecological systems. The quantified benefits of Clean Air Act Amendments programs reflected in the overall monetary benefits include: increased agricultural and timber yields; reduced effects of acid rain on aquatic ecosystems; and reduced effects of nitrogen deposited to coastal estuaries. Many ecological benefits, however, remain difficult or impossible to quantify, or can only be quantified for a limited geographic area. The magnitude of quantified benefits and the wide range of unquantified benefits nonetheless suggest that as we learn more about ecological systems and can conduct more comprehensive ecological benefits assessments, estimates of these benefits could be substantially greater.

[20] U.S. Environmental Protection Agency (USEPA), Benefits and Costs of the Clean Air Act, Final Report to Congress on Benefits and Costs of the Clean Air Act, 1990 to 2010. EPA 410-R-99-001, 1997.

3B.2.2 SENSITIVE RECEPTORS

Some land uses are considered more sensitive to air pollution than others due to certain types of population groups or activities. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardio-respiratory diseases. Residential areas are also considered to be sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present.

Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. Noticeable air pollution can detract from the enjoyment of recreation.

Industrial and commercial areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent, as the majority of the workers tend to stay indoors most of the time. Sensitive receptors in the immediate vicinity of the proposed project site include single- and multi-family residences. Specifically, single- and multi-family residential land uses are located approximately 25 feet north and west of the proposed project site, across East 52nd Street, East 53rd Street, South San Pedro Street, and Towne Avenue. Residential land uses are also located approximately 75 feet east of the proposed project site along Avalon Boulevard. A passive park is planned for the block located directly south of the proposed project site; the block is currently occupied by a Los Angeles Metropolitan Transportation Authority maintenance facility. The students who would attend the proposed new high school would also be considered a sensitive receptor population.

3B.3 APPLICABLE REGULATIONS

The development of the proposed project has the ability to release gaseous emissions of criteria pollutants and dust into the ambient air; therefore, it falls under the ambient air quality standards promulgated on the local, state, and federal levels. The proposed project site is located in the SCAB and is subject to the rules and regulations imposed by the SCAQMD. However, the SCAQMD reports to the CARB, and all criteria emissions are also governed by the California Ambient Air Quality Standards (CAAQS) as well as the National Ambient Air Quality Standards (NAAQS).

Below is a description of the various federal, state, and regional regulations that are involved in regulating air quality in the SCAB.

Federal Clean Air Act - The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years (1963, 1965, 1967, 1970, 1977, and 1990). The federal CAA establishes federal air quality standards, known as National Ambient Air Quality Standards (NAAQS) and specifies future dates for achieving compliance. NAAQS have been established for the following criteria pollutants: CO, O_3, SO_2, NO_2, PM_{10}, $PM_{2.5}$, and lead.[21]

[21] USEPA, *National Ambient Air Quality Standards*, website http://www.epa.gov/air/criteria.html, accessed July 6, 2006.

The Clean Air Act Amendments of 1971 established NAAQS, with States retaining the option to adopt more stringent standards or to include other pollution species. These standards are the levels of air quality considered to provide a margin of safety in the protection of the public health and welfare. They are designed to protect those sensitive receptors most susceptible to further respiratory distress such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed.

The federal CAA requires that states that do not meet the standards submit a State Implementation Plan (SIP). SIPs are designed to assist areas designated as non-attainment in establishing strategies to achieve compliance.[22] The California SIP is comprised of plans developed at the regional or local level. For example, the SCAB is a non-attainment area for PM10 and NOx, and the SIP addresses how these standards will be met. Each of these plans is reviewed and approved by the USEPA prior to incorporation into the SIP. The federal CAA allows California to adopt more stringent vehicle emission standards than the rest of the nation due to the state's severe O3 non-attainment status.

The most recent 1990 amendments to the federal CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones.

California Clean Air Act - In 1988, the state legislature passed the California CAA, which established California's air quality goals, planning mechanisms, regulatory strategies, and standards of progress for the first time.[23] The California CAA provides the state with a comprehensive framework for air quality planning regulation. The California CAA requires attainment of state ambient air quality standards by the earliest practicable date. Attainment plans are required for air basins in violation of the state O_3, CO, SO_2, and NO_2 standards. Preparation of and adherence to attainment plans are the responsibility of the local air pollution districts or air quality management districts.

California Ambient Air Quality Standards (CAAQS) - The State of California has also set ambient air quality standards for certain air pollutants. The CAAQS for these criteria pollutants are more stringent than the corresponding federal standards.[24] The state has set standards for $PM_{2.5}$, sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. **Table 3B-3** summarizes the state and federal standards within the project area.

[22] *Ibid*.
[23] CARB, *California Clean Air Act*, 1988.
[24] CARB, *Ambient Air Quality Standards*, May 17, 2006.

TABLE 3B-3
AMBIENT AIR QUALITY STANDARDS FOR CRITERIA POLLUTANTS

Pollutant	Averaging Time	California Standard	Federal Standard	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
Ozone (O_3)	1 hour	0.09 ppm	---	High concentrations can directly affect lungs, causing irritation. Long-term exposure may cause damage to lung tissue.	Motor vehicles.
	8 hours	0.07 ppm	0.08 ppm		
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	Classified as a chemical asphyxiant, CO interferes with the transfer of fresh oxygen to the blood and deprives sensitive tissues of oxygen.	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hours	9 ppm	9 ppm		
Nitrogen Dioxide (NO_x)	Annual Arithmetic Mean	---	0.053 ppm	Irritating to eyes and respiratory tract. Colors atmosphere reddish-brown.	Motor vehicles, petroleum refining operations, industrial sources, aircraft, ships, and railroads.
	1 hour	0.25 ppm	---		
Sulfur Dioxide (SO_x)	Annual Arithmetic Mean	---	0.03 ppm	Irritates upper respiratory tract; injurious to lung tissue. Can yellow the leaves of plants, destructive to marble, iron, and steel. Limits visibility and reduces sunlight.	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	1 hour	0.25 ppm	---		
	3 hours	---	0.50 ppm		
	24 hours	0.04 ppm	0.14 ppm		
Suspended Particulate Matter (PM_{10} $PM_{2.5}$)	Annual Geometric Mean	20 µg/m^3 (PM_{10})	---	May irritate eyes and respiratory tract, decreases in lung capacity, cancer and increased mortality. Produces haze and limits visibility.	Dust and fume-producing industrial and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g. wind-raised dust and ocean sprays).
	Annual Arithmetic Mean	20 µg/m^3 (PM_{10}) 12 µg/m^3 ($PM_{2.5}$)	50 µg/m^3 (PM_{10}) 15 µg/m^3 ($PM_{2.5}$)		
	24 hours	50 µg/m^3 (PM_{10})	150 µg/m^3 (PM_{10}) 65 µg/m^3 ($PM_{2.5}$)		
Lead (P_b)	Monthly	1.5 µg/m^3	---	Disturbs gastrointestinal system, and causes anemia, kidney disease, and neuromuscular and neurologic dysfunction (in severe cases).	*Present source*: lead smelters, battery manufacturing and recycling facilities. *Past source*: combustion of leaded gasoline.
	Quarterly	---	1.5 µg/m^3		
Sulfates (SO_4)	24 hours	25 µg/m^3	---	Decrease in ventilatory functions; aggravation of asthmatic symptoms; aggravation of cardio-pulmonary disease; vegetation damage; degradation of visibility; property damage.	Industrial processes.

ppm parts per million
µg/m^3 micrograms per cubic meter

SOURCE: CARB, *Ambient Air Quality Standards*, May 17, 2006.

South Coast Air Quality Management District Air Quality Management Plan - The SCAQMD and SCAG are both responsible for preparing the Air Quality Management Plan (AQMP), which address federal and the California CAA requirements.[25] The AQMP details goals, policies, and programs for improving air quality and establishes thresholds for daily operation emissions. Environmental review of individual projects within the region must demonstrate whether daily construction and operation emissions thresholds established by the SCAQMD would be exceeded, and whether the proposed project would increase the number or severity of existing air quality violations.

Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as non-attainment. Based on regional monitoring to date, the Los Angeles County portion of SCAB is currently designated as a non-attainment area with regard to O_3 and PM_{10}.[26] The SCAB is currently designated as an attainment area for CO, SO_2 and NO_2.[27]

To ensure continued progress toward clean air and to comply with state and federal requirements, the SCAQMD, in conjunction with the CARB and SCAG, prepared the 2003 revision to its Air Quality Management Plan (2003 AQMP). The 2003 AQMP employs up-to-date science and analytical tools and incorporates a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, on-road and off-road mobile sources, and area sources.

The 2003 AQMP updates the federal standards for ozone and PM_{10}, replaces the 1997 attainment demonstration for the federal CO standard, provides a basis for a maintenance plan for CO for the future, and updates the maintenance plan for the federal NO_2 standard, which the SCAB has met since 1992. The 2003 AQMP proposes policies and measures to achieve federal and state standards for healthful air quality in the SCAB.

This revision to the 2003 Plan also addresses several state and federal planning requirements and incorporates significant new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new meteorological episodes, and new air quality modeling tools. This Plan is consistent with and builds upon the approaches taken in the 2003 AQMP and the 1999 Amendments to the Ozone SIP for the SCAB for the attainment of the federal ozone standard.

Each revision of the AQMP represents a snapshot in time based on the best available information. The 2007 AQMP is generally very similar to the structure of the 2003 Plan and the 1999 amendments to the ozone SIP, but like all new editions, the 2007 AQMP includes significant enhancements. The key improvements incorporated in the 2007 AQMP are summarized as follows:[28]

- Revised emissions inventory projections using CARB's latest EMFAC working draft for the on-road mobile source emissions inventory, CARB's off-road model for the off-road

[25] SCAQMD, *2003 Air Quality Management Plan,* August 1, 2003, p. ES-1.
[26] SCAQMD, *2003 Air Quality Management Plan,* August 1, 2003.
[27] *Ibid.*
[28] SCAQMD, *2003 Air Quality Management Plan,* August 1, 2003, updated Draft proposed October 2006.

mobile source emission inventory, latest point source and improved area source inventories as well as the use of new episodes and air quality modeling analysis, and SCAG's forecast assumptions based on its modified 2004 Regional Transportation Plan (RTP);

- Revised control strategy that updates remaining control measures from the 2003 AQMP and includes the incorporation of new control measures based on current technology assessments;
- Gridded inventories associated with the selected ozone episodes have been prepared for air quality modeling analyses and gridded emissions for 2005 and 2014 were developed to calculate annual average $PM_{2.5}$ concentrations; and
- An update of the progress toward the new federal eight-hour ozone and $PM_{2.5}$ standards.

The basic PM_{10} control strategy contained in the 1997 and 2003 Plans, augmented by a few additional PM_{10} control measures included in this draft revision, appears to be adequate to demonstrate attainment of the federal PM_{10} standard. With respect to ozone, however, the basic strategy of the 1997 Plan and the 1999 amendments was significantly overhauled to address the new realities of higher mobile source emissions and lower carrying capacities for ozone, as indicated by new modeling and meteorological episodes. Additional reductions above and beyond those committed to in the 1997 Plan and 1999 amendments will be necessary to demonstrate attainment with the federal ozone standard. This presents a significant challenge.

The SCAQMD also adopts rules to implement portions of the AQMP. Some of these rules may apply to construction or operation of the project. For example, Rule 403 requires the implementation of numerous measures to control fugitive dust. In addition, certain stationary sources of air pollution, such as boilers and heaters, may require permits from the SCAQMD pursuant to Rules 201, 202 and 203. Emission increases related to those sources may be subject to SCAQMD Regulation XIII, which requires that the best available control technology be utilized to reduce pollutants and that any increases of criteria air pollutants be offset by achieving equivalent emission reductions at the facility or elsewhere in the SCAB. In addition, this proposed project is subject to Title V of the federal CAA, in which all equipment located at the Title V facility must be in compliance with all terms, requirements, and conditions specified in the Title V permit.

In addition to the AQMP and its rules and regulations, the SCAQMD has published a handbook (*CEQA Air Quality Handbook*, 1993) intended to provide local governments and CEQA practitioners with guidance for analyzing and mitigating project-specific air quality impacts relative to CEQA. This handbook provides standards, methodologies, and procedures for conducting air quality analyses in EIRs.

3B.4 IMPACTS AND MITIGATION

3B.4.1 METHODOLOGY

Project-related demolition, site preparation, and building erection emissions, except for fugitive dust, were calculated using the URBEMIS 2002 computer model. Fugitive dust emissions during

the demolition and site preparation phases were calculated using a spreadsheet developed by the SCAQMD.[29] The URBEMIS 2002 model compiles emissions from three stages of construction: demolition, site grading, and construction. A complete listing of the construction equipment by phase and construction phase duration assumptions used in this analysis is included within the URBEMIS 2002 printout sheets provided in Appendix B of this EIR.

In addition to the *CEQA Air Quality Handbook*, the SCAQMD published the *Localized Significance Threshold Methodology for CEQA Evaluations* (SCAQMD Localized Significance Threshold [LST] Guidance Document) that is intended to provide guidance in evaluating localized effects from mass emissions during construction.[30] The SCAQMD followed this guidance with *Final-Methodology to Calculate Particulate Matter (PM) $_{2.5}$ and $PM_{2.5}$ Significance Thresholds* (October 2006). For project sites greater than five acres, the SCAQMD recommends that exposure to localized emissions be calculated using the USEPA Industrial Source Complex (ISC) model. The proposed project site is approximately 13 acres. Therefore, ISC was used to determine the effects of localized construction emissions.

The URBEMIS 2002 software was also used to compile long-term project operational emissions from mobile sources. In calculating mobile-source emissions, the URBEMIS 2002 default trip length assumptions were changed to reflect a specific vehicle trip length identified by LAUSD. As documented in the PEIR, student vehicles traveling to and from central region high schools travel an average of 0.67 miles per trip.[31] Non-student (e.g., administration and delivery) trip lengths were modeled as the URBEMIS 2002 default option. Stationary source emissions were also compiled using URBEMIS 2002. The analysis of roadway CO impacts followed the protocol recommended by Caltrans and published in the *Transportation Project-Level Carbon Monoxide Protocol*.[32] It is also consistent with procedures identified through the SCAQMD's CO modeling protocol. The CO hotspot analysis worksheets and assumptions are presented in Appendix C.

3B.4.2 CRITERIA FOR DETERMINING SIGNIFICANCE

The criteria used to determine the significance of an impact related to air quality are based on the CEQA Guidelines and SCAQMD standards.[33,34] The proposed project may result in significant air quality impacts if it would:

- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- Expose sensitive receptors to substantial pollutant concentrations; or

[29] SCAQMD, Sample Construction Scenarios, http://www.aqmd.gov/ceqa/handbook/LST/LST.html, Accessed August 1, 2006.
[30] SCAQMD, *Localized Significance Threshold Methodology*, June 2003.
[31] LAUSD, OEHS, *New School Construction Program, Final Program Environmental Impact Report (incorporates the New School Construction Program, Draft EIR)*. Published May 2004, Board Certified June 8, 2004. p. 3.1-1.
[32] California Department of Transportation, *Transportation Project-Level Carbon Monoxide Protocol*, December 1997.
[33] *CEQA Guidelines*, CCR, Title 14, Division 6, Chapter 3, §15152, 2004.
[34] SCAQMD, *CEQA Air Quality Handbook*, April 1993.

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

CEQA allows for the significance criteria established by the applicable AQMP or air pollution control district to be used to assess the impact of a project on air quality. The SCAQMD has established the air pollution emissions criteria shown in **Table 3B-4** for determining the significance of an impact during project construction and operation.

Regarding local CO emissions from roadway traffic, the proposed project would result in a significant air quality impact if it would do either of the following: (1) cause or contribute to exceeding the California one-hour CO standard of 20 parts per million (ppm), or the eight-hour CO standard of 9.0 ppm, at an intersection or roadway near a sensitive receptor; or (2) create an incremental increase in CO levels equal to or greater than 1.0 ppm for the one-hour standard, or 0.45 ppm for the eight-hour standard, at an intersection or roadway near a sensitive receptor.

3B.4.3 PROJECT IMPACTS

The environmental impact analysis presented below is based on the determinations made in the Initial Study for issues that were potentially significant and potentially significant with mitigation incorporated (see Appendix A). The impact analysis included both construction related impacts and operational related impacts.

Impact 3B1: Violate an air quality standard or contribute to an existing or projected air quality violation.

Project-related construction and operational regional emissions would not exceed the SCAQMD significance thresholds. As such, the proposed project would not violate an air quality standard or contribute to an existing or projected air quality violation.

Construction Emissions

Construction of the proposed project has the potential, through the use of heavy-duty construction equipment and from trips generated by construction workers commuting to and from the proposed project site to impact air quality. Fugitive dust emissions would result from site preparation, grading, and other construction activities. Mobile source emissions, primarily NO_X, would result from the use of construction equipment such as bulldozers, wheeled loaders, and cranes. During the finishing phase, paving operations and the application of architectural coatings such as paints and other building materials would release ROCs. The assessment of construction air quality impacts considers all of these potential sources. Construction emissions can substantially vary from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

TABLE 3B-4
SCAQMD AIR QUALITY SIGNIFICANCE THRESHOLDS

Mass Daily Thresholds		
Pollutant	**Construction**	**Operation**
NO_X	100 lbs/day	55 lbs/day
VOC [a]	75 lbs/day	55 lbs/day
$PM_{2.5}$	55 lbs/day	55 lbs/day
PM_{10}	150 lbs/day	150 lbs/day
SO_X	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs) and Odor Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Hazard Index ≥ 1.0 (project increment) Hazard Index ≥ 3.0 (facility-wide)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
Ambient Air Quality for Criteria Pollutants[b]		
NO_2	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards:	
1-hour average	0.25 ppm (state)	
annual average	0.053 ppm (federal)	
$PM_{2.5}$		
24-hour average	10.4 $\mu g/m^3$ (recommended for construction) [c]	
annual arithmetic mean	2.5 $\mu g/m^3$ (operation)	
	12 $\mu g/m^3$	
PM_{10}		
24-hour average	10.4 $\mu g/m^3$ (recommended for construction) [c]	
	2.5 $\mu g/m^3$ (operation)	
annual geometric average	1.0 $\mu g/m^3$	
annual arithmetic mean	20 $\mu g/m^3$	
Sulfate		
24-hour average	1 $\mu g/m^3$	
CO	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards:	
1-hour average	20 ppm (state)	
8-hour average	9.0 ppm (state/federal)	

lbs/day = pounds per day
ppm = parts per million
$\mu g/m^3$ = micrograms per cubic meter
≥ = greater than or equal to

a. For purposes of this analysis, VOC is equivalent to ROC.
b. Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.
c. Ambient air quality threshold based SCAQMD Rule 403.

SOURCE: SCAQMD, *CEQA Air Quality Handbook*, 1993; SCAQMD, Localized Significance Methodology, June 2003.

It is mandatory for all construction projects in this air basin to comply with SCAQMD Rule 403 for fugitive dust.[35] Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, re-establishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site, and maintaining effective cover over exposed areas.[36] Incorporating Rule 403 compliance into the proposed project would reduce regional $PM_{2.5}$ and $PM_{10.}$ LAUSD's construction contractor shall comply with Rule 403.

Emissions for the regional construction air quality analysis were compiled using the URBEMIS 2002 emissions inventory model developed by the CARB and calculation spreadsheets developed by the SCAQMD. The URBEMIS 2002 model separates the construction process into three stages. The first stage is building demolition with emissions resulting from demolition dust, debris haul truck trips, equipment exhaust, and worker travel. The second stage of construction is site grading with emissions resulting from fugitive dust, soil haul truck trips, equipment exhaust, and worker travel. The third stage is subdivided into building equipment, architectural coating, asphalt, and worker travel. Emissions from the third stage include equipment exhaust from building construction and asphalt paving, ROC emissions from architectural coating and asphalt paving, and worker travel. The equipment mix and construction duration for each stage is detailed in Appendix B of this EIR.

Unmitigated daily construction-related regional emissions for the proposed project are presented in **Table 3B-5**. As shown, maximum regional emissions would not exceed the SCAQMD daily significance thresholds for ROC, NO_X, CO, $PM_{2.5}$ or PM_{10}. Therefore, the regional construction impact would be less than significant.

Sensitive receptor exposure to localized construction pollutants was calculated based on the SCAQMD LST Guidance Document. The maximum on-site $PM_{2.5}$, PM_{10}, NO_X, and CO emissions would occur in 2009 when the building erection phase overlaps with the backfilling phase. During this time, fugitive dust $PM_{2.5}$ and PM_{10} emissions would be 0.08 pounds per day and 0.4 pounds per day, respectively. On-site exhaust $PM_{2.5}$ and PM_{10} emissions would be 1.9 pounds per day and 2.2 pounds per day, respectively. On-site NO_X emissions would be 58.5 pounds per day and on-site CO emissions would be 72.7 pounds per day.

The maximum on-site emissions for each pollutant were input into the ISC dispersion model to determine localized impacts. Results of the dispersion modeling are shown in **Table 3B-6**. The dispersion modeling results indicate that localized 24-hour $PM_{2.5}$ and PM_{10} concentrations would be approximately 0.86 $\mu g/m^3$ and 1.1 $\mu g/m^3$, respectively. These concentrations would be less than the 10.4 $\mu g/m^3$ incremental significance threshold. Localized construction $PM_{2.5}$ and PM_{10} concentrations would not exceed the SCAQMD incremental threshold and, as such, the proposed project would result in a less than significant localized $PM_{2.5}$ and PM_{10} impact.

[35] SCAQMD, *Rule 403 – Fugitive Dust,* April 2, 2004.
[36] *Ibid*.

TABLE 3B-5
UNMITIGATED REGIONAL CONSTRUCTION EMISSIONS

	Estimated Emissions (lbs/day)				
Year/Phase[a]	**ROC**	**NO_X**	**CO**	**$PM_{2.5}$**	**PM_{10}**
2008					
Demolition	6	59	45	2	2
Site Preparation/Grading	4	40	26	2[b]	2[b]
Building Erection/Finishing	6	38	61	1	1
2009					
Site Preparation/Grading	4	38	27	2[b]	2[b]
Building Erection/Finishing	7	37	66	1	1
Backfill	4	25	46	1	1
2010					
Building Erection/Finishing[c]	55	37	87	1	1
Backfill	4	24	46	1	1
2011					
Building Erection/Finishing[c]	55	37	87	1	1
Maximum Regional Total	59[d]	75[e]	133[d]	3[e]	3[e]
Regional Significance Threshold	75	100	550	55	150
Significant Impact?	No	No	No	No	No

a. Demolition activity would not overlap with any other construction phase. Site preparation/grading and building erection/finishing would overlap for part of 2008 and 2009. Also, building erection and backfill activities would overlap during parts of 2009 and 2010.

b. The estimation of $PM_{2.5}$ and PM_{10} emissions during the site preparation/grading phase assumed that a maximum of approximately 1,500 cubic yards of dirt would be disturbed per day. It was also assumed that the proposed project would comply with SCAQMD Rule 403 (Fugitive Dust).

c. Includes architectural coating emissions.

d. The maximum regional emissions would occur in 2010 when building erection and backfill activities would overlap.

e. The maximum regional emissions would occur in 2008 when site preparation/grading and building erection/finishing activities overlap.

SOURCE: Terry A. Hayes Associates, 2006.

TABLE 3B-6
UNMITIGATED LOCALIZED CONSTRUCTION EMISSIONS

Pollutant	Estimated Emissions (lbs/day)[a]	Concentration at Nearest Sensitive Receptor	Localized Significance Threshold[c]	Significant Impact?
$PM_{2.5}$	1.98	0.86 µg/m^3	10.4 µg/m^3	No
PM_{10}	2.15	1.1 µg/m^3	10.4 µg/m^3	No
NO_X	58.5	0.17 ppm	0.25 ppm	No
CO	72.7	6.3 ppm (one-hour)	20 ppm	No
		4.7 ppm (eight-hour)	9.0 ppm	No

ppm = parts per million
ug/m^3 = micrograms per cubic meter

a. The estimated emissions were obtained from URBEMIS 2002 and SCAQMD spreadsheet methodology.

b. The concentration at the nearest sensitive receptor was obtained from the ISC model. The ISC concentrations for NO_X and CO were added to the existing ambient concentrations. PM_{10} impacts are treated differently as the Basin exceeds the State standard. The incremental $PM_{2.5}$ and PM_{10} concentration threshold of 10.4 µg/m^3 is based on SCAQMD Rule 403 requirements.

c. The localized significance thresholds were obtained from the SCAQMD's *Sample Construction Scenarios for Projects less than Five Acres in Size* (January 2005).

SOURCE: Terry A. Hayes Associates, 2006.

A localized analysis was also completed for NO2 (one-hour) and CO (one-hour and eight-hour) emissions. The analysis indicated that one-hour and eight-hour CO concentrations, when added to the highest ambient concentration over the last three years, would be 6.3 parts per million (ppm) and 4.7 ppm, respectively. These concentrations would be less than the state one-hour and eight-hour standards of 20 and 9.0 ppm, respectively. The one-hour NO2 concentration, when added to the highest ambient concentration over the last three years, would be 0.17 ppm. This concentration would be less than the state standard of 0.25 ppm. Localized construction NO2 and CO concentrations would not exceed the SCAQMD thresholds and, as such, the proposed project would result in a less than significant localized NO2 and CO impact. The ISC output files for $PM_{2.5}$, PM_{10}, NO_2, and CO modeling are included in Appendix B of this EIR.

Operational Emissions

Regional air pollutant emissions associated with proposed project operations would be generated by the consumption of electricity and natural gas and by the operation of on-road vehicles. Mobile source emissions would be the largest source of pollutants resulting from proposed project operation and were estimated using the URBEMIS 2002 emissions inventory model. The average daily trips total is based on information from the traffic study prepared for the proposed project (see Appendix F), as well as the trip generation rates provided by the Institute of Transportation Engineers (ITE) Trip Generation Manual.[37] According to the traffic study, the proposed project would generate 3,545 net daily trips.[38, 39] Stationary source emissions were also

[37] ITE, *Trip Generation Manual, 7th Edition*, 2004.
[38] Katz, Okitsu & Associates, *Traffic Study for LAUSD Central Region High School #16, **May 8, 2007*** ~~October 24, 2006~~.
[39] Existing uses result in 574 daily trips and the proposed project would result in 4,119 daily trips.

compiled using URBEMIS 2002. **Table 3B-7** shows the project operational emissions. As presented in **Table 3B-7,** regional operational emissions would not exceed the SCAQMD significance thresholds. Therefore, the regional operations impact would be less than significant.

TABLE 3B-7
OPERATIONAL EMISSIONS

	Estimated Emissions (lbs/day)			
	ROC	**NO_X**	**CO**	**PM_{10}**
Existing Uses				
Mobile Sources	5	6	46	6
Stationary Sources	3	<1	2	<1
Total	8	6	48	6
Proposed Uses				
Mobile Sources	39	14	124	10
Stationary Sources	<1	<1	1	<1
Total	39	14	125	10
Net Project Emissions	31	8	77	4
Regional Significance Threshold	55	55	550	150
Significant Impact?	No	No	No	No

SOURCE: Terry A. Hayes Associates, 2006.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

This impact would be less than significant.

Impact 3B2: Expose sensitive receptors to substantial pollutant concentrations.

Project-related construction and operational emissions would not expose sensitive receptors to substantial pollutant concentrations.

Construction Emissions

As described in Impact 3B1 above, construction of the proposed project would not result in a significant localized air pollution impact and, therefore, would not expose any nearby sensitive receptors to substantial pollutant concentrations. LAUSD's construction contractor shall comply with the SCAQMD Rule 403 regarding the control of fugitive dust and other specified dust control measures. As such, construction impacts to off-site sensitive receptors would be less than significant, and no mitigation measures would be required.

Operational Emissions

Regarding project operation, project traffic would have the potential to create local area CO impacts. The SCAQMD recommends a hot-spot evaluation of potential localized CO impacts when volume-to-capacity (V/C) ratios are increased by two percent at intersections with a level of service (LOS) of D or worse. The SCAQMD also recommends a CO hot-spot evaluation when an intersection decreases in LOS by one level beginning when LOS changes from an LOS of C to D. Intersections were analyzed based on information provided in the traffic study prepared for the proposed project.[40] Of the eight intersections analyzed in the traffic study, the following three intersections required further analysis: San Pedro Street and East 52nd Street, San Pedro Street and Slauson Avenue, and Avalon Boulevard and Slauson Avenue.

Local area CO concentrations were projected using the CALINE4 traffic pollutant dispersion model. The analysis of CO impacts followed the protocol recommended by the California Department of Transportation (Caltrans) published in the *Transportation Project-Level Carbon Monoxide Protocol*.[41] It is consistent with procedures identified through the SCAQMD's CO modeling protocol, with all four corners of each intersection analyzed to determine whether the project development would result in a CO concentration that exceeds federal or state CO standards. As stated in the protocol, receptor locations for the one-hour analysis were located three meters (approximately 9.8 feet) from each intersection corner and receptor locations for the eight-hour analysis were located seven meters (approximately 23 feet) from each intersection corner.

Tables 3B-8 and 3B-9 present one-hour and eight-hour CO concentrations for the A.M. and P.M. peak hours, respectively. CO concentrations were estimated for existing (year 2006) conditions and the proposed project (year 2011) conditions. CO concentrations would be lower in year 2011 cumulative conditions compared to existing conditions. The reduction in CO concentrations over time is due to a lower emitting fleet mix than what currently exists. As vehicles age and no longer function properly, they are replaced in the overall fleet by newer, less polluting vehicles.[42] As shown in **Tables 3B-8 and 3B-9**, the proposed project would not contribute to the formation of a CO hotspot and proposed project operations would not expose sensitive receptors to substantial pollutant concentrations. This impact would be less than significant, and no mitigation measures are required.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

This impact would be less than significant.

[40] Katz, Okitsu & Associates, *Traffic Study for LAUSD Central Region High School #16*, May 8, 2007.
[41] California Department of Transportation, *Transportation Project-Level Carbon Monoxide Protocol*, December 1997.
[42] This discussion is consistent with CO mobile source emission factors used in CARB's EMFAC2002 emissions inventory model.

TABLE 3B-8
RESULTS OF CO ANALYSIS FOR THE PROPOSED PROJECT –AM PEAK HOUR

Intersection	CO Concentration Existing Conditions (ppm)[a]	CO Concentration 2011 Conditions (ppm)[b]	Significance Criteria (ppm)	Impact?
San Pedro Street and East 52nd Street				
One-hour Concentration	7.0	5.7	20	No
Eight-hour Concentration	5.2	3.7	9.0	No
San Pedro Street and Slauson Avenue				
One-hour Concentration	8.6	6.8	20	No
Eight-hour Concentration	6.0	4.3	9.0	No
Avalon Boulevard and Slauson Avenue				
One-hour Concentration	9.4	7.6	20	No
Eight-hour Concentration	6.5	4.6	9.0	No

a. Existing concentrations include year 2006 one- and eight-hour ambient concentrations of 6 and 4.6 ppm, respectively.
b. Future concentrations include year 2011 one- and eight-hour ambient concentrations of 4.8 and 3.2 ppm, respectively.

SOURCE: Terry A. Hayes Associates, 2006.

TABLE 3B-9
RESULTS OF CO ANALYSIS FOR THE PROPOSED PROJECT –PM PEAK HOUR

Intersection	CO Concentration Existing Conditions (ppm)[a]	CO Concentration 2011 Conditions (ppm)[b]	Significance Criteria (ppm)	Impact?
San Pedro Street and East 52nd Street				
One-hour Concentration	6.8	5.4	20	No
Eight-hour Concentration	5.0	3.6	9.0	No
San Pedro Street and Slauson Avenue				
One-hour Concentration	8.7	6.8	20	No
Eight-hour Concentration	6.0	4.3	9.0	No
Avalon Boulevard and Slauson Avenue				
One-hour Concentration	9.3	7.2	20	No
Eight-hour Concentration	6.5	4.5	9.0	No

a. Existing concentrations include year 2006 one- and eight-hour ambient concentrations of 6 and 4.6 ppm, respectively.
b. Future concentrations include year 2011 one- and eight-hour ambient concentrations of 4.8 and 3.2 ppm, respectively.

SOURCE: Terry A. Hayes Associates, 2006.

3B.4.4 CUMULATIVE IMPACTS

Impact 3B3: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors).

Construction and operation of the proposed project would result in a cumulatively considerable impact to air quality.

Construction Emissions

Eleven related projects have been identified in the vicinity of the proposed project. However, LAUSD's SCAQMD-approved approach to determining cumulative air quality impacts is to determine whether or not there are related LAUSD projects in the vicinity of the proposed project under consideration, within approximately one mile.[43] If there are related projects within the vicinity of the proposed project (for example, projects that are part of an ongoing regulatory program or are contemplated in a PEIR) then additive effects of the related projects should be considered. Three of the related projects, Central Region Elementary School No. 16, South Region Elementary School No. 6, and the proposed new South Los Angeles Wetlands Park, are located within one mile of the proposed project site and would be constructed at the same time as the proposed project. Cumulative construction emissions are provided in **Table 3B-10**.

As presented in **Table 3B-10**, cumulative regional construction emissions would not exceed the SCAQMD significance thresholds for CO, $PM_{2.5}$, or PM_{10}. Cumulative regional emissions would exceed the threshold for ROC and NO_X. The combination of construction air quality of the proposed project and the related projects would result in a significant cumulatively considerable impact with respect to construction regional air quality emissions.

Operational Emissions

The SCAQMD's approach for assessing cumulative operational impacts is based on its it's forecasts of attainment of NAAQS in accordance with the requirements of both the federal and California CAAS. This forecast also takes into account SCAG's forecasted future regional growth. As such, the analysis of cumulative impacts focuses on determining whether the project is consistent with forecasted future regional growth. If a project is consistent with the regional population, housing and employment growth assumptions upon which the SCAQMD's AQMP is based, then future development would not impede the attainment of both federal and California State Ambient Air Quality Standards, and a significant cumulative air quality impact would not occur. The proposed project is intended to relieve existing overcrowded conditions at high schools within the Central Planning Region and would not provide new high school seats to increase the overall capacity of LAUSD. No population growth would occur as a result of the proposed project. High school students would be able to attend a school within their existing neighborhood. In turn, the proposed project would result in a net reduction in vehicle miles traveled and mobile source

[43] Steve Smith, Written Communication, SCAQMD, July 20, 2005.

TABLE 3B-10
CUMULATIVE CONSTRUCTION EMISSIONS

School	Maximum Cumulative Daily Emissions (lbs/day)				
	ROC	NO_X	CO	$PM_{2.5}$	PM_{10}
Proposed Project	55	75	93	3	3
Central Region Elementary School No. 16	--[b]	37	87	1	1
South Los Angeles High School No. 3 [a]	7	81	103	3	3
South Region Elementary School No. 6 [a]	55	81	103	3	3
South Los Angeles Wetlands Park [a]	--[b]	--	--	--	--
Maximum Regional Total	117[c]	274[d]	386[e]	10[f]	10[f]
Regional Significance Threshold	75	100	550	55	150
Exceed Threshold?	Yes	Yes	No	No	No

a. The emissions analysis for South Region Elementary School No. 6 and South Los Angeles High School No. 3 were not complete at the time of this analysis. As such, phased emissions were assumed to be similar to those calculated for the proposed project. The emissions analysis for the South Los Angeles Wetlands Park was not complete at the time of this analysis.

b. Maximum cumulative daily ROC emissions would occur when construction activities for Central Region Elementary School No. 16 have been completed.

c. The maximum regional ROC emissions would occur in August 2010 when the proposed project and South Region Elementary School No. 6 would be in the building erection/finishing/architectural coating phase and when South Los Angeles High School No. 3 would be in the building erection phase.

d. The maximum regional NO_X emissions would occur from February 2009 to April 2009. During this period, the proposed project, South Los Angeles High School No. 3, and South Region Elementary School No. 6 would be in the site preparation/building erection phase and Central Region Elementary School No. 16 would be in the building erection/architectural coating phase.

e. The maximum regional CO emissions would occur in February 2009. During this period, the proposed project, South Los Angeles High School No. 3, and South Region Elementary School No. 6 would be in the site preparation/building erection phase and Central Region Elementary School No. 16 would be in the building erection/architectural coating phase.

f. The maximum regional $PM_{2.5}$ and PM_{10} emissions would occur from February 2009 to April 2009. During this period, the proposed project, South Los Angeles High School No. 3, and South Region Elementary School No. 6 would be in the site preparation/building erection phase and Central Region Elementary School No. 16 would be in the building erection/architectural coating phase.

SOURCE: Terry A. Hayes Associates, 2006.

emissions. Therefore, the proposed project would be consistent with the underlying growth assumptions on which the AQMP is based and the cumulative operational impact would be less than significant.

As shown in **Tables 3B-8 and 3B-9**, a localized CO impact analysis was conducted for cumulative traffic (for example, related projects and ambient growth through 2011). The analysis indicates that no local CO violations would occur at any of the analyzed intersections. Therefore, the proposed project would not have a significant cumulative impact on localized air quality.

Mitigation Measures

LAUSD would implement the following mitigation measures to reduce construction emissions of NO_X:

M-3B.1 *If the electrical connections are available, petroleum powered construction equipment shall utilize electricity from power poles rather than temporary diesel power generators and/or gasoline power generators.*

M-3B.2 *On-site mobile equipment shall be powered by alternative fuel sources (for example, methanol, natural gas, propane or butane), as feasible.*

M-3B.3 *All construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.*

M-3B.4 *Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 30 minutes. Diesel-fueled commercial motor vehicles with gross vehicular weight ratings of greater than 10,000 pounds shall be turned off when not in use for more than five minutes.*

Residual Impacts

Mitigation Measures M-3B.1 through M-3B.4 would reduce project-related construction NO_X emissions by five percent to 189 pounds per day. Cumulative NO_x and ROC emissions would still exceed the SCAQMD thresholds and regional construction impact would remain cumulatively considerable.

CHAPTER 3C
CULTURAL RESOURCES

3C.1 INTRODUCTION

A detailed historic resource evaluation for the proposed project site was prepared by Kaplan Chen Kaplan.[1] The full text of the historic resource evaluation can be found in Appendix D. This section summarizes information contained in the historic resource evaluation and provides information on the regulatory framework affecting the treatment of historic resources. This chapter examines the potential for historic buildings to be identified in the proposed project area. Other potential resources such as archaeological and paleontological resources were discussed in the NOP and IS for Central Region High School No. 16 (see Appendix A). The proposed project was determined to have a less than significant impact on these resources based on a site visit,[2] a report from the South Central Coastal Information Center, and information provided by the New School Construction Program, Final Program Environmental Impact Report. [3,4,5]

3C.2 EXISTING ENVIRONMENTAL SETTING

The proposed 13.4-acre project site is located along East 52nd Street between Avalon Boulevard and South San Pedro Street. The proposed project site contains ***ten (10)*** ~~nine (9)~~ single-family parcels, ***eleven (11)*** ~~thirteen (13)~~ multi-family parcels ***(including one parcel with two single-family homes)***, five (5) commercial ***and/or industrial*** parcels, a swap meet, and an existing LAUSD facility, Johnson Opportunity High School.[6] A portion of East 53rd Street, an east-west alley running parallel to East 52nd Street and East 53rd Street between Towne Avenue and Avalon Boulevard, and a north-south alley running parallel to Avalon Boulevard**,** between East 52nd Street and East 53rd Street**,** currently bisect the proposed project site.

Historic Neighborhood Context

The proposed project site and vicinity have historically included mixed land uses. Multi-family land uses have historically occurred in the residential area between East 52nd Street and East 53rd Street, Avalon Boulevard and Towne Avenue. At least half of the parcels in this area have been developed with multi-family dwelling units, typically by adding multiple detached units to the

1 Kaplan Chen Kaplan, *LAUSD Central Region High School No. 16 Site Historic Resource Evaluation*, ***May 11, 2007*** ~~July 17, 2006~~.
2 ESA, Site visit, March 2, 2006.
3 South Central Coastal Information Center, *Archaeological Resources Information Request*, March 2006.
4 South Central Coastal Information Center, *Archaeological Resources Information Request*, March 2006.
5 LAUSD, OEHS, *New School Construction Program, Final Program Environmental Impact Report*, Board Certified June 8, 2004, p. 3.5-19.
6 LAUSD, *Parcel Map*, February 23, 2006.

parcel. Over the first half of the 20th century, Avalon Boulevard transitioned from residential land uses to a mix of residential/commercial land uses, and later to commercial uses, while land uses located at 5207 Avalon Boulevard remained largely residential.[7]

Land uses and building configurations on the block located south of the proposed project site (bounded by East 53rd Street and East 54th Street, Avalon Boulvard and South San Pedro Street) remain unchanged from the uses shown on a Sanborn Map from 1922. This block is currently used by the Metropolitan Transit Authority for its Division No. 2 facility.[8] In 1922, Avalon Boulevard (formerly South Park Avenue) was subdivided and developed with three additional parcels that no longer exist. Two additional parcels have been developed on East 52nd Street. One of them has been developed with three detached buildings, and the other with an existing house and a second unit added to the parcel. On East 53rd Street, two parcels have had additional detached dwelling units added to the rear of the properties. Over approximately the next 85 years, some parcels were subdivided and developed. However, in general, land uses and density remained largely unchanged.

By 1950, the Los Angeles Transit Lines, an historic predecessor to the Los Angeles Rapid Transit District and, later on, the LACMTA, had developed facilities between East 54th Street and East 55th Street and had moved out of the facilities located between East 53rd Street and East 54th Street, which had been reused for manufacturing and warehousing. These facilities later came to be used as the current site of the swap meet.

Also by 1950, the two parcels at the southwest corner of East 53rd Street and Avalon Boulevard had been consolidated and occupied by one commercial structure and a few smaller dwelling units. Additional residential units had been added to parcels on East 52nd Street, East 53rd Street, the alley east of the proposed project site, and the area behind commercial buildings along Avalon Boulevard.

Analysis of Buildings

The proposed project site consists of 28 parcels. **Table 3C-1** provides a summary of the buildings, including the assessor's parcel number, building address, construction date, and building type. **Figure 3C.1** shows the proposed project site with the surrounding building addresses.

400 52nd Street, 5205-5208 Towne Avenue, and 5212 Towne Avenue (Multi-Family Residences) - There are three buildings on the parcel. The house addressed 400 52nd Street is oriented to 52nd Street and was constructed in 1905. This two-story house is foursquare in form with a hipped roof, overhanging eaves, and exposed rafter tails. A porch runs the width of the front of the house, and its canopy features exposed rafters. The porch is supported by a wood post and beam system. Windows and doors have flatboard surrounds. This house has been

[7] Kaplan Chen Kaplan, *LAUSD Central Region High School No. 16 Site Historic Resource Evaluation*, May 11, 2007.
[8] LAUSD, *Parcel Map*, February 23, 2006.

significantly altered as the original wood clapboard siding has been irreversibly encased in stucco, compromising its architectural integrity.[9]

The second house on the parcel, a gable front duplex located at 5206-5208 Towne Avenue, is oriented toward Towne Avenue. This one-story building, constructed in 1905, has a broad front facing gable roof. The fenestration is symmetrically arranged along the front façade with an entry door at either end of the façade. Four steps with a gabled canopy frame the doors. One set of three double-hung windows are located on the front façade to the side of each door. The building is sheathed in clapboard siding. This structure is over 50 years old; but is not considered significant in terms of construction or use, is not of any significant architectural style, an example of important vernacular architecture, nor a product of exceptional craftsmanship.[10]

The third house (5212 Towne Avenue) is a one-story building located at the rear of the lot and is oriented to Towne Avenue. Rectangular and box-shaped, this building was constructed in 1924, and includes a hipped roof and stucco cladding. The entry door is centered with a window on each side. This structure is of no significant architectural style, and although it is a good example of vernacular architecture, it is not considered to be a product of exceptional craftsmanship.[11]

406 East 52nd Street (Single-Family Residence) - This one-story classical house was built in 1905 and includes a recessed porch under the southeast corner of the house. Three windows, consisting of two narrower windows flanking a centered window, are set in a slightly projecting bay on the western portion of the front façade. The entry door and another window are located under the porch with several steps leading up to it. The hipped roof, with boxed eaves, is punctuated with a front gable dormer located above the window bay. The original clapboard siding and porch support piers has since been covered with stucco, an irreversible alteration of the original architectural design resulting in the loss of major character-defining features and compromising its architectural integrity.[12]

412 East 52nd Street (Single-Family Residence) - This one-story classic cottage was built in 1908 with a hipped roof, a deep overhang, and exposed rafter tails. Rectangular in plan, it has no porch; it appears that the original porch area was enclosed. A set of steps lead to a centered entry door. On the east end of the front façade, a slightly projecting bay is capped by a gable-front dormer with a cross-bar detail and a pair of vents. A front board runs just below the roof line. A set of three windows is located in the bay, a wider window flanked by two narrower windows. This clapboard clad house has endboards and door surrounds. Half of the front yard has been paved, although a single tree is located in this paved area. The house retains a fair level of architectural integrity; however, it is not a good example of a classical cottage due to its lack of an original porch.[13]

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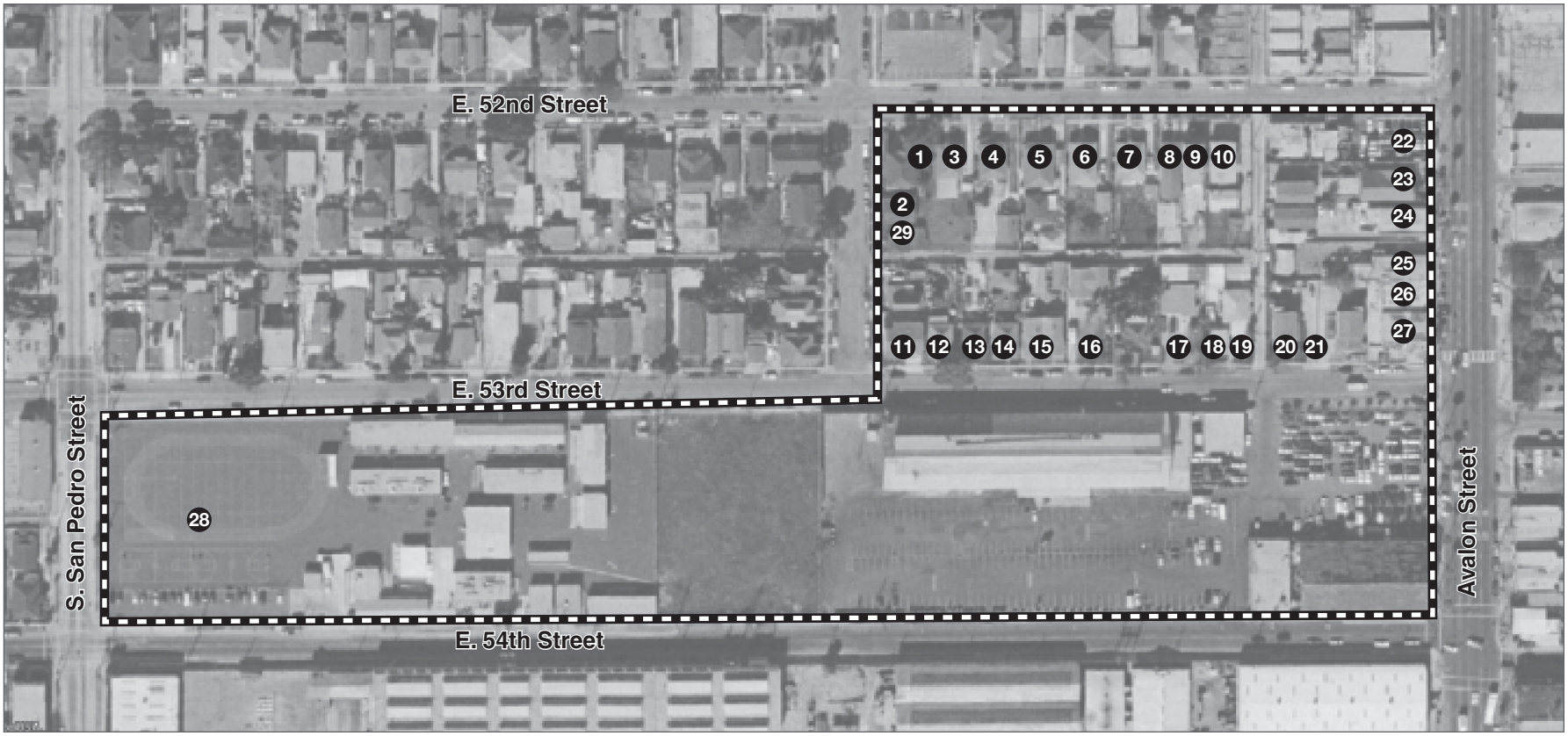
9 Kaplan Chen Kaplan, *LAUSD Central Region High School No. 16 Site Historic Resource Evaluation*, May 11, 2007.
10 *Ibid.*
11 *Ibid.*
12 *Ibid*
13 *Ibid.*

TABLE 3C-1
DESCRIPTION OF BUILDINGS ON THE PROPOSED PROJECT SITE

Parcel Number	Address	Date Built	Building Type
5109-026-016	400 E. 52nd Street, 5206-5208 S. Towne Avenue, and 5212 S. Towne Avenue	1905 and 1924	Multi-Family Residences
5109-026-015	406 E. 52nd Street	1905	Single-Family Residence
5109-026-014	412 E. 52nd Street	1908	Single-Family Residence
5109-026-013	416 E. 52nd Street	1905	Single-Family Residence
5109-026-012	424 E. 52nd Street	1912	Single-Family Residence
5109-026-011	426 E. 52nd Street	1907	Single-Family Residence
5109-026-010	428 E. 52nd Street	1910	Single-Family Residence
5109-026-009	430 E. 52nd Street	1924	Multi-Family Residence
5109-026-008	436 E. 52nd Street	1913 and 1958	Multi- and Single-Family Residences
5109-026-017	***5222 S. Towne Avenue***	***1897***	***Single-Family Residence***
5109-026-018	401 E. 53rd Street	1905 and 1995	Multi-Family Residence
5109-026-019	407 E. 53rd Street	1905	Single-Family Residence
5109-026-020	409 E. 53rd Street	1905	Single-Family Residence
5109-026-021	411 E. 53rd Street	1905	Single-Family Residence
5109-026-022	417 E. 53rd Street	1905	Triplex
5109-026-023	421 E. 53rd Street		Vacant Lot
5109-026-024	425 E. 53rd Street	1902	Single-Family Residence
5109-026-025	433 E. 53rd Street	1923 and 1947	Single-Family Residence
5109-026-026	437 E. 53rd Street	1948	Duplex
5109-026-030	443 E. 53rd Street	1984	Single-Family Residence
5109-026-031	445 E. 53rd Street	1984	Triplex
5109-026-029	5201 S. Avalon Boulevard	1947	Commercial
5109-026-003	5207 S. Avalon Boulevard	1910	Multi-Family Residence
5109-026-028	5213 S. Avalon Boulevard	1926	Commercial
5109-026-005	5219-21 S. Avalon Boulevard	1925 and 1916	Commercial
5109-026-006	5223 S. Avalon Boulevard	1927	Commercial
5101-001-002	5301 S. Avalon Boulevard	1904, 1940, and 1960	Industrial
5101-001-900	5300 S. San Pedro Street	C1970s	Institutional

SOURCE: Kaplan Chen Kaplan, *LAUSD Central Region High School No. 16 Site Historic Resource Evaluation*, ***May 11, 2007*** ~~July 18, 2006~~.



Site Location

1. 400 E. 52nd Street
2. 5206-5208 Towne Avenue
3. 406 E. 52nd Street
4. 412 E. 52nd Street
5. 416 E. 52nd Street
6. 424 E. 52nd Street
7. 426 E. 52nd Street
8. 428 E. 52nd Street
9. 430 E. 52nd Street
10. 436 E. 52nd Street
11. 401 E. 53rd Street
12. 407 E. 53rd Street
13. 409 E. 53rd Street
14. 411 E. 53rd Street
15. 417 E. 53rd Street
16. 421 E. 53rd Street
17. 425 E. 53rd Street
18. 433 E. 53rd Street
19. 437 E. 53rd Street
20. 443 E. 53rd Street
21. 445 E. 53rd Street
22. 5201 Avalon Boulevard
23. 5207 Avalon Boulevard
24. 5213 Avalon Boulevard
25. 5219 Avalon Boulevard
26. 5323 Avalon Boulevard
27. 5301 Avalon Boulevard
28. 5300 San Pedro Street
29. 5212 Towne Avenue

0 250
Feet

SOURCE: GlobeXplorer, 2006; Kaplan Chen Kaplen, 2006.

LAUSD CRHS No. 16 . 206048

Figure 3C.1
Project Site Building Addresses

416 East 52nd Street (Single-Family Residence) - This building is another one-story classical cottage constructed in 1905. The house is rectangular with a hipped roof, deep overhang and boxed eaves. The porch is recessed at the west end of the front façade. Tapered columns with capitals support the porch overhang. The entry door and a window are located under the porch. A front-gable dormer is located above the porch with a cross bar detail above a vent. A slightly projecting bay is located on the east end of the front façade with three aluminum slider type windows: two narrower windows flanking a wider centered window. The house was originally clad in clapboard, but has since been encased in stucco, which is an irreversible alteration resulting in the loss of major character-defining features and compromising its architectural integrity. A small front yard and driveway is defined by a fence and gate system.[14]

424 East 52nd Street (Single-Family Residence) - This house was built in 1912 in a California bungalow style. Rectangular in plan, the one-story house has a front facing gable roof with deep overhang and exposed rafters. A porch that runs the full width of the house is recessed under the front gable. The porch is supported by brick piers with tapered wooden columns and a wood slat rail system. A wide front board serves as the support for the porch. The gable roof projects out beyond the house and features a crossbar detail at the gable top. A small window flanked by vents on each side is centered in the gable area above the porch. A pair of doors is centered under the porch and a set of wide steps lead up to the porch. Located to the east of the door is a single fixed window with a decorative upper panel; located to the west of the door is a three part window system with a similar fixed window as described above flanked by two narrow double-hung windows. The house is clapboard clad, and is considered to be a good example of a California bungalow that retains good architectural integrity.[15]

426 East 52nd Street (Single-Family Residence) - Constructed in 1907, this classical cottage is rectangular in plan. The cottage is one-story in height with a hipped roof, a cross gable with a centered vent, and a deep overhang above a recessed porch. A wide front piece runs under the roof overhang and creates a roof beam for the porch that is supported by slender columns. A slightly projecting bay is located on the west end of the front façade and contains three windows: a centered wider window flanked by two narrower double-hung windows. The cottage was clapboard clad, but this original material has since been encased in stucco, an irreversible alteration resulting in the loss of major character-defining features and compromising the cottage's architectural integrity.[16]

428 East 52nd Street (Single-Family Residence) - A one-story residence constructed in 1910, this building appears to have been an even smaller house than the classical cottages on the block. The house is square in plan with a hipped roof. The entry door is recessed under a small porch-like entryway. A set of three windows are located in a slightly projecting front bay. The cottage was clapboard clad, but this original material has since been encased in stucco, which is

[14] *Ibid*.
[15] *Ibid.*
[16] *Ibid.*

considered to be an irreversible alteration resulting in the loss of major character-defining features and compromising the cottage's architectural integrity.[17]

430 East 52nd Street (Multi-Family Residence) - This two-story stucco-clad apartment building was constructed in 1924. The building is basically rectangular in plan and form. The flat roof features small pop-ups at the front corners; the parapet has a simple edge-course that is painted in a contrasting color. The main decorative elements are simple and concentrated on the front façade. Three double-hung windows are located along the second story. A narrow horizontal band connects the sills of the windows; a wider band connects the windows. Both bands run the full width of the building and are painted in a contrasting color. A small flat canopy is mounted above the windows. On the first level, an entry door is slightly recessed and flanked by a series of windows on both sides. The building sides are flat and featureless with double-hung windows as the only element. This building does not possess any significant architectural detailing, is not of any significant style, nor does it exhibit excellent craftsmanship.[18]

436 East 52nd Street (Multi- and Single-Family Residences) - The first building, located at the front of the lot was constructed in 1958 and is approaching 50 years old. This structure is a multi-family building of the most basic form. It has an almost flat roof with a deep overhang. Tuck-under parking is located along the back half of the east façade; a stairway leads up to a balcony off of which the unit's entry doors are located. A metal railing system defines the exterior stair system. The front façade contains both one wide and one narrower window at each of the two levels. The structure does not possess any architectural styling or detailing.[19]

A second house is located at the rear of the parcel behind the 1958 apartment building. This two-story house was constructed in 1913 with a front-gable roof and a deep overhang supported by triangular brackets. One window is set under the front gable. The first level of the front façade is simple with a few steps leading to an entry door that is defined by a small canopy supported by triangular braces. A double-hung window is located to each side of the door. All windows have flat-board surrounds. A small lean-to addition is located on the east side. The house is clad in clapboard siding and has end boards. This structure is not considered to be built in a significant architectural style, nor is it considered a good example of vernacular architecture, nor a product of exceptional craftsmanship.[20]

401 East 53rd Street (Multi-Family Residence) - Constructed in 1995, this two-story duplex features a cross-gable roof form and has an attached garage. This building is less than 50 years old. It is located on the northwest corner of East 53rd Street and Towne Avenue.

5222 Towne Avenue (Single-Family Residence) - At the rear of ***401 East 53rd Street is another parcel with a*** ~~the lot is another~~ residence that was originally constructed in ***1897*** ~~1905~~. It appears that the two-story wing with front-facing gable was the original house. The house has been radically altered with the addition of a one-story horizontal surface that is clad in random sized face stones. ***Stucco has been placed on the original form and windows changed to aluminum***

[17] *Ibid.*
[18] *Ibid.*
[19] *Ibid.*
[20] *Ibid*

sliders. This structure does not retain any historic character-defining features and has no historic architectural integrity.[21]

407 East 53rd Street (Single-Family Residence) - This classical cottage was constructed in 1905 by the Maccabee Building Association, Inc., and is one of three adjacent houses built by Maccabee on the block. What was originally platted as two parcels was later subdivided into three parcels, and individual cottages were constructed on each lot. The cottages were constructed by George Foster of Los Angeles.

The one-story structure is rectangular in form and plan. It is capped with a hipped roof with deep overhang and boxed eaves. A gable front dormer with vent is located above a set of three windows (unlike the typical condition, there is no projecting bay). The window set consisting of a wider middle window with a narrower window to each side is set flush into the front façade under the gable dormers. All windows have flatboard surrounds. Located at the southwest corner of the house, the porch is recessed and supported by tapered wood columns. Two entry doors and a window are located under the porch. A few steps lead to the porch with pipe handrails. The house is clad in narrow clapboard and security bars have been added to all windows and doors. This house retains a high level of architectural integrity.[22] Available City directories showed a typical pattern of residency by a variety of working individuals and occasional widows. No names of any historic significance were identified.[23]

409 East 53rd Street (Single-Family Residence) - This classical one-story cottage was constructed in 1905 by George Foster for the Maccabee Building Association, Inc., and is rectangular in form and plan. Capped by a hipped roof with deep overhang and boxed eaves, a gable-front dormer with centered vent is located above a slightly projecting bay at the west end of the front façade. A front board, under the overhang, runs around the house. A set of three windows is located in the bay with the centered window slightly wider than the flanking double-hung windows. Another window bay is located on the west elevation. All the windows are framed by simple flatboard surrounds and security bars have been added. The porch is recessed at the southeast corner of the house and is supported by a replaced system of decorative metal columns and railing. An entry door and window are located under the porch. The house is clad in narrow clapboard siding. This house retains a high level of architectural integrity.[24] Available City directories showed a typical pattern of residency by a variety of working individuals and occasional widows. No names of any historic significance were identified.[25]

411 East 53rd Street (Single-Family Residence) - This classical cottage was constructed in 1905 by George Foster for the Maccabee Building Association, Inc. This one-story house is similar to its neighbor located to the west. Rectangular in form and plan, it is capped by a hipped roof with a deep overhang and boxed eaves and a gable-front dormer with centered vent located above a slightly projecting bay at the west end of the front façade. A front board, under the overhang, runs around the house. A set of three windows is located in the bay with the centered window slightly

[21] *Ibid.*
[22] *Ibid.*
[23] *Ibid.*
[24] *Ibid.*
[25] *Ibid.*

wider than the flanking double-hung windows. Another window bay is located on the west elevation. All the windows are framed by simple flatboard that surrounds the building, and security bars have been added. The porch is recessed at the southeast corner of the house and is supported by a replaced system of decorative metal columns and railing. An entry door and window are located under the porch. The house is clad in narrow clapboard siding. This house retains a high level of architectural integrity.[26] Available City directories showed a typical pattern of residency by a variety of working individuals and occasional widows. No names of any historic significance were identified.[27]

417 East 53rd Street (Triplex) - This structure that was originally constructed in 1905 as a duplex has undergone significant alterations. The building form has a two gable front and a one and a half story building attached to it. Each segment has an entry door located on the far end of the front façade. Each entry has a hooded canopy supported by posts. The fenestration is simple, and the building is clad in stucco. The building retains no historic character-defining features and lacks architectural integrity.[28]

421 East 53rd Street (Vacant Lot) - The lot at 421 East 53rd Street is vacant.

425 East 53rd Street (Single-Family Residence) - This one-story house was constructed in 1902 and has undergone significant alterations. The house is cross gable in form and appears to have had an addition to the rear. No original windows or doors remain on the building, and the original wood siding is covered with stucco. No original character-defining features remain.[29]

433 East 53rd Street (Single-Family Residences) - Two one-story houses are located on this lot. The rear house appears to have been constructed in 1923 and is a simple form with a broad gable roof over a simple rectangular structure. It is stucco clad and has a hood canopy attached. Its fenestration is simple. The front house, constructed in 1947, is simple in form: a rectangular structure capped with a shallow hipped roof. Neither house has any historic character-defining features, are not of any architectural style, nor the work of a craftsman.[30]

437 East 53rd Street (Duplex) - This one-story house was constructed in 1948, is stucco-clad and, "L-shaped" in plan with a cross gable roof. The fenestration is simple and varied. There are no historic character-defining features. The house is not of any architectural style, nor the work of a craftsman.[31]

443 East 53rd Street (Single-Family Residence) - This structure was constructed in 1984 and is less than 50 years old.

445 East 53rd Street (Triplex) - This structure was constructed in 1984 and is less than 50 years old.

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[26] *Ibid.*
[27] *Ibid.*
[28] *Ibid.*
[29] *Ibid.*
[30] *Ibid.*
[31] Kaplan Chen Kaplan, *LAUSD Central Region High School No. 16 Site Historic Resource Evaluation*, May 11, 2007.

5201 Avalon Boulevard (Commercial) - This one-story structure, constructed in 1947, is located at the southwest corner of 52nd Street and Avalon Boulevard, at the rear of an automobile sales lot. It is a simple one-story structure of no architectural style.[32]

5207 Avalon Boulevard (Multi-Family Residence) - This building appears to have been originally designed as a single-family residence in 1910. It has undergone significant alterations. Some of its original form is visible in the cross gable roof with projecting rafters. All other elements of the original structure have been altered. Windows and doors have been replaced, and stucco has been added to the exterior. The building does not retain any historic architectural integrity due to the loss of significant character-defining features.[33]

5213 Avalon Boulevard (Commercial) - This commercial building was constructed in 1926 and is a one-story stucco-clad building with a flat roof. The front parapet has a slight step up at the corners and in the middle of the front façade forms a slight curve. The building's original storefronts have been replaced and the south end of the front façade has been enclosed. No significant character-defining features, other than its general form, remains. The building does not retain historic architectural integrity.[34]

5219-21 Avalon Boulevard (Commercial) - One residential building is located at the rear of the lot. Constructed in 1916, this structure is a simple one-story building with a side gable roof. The building in front is a commercial block building constructed in 1926. This stucco-clad building has no ornamentation and does not contain any original storefronts. Neither structure possesses any historic character-defining features or historic architectural integrity.[35]

5223 Avalon Boulevard (Commercial) - The structure is a "taxpayer" building, defined as "a building intended to cover the expenses of a piece of land until it can be put to a more profitable use."[36] According to architectural historian Chester Liebs, taxpayer buildings were commercial buildings "designed as shells that could be easily adapted to suit the needs of [an] individual tenant." Taxpayer buildings "were not intended as long-term investments." A taxpayer building filled with successful stores generated more revenue than the carrying costs of the property. Flexible space was important to the taxpayer building's plan, because the nature of the tenants was generally unknown at the design stage. Once the building was erected, tenancy could change, perhaps at frequent intervals. Since taxpayer buildings were not intended as long-term investments, both their design and construction tended to be "of an elementary kind." Furthermore, "some embellishment often was considered helpful in attracting tenants and customers alike…brick of hollow-tile terra cotta exterior walls became the norm after World War I, if not earlier, due to public preference as well as, perhaps, lower insurance premiums."[37] A

[32] *Ibid.*
[33] *Ibid.*
[34] *Ibid.*
[35] *Ibid.*
[36] American Heritage Dictionary of the English Language.
[37] Liebs, Chester, *Main Street to Miracle Mile: American Roadside Architecture*, 1985, pp. 64-65.

popular building form of the taxpayer building was the one-part commercial block, which was "a simple box with a decorated façade and thoroughly urban in its overtones."[38]

This one-part commercial block is located on the northwest corner of Avalon Boulevard and 53rd Street. Constructed in 1927, this stucco-clad building is simple in form and includes a horizontal band running along the top of the parapet and another band below it with the area between the bands available for signage. At the corner, a latter addition of a false parapet with a vertical structure provides a focal point. Storefronts, most of which have been changed to accommodate changing tenant requirements, punctuate the building at various locations. The original corner storefront has been removed and filled in with brick. While the basic form of the original building remains, most of the character-defining features have been removed, and the building does not possess historic architectural integrity.[39]

5301 Avalon Boulevard (Industrial) - No original building permits could be located for this property. The Los Angeles County Assessor records list one of the structures as dating from 1904. The 1906 Sanborn Map shows the block bordered by Avalon Boulevard (formerly South Park Avenue) to the east, East 53rd Street to the north and East 54th Street to the south built with structures to support the Los Angeles Railway Company. A "U"-shaped building was located along South Park Avenue, with the stems of the "U" oriented toward the numbered streets. The stems were the larger buildings of the complex while a short segment connected them. This stem and the "U" shape accommodated a long, narrow car transfer table and pit element that was located in the middle of the large parcel. The building along South Park Avenue contained the carpenter shop and machine shop. A long building along East 53rd Street was a car repair shop, and the building along East 54th Street housed a store room and print shop. The same configuration of buildings is shown on the 1922 Sanborn Map for the Los Angeles Railway Corporation's Division No. 2. By this time, the railroad company occupied the large block to the south of this one.

The 1950 Sanborn Map shows that the three buildings had transitioned to other uses. The block located to the south of the buildings continued to support transportation functions for the Los Angeles Transit Lines. The "U"-shaped building located on the present Avalon Boulevard contained a Venetian blind manufacturer and furniture storage business in the southeast building on the parcel. The small stem contained a steel slat manufacturing and painting facility, and the northeast building on the parcel contained a mattress and upholstery spring manufacturer. Other buildings located west of this parcel were used for surplus material storage, warehouse, and upholstered furniture manufacturing. The 1960 Sanborn Map shows the southeast building being used for steel products storage. In 1970 the "U"-shaped building was still being used for bedspring manufacturing in its northeast section and for aluminum products in its southeast section.

This "U"-shaped building is one and a half stories in height with a front facing gable on Avalon Boulevard. The brick façade is divided into six bays on its street-facing façade; the bays are

[38] Longsteth, Richard, *The Buildings of Main Street: a Guide to American Commercial Architecture, 1987,* pp. 54-55.
[39] *Ibid.*

separated by brick piers that slightly project outward. Each of the two middle bays contains an arched window. On the first floor level, similar arched topped windows are located in each bay. These windows have been filled in with brick. The north façade is devoid of windows (an indicator that the building may be a remnant); the south façade is separated into bays with each containing two narrow arched top windows.

The footprint of the "U"-shaped building, its form, and masonry construction provide some evidence that the building may have been part of the original transit facility built on the parcel in the early 20th century. In 1982, a building permit was issued to demolish approximately half of the building that had exterior brick walls. Thus, it appears that the brick structure at 5301 Avalon Boulevard is a remaining portion of the original "U"-shaped building. The southeast section of the building is located on the southwest corner of Avalon Boulevard and East 54th Street. The building represents less than half of the original structure and has lost architectural integrity.[40]

The larger building located along East 53rd Street is listed in the assessor records at 31,212 square feet with a construction date of 1904/1940. It appears that alterations in 1940 included application of the stucco exterior and the addition of new windows. This structure does not possess any historic architectural integrity.[41]

5300 South San Pedro Street (Institutional) - This large parcel contains the Johnson Opportunity High School. Constructed in 1970, the parcel is completely developed and contains a series of utilitarian, stucco-clad rectangular structures and is otherwise paved. The very basic buildings serve as classroom, administrative, and support spaces. The facility is less than 50 years old, and the buildings are unremarkable.[42]

At the beginning of the 20th century, this parcel contained a support facility for the Los Angeles Railway Company (with continued transit-related uses into the 1940s). In the 1950s, these uses were converted to private manufacturing and warehousing.

3C.3 APPLICABLE REGULATIONS

National Register of Historic Places[43] **-** The criteria for determining eligibility for listing on the National Register of Historic Places (NRHP) have been developed by the National Park Service. Properties may qualify for National Register listings if they:

- Are associated with events that have made a significant contribution to the broad patterns of history; or
- Are associated with the lives of persons significant in the past; or

[40] Longsteth, Richard, *The Buildings of Main Street: a Guide to American Commercial Architecture, 1987,* pp. 54-55.
[41] *Ibid.*
[42] *Ibid.*
[43] National Parks Service, National Register of Historic Places, website http://www.cr.nps.gov/nr/, accessed January 17, 2006.

- Embody the distinctive characteristics of a type, period, or method of construction that represent the work of a master, possess high artistic values, represent a significant and distinguishable entity whose components may lack individual distinction; or
- Have yielded or may be likely to yield, information important to prehistory or history.

According to the NRHP guidelines, the "essential physical features" of a property must be present for it to convey its significance. Furthermore, in order to qualify for the NRHP, a resource must retain its integrity, or "the ability of a property to convey its significance." The seven aspects of integrity are:

- Location (the place where the property was constructed or where the historic event occurred);
- Design (the combination of elements that create the form, plan, space, structure and style of a property);
- Setting (the physical environment of a historic property);
- Materials (the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property);
- Workmanship (the physical evidence of the crafts of a particular culture or people during any given period of history or prehistory);
- Feeling (a property's expression of the aesthetic or historic sense of a particular period of time); and
- Association (the direct link between an important historic event or person and a historic property).

The relevant aspects of integrity depend upon the NRHP criteria applied to a property.

The minimum age criterion for the NRHP and the California Register of Historical Resources (CRHR) is 50 years, as discussed below. Properties less than 50 years old may be eligible for listing on the NRHP if they can be regarded as "exceptional," as defined by the NRHP procedures, or in terms of the CRHR, "if it can be determined that sufficient time has passed to understand its historical importance."

California Register of Historical Resources[44] - CEQA requires evaluation of project impacts on historic resources, including properties, "listed in, or determined to be eligible for listing in, the [California Register of Historical Resources] CRHR or included in a local register of historic resources." A resource is eligible for listing on the CRHR if it meets any of the following criteria for listing:

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

[44] State of California, Office of Historic Preservation, California Register of Historical Resources, website http://www.ohp.parks.ca.gov/?page_id=21238, accessed July 18, 2006.

- Is associated with the lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Has yielded, or may be likely to yield, information important in prehistory or history.

The CRHR may also include properties listed in local registers of historic properties. A local register of historic resources is broadly defined as a "list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution." Local registers of historic properties essentially come in two forms: (1) surveys of historic resources conducted by a local agency in accordance with State Historic Preservation Office (SHPO) procedures and standards, adopted by the local agency and maintained as current and (2) landmarks designated under local ordinances or resolutions (Public Resources Code Section 5024.1, 21804.1, and 15064.5).

By definition, the CRHR also includes all "properties formally determined eligible for, or listed in, the NRHP," and certain specified state historical landmarks. The majority of "formal determinations" of NRHP eligibility occur when properties are evaluated by the SHPO in connection with federal environmental review procedures.[45] Formal determinations of eligibility also occur when properties are nominated to the NRHP but are not listed due to the filing of a notarized letter of objection.

3C.4 IMPACTS AND MITIGATION

3C.4.1 METHODOLOGY

Kaplan Chen Kaplan conducted a historic resources survey of the 400 block of East 52nd Street, the 400 block of East 53rd Street, the 5200 to 5300 blocks of Avalon Boulevard, and the west side of the 5300 block of South San Pedro Street. The existing structures were compared against the threshold criteria for inclusion on the NRHP and CRHR to determine the historic significance.

3C.4.2 CRITERIA FOR DETERMINING SIGNIFICANCE

The criteria used to determine the significance of an impact related to cultural resources are based on the *CEQA Guidelines*. The proposed project may result in a significant cultural resources impact if it would:

- Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5; or
- Result in a cumulatively considerable impact with respect to cultural resources.

[45] Section 106 of the National Historic Preservation Act, 1996.

3C.4.3 PROJECT IMPACTS

The environmental impact analyses presented below is based on the determinations made in the Initial Study (see Appendix A) for issues that were determined to be potentially significant.

Impact 3C1: Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.

Implementation of the proposed project would not cause a substantial adverse change in the significance of a historical resource. This impact would be less than significant.

There are numerous structures over 50 years old in the project area.[46] The single most common form is that of the classical cottage, of which there are eight out of 24 buildings in the residential area in the vicinity of the proposed project. Half of the classical cottages in the project vicinity, and all but one of the other older residences, have lost architectural integrity due to significant alterations (loss of original materials including stucco covering clapboard, porches altered, windows and doors altered). While these structures retain the outline of their original form, they all have undergone alterations that are irreversible. Due to this loss of significant character-defining features and irreversible alterations, these structures have lost their historic architectural integrity and do not qualify for inclusion on the NRHP or CRHR.

Five houses in the proposed project's vicinity retain a good level of architectural integrity. Two are on the 400 block of East 52nd Street: 412 (classic cottage, although porch is enclosed) and 424 East 52nd Street (California bungalow). Three houses on East 53rd Street located at 407, 409, and 411 (classic cottage style) retain a very good level of architectural integrity. A second dwelling unit was constructed at the rear of each lot. (Two of the original lots on East 53rd Street were subdivided into three smaller parcels to maximize the number of dwellings that could be built).

Also in the vicinity of the proposed project site, two cottages on the west side of Towne Avenue maintain very good architectural integrity. The cottage located at 5219 Towne was constructed in 1895, and the other cottage, located at 5221 Towne Avenue, was built in 1902. Both of these structures retain significant character-defining features and architectural styling. The classical cottage located at 5221 Towne Avenue is an excellent example of the style and retains original classical details such as the relief work in the gable pediment, original columns with capitals, and original siding. The cottage located at 5219 Towne Avenue is an excellent example of a transitional Victorian cottage. It also retains character-defining features and form and has a high level of architectural integrity. Both of these houses have potential historic significance as individual resources and could be eligible for the CRHR.[47] The adjacency of proposed new construction across the street would not affect this potential status. No historic district exists, and the street has already been redeveloped with structures that date from well after the period of significance of these two structures.

[46] Kaplan Chen Kaplan, *LAUSD Central Region High School No. 16 Site Historic Resource Evaluation*, May 11, 2007.
[47] *Ibid.*

The three cottages on East 53rd Street were constructed by a fraternal/ethnic organization, but this was not an unusual way to fund construction of housing at the time they were built. The cottages retain a good level of architectural integrity but do not individually rise to a level of significance for inclusion on the CRHR or NRHP based on their architecture or historic association. The fact that any individual building retains features that define it as a building type or style does not qualify a building for historic designation under the CRHR or NRHP.[48]

The cluster of cottages located at 412 East 52nd Street, 424 East 52nd Street, 407 East 53rd Street, 409 East 53rd Street, 411 East 53rd Street, 5219 Towne Avenue, and 5221 Towne Avenue in the project vicinity which date from 1895 to 1905 are divided into three small areas that are separated by parcels with a range of other buildings in various styles. There is not a sufficient concentration of cottages to create a historic district. Only one of the cottages, the 1895 structure located at 5219 Towne Street Avenue, across the street from the proposed project site, appears to meet criteria for potential inclusion on the CRHR as an individual landmark. Implementation of the proposed project would not impact this cottage, since the individual parcel is not related to other parcels. Furthermore, the urban form of the project vicinity is eclectic with structures of varying ages and including the proposed project with these structures would not change the historic significance of the 1895 cottage.

The buildings along the 5200 block of Avalon Boulevard include a mix of commercial and residential land uses. While some of these buildings are over 50 years old, all of those buildings have undergone significant alterations resulting in a loss of architectural integrity.

The western portion of the large block bounded by East 53rd Street to the north, East 54th Street to the south, Avalon Boulevard to the east, and South San Pedro Street located to the south includes the Johnson Opportunity School which is less than 50 years old and has an utilitarian rectangular form with stucco-clad buildings. The eastern portion of the lot contains industrial structures located at 5301 Avalon Boulevard. These structures are currently used by the swap meet. At the beginning of the 20th century, this block contained a support facility for the Los Angeles Railway Company, located adjacent to the southern perimeter of the project site. Railway- and transit-related uses continued into the 1940s. In the 1950s, uses on this block were converted to private manufacturing and warehousing.

It appears that two portions of the original railway support facility complex remain: a long shed along East 53rd Street and a masonry wing of what was a larger "U"-shaped building at the southwest corner of Avalon Boulevard and East 54th Street. The East 53rd Street structure is a utilitarian shed-like structure that has limited architectural features. Building permit records were not located; the Assessor's records include a date of 1904 with alterations in 1940. While the structure had been used for transportation and industrial uses through the 20th century, there is nothing exceptional about the structure or its use to convey historic or architectural significance.[49]

[48] Kaplan Chen Kaplan, *LAUSD Central Region High School No. 16 Site Historic Resource Evaluation*, May 11, 2007.

[49] *Ibid.*

The building on the southwest corner of Avalon Boulevard is more architecturally interesting than the one described above. Constructed with brick, a gable roof, and arched windows, it is constructed in a form that was used throughout the early 20th century. The date of original construction could not be established although the Assessor's records list a 1960 date. The footprint of the transportation facility from 1960 is similar to that of the existing portion of the building, and it is possibly a remnant from that period. However, it would only be a residual portion of what was a larger "U"-shaped structure that took up the whole frontage along Avalon Boulevard. The larger wing on the northwest corner and the wing that connects the two large wings have been demolished, resulting in a loss of architectural integrity. This masonry construction could also have been used in the middle of the century, but that fact would not meet the threshold to render the building as historic. The building, while interesting in form, would only be a residual section of what was originally a complex. As such, it does not appear to meet the threshold to be eligible for the CRHR or NRHP.[50]

The potentially historic building at 5219 Towne Street (across the street from the proposed project) would not be substantially affected by the proposed project, and the proposed project's impact on the building would therefore be considered less than significant. In addition, the remnants of the railroad support facility have lost architectural integrity and would not be eligible for either the California Register or the National Register.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Based on the information and discussion above, the proposed project would have a less than significant residual impact on historical resources.

3C.4.4 CUMULATIVE IMPACTS

Impact 3C2: Result in cumulatively considerable impact with respect to cultural resources.

The proposed project would not result in a cumulatively considerable impact with respect to cultural resources.

This analysis is based on the cumulative projects list provided in Chapter 2. The listed projects include various commercial and public facility projects located in the vicinity of the proposed project site that are currently under construction, approved but not built, or proposed for development. The listed projects also include the adjacent development of the proposed South Los Angeles Wetlands Park, which would remove the last vestiges of railroad activity near the project site. Neither the remnants on the project site nor the buildings across the street at the MTA facility have, however, been identified as eligible for the California Register or National Register. Other potentially historic railway facilities can be found throughout the Los Angeles area. The

[50] Kaplan Chen Kaplan, *LAUSD Central Region High School No. 16 Site Historic Resource Evaluation*, May 11, 2007.

redevelopment of the proposed project site with a high school would not involve a significant adverse impact to a historic, archaeological or paleontological resource as noted in the *Notice of Preparaion and Initial Study for Central Region High School No. 16*. Implementation of the proposed project would not result in a cumulatively considerable impact with respect to cultural resources.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Based on the information and discussion above, the proposed project would not result in cumulatively considerable impacts to cultural resources.

CHAPTER 3D
NOISE

3D.1 INTRODUCTION

This chapter presents information on ambient noise conditions in the vicinity of the proposed project site and identifies potential impacts associated with noise and vibration due to the construction and operation of the proposed project, including potential effects on the prospective students and employees of the proposed project. Noise analysis worksheets are provided in Appendix E.

3D.1.1 NOISE

Sound is mechanical energy transmitted by pressure waves in a compressible medium such as air. Noise can be defined as unwanted sound. Sound is characterized by various parameters that include the rate of oscillation of sound waves (frequency), the speed of propagation, and the pressure level or energy content (amplitude). In particular, the sound pressure level has become the most common descriptor used to characterize the loudness of an ambient sound level. The decibel (dB) scale is used to quantify sound intensity. Since the human ear is not equally sensitive to all frequencies within the entire spectrum, noise measurements are weighted more heavily within those frequencies of maximum human sensitivity in a process called "A-weighting," referred to as dBA. In general, a difference of more than three dBA is a perceptible change in environmental noise, while a five dBA difference typically causes a change in community reaction. An increase of 10 dBA is perceived by people as a doubling of loudness.[1]

Because sound pressure can vary by over one trillion times within the range of human hearing, a logarithmic loudness scale is used to keep sound intensity numbers at a convenient and manageable level. Therefore, the cumulative noise level from two or more sources will combine logarithmically, rather than linearly (for example, simple addition). In other words, if two identical noise sources produce a noise level of 50 dBA each, the combined noise level would be 53 dBA, not 100 dBA.

Time variation in noise exposure is typically expressed in terms of the average energy over time (Leq), or alternatively, as a statistical description of the sound level that is exceeded over some fraction of a given period of time. For example, the L_{50} noise level represents the noise level that is exceeded 50 percent of the time – half the time the noise level exceeds this level and half the time the noise level is less than this level. This level is also representative of the level that is exceeded 30 minutes in an hour. Similarly, the L_8 and L_{25} represent the noise levels that are exceeded eight and 25

[1] EPA. *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety*, March 1974.

percent of the time, respectively, or for five and 15 minutes during a one-hour period, respectively.

Several methods have been devised to relate noise exposure over time to human response. A commonly used noise metric for this type of study is the Community Noise Equivalent Level (CNEL). The CNEL, originally developed for use in the California Airport Noise Regulation, adds a five dBA penalty to noise occurring during evening hours from 7 P.M. to 10 P.M., and a ten dBA penalty to sounds occurring between the hours of 10 P.M. and 7 A.M. to account for the increased sensitivity to noise events that occur during the quiet late evening and nighttime periods. Thus, the CNEL noise metric provides a 24-hour average of A-weighted noise levels at a particular location, with an evening and a nighttime adjustment, which reflects increased sensitivity to noise during these times of the day.

The day-night noise level (L_{dn}) is the energy average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to the A-weighted sound levels occurring during the period from 10 P.M. to 7 A.M. L_{dn} and CNEL values are generally considered to be equivalent and are treated as such in this assessment. In general, a change in sound level of three dB is just noticeable, a change of five dB is clearly noticeable, and a change of 10 dB is perceived as doubling or halving sound level.

3D.1.2 TYPICAL ENVIRONMENTAL NOISE LEVELS

Noise levels are generally considered low when they are below 45 dB(A), moderate in the 45-60 dB(A) range, and high above 60 dB(A). Although people often accept the higher levels associated with very noisy urban residential and residential-commercial zones (above 60 dB(A)) as well as industrial areas (65 to 70 dB(A)), they nevertheless are considered adverse noise levels.

Lower noise levels are more expected in rural or suburban areas than in commercial or industrial zones. Nighttime ambient levels in urban environments are about seven decibels lower than the corresponding average daytime levels. The day-to-night difference can be less in rural areas away from roads and other human activity. Areas with full-time human occupation that are subject to nighttime noise that does not decrease relative to daytime levels are often considered objectionable. Noise levels above 45 dB(A) at night can result in sleep interference. **Table 3D-1A**, below, shows typical sound levels from common sources and how L_{dn} varies in different areas.

The normal range of conversation is between 34 and 66 dB(A). Between 70 and 90 dB(A), sound is distracting and presents an obstacle to conversation, thinking, or learning. Above 90 dB(A), sound can cause permanent hearing loss.[2] In general, a difference of more than 3 dB(A) is a perceptible change in environmental noise, while a 5 dB(A) difference typically causes a change in community reaction. An increase of 10 dB(A) is perceived by people as a doubling of loudness.[3]

[2] CDE, School Facilities Planning Division, *School Site Selection and Approval Guide*, October, 2004.

[3] U.S. Environmental Protection Agency (USEPA), *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety*, March 1974.

TABLE 3D-1A
TYPICAL SOUND LEVELS

Common Sounds	A-Weighted Sound Level in Decibels	Subjective Impression
Oxygen Torch	120	Pain Threshold
Rock Band	110	
Ambulance Siren at 100 feet	90	
Garbage disposal	80	
Vacuum Cleaner at 10 feet	70	Moderately Loud
Air Conditioner at 100 feet	60	
Quiet Urban Daytime	50	
Quiet Urban Nighttime	40	Quiet
Bedroom at Night	30	
Recording Studio	20	Just Audible
	10	Threshold of Hearing
	0	

SOURCE: Aviation Planning Associates, *Calculations of Maximum A-weighted Sound Levels (dB(A)) Resulting from Civil Aircraft Operations*, 1978.

Noise levels from any source will naturally diminish as the sound radiates outward over increasing distance and is absorbed or dissipated into the air. As a rule of thumb, for a stationary noise source, the noise level is reduced by at least 6 dB(A) for each doubling of distance from the source. Other factors such as the weather and reflecting or shielding also help intensify or reduce noise levels at any given location. Noise levels may also be reduced by intervening structures. Generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dB(A). Exterior noise levels can normally be reduced by 15 dB(A) inside buildings constructed with no special noise insulation.[4]

3D.1.3 VIBRATION

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings. The root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on the human body. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (Vdb) is commonly used to measure RMS. The decibel notation acts to compress the range of numbers required to describe vibration.[5] Typically, groundborne vibration generated by human activities rapidly attenuates with distance from the source of the vibration. Human-produced vibration issues are, therefore, usually confined to short distances (for example, 500 feet or less) from the source.

[4] U.S. Department of Housing and Urban Development (HUD), *Noise Guidebook*, 1985.
[5] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, April 1995.

3D.2 EXISTING ENVIRONMENTAL SETTING

3D.2.1 EXISTING NOISE SOURCES

The predominant noise source in the project area is roadway noise from the surrounding roadway network. Other community noise sources include incidental noise from nearby residences (for example, landscaping activity and domestic animals), pedestrians, and aircraft over-flights.

Noise monitoring was conducted on July 7, 2006 to ascertain the existing ambient daytime noise levels at nearby sensitive receptors.[6] The measurement locations, along with sensitive receptor locations, are presented in **Figure 3D.1**. A summary of noise measurement data is provided in **Table 3D-1B**. As shown on the table, ambient noise levels near the proposed project site ranged from 59.8 to 70.1 dBA L_{eq} (for 15 minutes).

TABLE 3D-1B
MEASURED AMBIENT NOISE LEVELS ON AND SURROUNDING PROJECT SITE

Location	Start Time	Duration	Exterior Existing 15 Minute Average (dBA, L_{eq})	Existing Noise Sources
A – S. San Pedro Street	8:10 a.m.	15 minutes	69.6	Light Traffic, Trucks, Pedestrians
B – East 54th Street	8:30 a.m.	15 minutes	67.7	Light Traffic, Buses
C – Avalon Boulevard	8:55 a.m.	15 minutes	70.1	Light Traffic, Buses, Pedestrians
D – East 52nd Street	9:15 a.m.	15 minutes	66.9	Light Traffic
E – Towne Avenue	9:40 a.m.	15 minutes	59.8	Light Traffic
F – East 53rd Street	10:00 a.m.	15 minutes	59.8	Light Traffic

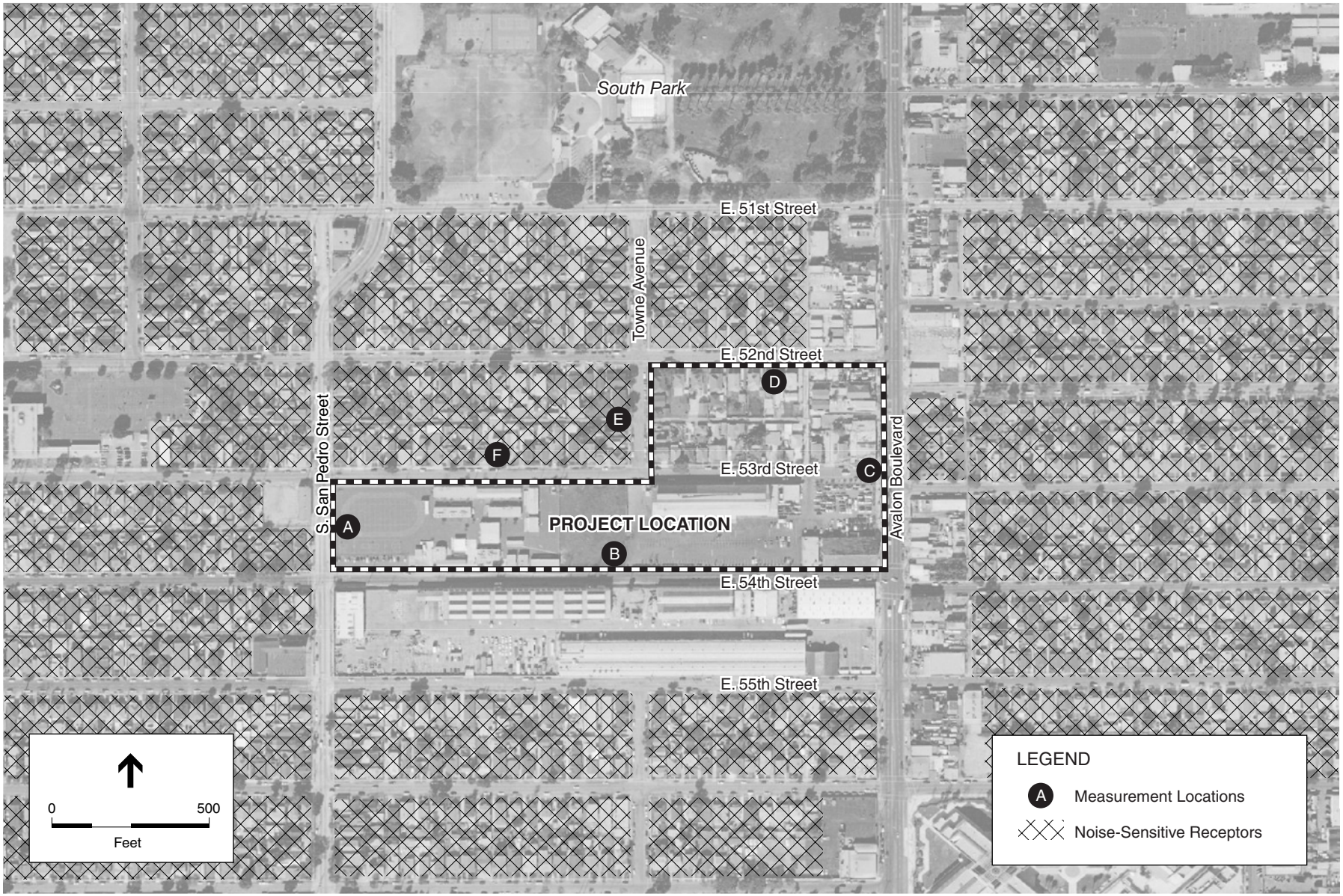
Notes: dBA: A-weighted decibel.
L_{eq}: Equivalent sound level.

SOURCE: Terry A. Hayes Associates, 2006.

To further characterize existing noise levels in the project area, noise from traffic traveling on streets during the morning peak-hour in the project area was modeled using the Federal Highway Administration Traffic Noise Prediction Model and traffic volumes provided in the traffic study (see Appendix F).[7,8] **Table 3D-2** summarizes traffic noise modeling results for the existing conditions.

As shown in **Table 3D-2**, the calculated CNEL for the analyzed roadway segments as a result of existing traffic volumes ranged from 53.3 to 67.8 dBA CNEL at a distance of 50 feet. The predicted noise levels are lower than the monitored noise level presented in **Table 3D-1**, because the mobile noise levels do not account for other community noise sources such as overhead aircraft, pedestrians, and landscaping activity.

6 Terry A. Hayes Associates, July 7, 2006.
7 U.S. Federal Highway Administration, *Traffic Noise Prediction Model (FHWA-RD-77-108)*, December 1978.
8 Katz, Okitsu, & Associates, *Traffic Study for LAUSD Central Region High School #16*, May 8, 2007.



SOURCE: GlobeXplorer; ESA, 2006.

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Figure 3D.1
Measurement Locations
and Noise-Sensitive Receptors

TABLE 3D-2
SUMMARY OF TRAFFIC MODELING FOR EXISTING CONDITIONS

Roadway Segment	Sound Level at 50 feet from Roadway Center (CNEL)[a]	Sound Level at 75 feet from Roadway Center (CNEL)[a]	Sound Level at 100 feet from Roadway Center (CNEL)[a]
S. San Pedro Street, between E. 50th Street and E. 51st Street	64.8	63.5	62.4
S. San Pedro Street, between E. 53rd Street and E. 54th Street	64.3	62.9	61.9
S. San Pedro Street, between E. 55th Street and E. 56th Street	64.2	62.9	61.8
E. 54th Street, between S. San Pedro Street and Avalon Boulevard	61.9	60.4	59.2
Avalon Boulevard, between E. 52nd Street and E. 54th Street	67.8	66.5	65.5
E. 52nd Street, between Towne Avenue and E. 53rd Street	53.6	52.3	51.2
Towne Avenue, between E. 52nd Street and E. 53rd Street	54.1	52.7	51.6
E. 53rd Street, between S. San Pedro Street and Towne Avenue	53.3	51.9	50.9

[a] The predicted CNELs were calculated as peak hour L_{eq} and converted into CNELs utilizing methodology in the California Department of Transportation *Technical Noise Supplement* (October 1998).

SOURCE: Terry A. Hayes Associates, 2006.

3D.2.2 EXISTING VIBRATION SOURCES

Similar to the environmental setting for noise, the vibration environment is dominated by traffic-related vibration from nearby roadways. Heavy trucks can generate groundborne vibrations that vary depending on vehicle type, weight, and pavement conditions. Heavy trucks typically operate on major streets. Existing groundborne vibration in the project vicinity is largely related to heavy truck traffic on South San Pedro Street, East 54th Street, and Avalon Boulevard. No major vibration sources exist in close proximity to the proposed project site. As such, vibration levels at the proposed project site are not typically perceptible.

3D.2.3 SENSITIVE RECEPTORS

Noise-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would each be considered noise-sensitive and may warrant unique measures for protection from intruding noise. **Figure 3D.1** shows the location of sensitive receptors near the proposed project site. As shown, surrounding land uses consist of predominately single- and multi-family residences. Specifically, residential land uses are located approximately 25 feet north and west of the proposed project site across East 52nd Street, East 53rd Street, Towne Avenue, and South San Pedro Street. In addition, multi-family residences are located approximately 75 feet east of the proposed project site, across Avalon Boulevard.

Vibration sensitive land uses include fragile/historic buildings, commercial buildings where low ambient vibration is essential for operations within the buildings (for example, computer chip manufacturers and hospitals), and buildings where people sleep. Vibration-sensitive receptors near the proposed project site are identical to the noise-sensitive receptors presented above.

3D.3 APPLICABLE REGULATIONS

3D.3.1 NOISE

No federal noise regulations directly apply to the Program. Certain federal programs, however, influence the audible landscape. Most transportation-related sources of noise are within federal jurisdiction. Vehicle noise emissions standards and requirements for mufflers are set by the USEPA, but are normally enforced locally to avoid potential conflicts.[9] The Federal Highway Administration (FHWA) requires abatement of highway traffic noise for highway projects.[10] The Federal Transit Administration (FTA) recommends noise and vibration assessments for mass transit projects through comprehensive guidelines.[11] For transportation projects that trigger abatement requirements, the normal result is to shield the existing buildings from traffic noise with sound walls or retrofitted noise insulation. The FHWA criteria specify that noise abatement should be provided if a highway project would cause exterior noise levels at any affected school to approach or exceed 67 dBA $L_{eq\ (h)}$ or 70 dBA L_{10}. **Table 3D-3, *below,*** ~~on page 9~~ provides examples of protective noise levels recommended by the EPA. The Occupational Safety and Health Administration (OSHA) regulations protect the hearing of workers exposed to occupational noise.[12]

TABLE 3D-3
SUMMARY OF NOISE LEVELS IDENTIFIED AS REQUISITE TO PROTECT PUBLIC HEALTH AND WELFARE WITH AN ADEQUATE MARGIN OF SAFETY

Effect	Level	Area
Hearing Loss	L_{eq} (24)<70 dB	All Areas
Outdoor Activity Interference and Annoyance	L_{dn} <55 dB	Outdoors in residential areas and farms and other areas where people spend widely varying amounts of time and other places in which quiet is a basis for use.
	L_{dn} (24) <55 dB	Outdoor areas where people spend limited amounts of time, such as school yards, playgrounds.
Indoor Activity Interference and Annoyance	L_{dn} <45 dB	Indoor residential areas.
	L_{eq} (24) <45 dB	Other indoor areas with human activities such as schools.

SOURCE: U.S. Environmental Protection Agency (USEPA), *Information on Levels of Environmental Noise Requite to Protect Public Health and Welfare with an Adequate Margin of Safety*, March, 1974.

[9] U.S. Environmental Protection Agency (USEPA), 49 CFR 190.
[10] Federal Highway Administration (FHWA), 23 CFR 772.
[11] US Department of Transportation (USDOT), Federal Transit Administration (FTA): Noise and Vibration Impact Guideline, April 1995,.
[12] Occupational Safety and Health Administration (OSHA), 29 CFR Section 1910.95.

California Standards for Noise-Compatible Land Uses. The Governor's Office of Planning and Research (OPR) recommends that local jurisdictions follow consistent guidelines for determining the compatibility of land uses with respect to noise.[13] Noise-compatible land use planning depends on the ability to locate noise-sensitive land uses in an acceptable environment. **Figure 3D.2** on page **3D-11** ~~12~~ provides the state's noise-land use compatibility matrix. As shown, exterior noise environments are "normally acceptable" for schools and residences if they are below 60 dBA L_{dn} and "conditionally acceptable" below 70 dBA L_{dn}. A "conditionally acceptable" designation implies that new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features are incorporated in the design of the new land use. By comparison, a "normally acceptable" designation indicates that standard construction can occur with no special noise reduction requirements.

California Department of Education Regulations. The CDE requires all school districts to select school sites that provide safety and support learning.[14] Because the CDE recognizes that unwanted sound can be distracting and can present an obstacle to learning, the CDE requires the school district to consider noise in the site selection process.[15] The School Site Selection and Approval Guide document recommends that this be accomplished with an assessment of noise from major roadways and railroads during environmental review of school construction.[16] If the LAUSD considers a potential school site near a freeway or other source of noise, CDE recommends hiring an acoustical engineer to determine the level of sound that the location is subjected to and to assist in designing the school.[17] The American Speech Language-Hearing Association (ASLHA) guidelines recommend that in classrooms sounds dissipate in 0.4 seconds or less (and not reverberate) and that background noise not rise above 30 dBA.[18]

City of Los Angeles General Plan Noise Element. The City of Los Angeles General Plan Noise Element outlines guidelines for noise and land use compatibility for development and planning purposes.[19] The Noise Element has adopted local guidelines based, in part, on the community noise compatibility guidelines established by the California Department of Health Services for use in assessing the compatibility of various land use types with a range of noise levels. These guidelines are presented in **Figure 3D.2**.

City of Los Angeles Noise Ordinance. The City of Los Angeles has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise sensitive land uses. The Los Angeles Municipal Code (LAMC) indicates that no construction or repair work shall be performed between the hours of 9 P.M. and 7 A.M. the following day, since such activities would generate loud noises and disturb persons occupying

[13] State of California, Governor's Office of Planning and Research (OPR), *General Plan Guidelines, Appendix A, Noise Element Guidelines,* November 1998.
[14] California Department of Education (CDE), Regulations (CCR Tit. 5, Div. 1, Ch. 13 Subchapter 1, Article 2 §14010 "Standards for School Site Selection").
[15] CDE Regulations (CCR Tit. 5, Div. 1, Ch. 13 §14010(q)).
[16] CDE, School Facilities Planning Division, *School Site Selection and Approval Guide,* March 2001.
[17] *Ibid.*
[18] *Ibid.*
[19] City of Los Angeles, *Noise Element of the General Plan,* February 3, 1999.

sleeping quarters in any adjacent dwelling, hotel, apartment or other place of residence.[20] No person, other than an individual homeowner engaged in the repair or construction of his/her single-family dwelling, shall perform any construction or repair work of any kind or perform such work within 500 feet of land so occupied before 8 A.M. or after 6 P.M. on any Saturday or on a federal holiday, or at any time on any Sunday. Under certain conditions, the City may grant a waiver to allow limited construction activities to occur outside of the limits described above.

According to the Noise Ordinance:

> *[N]o person shall operate or cause to be operated any machinery, equipment, tools, or other mechanical or electrical device, or engage in any other activity in such a manner as to create any noise which would cause the noise level on the premises of any other occupied property, or, if a condominium, apartment house, duplex, or attached business, within any adjoining unit, to exceed the ambient noise level by more than five decibels.*[21]

The LAMC also specifies the maximum noise level of powered equipment or powered hand tools.[22] Any powered equipment or hand tool that produces a maximum noise level exceeding 75 dBA at a distance of 50 feet is prohibited. However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be met despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of equipment.

LAUSD Noise Standards. LAUSD has established noise standards (see **Table 3D-4**) to protect students and staff from noise impacts generated by traffic in terms of L_{eq}.[23] These standards were established based on regulations set forth by the California Department of Transportation (Caltrans) and the City of Los Angeles. LAUSD has indicated that a three dBA L_{dn} increase would represent a permanent increase in ambient noise levels when projected ambient noise levels (ambient noise levels after implementation of the proposed project) would exceed acceptable noise levels as adopted in local agency noise ordinances or general plan goals.[24] LAUSD has also indicated that a substantial temporary significant noise increase would result from activity that generates noise levels above 75 dBA when measured at a distance of 50 feet when near a sensitive receptor.[25]

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20 LAMC, Chapter IV, Article 1, Section 41.40, January 29, 1984 and Chapter XI, Article 2, Section 112.04, August 8, 1996.
21 *Ibid.*
22 LAMC. Chapter XI, Article 2, Section 112.05. August 8, 1996.
23 LAUSD, OEHS, *New School Construction Program, Final Program Environmental Impact Report (PEIR)*, published May 2004, Board Certified June 8, 2004, p. 3.3-7.
24 *Ibid,* p. 3.3-7.
25 *Ibid*.

TABLE 3D-4
ACCEPTABLE OPERATIONAL NOISE LEVELS ESTABLISHED BY LAUSD

Location	L_{10} Noise Level	L_{eq} Noise Level
Exterior	70 dBA	67 dBA
Interior	55 dBA	45 dBA

SOURCE: LAUSD, OEHS. *New School Construction Program, Final Program Environmental Impact Report (incorporates the New School Construction Program, Draft EIR)*, Published May 2004. Board Certified June 8, 2004, p. 3.3-7.

3D.3.2 VIBRATION

Neither the City of Los Angeles nor LAUSD have specific thresholds for vibration impacts. Generally, well-engineered buildings (as opposed to fragile buildings) can be exposed to groundborne vibration levels of 2.0 inches per second Peak Particle Velocity (PPV) without experiencing structural damage.[26]

3D.4 IMPACTS AND MITIGATION

3D.4.1 METHODOLOGY

Construction and operational point source noise impacts were evaluated by comparing anticipated noise levels to the guidelines set forth in the City of Los Angeles Municipal Code and LAUSD's PEIR. Roadway noise impacts were projected using the FHWA-RD-77-108 prediction model. This methodology allows the user to define roadway configurations, barrier information (if any), and receiver locations. Roadway-noise attributable to the proposed project was calculated and compared to baseline noise levels that would occur under the "no project" condition to determine significance.

Groundborne vibration impacts were evaluated by identifying potential vibration sources, measuring the distance between vibration sources and surrounding structure locations, and making a significance determination.

3D.4.2 CRITERIA FOR DETERMINING SIGNIFICANCE

The criteria used to determine the significance of an impact related to noise are based on Appendix G of the *CEQA Guidelines.* The proposed project may result in a significant noise impact if it would:

- Expose persons to or generate noise levels in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies;
- Expose persons to or generate excessive groundborne vibration or groundborne noise levels;

[26] United States Bureau of Mines, *Bulletin 656 (Blasting Vibrations and Their Effects on Structures)*, 1971.

Land Use Category	Day-Night Average Exterior Sound Level (CNEL dB)						
	50	55	60	65	70	75	80
Residential Single Family, Duplex, Mobile Home	A	C	C	C	N	U	U
Residential Multi-Family	A	A	C	C	N	U	U
Transient Lodging, Motel, Hotel	A	A	C	C	N	U	U
School, Library, Church, Hospital, Nursing Home	A	A	C	C	N	N	U
Auditorium, Concert Hall, Ampitheater	C	C	C	C/N	U	U	U
Sports Arena, Outdoor Spectator Sports	C	C	C	C	C/U	U	U
Playground, Neighborhood Park	A	A	A	A/N	N	N/U	U
Golf Course, Riding Stable, Water Recreation, Cemetery	A	A	A	A	N	A/N	U
Office Building, Business, Commercial, Professional	A	A	A	A/C	C	C/N	N
Agriculture, Industrial, Manufacturing, Utilities	A	A	A	A	A/C	C/N	N

A = Normally acceptable. Specified land use is satisfactory, based upon assumption buildings involved are conventional construction, without any special noise insulation.

C = Conditionally acceptable. New construction or development only after a detailed analysis of noise mitigation is made and needed noise insulation features are included in project design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning normally will suffice.

N = Normally unacceptable. New construction or development generally should be discouraged. A detailed analysis of noise reduction requirements must be made and noise insulation features included in the design of a project.

U = Clearly unacceptable. New construction or development generally should not be undertaken.

SOURCE: State of California

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Figure 3D.2
Guidelines for Noise Compatible Land Use

- Result in a permanent increase of over three (3) dBA L_{dn} in ambient noise levels where existing ambient noise levels, or the projected ambient noise level after implementation of the project, would exceed acceptable noise levels as adopted in local agency noise ordinances or general plan goals;[27]
- Result in a temporary or periodic increase in ambient noise levels above 75 dBA when measured at a distance of 50 feet from school-related activity or other sensitive receptors within 500 feet of the proposed project site;[28] or
- Result in a cumulatively considerable impact with respect to noise.

3D.4.3 PROJECT IMPACTS

The environmental impact analysis presented below is based on the determinations made in the IS for issues that were determined to be potentially significant and potentially significant with mitigation incorporated (see Appendix A).

Impact 3D1: Expose people to or generate noise levels in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies.

Implementation of the proposed project would result in a significant and unavoidable impact regarding exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance.

Construction

Noise impacts from construction activities occurring within the proposed project site would be a function of the noise generated by construction equipment, the equipment location, and the timing and duration of the noise-generating activities. Construction activities would include four stages: (1) demolition; (2) foundations; (3) construction; and (4) finishing. Each stage involves the use of different kinds of construction equipment and, therefore, has its own distinct noise characteristics. As mentioned earlier, construction activities would be limited to the hours specified in the LAMC, thereby limiting the hours during which construction noise would be generated.[29] The anticipated noise level associated with each construction phase is listed in **Table 3D-4**. Additionally, typical noise levels generated by individual pieces of equipment are displayed in **Table 3D-5**.

The construction noise levels presented in **Table 3D-5** represent worst-case conditions in which the maximum amount of construction equipment would be operating during a one-hour period. These estimated maximum noise levels would not be continuous, nor would they be typical of noise levels throughout the construction period. As indicated in **Table 3D-5**, due to the type of construction equipment, the highest level of construction noise would be expected to occur during

[27] LAUSD, OEHS, *New School Construction Program, Final Program Environmental Impact Report, p*ublished May 2004, Board Certified June 8, 2004, p. 3.3-7.

[28] LAUSD, OEHS, *New School Construction Program, Final Program Environmental Impact Report*, published May 2004, Board Certified June 8, 2004. p. 3.3-7.

[29] Intensive construction or repair work shall not be performed between the hours of 9 P.M. and 7 P.M. on any weekday, before 8 A.M. or after 6 P.M. on any Saturday or national holiday, or at any time on Sunday.

the finishing phase. The finishing phase is anticipated to generate a noise level of approximately 89 dBA (without mufflers) at a reference distance of 50 feet from the center of construction activity. Most construction activity would be located 50 feet or more away from residential structures given the setbacks of the residences themselves from their property line and the setback of the buildings being constructed. Construction-related noise levels decline or lessen at a rate of six dBA for every "doubling" of distance between the noise source and receptor. **Table 3D-7** provides further information regarding exterior construction noise levels at different distances.

TABLE 3D-5
ESTIMATED NOISE LEVELS FROM CONSTRUCTION ACTIVITIES

Construction Phase	Noise Level (dBA, L_{eq}[a])
Demolition	84
Foundations	78
Construction	85
Finishing	89

[a] Average noise levels correspond to a distance of 50 feet from the noisiest piece of equipment associated with a given phase of construction and 200 feet from the rest of the equipment associated with that phase.

SOURCE: Bolt, Baranek, and Newman. *Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances*. 1971.

TABLE 3D-6
NOISE LEVELS FROM CONSTRUCTION EQUIPMENT

Construction Equipment	Noise Level (dBA, L_{eq} at 50 feet)
Dump Truck	88
Portable Air Compressor	81
Concrete Mixer (Truck)	85
Jack Hammer	88
Dozer	87
Paver	89
Generator	76
Pneumatic Tools	85
Concrete Pump	82
Backhoe	85

SOURCE: Cunniff. *Environmental Noise Pollution*, 1977; U.S. Department of Transportation Federal Transit Administration. *Transit Noise and Vibration Impact Assessment*, 1995.

TABLE 3D-7
ATTENUATION OF CONSTRUCTION NOISE LEVELS AWAY FROM PROPOSED PROJECT SITE

Distance (feet)	Noise Levels (dBA, L_{eq})
50	76-89
100	70-83
200	64-77
400	58-71
800	52-65

SOURCE: Cunniff, *Environmental Noise Pollution*, 1977; U.S. Department of Transportation Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, 1995.

Exterior construction-related noise levels are shown in **Table 3D-8**. As shown, construction activity would increase exterior ambient noise levels at sensitive receptors by up to 29.2 dBA L_{eq}. It is important to note that construction activity would occur for short-time periods during the day and would not occur within noise sensitive hours (10 P.M. to 7 A.M.).

TABLE 3D-8
EXTERIOR CONSTRUCTION NOISE LEVELS

Noise Receptor	Distance (Feet)[a]	Maximum Construction Noise Level (dBA, Leq)[b]	Existing Ambient Noise Level (dBA, Leq)[c]	New Ambient Noise Level (dBA, Leq)[d]	Increase
Residences – East 52nd Street	50	89	66.9	89.0	22.1
Residences – East 53rd Street	50	89	59.8	89.0	29.2
Residences – Towne Avenue	50	89	59.8	89.0	29.2
Residences – South San Pedro Street	50	89	69.6	89.0	19.4
Residences – Avalon Boulevard	75	86	70.1	86.1	16.0

[a] Distance of noise source to receptor.
[b] Construction source's noise level at receptor location, with distance adjustment
[c] Pre-construction ambient noise level at receptor location.
[d] New noise level at receptor location during the construction period, including noise from construction activity.

SOURCE: Terry A. Hayes Associates, 2006.

Interior construction-related noise levels are shown in **Table 3D-9**. Typical building construction provides a noise reduction of approximately 12 dBA with windows open and a minimum 26 dBA with windows closed.[30] As shown, interior noise levels at sensitive receptors would range from 63.0 to 63.1 dBA L_{eq}.

[30] American Society for Testing of Materials, *Standard Classification for Determination of Outdoor-Indoor Transmission Class*, 2003.

TABLE 3D-9
INTERIOR CONSTRUCTION NOISE LEVELS

Noise Receptor	Maximum Exterior Noise Level (dBA, Leq)	Outdoor-to-Indoor Attenuation (dBA)[a]	Maximum Interior Noise Level (dBA, Leq)
Residences – East 52nd Street	89.0	26	63.0
Residences – East 53rd Street	89.0	26	63.0
Residences – Towne Avenue	89.0	26	63.0
Residences – South San Pedro Street	89.0	26	63.0
Residences – Avalon Boulevard	89.1	26	63.1

[a] Assumes windows closed condition.

SOURCE: Terry A. Hayes Associates, 2006.

To put these noise levels in perspective, the maximum sound level that permits relaxed conversation with 100 percent intelligibility is 45 dBA. This drops to 60 percent intelligibility at 70 dBA.

The noise limitation of the LAMC does not apply where compliance is technically infeasible.[31] "Technically infeasible" means that the noise standard cannot be met despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of equipment. In order to reduce temporary construction noise impacts to off-site receptors, LAUSD would require its construction contractor to implement LAUSD BMPs (listed as Mitigation Measures M-3D.1 through M-3D.5) to ensure that construction impacts would be less than significant.

Operation (non-vehicular)

Non-vehicular operational activities associated with the proposed project that would generate noise include student activity on-site (especially within the football stadium and track area), bells, and alarms. These sources would be limited to school hours. The football stadium and track area would be located on the eastern portion of the proposed project site. In addition, play courts would be located on top of the proposed parking structure.

Athletic activity (for example, basketball, tennis, baseball, etc.) would result in a noise level of approximately 65 L_{dn}.[32] Noise generated by activity in the football stadium and track area would be audible to residences along East 52nd Street and Avalon Boulevard. Noise generated by activity on the rooftop play courts would also be audible to residences along Towne Avenue and East 52nd Street. **Table 3D-10** shows ambient noise generated by athletic activity at nearby sensitive receptors. As shown, athletic activity noise would not result in a significant impact at residences along Avalon Boulevard or East 52nd Street. However, activity occurring in the athletic areas would increase the ambient noise level at residences along Towne Avenue by approximately 6.3 dBA. As such, noise generated by activity occurring in the designated play areas would be greater

[31] LAMC, Chapter IX, Article 2, Section 122.05.
[32] LAUSD, OEHS, *New School Construction Program, Final Program Environmental Impact Report (incorporates the New School Construction Program, Draft EIR),* published May 2004, Board Certified June 8, 2004, p. 3.3-8.

than the three dBA L_{dn} incremental threshold. However, due to the fact that the existing ambient noise level and the post-project noise level would not exceed relevant standards established in the local general plan or noise ordinance, this impact would be considered less than significant.

TABLE 3D-10
ATHLETIC AREA NOISE LEVELS

Noise Receptor	Distance (Feet)[a]	Athletic Area Noise Level (dBA)[b]	Existing Ambient Noise Level (dBA)[c]	New Ambient Noise Level (dBA)[d]	Increase
Residences – East 52nd Street	50	65	66.9	69.1	2.2
Residences – Towne Avenue	50	65	59.8	66.1	6.3
Residences – Avalon Boulevard	75	65	70.1	71.3	1.2

[a] Distance of noise source to receptor.
[b] Athletic area noise level at receptor location, with distance adjustment
[c] Existing ambient noise level at receptor location.
[d] New ambient noise level at receptor location.

SOURCE: Terry A. Hayes Associates, 2006.

Operation (vehicular)

Vehicular-related operational noise levels would result from parked, idling, and moving vehicles on the local roadway system and on the proposed project site. Parking noise could include occasional car alarm noise, loud radios, brake noise, vehicle horns, vehicle doors/trunks opening and closing, and conversations of people using the parking lot. The most disruptive of these noise sources would be associated with car alarm noise and vehicle horns because of their intermittent nature and loudness. Activity in the parking structure would generate a noise level of approximately 60 dBA L_{eq} at 50 feet.[33] The parking structure would be located approximately 50 feet from residences on East 52nd Street and approximately 50 feet from residences on Towne Avenue. Based on distance attenuation, and existing ambient noise levels, the incremental noise level increase at residences along East 52nd Street and Towne Avenue would be 0.7 and 1.2 dBA, respectively. The incremental noise level increase due to parking activity would be less than the three dBA significance threshold. As such, potential parking lot noise would result in a less than significant impact.

Access to the parking structure would be provided from East 52nd Street. A student drop-off and pick-up lane for private vehicles would be provided along East 53rd Street. In addition, a bus drop-off and pick-up lane would be located on Towne Avenue. Access to the parking structure and the drop-off and pick-up lanes would be located within 50 feet of residential properties. Private vehicles, buses, and delivery trucks traveling to and from the proposed project site may generate noise levels as high as 88 dBA at a distance of 50 feet.[34] However, this activity would occur for short-time periods (i.e., less than 15 minutes) during the day and would not occur within noise sensitive hours (10 P.M. to 7 A.M.). In addition, intermittent daytime noises have little effect on day-

[33] Harris, Cyril M., *Handbook of Noise Control*, 1979.
[34] Patterson, W.N., R.A. Ely, and S.M. Swanson, *Regulation of Construction Activity Noise*. Bolt Baranek and Newman, Inc. *Report 2887, for the Environmental Protection Agency65.0*, Washington, D.C., November 1974.

night average noise levels, which are critical to noise-sensitive land uses.[35] The incremental noise level increase due to vehicles, buses, and delivery truck activity would be less than the three dBA L_{dn} significance threshold. Therefore, the impact would be less than significant.

With respect to roadway noise impacts, the greatest project-related traffic would be generated during the hour preceding and the hour following normal school hours. To ascertain off-site noise impacts, traffic was modeled under future year (2011) no project and with project conditions. Results are summarized below in **Table 3D-10** and noise calculations are presented in Appendix E. The roadway noise increase attributed to the proposed project would be less than the three dBA L_{dn} increment at all analyzed segments except for along Towne Avenue between East 52nd Street and East 53rd Street, and East 53rd Street between South San Pedro Street and Towne Avenue. The project-related noise increase along Towne Avenue between East 52nd Street and East 53rd Street, and East 53rd Street between South San Pedro Street and Towne Avenue would be approximately 5.4 and 7.5 dBA, respectively. These roadway segments have low levels of existing traffic volume and, as such, a small number of new daily trips may significantly raise traffic volumes. Nonetheless, the project-related mobile noise level increase would result in a significant and unavoidable project-related impact.

On-site Noise Levels – Impact to Students at Proposed Project Site

Ambient community noise external to the school may affect future students of the proposed project. LAUSD standards used for exterior and interior noise are 67 and 45 dBA L_{eq}, respectively.[36] **Table 3D-11** shows the existing monitored noise levels along roadway segments bordering the proposed project site. The existing noise levels along East 52nd Street, East 53rd Street, and Towne Avenue are below the 67 dBA L_{eq} exterior standard. The monitored ambient noise levels along South San Pedro Street, East 54th Street, and Avalon Boulevard do exceed the 67 dBA L_{eq} LAUSD exterior standard. It should be noted that no classroom is proposed within 500 feet of Avalon Boulevard. The portion of the proposed project site adjacent to Avalon Boulevard would be utilized for a football stadium and track with bleachers. Regardless, exterior noise levels on the project site along South San Pedro Street, East 54th Street, and Avalon Boulevard would exceed the 67 dBA L_{eq} LAUSD exterior standard. On-site exterior noise levels would result in a significant impact without incorporation of mitigation.

Future noise levels along roadway segments surrounding the proposed project site are shown in **Table 3D-11**. As shown, future exterior mobile noise levels would be less than 67 dBA L_{eq} along the majority of the project site. The mobile noise level at the project site along Avalon Boulevard would be approximately 68.3 dBA L_{eq}. It should be noted that no classroom is proposed within 500 feet of Avalon Boulevard. The proposed project site adjacent to Avalon Boulevard would be utilized for a football stadium and track with bleachers and basketball courts. Regardless, the athletic areas are considered outside occupied space and the ambient noise levels at the athletic areas along Avalon Boulevard would exceed the 67 dBA LEQ LAUSD exterior standard. As such, this would result in a significant impact without incorporation of mitigation.

[35] LAUSD, OEHS, *New School Construction Program, Final Program Environmental Impact Report (PEIR)*, published May 2004, Board Certified June 8, 2004, p. 3.3-10.

[36] *Ibid*., p. 3.3-7.

The interior noise standard established by LAUSD is 45 dBA. Typical building construction generally provides a minimum exterior to interior noise attenuation rate of 26 dBA.[37] To exceed the interior standard of 45 dBA, the exterior noise level would have to be at least 71 dBA. As shown in **Table 3D-11**, existing ambient noise levels monitored at the proposed project site did not exceed 71 dBA. As such, interior noise levels would not exceed the 45 dBA LAUSD standard.

TABLE 3D-11
SUMMARY OF POTENTIAL ROADWAY NOISE LEVELS IN THE PROJECT AREA

	CNEL at 50 Feet from Right-Of-Way				
Roadway Segment	**Existing**	**Future-No Project**	**Future-With Project**	**Project Impact**	**Cumulative Impact**
S. San Pedro Street, between E. 50th Street and E. 51st Street	64.8	65.3	65.9	0.6	1.1
S. San Pedro Street, between E. 53rd Street and E. 54th Street	64.3	64.8	65.4	0.6	1.1
S. San Pedro Street, between E. 55th Street and E. 56th Street	64.2	65.0	65.3	0.3	1.1
E. 54th Street, between S. San Pedro Street and Avalon Boulevard	61.9	62.1	62.9	0.8	1.0
Avalon Boulevard, between E. 52nd Street and E. 54th Street	67.8	68.2	68.3	0.1	0.5
E. 52nd Street, between Towne Avenue and E. 53rd Street	53.6	53.8	55.1	1.3	1.5
Towne Avenue, between E. 52nd Street and E. 53rd Street	54.1	54.2	59.6	5.4	5.5
E. 53rd Street, between S. San Pedro Street and Towne Avenue	53.3	53.6	61.1	7.5	7.8

SOURCE: Terry A. Hayes and Associates, 2006.

Mitigation Measures

Implementation of the following construction BMPs, as identified in the PEIR would reduce construction noise levels.[38] In addition, the following mitigation measures would reduce noise generated by operations activity.

Construction

M-3D.1 *LAUSD's construction contractor shall comply with Los Angeles Municipal Code Section 112.05 such that construction activities shall be performed in accordance with LAUSD's and applicable City of Los Angeles noise standards.*

[37] American Society for Testing of Materials, *Standard Classification for Determination of Outdoor-Indoor Transmission Class*, 2003.

[38] LAUSD, OEHS, *New School Construction Program, Final Program Environmental Impact Report (PEIR),* published May 2004, Board Certified June 8, 2004. p. 3.3-8.

Noise Ordinance Section 41.40 of the Los Angeles City Municipal Code restricts construction noise to between the hours of 7 A.M. and 9 P.M., Monday through Friday (8 A.M. to 6 P.M. on Saturday and national holidays). No construction is allowed on Sundays. No noise-intensive construction or repair work shall be performed between the hours of 9 P.M. and 7 A.M. on any weekday, or before 8 A.M. or after 6 P.M. on any Saturday, or at any time on Sundays or federal holidays.

The Noise Ordinance, Municipal Code Section 41.40(b), also permits an exception for various construction activities, including those that are "effected with the public interest." In the event that the construction contractor requires a waiver from the specifications of the Noise Ordinance, the construction contractor may in a written application request the Board of Police Commissioners to grant a waiver from the time limitations for construction activity.

M-3D.2 *LAUSD's construction contractor shall require all construction equipment, stationary and mobile, be equipped with properly operating and maintained muffling devices.*

M-3D.3 *LAUSD's construction contractor shall provide advance notification to adjacent property owners and post notices adjacent to the proposed project site with regard to the schedule of construction activities.*

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M-3D.4 *LAUSD's construction contractor will place all stationary construction equipment and vehicle staging areas to be placed such that noise is directed away from sensitive receptors, as feasible.*

M-3D.5 *LAUSD's construction contractor shall implement the use of sound blankets along the northern and western portions of the proposed project's property lines located between the proposed site and the adjacent residential units. In addition, sound blankets shall be located long the proposed project's property line with Avalon Boulevard to reduce noise levels at residential units set back from Avalon Boulevard. Such attenuation measures could be expected to reduce noise levels by 8 to 10 dBA.*

Operations

M-3D.6 *LAUSD shall incorporate sound barriers, or other special design features, to ensure that exterior ambient noise levels do not exceed 67 dBA Leq along the portion of the project site bordering Avalon Boulevard. This feature shall include, but is not limited to, an eight-foot high wall along the portion of the project site bordering Avalon Boulevard.*

Residual Impacts

Implementation of Mitigation Measures M-3D.1 through M-3D.5 would ensure that impacts associated with the exposure of people to, or generation of, construction noise levels in excess of standards established in the local general plan or noise ordinance would remain less than significant.

Implementation of Mitigation Measure M-3D.6 would reduce athletic activity noise by approximately five (5) dBA. The mitigated exterior noise levels on the project site along Avalon Boulevard would be 65.1 dB. This exterior noise level would be below the 67 dBA L_{eq} LAUSD exterior standard, and the impact would be less than significant.

The proposed project would result in a mobile noise impact along Towne Avenue between East 52nd Street and East 53rd Street, and East 53rd Street between South San Pedro Street and Towne Avenue. There are no feasible mitigation measures to reduce the mobile noise impact. As such, the ambient noise increase due to operational noise would result in a significant and unavoidable impact.

Impact 3D2: Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the proposed project.

Implementation of the proposed project would result in a significant and unavoidable impact regarding permanently increasing ambient noise levels above levels existing without the proposed project.

Operational activities associated with the proposed project that would generate periodic noise include student activity on-site (especially within the football stadium and track field), bells, and alarms. These sources would be limited to school hours. As noted in Impact 3D1, on-site activities would result in a less than significant impact with incorporation of mitigation. However, mobile noise associated with the project-related increase in traffic volumes would result in a significant and unavoidable impact along Towne Avenue between East 52nd Street and East 53rd Street, and East 53rd Street between South San Pedro Street and Towne Avenue. Refer to Impact 3D1 for further discussion.

Mitigation Measures

There are no feasible mitigation measures to reduce off-site, project-related operational noise levels along Towne Avenue between East 52nd Street and East 53rd Street, and East 53rd Street between South San Pedro Street and Towne Avenue.

Residual Impacts

The project-related operational noise impact would be significant and unavoidable.

Impact 3D3: Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the proposed project.

Implementation of the proposed high school would significantly impact ambient noise levels by increasing mobile noise sources created by increased traffic in the project vicinity.

Construction

The proposed project would cause temporary noise increases during construction activities at the proposed project site that would be perceptible from nearby residences. Noise levels would vary depending on the types and number of construction equipment in operation at any given time.

Tables 3D-7 and 3D-8 show exterior and interior noise levels, respectively, at nearby sensitive receptors. As noted in Impact 3D1, construction activity would result in a less than significant impact. Refer to Impact 3D1 for further discussion.

Operation

A student auto drop-off/pick-up zone for private vehicles would be provided along the southern curb of East 53rd Street while the bus drop-off would be located on Towne Street. The special education bus drop-off area would also occur on East 53rd Street but would be separated from the student drop-off and pick-up area. Access to the parking structure would be provided from East 52nd Street. These access points are located within 50 feet of residential properties. Delivery trucks and buses traveling to and from the proposed project site, along with vehicle activity, may generate noise levels as high as 88 dBA at a distance of 50 feet.[39] However, this activity would occur for short-time periods during the day and would not occur within noise sensitive hours (10 P.M. to 7 A.M.). In addition, intermittent daytime noises have little effect on day-night average noise levels, which are critical to noise-sensitive land uses.[40] The incremental noise level increase due to vehicles, buses, and delivery truck activity would be less than the three dBA L_{dn} significance threshold. Therefore, the impact would be less than significant. Refer to Impact 3D1 for further discussion.

Mitigation Measures

As previously discussed, implementation of Mitigation Measures M-3D.1 through M-3D.5 would ensure that impacts associated with the exposure of people to, or generation of, construction noise levels in excess of standards established in the local general plan or noise ordinance would remain less than significant.

Residual Impacts

Implementation of BMPs would ensure that impacts associated with exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance would remain less than significant.

Impact 3D4: Expose persons to or generate excessive groundborne vibration or groundborne noise levels.

Implementation of the proposed project would result in a less than significant impact regarding groundborne vibration.

Both construction and operation of projects can generate groundborne vibration. In general, demolition of structures during construction generates the highest vibrations. Vibratory compactors or rollers, pile drivers, and pavement breakers can generate perceptible vibration.

[39] Patterson, W.N., R.A. Ely, and S.M. Swanson, *Regulation of Construction Activity Noise*. Bolt Baranek and Newman, Inc. *Report 2887, for the Environmental Protection Agency*, Washington, D.C., November 1974.

[40] LAUSD, OEHS. *New School Construction Program, Final Program Environmental Impact Report (PEIR)*, published May 2004. Board Certified June 8, 2004, p. 3.3-10.

Heavy trucks can also generate groundborne vibration, which vary depending on vehicle type, weight, and pavement conditions. The FTA has published standard vibration velocities for construction equipment operations.[41] The PPV for various construction equipment are listed in **Table 3D-12**.

TABLE 3D-12
VIBRATION VELOCITIES FOR CONSTRUCTION EQUIPMENT

Equipment	Approximate Peak Particle Velocity at 25 ft, inch/second	Approximate Peak Particle Velocity at 75 ft, inch/second
Caisson drilling	0.089	0.017
Loaded trucks	0.076	0.015
Jackhammer	0.035	0.007
Small bulldozer	0.003	0.001

[a] Data reflects typical vibration level.

SOURCE: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, April 1995.

Short-term vibration would occur as a result of construction activities. The nearest sensitive receptors to the proposed project site would be at least 50 feet away from significant vibration sources. As shown in **Table 3D-12**, construction vibration would not be anticipated to exceed the 2.0 PPV significance threshold at 25 feet. Therefore, construction vibration at 50 feet would be less than 2.0 PPV and vibration levels due to construction activity at nearby sensitive receptors would be less than significant.

Future groundborne vibration in the project vicinity would continue to be generated by vehicular travel on the local roadways. Proposed project operation would not result in any additional long-term ground-borne vibration sources. As such, proposed project operation would not exceed the 2.0 inch per second PPV significance threshold for groundborne vibration. The impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Impact would be less than significant.

3D.4.4 CUMULATIVE IMPACTS

Impact 3D5: Result in cumulatively considerable impact with respect to noise.

[41] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, April 1995.

The proposed project would result in a cumulatively considerable noise impact.

Noise from construction of the proposed project and related projects, would be localized, thereby potentially affecting areas immediately surrounding or between each particular proposed project site. The nearest listed related project to the proposed project is the South Los Angeles Wetlands Park, to be located at 5413 Avalon Boulevard, adjacent to the southern perimeter of the proposed project site. Currently, LAUSD has no means of estimating potential noise generation or the construction schedule associated with the South Los Angeles Wetlands Park project. Therefore, it is not considered in the cumulative analysis.

The only LAUSD project in close proximity to the proposed project is Central Region Elementary School No. 16 (CRES No. 16). Construction of CRES No. 16 would not result in a noticeable cumulative increase in noise at sensitive receptors near the proposed project site. Additionally, this related project would be subject to noise-limiting mitigation measures similar to those prescribed for the proposed project. As such, cumulative impacts associated with construction noise would be less than significant.

Regarding roadway noise, the cumulative increase in future CNEL traffic noise levels at project buildout with future ambient growth relative to the existing baseline are presented in **Table 3D-11** as shown above. As shown, the roadway noise increase attributed to the proposed project would be less than the three dBA L_{dn} increment at all analyzed segments except for along Towne Avenue between East 52nd Street and East 53rd Street, and East 53rd Street between South San Pedro Street and Towne Avenue. The cumulative noise increase along Towne Avenue between East 52nd Street and East 53rd Street, and East 53rd Street between South San Pedro Street and Towne Avenue would be approximately 5.5 and 7.8 dBA, respectively. This noise level increase would be greater than the three dBA L_{dn} incremental threshold and would result in a significant and unavoidable cumulative impact.

Groundborne vibration impacts from equipment that would be used during proposed project construction and operation would be localized. There are no related projects within 1,500 feet of the proposed project site. As such, there is also no potential for a cumulatively considerable impact with respect to groundborne vibration.

Mitigation Measures

There are no feasible mitigation measures to reduce cumulative operational noise levels from mobile sources along Towne Avenue between East 52nd Street and East 53rd Street, and East 53rd Street between South San Pedro Street and Towne Avenue.

Residual Impacts

The cumulative operational noise impacts from mobile sources would be significant and unavoidable.

CHAPTER 3E
PEDESTRIAN SAFETY

3E.1 INTRODUCTION

This section discusses potential impacts on pedestrian safety that could result with operation of the proposed high school. The analysis focuses on the potential for pedestrian safety hazards associated with construction, pedestrian routes to school, and existing and proposed transportation facilities. This analysis is based in part on the results of a pedestrian safety prepared as part of the traffic study conducted by Katz, Okitsu & Associates in accordance with the policies of the Program EIR and the Caltrans *School Area Pedestrian Safety Manual*.[1] Section 3F, *Traffic*, of this EIR addresses the findings of the traffic study. Additionally, the complete traffic study and the pedestrian safety study are provided as Appendix F of this EIR.

3E.2 EXISTING ENVIRONMENTAL SETTING

The proposed project site is located in the City of Los Angeles approximately five miles south of downtown Los Angeles. The proposed project site is approximately 0.6 mile east of Interstate 110 (I-110, Harbor Freeway) and approximately 2.7 miles south of Interstate 10 (I-10, Santa Monica Freeway).[2] Figure 2-2 shows the regional location of the proposed project site. The proposed project site is approximately 13.4 acres in and is "L" shaped. The site is generally bounded by East 52nd Street and East 53rd Street to the north, Avalon Boulevard to the east, East 54th Street to the south, and South San Pedro Street and Towne Avenue to the west.

The proposed project site encompasses 28 parcels, and currently includes approximately 46 single-family and multi-family units on 20 parcels. The remaining parcels are occupied by commercial businesses, including a swap meet, and other retail and service uses; and an existing LAUSD school campus, the Johnson Opportunity High School.[3] This school currently serves 140 students attending grades 9 through 12.

The street and road network in the area is comprised of a grid of arterials, collector streets, and roadways. The following streets act as boundaries to the proposed project site: East 52nd Street, East 53rd Street, East 54th Street, Avalon Boulevard, South San Pedro Street, and Towne Avenue. East 52nd Street, East 53rd Street, South San Pedro Street, and Towne Avenue are residential (two-lane) streets. East 54th Street is a two-lane roadway, and Avalon Boulevard is a four-lane roadway. Slauson Avenue which is located approximately one-quarter (1/4) mile south of the

1 Katz Okitsu & Associates, *Traffic Study for Los Angeles Unified School District Central Region High School #16*, May 8, 2007.
2 Rand McNally and Company, *The Thomas Guide, Los Angeles and Orange Counties*, 2005 Edition.
3 LAUSD, *Parcel Map*, February 23, 2006.

proposed project site, was also included in the study area. See Section 3F, *Traffic*, of this EIR for a complete description of the roadways in the project vicinity.

Traffic Signals or stop signs in the vicinity of the project site are located at the following intersections:

- San Pedro Street and East 51st Street;
- Avalon Boulevard and East 51st Street;
- San Pedro Street and East 52nd Street (stop-controlled intersection);
- Towne Avenue and East 52nd Street (stop-controlled intersection);
- San Pedro Street and East 53rd Street;
- San Pedro Street and East 54th Street;
- San Pedro Street and Slauson Avenue; and
- Avalon Boulevard and Slauson Avenue.

3E.2.1 EXISTING PEDESTRIAN NETWORK

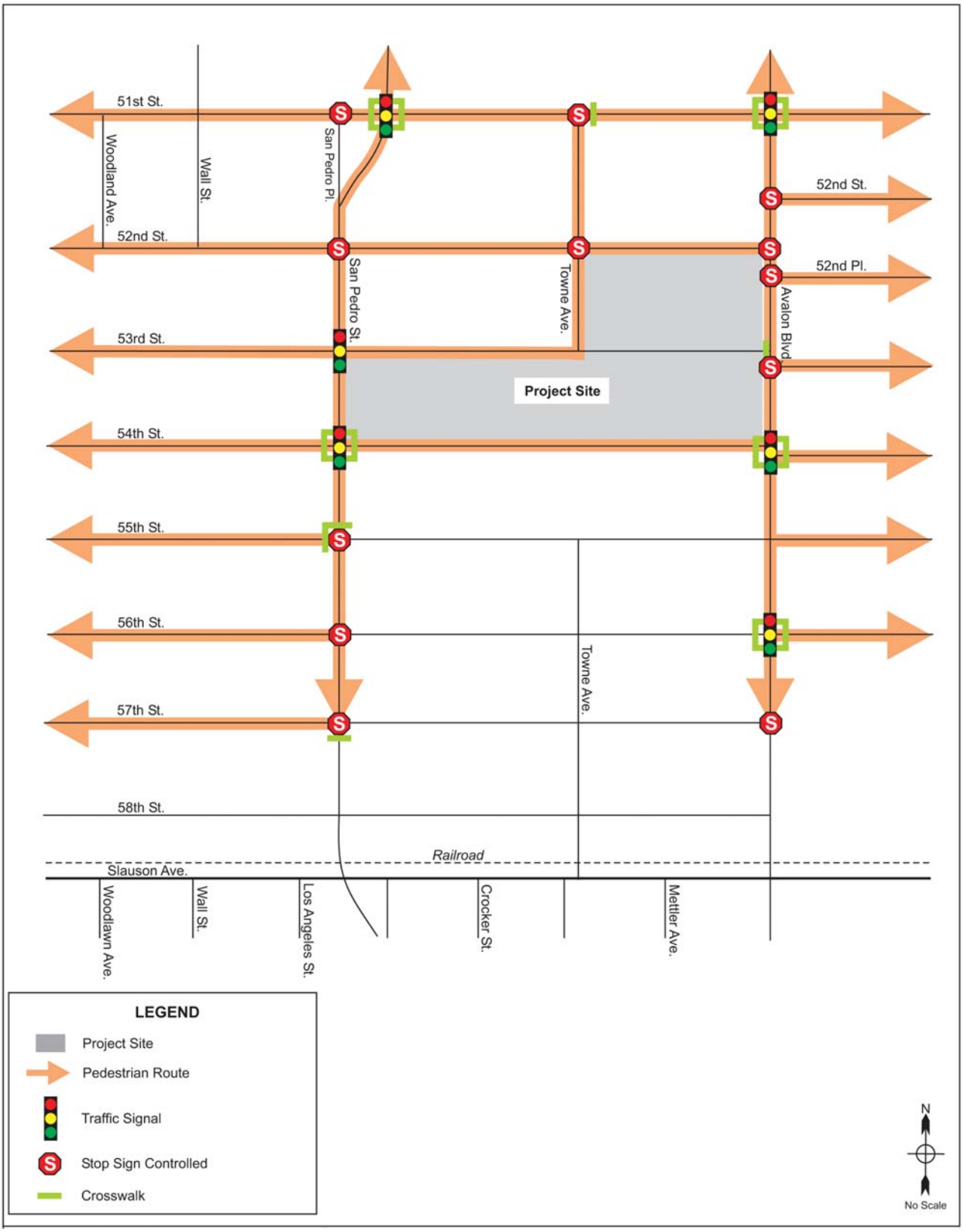
The pedestrian network in the study area is comprised of the surrounding street grid with various traffic intersection controls as described below (see **Figure 3E.1**). The street network surrounding the proposed project site is primarily used to support the surrounding residential neighborhood. In general, the smaller residential streets are controlled by stop signs. All traffic signals within the study area provide pedestrian signals and marked crosswalks. (The study area, defined through consultation with LADOT staff, encompasses the eight roadway intersections listed above.) All of the local streets in the project vicinity also have sidewalks and crosswalks.

An at-grade railroad crossing is located approximately one-quarter (1/4) of a mile south of the proposed project at the intersection of Slauson Avenue and Avalon Boulevard. Sidewalks and adequate warning signs are provided at this crossing for pedestrians attempting to cross the tracks.

3E.3 REGULATORY FRAMEWORK

Los Angeles Unified School District. LAUSD's Office of Environmental Health and Safety (OEHS) document entitled *Traffic and Pedestrian Safety Requirements for New Schools*,"[4] provides performance guidance to minimize potential pedestrian safety risks to students, staff, and visitors at LAUSD schools. The document includes guidelines for student drop-off areas, vehicle access, pedestrian routes to school, and general signage. In accordance with that document and the Caltrans *School Area Pedestrian Safety Manual*,[5] LAUSD will prepare a pedestrian safety plan and safe-routes-to-school map to ensure safe pedestrian access.

[4] *Traffic and Pedestrian Safety Requirements for New Schools*, Op. Cit.
[5] Caltrans, *School Area Pedestrian Safety Manual*, 1987 edition.



SOURCE: Katz, Okitsu & Associates, 2006.

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Figure 3E.1
Recommended Pedestrian Routes
and Estimated Pedestrian Traffic

As stated in the Traffic Study by Katz, Okitsu & Associates,[6] performed as part of this DEIR, the proposed project adheres with the guidelines in *Traffic and Safety Requirements for New Schools*.[7] According to the study, the placement of the student drop-off area complies with all three criteria. Criteria A requires that the drop-off area not be located along major streets or thoroughfares (defined as four lanes of traffic or having high traffic volumes). The site plan also complies with Criteria B because there would be at least 60 feet between the drop-off area and the school access driveway. Finally, the site plan complies with Criteria C, which states the bus drop-off area must be located so that it will not conflict with the vehicle drop-off area.

The California Department of Transportation. Caltrans establishes and administers the Safe Routes to Schools program.[8] The purpose of this program is to provide funding to improve the safety of children as they walk or bike to school. School districts are responsible for establishing and enforcing school route plans. School districts are also responsible for siting and developing school facilities that foster a good walking environment.[9] These responsibilities include choosing school locations that balance vehicle access with pedestrian safety needs, constructing adequate pedestrian facilities along the perimeter of the school site, and working with the local public works agency to fund and install adequate crossing protection at key points. School districts are responsible for distributing walk route maps to parents and students.[10] Under this program, school districts are required to prepare, prior to school opening, a pedestrian safety plan for the safe arrival and departure of students in accordance with the *School Area Pedestrian Safety Manual*.[11]

Memorandum of Cooperation (MOC) Between LAUSD and the Los Angeles Department of Transportation. In accordance with this MOC, dated June 24, 2005, LAUSD will participate with LADOT in the preparation of a "Pedestrian Routes to School" map as part of an application for the Safe Routes to School grant program.[12] During the CEQA process, LAUSD will prepare a preliminary "Pedestrian Routes to School" map, inventory the pedestrian system including existing sidewalks, crosswalks, and other pedestrian access elements, and identify necessary safe routes for providing access to and from school. Prior to the opening of the school, LAUSD will again participate with LADOT in the preparation of the final "Pedestrian Routes to School" map.

Los Angeles Department of Transportation. Section 354 of the *LADOT Manual of Policies and Procedures* establishes guidelines to be used in determining the need for smart pedestrian warning devices (for example, a smart crosswalk) at uncontrolled intersection approaches. (Smart pedestrian warning devices include, for example, pedestrian and/or vehicle-activated flashing lights installed in the street along the crosswalk). This policy was established by LADOT in December 2004. Such devices use pedestrian or automatically activated warnings to motorists of the presence of crossing pedestrians.

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6 Katz Okitsu & Associates, Traffic Study for Los Angeles Unified School District Central Region High School #16, May 8, 2007.

7 LAUSD, Traffic and Pedestrian Safety Requirement for New Schools, December 15, 2005
Caltrans. AB 1475 Street and Highways Code Sections 2331, 2333 1n3 2333.5. Safe Routes to School (SR2S), January 2000.

9 *Ibid.*

10 California Department of Health Services (DHS), *Responsibilities for Walk Route Safety*, 2004. ww.dhs.ca.gov/ps/cdic/epic/sr2s/documents/RouteResponsibilitiesChart.doc

11 Caltrans, *School Area Pedestrian Safety Manual*, 1997.

12 LAUSD and LADOT, *Memorandum of Cooperation*, June 24, 2005.

3E.4 IMPACTS AND MITIGATION

3E.4.1 METHODOLOGY

As part of the MOC between LAUSD and LADOT, an inventory of the pedestrian system within one-quarter (1/4) mile of the proposed project site was conducted. The scope of the inventory included the location and identification of existing traffic controls in the area that could be used by students to access the school site from adjacent neighborhoods. Traffic control locations that were documented included traffic signals, active rail at-grade crossings, signed and striped crosswalks, and all-way stop-controlled intersections.

Recommended pedestrian routes were formulated, based on the information collected for this initial pedestrian safety study. Routes with existing traffic controls, were used when feasible, to provide safe crossing points on major roadways.

Pedestrian volume calculations were extrapolated using mode split characteristics developed for the PEIR. The results of the surveys in the PEIR showed that for high school students approximately 57.70 percent of the students arrived by car, 2.90 percent arrived by school bus, 21.58 percent walked/bicycled, and the remaining 17.82 percent arrived by public transportation and other modes.

3E.4.2 CRITERIA FOR DETERMINING SIGNIFICANCE

The criteria used to determine the significance of an impact related to pedestrian safety are based on the policies of the Program EIR and Caltrans School Area Pedestrian Safety Manual.[13] The proposed project may result in potentially significant impacts relating to pedestrian safety if it would:

- Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible land uses;
- Create unsafe routes to schools for students walking from local neighborhoods; and
- Result in a cumulatively considerable impact to pedestrian safety.

3E.4.3 PROJECT IMPACTS

The environmental impact analysis presented below is based on the determinations made in the IS for issues that were determined to be potentially significant and potentially significant with mitigation incorporated (see Appendix A).

Impact 3E1: Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible land uses.

The impact relating to the increase of pedestrian-vehicle conflicts would be less than significant with mitigation incorporated.

[13] Katz Okitsu & Associates, *Traffic Study for Los Angeles Unified School District Central Region High School #16,* May 8, 2007.

Vehicular access to the proposed parking structure for faculty and staff would be provided at East 52nd Street. On-street parking is available in the vicinity of the proposed project site for student and visitor parking.[14]

The main school building entrance would be located on East 53rd Street, a local street. Traffic would circulate in a clockwise direction as the southern curb of East 53rd Street is designated as the student drop-off/pick-up area for automobiles. East 53rd Street has approximately 700 feet of curb space to accommodate drop-off/pick-up activities. The bus drop-off/pick-up area would be on Towne Avenue, a local street. The drop-off/pick-up locations would allow students to avoid crossing East 53rd Street during drop-off/pick-up times.

Based on the mode splits identified in the PEIR the total net vehicle A.M. peak period project trip generation is 689 inbound vehicles in the A.M. peak period and 282 inbound student pedestrians.[15]

The traffic volumes were calculated based on the number of vehicles that would be crossing the intersections. Future projected pedestrian volumes were based on the observation of existing pedestrian traffic and future pedestrians estimated to cross the intersections. Due to the expected vehicular and pedestrian traffic volumes at the stop-controlled intersections adjacent to the proposed project site, implementation of the proposed project could result in significant vehicular and pedestrian safety hazards. However, with implementation of the mitigation measures below, potential vehicular and pedestrian impacts on- and off-site would be reduced to acceptable levels. The impact would be less than significant.

Mitigation Measure

M-3E.1 *Four months prior to opening of the proposed school, LAUSD's OEHS shall contact the Los Angeles Department of Transportation (LADOT) to coordinate the installation of signage to create passenger loading zones. The signage for the passenger loading zones would state, "Passenger Loading only 6:30 A.M – 9 A.M. and 1:30 P.M. – 4 P.M., and 2-Hour Parking 9 A.M. to 1:30 P.M.," or "15-Minute Parking 7 A.M. to 5 P.M. on School Days," or provide other notice as deemed appropriate by LAUSD. The precise locations and lengths of the restricted on-street parking zones would be jointly determined by LAUSD and LADOT.*

Residual Impacts

Impact would be less than significant.

Impact 3E2: Create unsafe routes for students walking from local neighborhoods.

The impact relating to creating unsafe routes for students walking from local neighborhoods would be less than significant with mitigation incorporated.

[14] Katz, Okitsu & Associates, *Traffic Study for Los Angeles Unified School District Central Regional High School #16 Los Angeles, CA*, May 7, 2007.

[15] LAUSD, OEHS, *New School Construction Program, Final Environmental Impact Report*, published May 2004, Board Certified June 8, 2004, p. 3.1-3.

Pedestrian routes have been formulated based on the density and geographical dispersion of the population for the school's area of influence within the local district. All recommended routes use existing traffic controls to provide safe crossing points on major roadways. Figure 3E.1 as shown above shows suggested pedestrian traffic controls, existing and suggested pedestrian routes, and anticipated student traffic volumes. Additionally, the final "Pedestrian Routes to School Map" should show the intersection of San Pedro Street and East 53rd Street as an approved intersection to cross. Students should be highly encouraged to use the existing traffic signal at San Pedro Street and East 53rd Street.

The intersection at Avalon Boulevard and East 52nd Street, which is an unsignalized intersection with a stop sign, qualifies under LADOT guidelines (Section 354) for installation of a pedestrian safety warning device. None of the other study intersections currently meet the minimum requirements for smart pedestrian warning devices. Installation of a traffic signal at the intersection of Avalon Boulevard and East 52nd Street would, however, further enhance pedestrian safety in accordance with LADOT guidelines.

Implementation of Mitigation Measures M-3E.2 through M-3E.4 would reduce all potential impacts to safety at other intersections to a less than significant impact.

Mitigation Measures

In addition to Mitigation Measure M-3E.1 the following mitigation measures shall be implemented to reduce pedestrian safety impacts associated with the proposed project:

M-3E.2 *Four months prior to opening the proposed high school, LAUSD's OEHS shall contact LADOT to coordinate the installation of appropriate traffic controls, school warning and speed limit signs, school crosswalks, and pavement markings.*

M-3E.3 *Prior to opening the proposed high school, LAUSD~~'s OEHS shall contact LADOT to coordinate the installation of~~* ***shall install*** *a traffic signal at the intersection of Avalon Boulevard and East 52nd Street.*

M-3E.4 *Six months prior to opening of the proposed high school, LAUSD's OEHS shall contact LADOT's citywide traffic control program section for preparation of a final "Pedestrian Routes to School Plan" for the safe arrival and departure of students in accordance with the "School Area Pedestrian Safety Manual."[16] The plan shall include a "Pedestrian Routes to School Map" for distribution to all students and parents. Parents and students shall be notified to use the existing traffic safeguards. The Map shall encourage students to cross San Pedro Street at East 53rd Street for travel west of the project site.*

Residual Impacts

Impact would be less than significant.

[16] Caltrans, *School Area Pedestrian Safety Manual*, 1997.

3E.4.4 CUMULATIVE IMPACTS

Impact 3E3: Result in cumulatively considerable impact with respect to pedestrian safety.

The proposed project would not result in a cumulatively considerable impact with respect to pedestrian safety when appropriate mitigation measures are applied.

The addition of project-related traffic to cumulative traffic could result in a cumulatively considerable impact on pedestrian safety. Implementation of Mitigation Measures M-3E.1 through M-3E.4 would, however, ensure that students attending the proposed high school would have safe routes to school. The construction and operation of the proposed project would not result in a cumulative impact to pedestrian safety. The cumulative impact of the proposed project on pedestrian safety would be less than significant.

Mitigation Measures

See Mitigation Measures M-3E.1 through M-3E.4, above.

Residual Impacts

Impact would be less than significant.

CHAPTER 3F
TRAFFIC

3F.1 INTRODUCTION

This chapter discusses the potential impacts on transportation facilities and parking resulting from the proposed project. This analysis is based on the results of a traffic impact analysis conducted by Katz, Okitsu & Associates for the proposed project, in accordance with the *Guidelines for Traffic Impact Analysis Reports*[1,2] and the MOU between LAUSD and LADOT.[3] The complete traffic study is provided as Appendix F of this EIR.

3F.2 EXISTING ENVIRONMENTAL SETTING

3F.2.1 EXISTING TRANSPORTATION NETWORK

Street Network and Study Area

The transportation network in the study area is comprised of a grid of arterial and collector streets and roadways. The following streets act as boundaries to the proposed project site: East 52nd Street and East 53rd Street located to the north, East 54th Street located to the south, Avalon Boulevard located to the east, and San Pedro Street and Towne Avenue located to the west. These streets are described in greater detail below. **Figure 3F.1** depicts the lane configurations and traffic control at the study intersections.

Slauson Avenue: Within the study area, Slauson Avenue is an east-west class II major highway providing two travel lanes in each direction with striped left turn lanes. Parking on Slauson Avenue is prohibited, and the speed limit is 35 miles per hour (mph). A protected railroad crossing is located on Slauson Avenue at its intersection with Avalon Boulevard.

San Pedro Street: Within the study area, San Pedro Street is a north-south secondary roadway providing two travel lanes in each direction, with a striped median. Left-turn pockets are typically not provided at intersections. Parking is generally permitted except during peak periods, and the speed limit is 25 mph.

Avalon Boulevard: Within the study area, Avalon Boulevard is a north-south class II major highway providing two travel lanes in each direction, with a striped median. Parking is permitted, and the speed limit is 25 mph.

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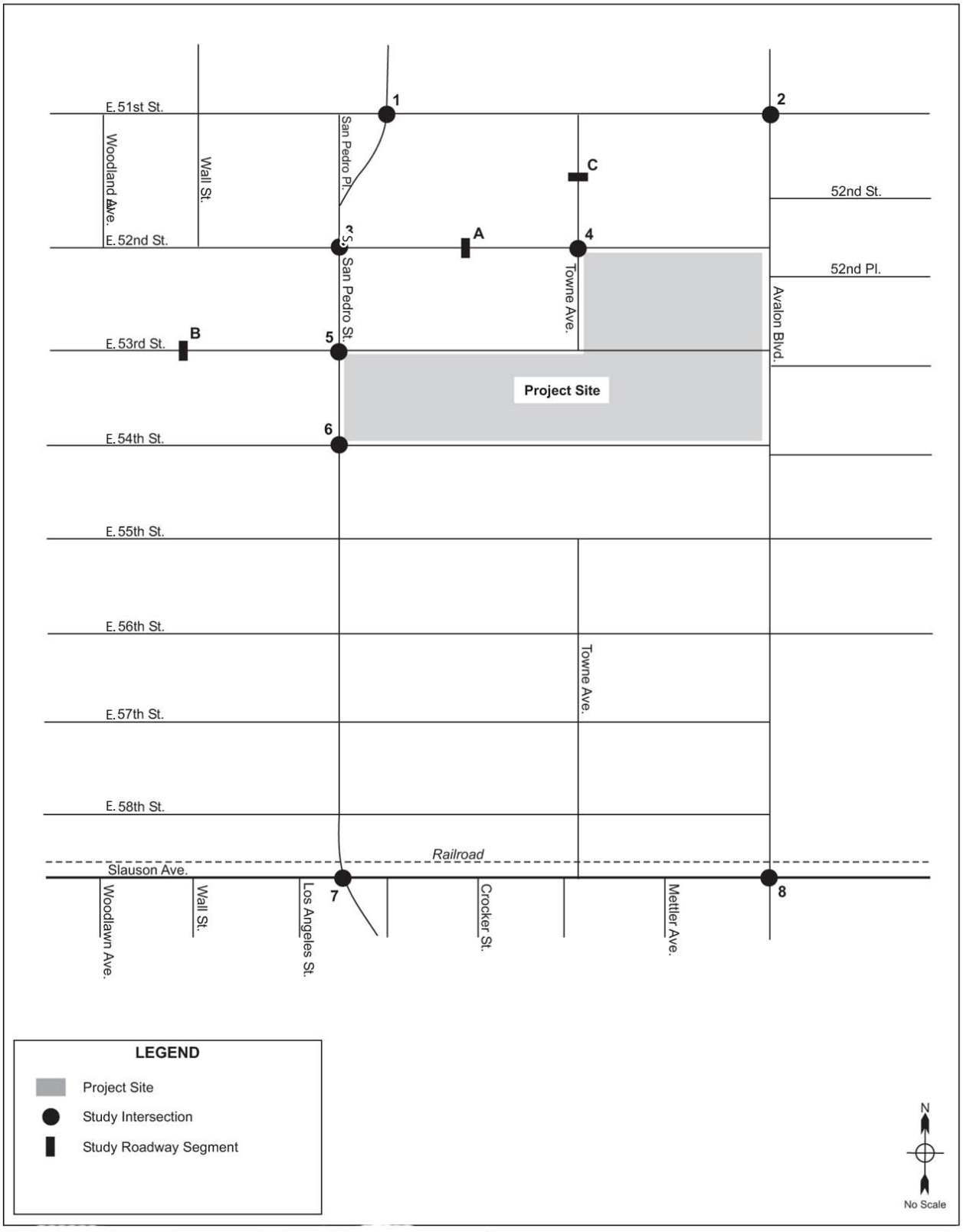
1 Katz, Okitsu & Associates, *Traffic Study for Los Angeles Unified School District Central Region High School # 16, May 8, 2007.*

2 LADOT, *Traffic Impact Analysis Reports*, January 1997.

3 LADOT and Katz, Okitsu & Associates, *Memorandum of Understanding*, April 7, 2006.



SOURCE: Katz, Okitsu & Associates, 2006.

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Figure 3F.1
Location of Study Intersections

East 51st Street: Within the study area, East 51st Street is an east-west secondary roadway providing one travel lane in each direction. Parking is permitted along the street in both directions.

East 52nd Street: Within the study area, East 52nd Street is an east-west local street providing one travel lane in each direction. Parking is permitted along the street in both directions.

East 53rd Street: Within the study area, East 53rd Street is an east-west local street providing one travel lane in each direction. Parking is permitted along the street in both directions.

East 54th Street: Within the study area, East 54th Street is an east-west collector street providing one travel lane in each direction. Parking is permitted along the street in both directions.

Towne Avenue: Within the study area, Towne Avenue is a north-south local street providing one travel lane in each direction. Parking is permitted along the street in both directions.

Existing Transit Operations

The project study area is served by bus transit lines operated by the LACTA and LADOT. The proposed project is served by multiple transit lines with stops located within walking distance of the proposed project site.

MTA Line 51 operates as a regional bus route that provides service between the Compton Metro Station and the Wilshire/Vermont Metro Station. Buses on this line travel along Avalon Boulevard within the study area. The line provides bus service to designated stops approximately every eight to 15 minutes during the weekday peak period.

MTA Lines 52 and 352 operate as regional bus routes that provide service between the Artesia Transit Center and the Wilshire/Vermont Metro Station. Buses on this line travel along Avalon Boulevard within the study area. Both bus lines provide service to designated stops approximately every 15 minutes during the weekday peak period.

MTA Lines 108 and 358 operate as regional bus routes that provide service between Marina Del Rey and Pico Rivera via Slauson Avenue through the cities of Culver City, Los Angeles, Maywood, and the City of Commerce. Buses on this line travel along Slauson Avenue within the study area. Both bus lines provide service to designated stops approximately every 15 to 20 minutes during the weekday peak period.

LADOT - DASH E operates as a local bus route that provides service between southeast Los Angeles and Pueblo del Rio. Buses on this line travel along East 54th Street within the study area. The bus line provides service at designated stops approximately every 20 minutes during the weekday peak period.

3F.2.2 EXISTING AREA TRAFFIC CONDITIONS

Eight intersections in the project vicinity were analyzed with regard to potential traffic impacts that could result from the implementation of the proposed project.[4] **Figure 3F.2** depicts the lane configurations and traffic controls at the study intersections. Three of the eight study intersections are controlled by traffic signals. The eight study intersections are:

1. San Pedro Street and East 51st Street.
2. Avalon Boulevard and East 51st Street.
3. San Pedro Street and East 52nd Street (stop-controlled intersection).
4. Towne Avenue and East 52nd Street (stop-controlled intersection).
5. San Pedro Street and East 53nd Street.
6. San Pedro Street and East 54th Street.
7. San Pedro Street and Slauson Avenue.
8. Avalon Boulevard and Slauson Avenue.

Additionally, the following roadway segments were analyzed:

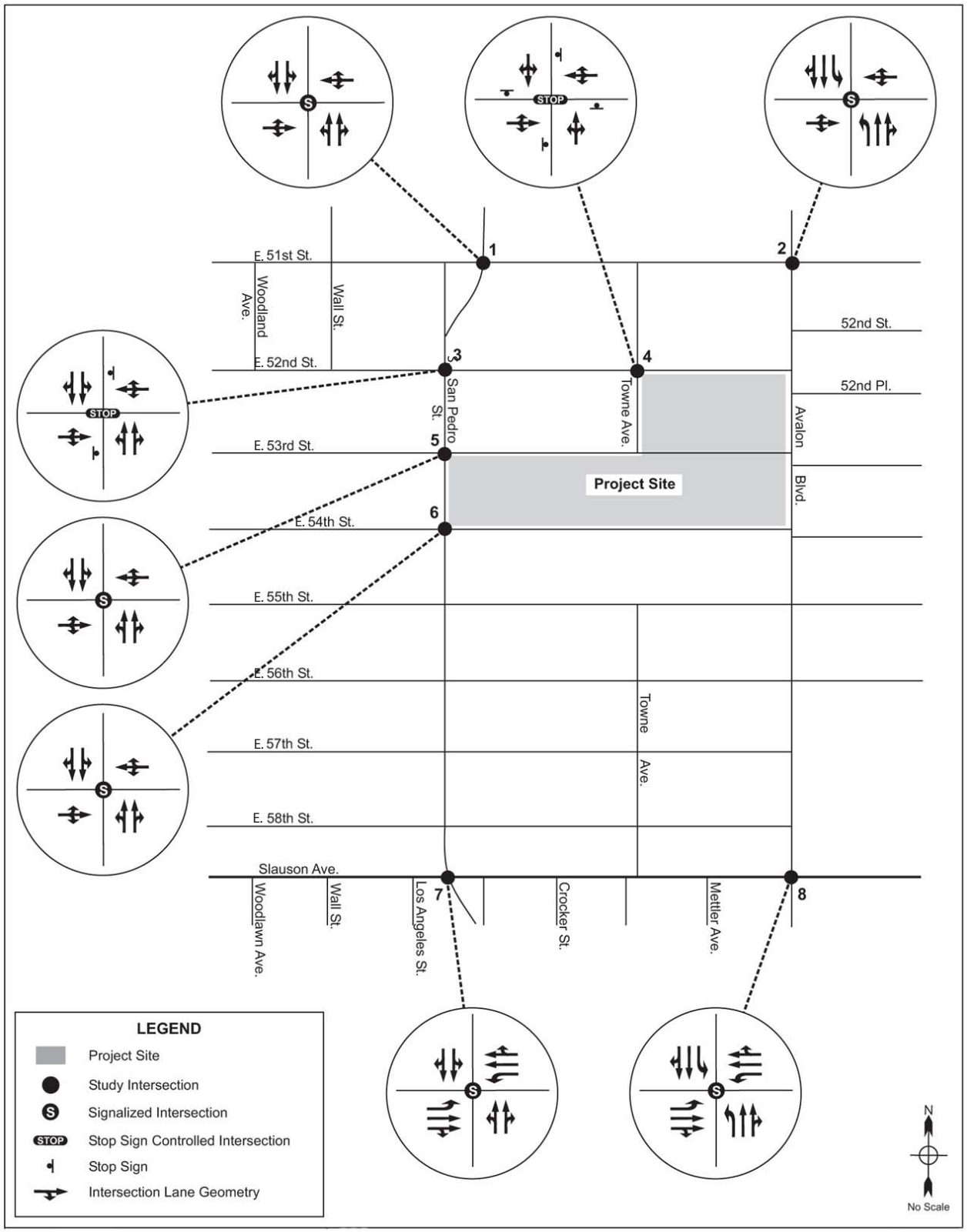
1. East 52nd Street, between San Pedro Street and Towne Avenue.
2. East 53rd Street, west of San Pedro Street.
3. Towne Avenue, north of East 52nd Street.

These intersections and roadway segments surround the proposed project site or are located on potential routes to the proposed school (as determined by the projected attendance area), and as such, are the intersections most likely to be directly impacted by traffic generated by the proposed project.

Study Methodology

LADOT requires the use of the Transportation Research Board Critical Movement Analysis (CMA) Circular 212 method to analyze traffic operating conditions at study intersections. The CMA analysis planning method for evaluating signalized intersections involves the computation of volume-to-capacity (V/C) ratios for each critical movement. Capacity, or saturation flow rate, is defined as the maximum rate of flow that can pass through a given intersection approach under prevailing traffic and roadway conditions. A facility is "at capacity" (V/C of 1.00 or greater) when extreme congestion occurs. This V/C ratio value is based upon volumes by lane, signal

[4] LADOT and Katz, Okitsu & Associates, *Memorandum of Understanding,* April 7, 2006.



SOURCE: Katz, Okitsu & Associates, 2006.

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Figure 3F.2
Intersection Lane Configuration and Control

phasing, and approach lane configuration. The sum of all critical movements on a critical lane basis is used to determine the total intersection V/C and corresponding level of service (LOS).

LOS values range from A to F. LOS A indicates excellent operating conditions with little delay to motorists, whereas LOS F represents congested conditions with excessive vehicle delay. LOS E is typically defined as the operating "capacity" of a roadway. LADOT defines LOS D as the lowest acceptable operating condition. **Table 3F-1** defines each LOS and provides the corresponding V/C ratios.

For the two-way stop controlled study intersections, LOS is evaluated using stop-controlled methodologies from the *2000 Highway Capacity Manual*. Under this methodology, intersection conditions are based upon intersection delay, which is defined as the average delay in seconds

TABLE 3F-1
INTERSECTION LOS DEFINITIONS

LOS	Interpretation	Signalized Intersection V/C Ratio (ICU)
A	Excellent. No vehicle waits longer than one red light and no approach phase is fully used.	0.000 - 0.600
B	Very good. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.	0.601 - 0.700
C	Good. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.	0.701 - 0.800
D	Fair. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.	0.801 - 0.900
E	Poor. Represents the most vehicles that intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.	0.901 - 1.000
F	Failures. Backups from nearby intersections or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.	Greater than 1.000

SOURCE: City of Los Angeles, *Traffic Studies Policies and Procedures,* November 1993.

experienced by users of the intersection who must stop or yield to uncontrolled through traffic. This method uses a "gap acceptance" technique to predict driver delay. This methodology is applicable to unsignalized intersections on major streets where there is potential for difficulty for cross traffic due to heavy traffic volumes on the major street.

Existing Intersection Levels of Service

Based on traffic counts taken at the study intersections, a V/C ratio and corresponding LOS was determined for each of the study intersections, as shown in **Table 3F-2**, for existing (2006) conditions.

TABLE 3F-2
SUMMARY OF INTERSECTION PERFORMANCE EXISTING (2006) CONDITIONS

Intersection Location	Weekday AM Peak		Weekday PM Peak	
	V/C or Delay	LOS	V/C or Delay	LOS
San Pedro Street/E. 51st Street	0.421	A	0.364	A
Avalon Boulevard/E. 51st Street	0.586	A	0.636	B
San Pedro Street/E. 52nd Street[a]	0.339	A	0.235	A
Towne Avenue/E 52nd Street[a]	0.079	A	0.064	A
San Pedro Street/E. 53rd Street	0.248	A	0.180	A
San Pedro Street/E. 54th Street	0.375	A	0.309	A
San Pedro Street/Slauson Avenue	0.662	B	0.776	C
Avalon Boulevard/Slauson Avenue	0.965	E	0.905	E

[a] *Stop-controlled intersection, average delay; LOS was calculated based on the 1,200 capacity utilizing the Circular 212 methodology.*

SOURCE: Katz, Okitsu & Associates, *Traffic Study for LAUSD Central Region High School #16 Project,* May 8, 2007.

As shown on Table 3F-2, seven of the eight study intersections operate at an acceptable LOS (LOS D or better) under existing (2006) conditions. The traffic analysis worksheets for the existing conditions scenario are provided in Appendix F. The following intersections are operating at acceptable levels of service:

- San Pedro Street and East 51st Street;
- Avalon Boulevard and East 51st Street;
- San Pedro Street and East 52nd Street;
- Towne Avenue and East 52nd Street;
- San Pedro Street and East 53rd Street;
- San Pedro Street and East 54th Street;
- San Pedro Street and Slauson Avenue.

The intersection of Avalon Boulevard and Slauson Avenue operates at LOS E (poor) during both morning and peak hours.

3F.3 APPLICABLE REGULATIONS

Caltrans. The California Vehicle Code establishes height, weight, length, and width restrictions for vehicles and their loads.[5] Vehicles or loads that exceed these limitations are considered oversize and require a special permit to operate on the state highway system. The Code authorizes Caltrans to issue special permits for the movement of these oversize vehicles along specified

[5] California Department of Motor Vehicles, *California Vehicle Code Section 35000*, January 2005.

routes on the state highway system. The Code authorizes county and city governments, such as the City, to issue special permits for movement of oversize vehicles through their jurisdictions.

County of Los Angeles. New projects within the County of Los Angeles must comply with the Congestion Management Program (CMP) for Los Angeles County[6] that was adopted by the LAMTA in November 1995 pursuant to state law. The CMP involves monitoring traffic conditions and performance measures on the designated transportation network, analysis of the impact of land use decisions on the transportation network, and mitigation to reduce impacts on the transportation network.

Appendix D of the CMP includes Transportation Impact Assessment (TIA) guidelines.[7] The TIA guidelines require analysis at monitored street intersections and segments, including freeway on- and off-ramp intersections where a project is expected to add 50 or more peak hour vehicle trips and mainline freeway or ramp monitoring locations where a project is expected to add 150 or more peak hour trips. If a project does not add, but merely shifts trips at a given monitoring location, the CMP analysis is not required.

City of Los Angeles. LADOT is responsible for transportation issues within the City of Los Angeles. LADOT reviews the transportation/traffic studies prepared for projects of all types for which the City is the lead agency, in addition to other public agency projects (county, state, or federal) located within, or that may affect, the City.

3F.4 IMPACTS AND MITIGATION

3F.4.1 METHODOLOGY

The baseline for the analysis of the proposed project and proposed project alternatives in this Draft EIR is based on the traffic study prepared for the proposed project site (see Appendix F).[8] Potential impacts are described in terms of increases to the capacity of the roadway, variation in LOS, and cumulative effects.

3F.4.2 CRITERIA FOR DETERMINING SIGNIFICANCE

LADOT has established specific threshold criteria that are used to determine if implementation of a project would result in a significant traffic impact. Using these criteria, a proposed project may result in a significant impact on intersection capacity if the estimated project traffic would increase the V/C ratio under one or more of the following conditions as required by LADOT:[9]

- The V/C ratio increase is equal to or greater than 0.040 and the final LOS (defined as projected future conditions including project, ambient, and related project growth but without project traffic mitigation) is C;

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6 MTA, *Congestion Management Program (CMP) for Los Angeles County, Appendix D,* November 1995.
7 *Ibid*.
8 Katz, Okitsu & Associates, *Traffic Study for Los Angeles Unified School District Central Region High School #16,* May 8, 2007.
9 LADOT, *Traffic Impact Analysis Reports*, January 1997.

- The V/C ratio increase is equal to or greater than 0.020 and the final LOS is D; or
- The V/C ratio increase is equal to or greater than 0.010 and the final LOS is E or F.

Additionally, the proposed project may result in potentially significant impacts relating to traffic if it would:

- Cause a substantial increase in traffic in relation to the existing traffic load and capacity of the street system (for example, result in a substantial increase in either the number of vehicle trips, the V/C ratio on roads, or congestion at intersections);
- Exceed, either individually or cumulatively, a LOS standard established by the county congestion management agency for designated roads or highways;
- Result in inadequate parking capacity; or
- Result in a cumulatively considerable impact with respect to traffic.

3F.4.3 PROJECT IMPACTS

The environmental impact analyses presented below are based on the determinations made in the Initial Study for issues that were determined to be potentially significant and potentially significant with mitigation incorporated (see Appendix A for the Initial Study).

Impact 3F1: Cause a substantial increase in traffic in relation to the existing traffic load and capacity of the street system (for example, result in a substantial increase in either the number of vehicle trips, the V/C ratio on roads, or congestion at intersections).

Implementation of the proposed project would cause an increase in traffic that would be substantial in relation to the existing traffic load. The impact would be less than significant with mitigation measures incorporated for the studied intersection and roadway segments.

To evaluate the potential impacts of the proposed project on local traffic conditions, a forecast of future traffic volumes in the study area under conditions without the proposed project was developed. This forecast provides a basis against which to measure the proposed project's traffic impacts.

Future No-Project Traffic Conditions

The anticipated build-out year of the proposed project, when the proposed high school would be in full operation, is 2011. The projection of year 2011 no-project traffic consists of existing traffic plus ambient traffic growth (general background regional growth) plus growth in traffic generated by specific cumulative (related) projects expected to be completed by 2011, without the proposed project. The following describes the two growth components.

Ambient Traffic Growth. Ambient traffic growth is the traffic growth that would occur in the study area due to general employment growth, housing growth, and regional growth through trips

in Southern California. Even with no change in housing or employment in the City, there would be some background (ambient) traffic growth in the region. For the analysis of background traffic during the project year, an annual traffic growth rate factor of 1.05 was applied to the existing traffic volumes. This simulates a one percent annual increase over the five-year period between existing conditions (year 2006) and future (year 2011) conditions. This rate was included in the MOU submitted to LADOT.[10]

Cumulative Project Traffic Growth. Cumulative project traffic growth, which is growth due to known development projects in the City, is also included in the analysis of the year 2011 no-project conditions. Based on coordination with the LADOT, a total of 10 projects that could affect traffic circulation were identified within the study area. These projects are listed in ~~Table 2-3~~ ***Table 2-1***, and the location of these projects is shown on Figure 2.6 of the Project Description of this EIR.

2011 Without Project Traffic Conditions

Based on the forecast parameters discussed above, peak-hour traffic volumes were estimated for the year 2011 without the proposed project. The results of the LOS analysis for this scenario are shown in **Table 3F-3**.

TABLE 3F-3
INTERSECTION PERFORMANCE –
FUTURE (YEAR 2011) AMBIENT GROWTH + RELATED PROJECTS

Intersection Location	Weekday AM Peak		Weekday PM Peak	
	V/C or Delay [a]	LOS	V/C or Delay [a]	LOS
San Pedro Street/E. 51st Street	0.481	A	0.408	A
Avalon Boulevard/E. 51st Street	0.630	B	0.680	B
San Pedro Street/E. 52nd Street[a]	0.404	A	0.258	A
Towne Avenue/E 52nd Street[a]	0.083	A	0.066	A
San Pedro Street/E. 53rd Street	0.304	A	0.201	A
San Pedro Street/E. 54th Street	0.622	B	0.484	A
San Pedro Street/Slauson Avenue	0.828	D	0.900	D
Avalon Boulevard/Slauson Avenue	1.103	F	1.006	F

[a] Stop-controlled intersection, average delay; LOS calculated based on the 1,200 capacity utilizing the Circular 212 methodology.

SOURCE: Katz, Okitsu & Associates, *Traffic Study for LAUSD Central Region High School #16*, May 8, 2007.

As shown in Table 3F-3, when compared to existing conditions, operations at the intersections of San Pedro Street and East 51st Street, Towne Avenue and East 52nd Street, San Pedro Street and East 52nd Street, and San Pedro Street and East 53rd Street, would remain at LOS A for both the A.M. and P.M. peak hours with the addition of traffic generated by ambient growth and related projects. Operations at the intersection of Avalon Boulevard and East 51st Street, and San Pedro Street and East 54th Street would deteriorate from LOS A during both the A.M. to LOS B. The

[10] LADOT and Katz, Okitsu & Associates, *Memorandum of Understanding*, April 7, 2006.

LOS at the intersection of San Pedro Street and Slauson Avenue would decrease from LOS B to LOS D during the A.M. peak hour, and would decrease from LOS C to LOS D during the P.M. peak hour. Operations at the intersection of Avalon Boulevard and Slauson Avenue would deteriorate from LOS E during both the A.M. and P.M. peak hours to LOS F during both peak hours. With the exception of Avalon Boulevard and Slauson Avenue, the study intersections are forecasted to operate at acceptable LOS (D or better).

Future with Project Traffic Conditions

Forecast Trip Generation of the Proposed Project. Trip generation for the proposed project land uses was calculated by utilizing the ITE *Trip Generation Manual* [11] and the rates defined in the MOC between LAUSD and the LADOT.[12] Application of these rates to existing land uses at the proposed project site (for reduction of net trip generation) and the proposed project land uses are summarized in **Table 3F-4**.

Project trip distribution was based on the geographic distribution of the student population as well as knowledge of development trends in the area, local and sub-regional traffic routes, and regional traffic flows. For regional routes, freeway access was used. **Figure 3F.3** shows the intersection trip distribution percentages that were used for the project traffic volumes. **Figures 3F.4** and **3F.5** show the project trip assignment.

Future (Year 2011) Ambient Growth + Related Projects + Proposed Project. Traffic volumes for these conditions were derived by adding project trips to the future traffic volumes generated by ambient growth. **Table 3F-5** provides a comparison of all the A.M. peak period study scenarios for the proposed project. **Table 3F-6** provides a comparison of all the P.M. peak period study scenarios for the proposed project. Traffic impacts are determined by comparing future ambient growth and related project conditions to future traffic conditions with the proposed project.

As shown in Table 3F-5, the proposed project would result in a significant impact during the A.M. peak hour at the intersection of Avalon Boulevard and Slauson Avenue. V/C ratios (or delay) would increase to 0.029, which is above the threshold that the City considers acceptable (equal to or greater than 0.010) for intersections with a V/C ratio of F.

As shown in Table 3F-6, the proposed project would result in no significant traffic impacts during the P.M. peak hour.

Neighborhood Impact Analysis

In addition to the intersections within the study area, three residential street segments were included in the traffic analysis. Similar to the intersection analysis, the existing average daily traffic (ADT) at each study segment was adjusted to include ambient growth and any related project traffic estimated to occur on the residential roadway segment. Proposed project traffic was

[11] LADOT and Katz, Okitsu & Associates, *Memorandum of Understanding*, April 7, 2006.
[12] LAUSD and LADOT, *Memorandum of Cooperation*, June 24, 2005.

TABLE 3F-4
PROPOSED PROJECT TRIP GENERATION ESTIMATES

Land Use	Intensity	Units	Daily Weekday	Weekday AM Peak Hour			Weekday PM Peak Hour		
				Total	In	Out	Total	In	Out
Trip Rates									
High School[1]	-	student	1.71	0.34	56%	44%	0.14	47%	53%
Single Family Residential (ITE 210)	-	d.u.	9.57	0.75	25%	75%	1.01	63%	37%
Multi-Family Residential (ITE 220)	-	d.u.	6.72	0.51	20%	80%	0.62	65%	35%
Adult Evening School[2]	-	student	1.20	n/a	n/a	n/a	0.12	64%	36%
Sports Field[3]	-	field	58.00	n/a	n/a	n/a	29.00	48%	52%
Trips									
Existing Uses Credit									
High School	(140)	student	(239)	(48)	(27)	(21)	(20)	(9)	(11)
Single Family Residential (ITE 210)	(9)	d.u.	(86)	(7)	(2)	(5)	(9)	(6)	(3)
Multi-Family Residential (ITE 220)	(37)	d.u.	(249)	(19)	(4)	(15)	(23)	(15)	(8)
Proposed Project-									
High School	2,025	student	3,463	689	385	304	284	133	151
Adult Evening School[2]	450	student	540	n/a	n/a	n/a	54	35	19
Sports Field [3]	2	field	116	n/a	n/a	n/a	58	28	30
TOTAL NET TRIPS[4]			**3,545**	**615**	**352**	**263**	**344**	**166**	**178**

[1] Morning peak hour rates were based the Memorandum of Cooperation (MOC) between City of Los Angeles and LAUSD, June 24, 2005. Daily and afternoon peak hour rates were based on ITE Trip Generation Manual, 7th Edition.

[2] Adult evening school rates were based on Community College rates from the ITE Trip Generation Manual.

[3] Sport fields are designated for football, baseball, or softball practices only since bleachers are not typically provided on all fields. Trip generations rates were based on the results of the survey of soccer practices/scrimmages conducted by Katz, Okitsu & Associates (August 2006).

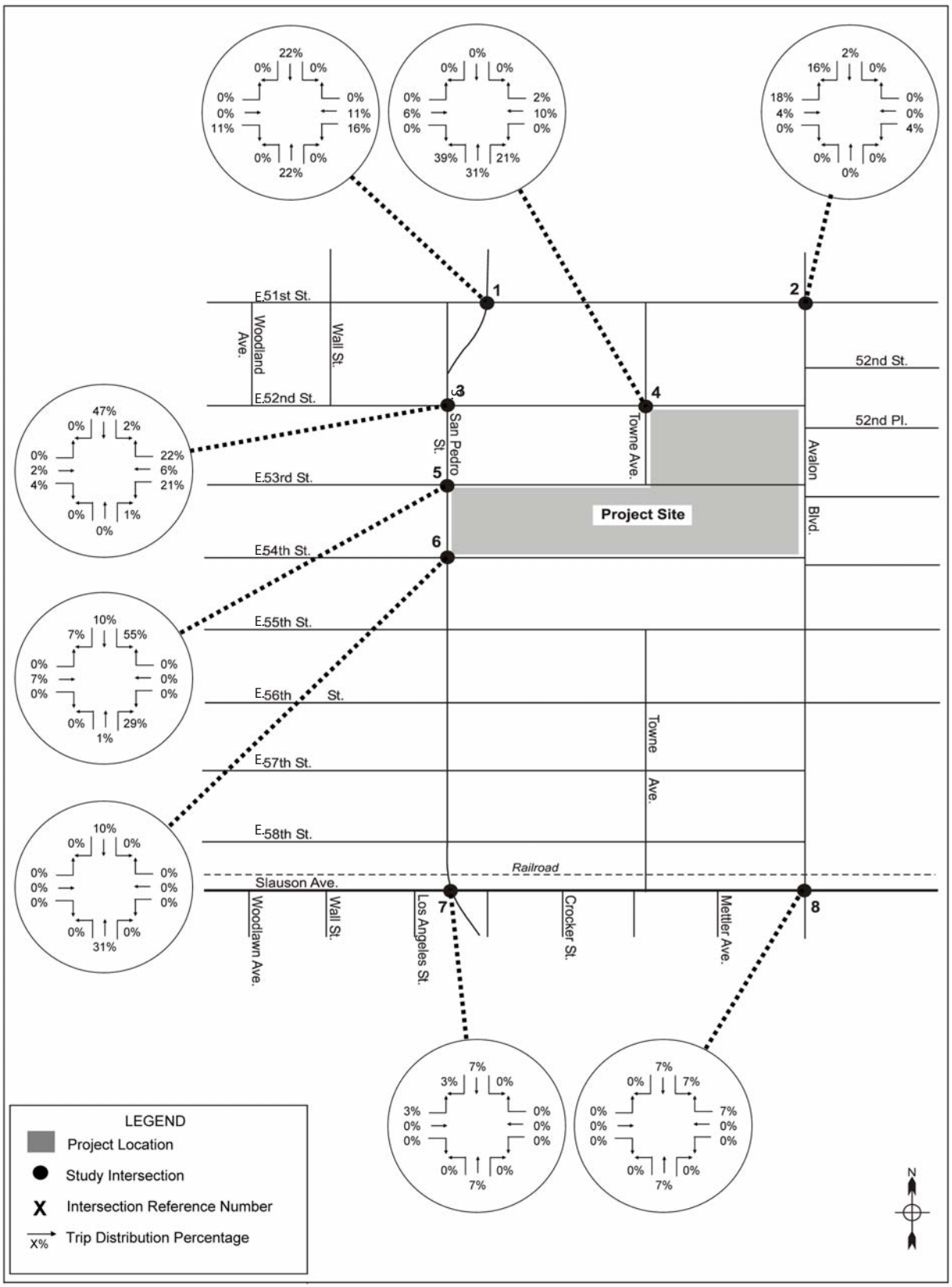
[4] The proposed project would generate 3,545 net trips, including 615 net trips during the AM peak hour, and 344 net trips during the PM peak hour, after taking reductions due to existing land uses at the proposed project site that would be removed as part of the proposed project.

SOURCE: Katz, Okitsu & Associates, *Traffic Study for LAUSD Central Region High School #16*, May 8, 2007.

then added to each of the three study segments, which represent future with proposed project conditions. The analysis of future with proposed project and future without proposed project traffic volumes determines whether or not the proposed project would have an impact on these study segments.

LADOT has established thresholds for project-related increases in the ADT on study roadway segments, as shown in **Table 3F-7**.

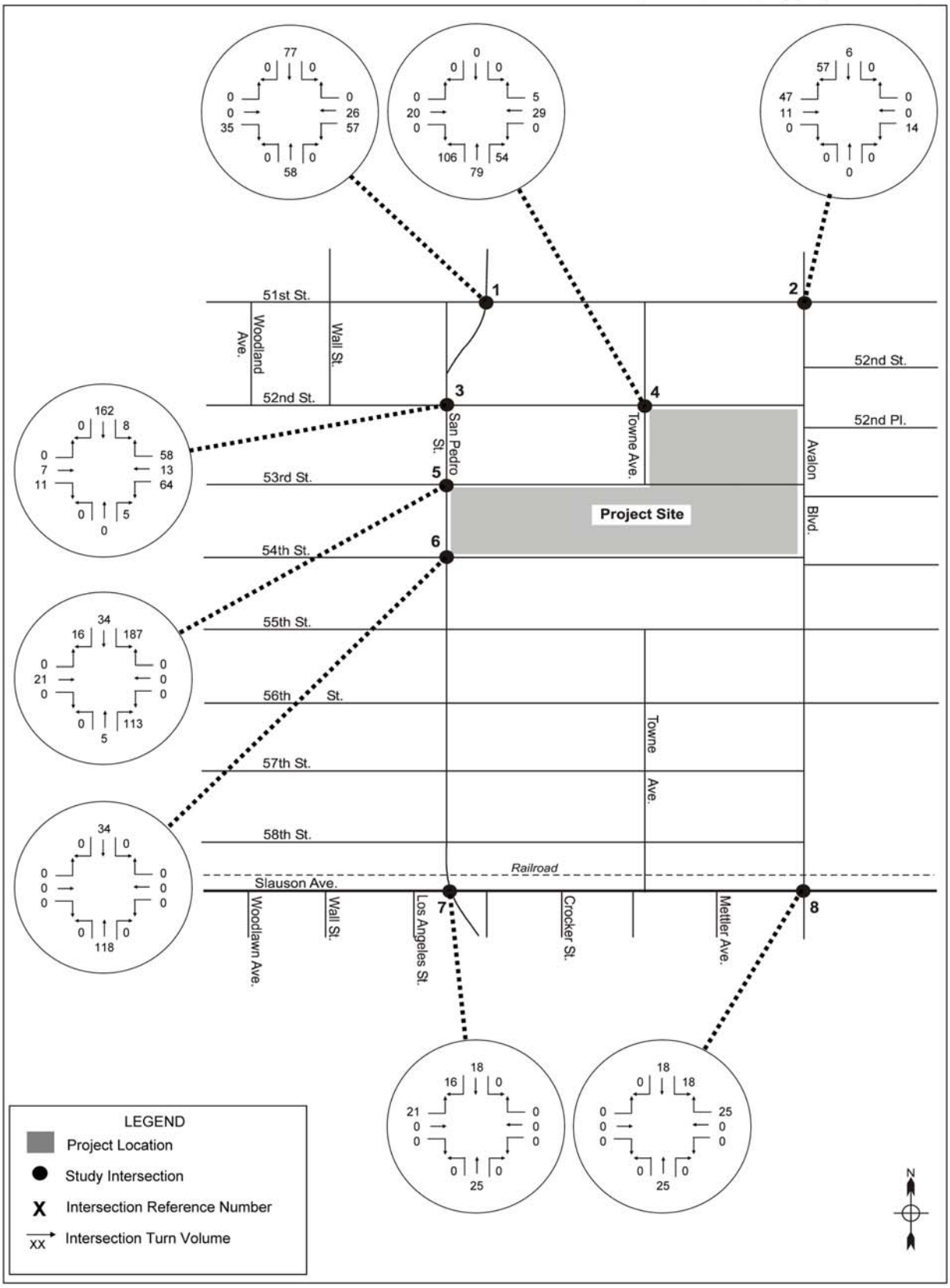
Table 3F-8 provides a summary of traffic impacts to the study segment roadways that would occur during the operation of the proposed project.



SOURCE: Katz, Okitsu & Associates, 2007.

LAUSD CRHS No. 16 . 206048

Figure 3F.3
Proposed Project Trip Distribution

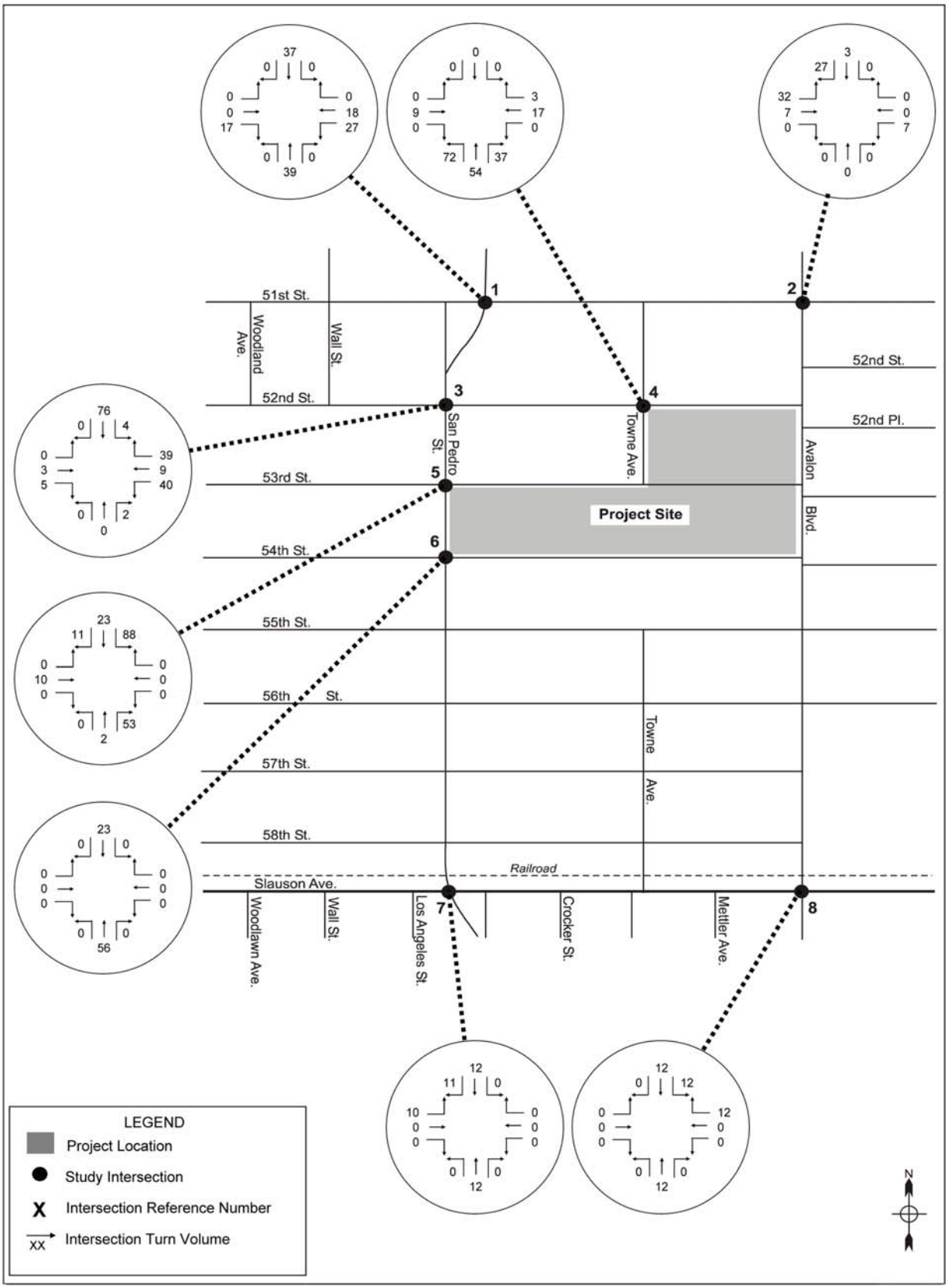


SOURCE: Katz, Okitsu & Associates, 2007.

LAUSD CRHS No. 16 . 206048

Figure 3F.4

Proposed Project Net Trip Assignment - AM Peak Hour



SOURCE: Katz, Okitsu & Associates, 2007.

LAUSD CRHS No. 16 . 206048

Figure 3F.5

Proposed Project Trip Net Assignment - PM Peak Hour

TABLE 3F-5
DETERMINATION OF PROPOSED PROJECT IMPACTS – WEEKDAY A.M. PEAK PERIOD

Intersection	Existing Conditions (Year 2006)		Future (Year 2011)) Ambient Growth + Related Projects		Future (Year 2011) Ambient Growth + Related Projects + Proposed Project		Diff.	Signif?
	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS		
1. San Pedro Street and East 51st Street	0.421	A	0.481	A	0.558	A	0.077	No
2. Avalon Boulevard and East 51st Street	0.586	A	0.630	B	0.678	B	0.048	No
3. San Pedro Street and East 52nd Street [a]	0.339	A	0.404	A	0.497	A	0.093	Yes
4. Towne Avenue and East 52nd Street [a]	0.079	A	0.083	A	0.299	A	0.216	No
5. San Pedro Street and East 53rd Street	0.248	A	0.304	A	0.516	A	0.212	No
6. San Pedro Street and East 54th Street	0.375	A	0.622	B	0.657	B	0.035	No
7. San Pedro Street and Slauson Avenue	0.662	B	0.828	D	0.846	D	0.018	No
8. Avalon Boulevard and Slauson Avenue	0.965	E	1.103	F	1.132	F	0.029	Yes

[a] See "Determination of Traffic Impacts" section for explanation.

SOURCE: Katz Okitsu & Associates, *Traffic Impact Study for LAUSD Central Region High School #16*, May 8, 2007.

TABLE 3F-6
DETERMINATION OF PROPOSED PROJECT IMPACTS – WEEKDAY P.M. PEAK PERIOD

Intersection	Existing Conditions (Year 2006)		Future (Year 2011)) Ambient Growth + Related Projects		Future (Year 2011) Ambient Growth + Related Projects + Proposed Project		Diff.	Signif?
	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS		
1. San Pedro Street and East 51st Street	0.364	A	0.408	A	0.451	A	0.043	No
2. Avalon Boulevard and East 51st Street	0.636	B	0.680	B	0.716	C	0.036	No
3. San Pedro Street and East 52nd Street [a]	0.235	A	0.258	A	0.350	A	0.092	No
4. Towne Avenue and East 52nd Street [a]	0.064	A	0.066	A	0.211	A	0.145	No
5. San Pedro Street and East 53rd Street	0.180	A	0.201	A	0.279	A	0.078	No
6. San Pedro Street and East 54th Street	0.309	A	0.484	A	0.514	A	0.030	No
7. San Pedro Street and Slauson Avenue	0.776	C	0.900	D	0.908	E	0.008	No
8. Avalon Boulevard and Slauson Avenue	0.905	E	1.006	F	1.014	F	0.008	No

[a] See "Determination of Traffic Impacts" section for explanation.

SOURCE: Katz, Okitsu & Associates, *Traffic Impact Study for LAUSD Central Region High School #16,* May 8, 2007.

TABLE 3F-7
PROPOSED PROJECT-RELATED AVERAGE DAILY TRAFFIC PERCENT INCREASES

ADT with Proposed Project	Maximum Proposed Project-Related Increase in ADT
0 to 999	16%
1,000 or more	12%
2,000 or more	10%
3,000 or more	8%

SOURCE: Katz, Okitsu & Associates, *Traffic Impact Study for LAUSD Central Region High School #16*, May 8, 2007.

TABLE 3F-8
NEIGHBORHOOD STREET IMPACT ANALYSIS

Street Segments	Time Period	Weekday Base Volumes		Proposed Project				
		Existing Year 2006	V/C or Delay	Project Only	Future Year 2011 with Project	Increase (%)	Significant Impact Criteria	Significant Impact
1. East 52nd Street between San Pedro Street and Towne Avenue	ADT	974	984	974	1,958	99.0%	12.0%	Yes
2. East 53rd Street, west of San Pedro Street	ADT	1,668	1,685	248	1,933	14.7%	12.0%	Yes
3. Towne Avenue, north of East 52nd Street	ADT	530	535	585	1,120	109.3%	12.0%	Yes

SOURCE: Katz, Okitsu & Associates, *Traffic Impact Study for LAUSD Central Region High School #16 Project*, May 8, 2007.

As shown in Table 3F-8 the proposed project would result in significant traffic impacts to the roadway segments of East 52nd Street between San Pedro Street and Towne Avenue, Towne Avenue north of East 52nd Street, and East 53rd Street west of San Pedro Street. ADT on these three roadway segments would increase by 99.0 percent, 14.7 percent, and 109.3 percent respectively, which are above what the City considers acceptable.

LADOT guidelines for traffic impact analyses state that if significant project traffic impacts occur on roadway segments, and if no physical roadway improvements can be realized, the applicant should coordinate with LADOT to develop a Neighborhood Traffic Management Plan.

The analyzed roadway segments are bordered by single-family residential land uses on two sides, and the other sides are developed. For this reason, widening these roadways to mitigate proposed project impacts would be highly infeasible. Therefore, it is recommended that a contribution be made toward the development of a Neighborhood Traffic Management Plan, which would be implemented by the City.

Mitigation Measures

M-3F.1 *LAUSD shall contribute impact-based fair share funding towards the installation of an ATSAC system at the intersection of Avalon Boulevard and Slauson Avenue. This mitigation measure appears to be feasible, provided that the responsible agency, LADOT, considers it and agrees to enforce it.*

M-3F.2 *LAUSD shall coordinate with LADOT to develop a Neighborhood Traffic Management Plan for the roadway segments of East 52nd Street between San Pedro Street and Towne Avenue; Towne Avenue, north of East 52nd Street and East 53rd Street, west of San Pedro Street. This mitigation measure appears to be feasible, provided that the responsible agency, LADOT, considers it and agrees to enforce it.*

Residual Impacts

The installation of an ATSAC system at the intersection of Avalon Boulevard and Slauson Avenue would reduce the traffic-related impacts to a less than significant level at all this intersection. ~~Furthermore, the traffic-related impact to the roadway segments of East 52nd Street between San Pedro Street and Towne Avenue, and Towne Avenue (north of East 52nd Street), and East 53rd Street west of San Pedro Street, would also be less than significant.~~ After the installation of the ATSAC system, the intersection Avalon Boulevard and Slauson Avenue would operate at LOS F during the A.M. peak hour and LOS F during the P.M. peak hour. However, because the project's contribution to the V/C ratio (or delay) is not substantial (less than 0.029), the impact with the proposed mitigation measure would be considered less than significant.

Impact 3F2: Exceed, either individually or cumulatively, a LOS standard established by the county congestion management agency for designated roads or highways.

Implementation of the proposed project would not exceed designated CMP LOS for roads and highways. The impact would be less than significant.

The CMP was created statewide as a result of Proposition 111 and has been locally implemented by the MTA. The CMP for Los Angeles County requires that the traffic impact of development projects of potential regional significance be analyzed. A specific system of arterial roadways plus all freeways comprise the CMP system. Per the CMP TIA Guidelines, a traffic impact analysis is conducted where the following occur:

- Where the proposed project would add 50 or more vehicle trips during either A.M. or P.M. weekday peak hours at CMP arterial monitoring intersections, including freeway on-ramps or off-ramps; and

- Where the proposed project would add 150 or more trips, in either direction, during either the A.M. or P.M. weekday peak hours at CMP mainline freeway monitoring locations.

The nearest CMP roadway to the proposed project site is on I-110 at Slauson Avenue. The CMP arterial monitoring intersection nearest to the project site is Manchester Avenue and Avalon Boulevard, located approximately two miles from the project site. Based on the project trip

distribution and traffic assignment presented in the analysis of Impact 3F.1, the proposed project would primarily include local traffic rather than regional traffic. The proposed project would add less than 150 new trips per hour to any freeway segment near the proposed project site. The impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Impact would be less than significant.

Impact 3F3: Result in inadequate parking capacity.

Implementation of the proposed project would not result in inadequate parking capacity. The impact would be less than significant.

Project Supply and Demand

The proposed project would provide a total of 188 off-street parking spaces for use by faculty and staff. No student or visitor parking is proposed. Therefore, any student choosing to drive to the school would utilize on-street parking. During mid-day hours, the pick-up/drop-off area would be made available to visitor vehicles.

To determine the typical parking demand for a high school, a parking survey of a nearby high school was conducted. Based on a recent parking survey conducted at Fremont High School, located approximately 1.6 miles south of the proposed project site at South San Pedro Street and East 77th Street in the City of Los Angeles; the typical parking demand ratio is 0.06 vehicles per student.[13] This student-based rate defines the total parking demand for students, faculty and staff, and visitors.

The proposed project's campus population would be 2,025 students. Using the 0.06 vehicles per student rate calculated from the Fremont High School survey, the total student parking demand for the proposed project would be 121 vehicles.

Existing on-street parking within the perimeter of the proposed project site was observed during mid-morning at around 9:00 A.M. on a typical Thursday, which was observed to be consistent with the observations of parking availability in the late afternoon. The day that the streets were surveyed was typical in the sense that activities that occur once a week, such as street sweeping and trash pick-up, do not occur on this day. Approximately one quarter mile is considered the maximum distance a typical person would walk from a parking space to a destination, and vice versa. However, streets within two blocks of the intersection of San Pedro Street and East 53rd Street, a radius of approximately .07 mile, were surveyed. These streets are the ones on

[13] Katz, Okitsu & Associates, Traffic *Study for Los Angeles Unified School District Central Region High School # 16, May 8, 2007.*

which students would be expected to park their vehicles in the surrounding street network. Approximately 160 vehicles were observed parked on-street within two blocks of the intersection of San Pedro Street and East 53rd Street. An approximate total of 350 spaces were estimated to be available within the survey area. Approximately 190 spaces (or approximately 54 percent of the remaining capacity) of the total 350 spaces were available. The calculation of this capacity takes into account residential driveways. The proposed project parking demand would be met by the on-street parking supply, even with the closure of East 54th Street for the South Los Angeles Wetlands Park. West of Avalon, all street cleaning on East 52nd Street, East 53rd Street, East 54th Street, and San Pedro Street takes place on alternating sides on Thursday and Friday nights, between the hours of 10 A.M. and midnight. Street cleaning along Towne Avenue, east of Avalon, takes place on alternating sides on Thursday and Friday mornings, between 8 A.M. and 10 A.M. Avalon Boulevard has no posted street cleaning hours. Because of the late night hours, street cleaning would have no impact on on-street parking, except along Towne Avenue, where parking would be unavailable temporarily on alternating sides between the hours of 8 A.M. and 10 A.M. The impact would be less than significant. The available on-street parking supply of 190 spaces would be adequate to accommodate the 121 space student parking demand.

Adult School Parking Demand

The adult school education program would provide seats for 450 students, and based on the trip generation methodology utilized for the program, 45.5 percent of the students would drive to the campus (205 students). The 15 instructors and 15 support staff members would generate demand for an additional 30 spaces. Thus, there would be a generated parking demand of 235 spaces. As operation of the adult school would not overlap with operation of the high school facility, there would be 188 spaces available on-site. Demand overflow to adjacent on-street parking areas would total 48 spaces. Approximately 25 percent of the available street parking would be used by the proposed adult school.

Project Demand with Stadium Use

The 1,500-seat campus stadium is expected to generate parking demand for 425 spaces. This estimate is based on the assumptions that 85 percent of the spectators would arrive by vehicle, and the average vehicle occupancy would be 3.0. Additional parking demand would be generated by the estimated total staff requirement (coaches, support staff, security, vendors) of 50 persons. Assuming that staff members would drive alone; a total parking demand of 475 vehicle spaces would result.

Based on the parking observation made within one quarter mile of the existing school, it was estimated that approximately 350 parking spaces were available for the midday, mid-week counts; a total of 450 on-street parking spaces would be available during Friday afternoon games. Assuming the 188 on-site parking spaces would also be available, the parking demand would be adequately supported and there would not be any significant area parking impacts during Friday afternoon peak periods.

Neighborhood on-street parking areas are expected to adequately absorb student and visitor parking demand during normal operations of the high school and related facilities. The impact

would be less than significant, even with the closure of East 54th Street for the South Los Angeles Wetlands Park.

Mitigation Measure

No mitigation measures are required.

Residual Impacts

Based on the information and discussion above, the proposed project would have a less than significant residual impact on parking supply.

3F.4.4 CUMULATIVE IMPACTS

Impact 3F4: Result in a cumulatively considerable impact with respect to traffic.

Implementation of the proposed project would not result in a cumulatively considerable significant impact on traffic.

As described in Impact 3F1, cumulative traffic is part of background traffic volumes. A total of ten related projects were considered along with an annual growth rate of one percent over five years to define future traffic without the proposed project. Future traffic without the proposed project was subtracted from the future traffic with the proposed project to determine the impact of the proposed project on the six study intersections (see Tables 3F-5 and 3F-6). With the implementation of Mitigation Measures M-3F.1 and M-3F.2 above, implementation of the proposed project would result in a less than significant impact to the studied impacted intersections and roadway segments.

The installation of an ATSAC system at the intersections of Avalon Boulevard and Slauson Avenue would reduce the traffic-related impacts to a less than significant level at this intersection. ~~Furthermore, the traffic-related impact to the roadway segments of East 52nd Street between San Pedro Street and Towne Avenue, and Towne Avenue (north of East 52nd Street), and East 53rd Street west of San Pedro Street would also be less than significant.~~ After the installation of the ATSAC system, the intersection of Avalon Boulevard and Slauson Avenue would operate at LOS F during the A.M. peak hour and LOS F during the P.M. peak hour. However, because the project's contribution to the V/C ratio (or delay) is not substantial (less than 0.029), the impact with the proposed mitigation measure would be considered less than significant.

Mitigation Measures

See Mitigation Measures M-3F.1 and M-3F.2 above.

Residual Impacts

As stated above, the traffic-related impact to the studied impacted intersections and roadway segments would be less than significant.

CHAPTER 4.0
ALTERNATIVES ANALYSIS

4.1 INTRODUCTION AND OVERVIEW

CEQA requires that an EIR describe a range of reasonable alternatives to the proposed project, and, if appropriate, to the location of the proposed project such that the alternative could feasibly avoid or lessen any significant environmental impacts while substantially attaining the basic objectives of the proposed project.[1] An EIR should also evaluate the comparative impacts of the alternatives. This chapter sets forth potential alternatives to the proposed project and evaluates them, as required by CEQA.

Key provisions of the *CEQA Guidelines* pertaining to the alternatives analysis are summarized below.[2]

- The discussion of alternatives shall focus on alternatives to the proposed project or to the project location that are capable of avoiding or substantially lessening any significant effects of the proposed project, even if these alternatives would impede to some degree the attainment of the proposed project objectives, or would be more costly.
- The No Project Alternative shall be evaluated along with its impact. The No Project Alternative analysis shall discuss the existing conditions at the time the NOP is published. Additionally, the analysis shall discuss what would be reasonably expected to occur in the foreseeable future if the proposed project were not approved, based on current plans and consistent with available infrastructure and community services.
- The range of alternatives required in an EIR is governed by a "rule of reason"; therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the proposed project.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the proposed project need to be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

The range of feasible alternatives is selected and discussed in a manner to foster meaningful public participation and informed decision-making. Among the factors that may be taken into

[1] *CEQA Guidelines*, California Code of Regulations (CCR), Title 14, Division 6 Chapter 3, §15126.6, ***2007*** ~~2004~~.
[2] *Ibid*.

account when addressing the feasibility of alternatives are environmental impacts, site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the proponent could reasonably acquire, control, or otherwise have access to the alternative site.[3]

4.2 PROJECT OBJECTIVES

As discussed in Chapter 2, Project Description, the proposed project is intended to implement the *Facilities Master Plan* to provide for a portion of the educational needs of students within LAUSD's Central Region Planning Area for grades 9 through 12. The proposed project would fulfill the following major objectives:

- Provide a neighborhood school for grades 9 through 12 to relieve overcrowding and restore pre-2002 classroom size norms at existing schools within the Central Planning Region, specifically at Manual Arts High School and Santee Education Complex;
- Create a school that is a center of community engagement both during and outside of normal operating hours;
- Eliminate involuntary busing of students as soon as possible;
- Reduce reliance on portable classrooms as soon as possible;
- Maximize the use of limited bond funds to provide the needed classroom facilities;
- Avoid displacement of existing residences and businesses where feasible;
- Maintain traditional classroom instruction hours for high school students of approximately 8 A.M. to 3 P.M.;
- Build and maintain a school that reflects the wise and efficient use of limited land and public resources;
- Maintain or increase existing opportunities for after-school athletic and extra-curricular activities; and
- Provide playfields for community use outside normal school operating hours.

4.3 ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION

An EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are feasible, and therefore merit in-depth consideration, and which are infeasible. Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered.[4] This section provides alternatives considered by the Lead Agency that were found to be infeasible and provides a brief explanation of the reasons for their exclusion. Alternatives may be eliminated

[3] *CEQA Guidelines*, California Code of Regulations (CCR), Title 14, Division 6 Chapter 3, §15126.6, ***2007*** ~~2006~~.
[4] *CEQA Guidelines*, California Code of Regulations (CCR), Title 14, Division 6 Chapter 3, §15126.6, 2006.

from detailed consideration in the EIR if they fail to meet proposed project objectives, are infeasible, or do not avoid any significant environmental effects.[5]

4.3.1 ALTERNATIVE SITES

LAUSD considered developing the proposed project at four alternative sites. These sites would include the construction of similar project components as the proposed project at different locations. The following alternative sites were considered for the proposed project:

1) Alternative Site 1 – a 13.34-acre site bounded by West Vernon Avenue to the north, San Pedro Street to the west, 46th Street to the south, and residential housing to the east. This alternative site would displace 43 single-family units, 109 multi-family units, and six commercial units.

2) Alternative Site 2 – a 13.36-acre site bounded by East 40th Place to the north, Broadway to the west, East 41st Place to the south, and residential housing to the east. Alternative Site 2 would remove 17 single-family units, 189 multi-family units, and nine commercial units.

3) Alternative Site 3 – a 14.51-acre site bounded by East 52nd Street to the north, San Pedro Street to the west, East 54th Street to the south, and Towne Avenue and Avalon Boulevard to the east. This alternative site would displace 11 single-family units, 84 multi-family units, and 101 commercial units.

4) Alternative Site 4 – a 19.5 acre site bounded by East 53rd Street to the north, San Pedro Street to the west, East 55th Street to the south, and Avalon Boulevard to the east. Alternative Site 4 would not remove any residential units and would displace 102 commercial units.

Alternative Sites 1 through 3 were determined by LAUSD to be infeasible because the use of these sites would result in a higher level of residential displacement than the proposed project. This would not meet the objective of the LAUSD New School Construction Program relating to avoiding the displacement of existing residences. Furthermore, in contrast to the Alternative Sites, access to the proposed project site is available on all sides of the site. The proposed project site is relatively flat and appears suitable for development. Selection of the proposed project site also minimizes residential displacement in the community. Therefore, Alternative Sites 1 through 3 were eliminated from further consideration. Alternative Site 4 was selected as the primary alternative site because it would avoid the displacement of residences and was suggested by the community at community meetings and the scoping meeting held on June 13, 2006. This alternative is analyzed in further detail in Section 4.4.3.

4.4 ALTERNATIVES TO THE PROPOSED PROJECT

The alternatives identified below, with the exception of the mandatory No Project Alternative, were selected due to their potential to achieve basic project objectives and to lessen or avoid

[5] *Ibid*, §15126.6(c), ***2007*** ~~2006~~.

significant environmental effects of the proposed project discussed in the EIR. Alternatives considered include:

- The No Project/No Build Alternative;
- The No Project/Reasonably Foreseeable Development Alternative;
- The Reduced Project Alternative; and
- The Alternative Site Option.

A summary comparison of all potential environmental impacts of the alternatives and the proposed project is included in Table 4-2 at the end of this chapter.

4.4.1 NO PROJECT/NO BUILD ALTERNATIVE

Section 15126.6(e) of the *CEQA Guidelines* requires consideration and analysis of the No Project Alternative. The No Project Alternative must discuss existing conditions at the site, what would be reasonably expected to occur in the foreseeable future if the proposed project were not approved based on current plans, site zoning, and consistency with available infrastructure and community services.

Under the No Project/No Build Alternative, the proposed project would not be constructed. The current site would remain in its present condition, including single- and multi-family residences, commercial spaces, the swap meet, and LAUSD's Johnson Opportunity High School. Students living in the vicinity of the proposed project would continue to attend Manual Arts High School and Santee Education Complex. Demand for additional two-semester high school seats would not be met and overcrowding would continue at the relief schools mentioned above.

Aesthetics. Under the No Project/No Build Alternative, the existing visual character of the proposed project site would not change. Existing sources of light would remain the same. Because this alternative would therefore not a change to the existing visual character of the ~~P~~ *p*roposed site, the No Project/No Build Alternative would have fewer impacts to the visual quality (aesthetics) of the proposed project site.

Air Quality. No new construction-related or operations-related emission would occur because there would be no change to existing site conditions under this alternative. Impacts to air quality would therefore be less than the proposed project.

Cultural Resources. Under the No Project/No Build Alternative, the impact on cultural resources would generally be similar to the impact under the proposed project. Under this alternative, there would be little or no potential to unearth previously undiscovered archaeological resources. As a result, when compared to the proposed project, this alternative would result in fewer impacts than the proposed project.

Noise. Under the No Project/No Build Alternative, the proposed project would neither be constructed or operated. Students would continue to attend the relief schools as under current conditions. Current noise emitters/producers such as auto or traffic related activities, pedestrian

activity, and student activity would continue to exist in absence of the proposed project. Furthermore, other pre-existing ambient noise producers would continue to exist. Therefore, noise impacts would be less than the proposed project.

Pedestrian Safety. Implementation of this alternative would not increase the number of pedestrians on the street network surrounding the proposed project site. Students would continue to walk to the relief schools as under current conditions where crosswalks, and sidewalks have been established to ensure pedestrian safety. Existing traffic and pedestrian control measures at the proposed project site including crosswalks, stop signs, traffic signals, sidewalks, pedestrian signals, and marked crosswalks would continue to be used in absence of the proposed project and related improvements. Therefore, impacts under this alternative would be less than impacts under the proposed project.

Traffic. Under the No Project/No Build Alternative, proposed project-related vehicular traffic along East 52nd Street and surrounding roads would not occur. Subsequently, traffic patterns would also stay the same, with the exception of normal non-project growth related traffic increases. Traffic impacts created by the proposal would not exist since the proposed project would not be built under the No Project/No Build Alternative. Therefore, the project-related vehicle trips and project-related impacts to existing intersection levels of service would not occur. Impacts under this alternative would result in fewer transportation impacts than the proposed project.

Conclusion and Relationship to Project Objectives

The No Project/No Build Alternative would result in the continuation of existing conditions at the proposed project site. Current schools would continue to suffer from overcrowding and the need for the students to attend already overcrowded relief schools would also continue to exist. No improvements to the overcrowding would occur. This would most likely have negative impacts upon the learning environment within the schools and make the job more difficult for LAUSD administration, faculty, and staff to improve the learning environment and positively affect student performance. Compared to the proposed project, the No Project/No Build Alternative is environmentally superior in the areas of aesthetics, air quality, noise, and traffic. While the overall environmental impacts associated with the No Project/No Build Alternative would be considered environmentally superior to the proposed project, under the No Project/No Build Alternative, the following project objectives would not be attained:

- Provide a neighborhood high school for grades 9 through 12 to relieve overcrowding and restore pre-2002 classroom size norms at existing schools within the Central Planning Region, specifically at Manual Arts High School and Santee Education Complex;
- Create a school that is a center of community engagement both during and outside of normal operating hours;
- Eliminate involuntary busing of students as soon as possible;
- Reduce reliance on portable classrooms as soon as possible;
- Maximize the use of limited bond funds to provide the needed classroom facilities;

- Maintain traditional classroom instruction hours for high school students of approximately 8 A.M. to 3 P.M.;
- Build and maintain a school that reflects the wise and efficient use of limited land and public resources;
- Maintain or increase existing opportunities for after-school athletic and extra-curricular activities; and
- Provide playfields for community use outside normal school operating hours.

4.4.2 NO PROJECT/REASONABLY FORESEEABLE DEVELOPMENT ALTERNATIVE

Under this alternative, if the proposed project were not developed on the proposed site, the site could be developed with other land uses consistent with the zoning. The zoning for the site is M1-1, *Light Manufacturing;* C2-1VL, *General Commercial;* and R2-1, *Low-Medium Residential*.[6] The Reasonably Foreseeable Development Alternative would generally keep the existing land uses for the site with a slight intensification of the residential land uses, since the need for residential land uses is occurring at a greater rate than the need for manufacturing/commercial land uses.[7] There are currently approximately 46 residential units located on the proposed project site. At full buildout, the proposed project site could be occupied by up to an additional five residential units for a total of 51 units. High school students in the Central Region Planning Area would continue to attend the relief schools, which are currently overcrowded. Additional school facilities would not be constructed elsewhere to provide relief seats. The non-residential uses including the Johnson Opportunity High School would likely remain in use. Furthermore, industrial and commercial uses would likely continue, although those buildings or structures would likely deteriorate over time with continued use without proper upkeep and maintenance. Furthermore, some industrial or commercial structures may be vacated or abandoned and might become unsafe and create hazards to the surrounding properties and the neighborhood.

Aesthetics. This alternative would change the visual character of the proposed project site. The existing land uses along East 52nd and East 53rd Streets are primarily up to two stories in height. The Reasonably Foreseeable Development Alternative could develop the project site to its maximum building height, resulting in buildings up to approximately four stories in height located on East 52nd and East 53rd Streets. In addition, development of the No Project/Reasonably Foreseeable Development Alternative could require the removal of the mature trees located on-site. In general, this alternative would result in similar or fewer aesthetic impacts than the proposed project.

Air Quality. Under this alternative, development of the proposed project site in a manner that is consistent with the existing zoning and land use designations could result in construction activities similar to the proposed project. Construction impacts on air quality associated with this

[6] City of Los Angeles, *Zoning Information and Map Access System*, http://zimas.lacity.org, accessed on February 27, 2006.
[7] Southern California Association of Governments. *2004 Regional Transportation Plan/Growth Vision: Socio-Economic Forecast Report*, June 2004.

alternative would be similar to the proposed project. Depending on the type and scale of development proposed under this alternative, operational emissions could not likely exceed the level of operational emissions that would occur under the proposed project, and would mostly likely be less than the proposed project (see *Traffic*, below). Therefore, operational impacts would likely be less than the proposed project due to the potential for fewer vehicle trips.

Cultural Resources. Under the No Project/Reasonably Foreseeable Development Alternative, the impact on cultural resources would be similar to the impact under the proposed project. The impact would be less than significant.

Noise. Similar to the proposed project, development consistent with the current zoning under this alternative would increase ambient noise levels above City of Los Angeles thresholds. As with the proposed project, short-term construction noise would occur. Therefore this alternative and the proposed project would result in similar impacts to noise levels.

Because the No Project/Reasonably Foreseeable Development Alternative would result in few additional vehicle trips, this alternative is considered environmentally superior to the proposed project regarding traffic-related noise, regarding both project-specific traffic and the project's contribution to cumulative noise levels from mobile sources.

Pedestrian Safety. Under this alternative, residences would be constructed at the proposed project site. Unlike the proposed project, this type of development would be similar to existing conditions and would not involve a substantial number of additional pedestrians on 52nd and 53rd Streets. Therefore, this alternative would result in fewer impacts to pedestrian safety than the proposed project.

Traffic. Compared to the proposed project, development of an additional five residential units on the proposed project site would generate fewer vehicle trips. Therefore, this alternative would result in fewer traffic-related impacts than the proposed project.

Conclusion and Relationship to Project Objectives

The No Project/Reasonably Foreseeable Development Alternative could result in the construction of additional residential land uses on the proposed project site. Compared to the proposed project, the No Project/Reasonably Foreseeable Development Alternative is environmentally superior in the areas of pedestrian safety, traffic, and traffic-related noise. This alternative is considered neither environmentally superior nor inferior to the proposed project in the areas of air quality, aesthetics, and construction noise. In addition, under the No Project/Reasonably Foreseeable Development Alternative, the following project objectives would not be attained:

- Provide a neighborhood high school for grades 9 through 12 to relieve overcrowding and restore pre-2002 classroom size norms at existing schools within the Central Planning Region, specifically at Manual Arts High School and Santee Education Complex;
- Create a school that is a center of community engagement both during and outside of normal operating hours;

- Eliminate involuntary busing of students as soon as possible;
- Reduce reliance on portable classrooms as soon as possible;
- Maximize the use of limited bond funds to provide the needed classroom facilities;
- Maintain traditional classroom instruction hours for high school students of approximately 8 A.M. to 3 P.M.;
- Build and maintain a school that reflects the wise and efficient use of limited land and public resources;
- Maintain or increase existing opportunities for after-school athletic and extra-curricular activities; and
- Provide playfields for community use outside normal school operating hours.

4.4.3 REDUCED PROJECT ALTERNATIVE

Under this alternative, a smaller high school would be built on the proposed project site. The remaining project site would be open space. The Reduced Project Alternative would provide approximately 1,645 two-semester seats compared to 2,025 two-semester seats under the proposed project, which is approximately 81.25 percent of the proposed 2,025 seats. The Reduced Project Alternative would include a stadium that would not accommodate Level IV (competitive) athletics. The 400 high school students that would not be accommodated by this alternative would continue to attend the relief schools that are currently overcrowded.

Aesthetics. Aesthetic impacts associated with the proposed project would include the loss of some mature trees present on the site. Depending on the location of the mature trees, some trees could be preserved in place under the Reduced Project Alternative if they do not pose a safety hazard to the students, faculty, staff, or the public. The Reduced Project Alternative would result in a less than significant impact related to nighttime lighting of the stadium. This impact would be less than the proposed project, since this alternative would include a stadium that would not accommodate Level IV athletics. Therefore, this alternative would result in fewer impacts to visual quality (aesthetics) than the proposed project.

Air Quality. The Reduced Project Alternative would still require the removal of existing structures and subsequent grading of the proposed project site. Operational emissions would still be generated by vehicle trips to and from the school, but at a lesser magnitude due to fewer vehicle trips to the smaller educational facility. This alternative would not result in any appreciable difference in the magnitude of significance of potential operational air quality impacts. Overall, air quality impacts from this alternative would be less than the proposed project.

Cultural Resources. Under the Reduced Project Alternative, the impact on cultural resources would be similar to the impacts under the proposed project, since this alternative would not change the significance of a historical resource nor result in a cumulatively considerable impact to cultural resources. As a result, neither this alternative nor the proposed project would have an impact on cultural resource.

Noise. Noise levels during construction under the Reduced Project Alternative would be expected to be similar to the proposed project since similar activities would be involved during construction and similar activities would be conducted at the proposed project site. Operational impacts would be similar to the proposed project, but would be expected to be reduced by a small amount as a result of less traffic noise and less noise from a smaller student population. Therefore, this alternative would therefore have fewer potential impacts than the proposed project.

Pedestrian Safety. Implementation of the Reduced Project Alternative would result in the operation of a local high school bordered by streets with high volumes of traffic. Similar to the proposed project, students would walk to school along Avalon and San Pedro Streets. Even though there would be fewer students, the potential hazard for students crossing Avalon and San Pedro Streets remains. Therefore, this alternative would have impacts to pedestrian safety that would be similar to the proposed project.

Traffic. Under the Reduced Project Alternative, traffic impacts would be incrementally reduced compared to the proposed project because 400 fewer students would attend the school Therefore, this alternative would generate less traffic than the project and would reduce the intensity of impacts as compared to the proposed project.

Conclusion and Relationship to Project Objectives

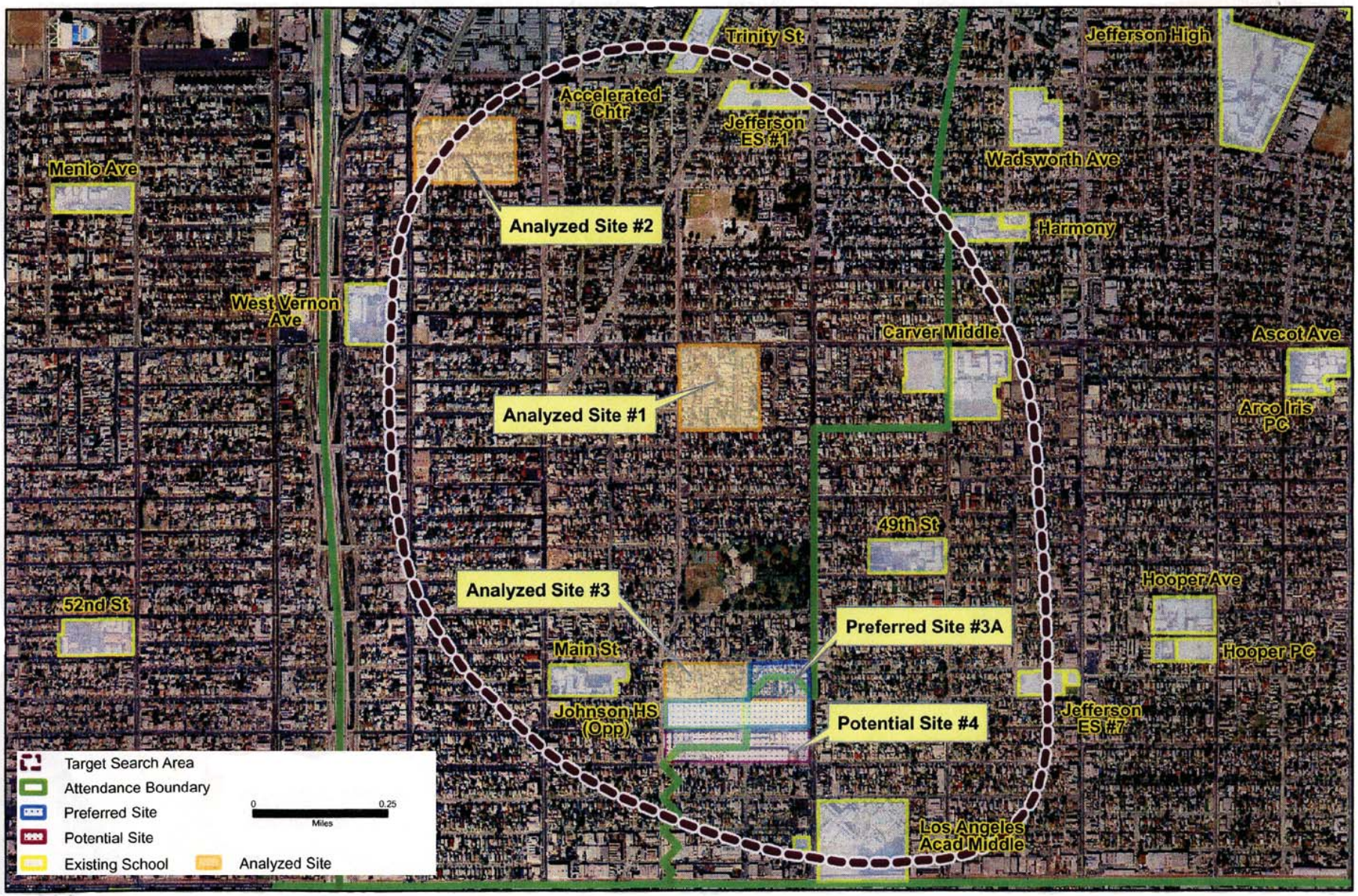
The Reduced Project Alternative would provide approximately 1,625 two-semester high school seats. Under this alternative, the overcrowded conditions at Manual Arts High School and Santee Education Complex would be alleviated but not to the extent that it would occur under the proposed project. Compared to the proposed project, the Reduced Project Alternative is environmentally superior in the area of aesthetics, air quality, noise, and traffic and is neither environmentally superior nor inferior to the proposed project in the areas of cultural resources and pedestrian safety. However, the following project objectives would not be achieved:

- Eliminate involuntary busing of capped students as soon as possible;
- Reduce reliance on portable classrooms as soon as possible; and
- Build and maintain schools that reflect the wise and efficient use of limited land and public resources.

4.4.4 ALTERNATIVE SITE 4

In selecting potential sites for the proposed high school, LAUSD considered sites within a target search area (see **Figure 4.1**). Site selection is also based on whether the site would fulfill the basic project objectives and LAUSD guidelines for school site size and location (see **Table 4-1**).

LAUSD reviewed a total of five potential sites, of which the proposed project site was chosen as the most feasible alternative. Alternative Sites 1 through 3 were eliminated from consideration, as described in Section 4.3.1 above. Alternative Site 4 was determined to be suitable and analyzed for potential impacts. It is a 19.5-acre site generally bounded by East 53rd Street to the north, East



SOURCE: LAUSD, 2006.

LAUSD CRHS No. 16. 206048

Figure 4.1

Potential Sites within the Target Search Area

TABLE 4-1
LAUSD SITE SELECTION CRITERIA[8]

Criterion		Standards for Site Selection
A.	Location	Is the proposed site within the geographic boundaries, which will serve the maximum number of resident students?
B.	Size and Topography	Based on net usable acreage, minimum required: K-3, 24 classroom Primary School: 1.5 to 3 acres 4-8 Middle School: 5 to 13 acres 9-12 High School: 8 to 15 acres
C.	Environmental	Phase I indication of no hazardous materials release No hazardous substances generated by adjacent uses within ¼ mile
D.	Cost	Estimated initial District budget for site procurement Additional acquisition costs due to relocation requirements Additional construction costs due to site conditions, including site preparation Maintenance of site until occupancy
E.	Joint Use Opportunities	Potential opportunities for shared facilities within 3 miles or less (park/playfield, library, parking facility, theater, preschool or after school programs, health clinic, and family support services) Potential opportunities on-site for community services or off-hours activities
F.	Safety	Adjacent highway or railway with no opportunity for sound control Airport or heliport within 2 miles High voltage lines on or adjacent to property Prior landfill, open pit mine Directly on active seismic fault or fault zone Within designated flood plain Pipeline crossing property Major street or intersection crossing required Social hazards (crosses known gang lines, high crime area, etc.)
G.	Political	Minimum residential impact, with attention to low-income housing Reviewed with city and county planning and zoning plans Community acceptance
H.	Soils	Capabilities or issues
I.	Accessibility	Access to public transportation Access for bus and auto drop-off and pick-up
J.	Utilities	Relocation of any major utilities located within property boundaries
K.	Availability	Site currently on the market or offered for sale Site identified by other local agencies as blighted or targeted for redevelopment Site currently abandoned

SOURCE: LAUSD Facilities Service Division, School Building Planning, Real Estate Acquisition and Asset Management, April 4, 2001.

55th Street to the south, Avalon Boulevard to the east, and San Pedro Street located to the west. This site would include the existing Johnson Opportunity School and swap meet.

Alternative Site 4 is a site that was suggested by the community; this site includes a LACMTA maintenance facility, the existing Johnson Opportunity High School, the swap meet, and commercial land uses. As described above, Alternative Site 4 is located at the intersection of East 53rd Street and Avalon Boulevard in the southern portion of the target search area, and is controlled by another public agency. Additionally, East 54th Street, considered by the General Plan to be a collector street, transverses the site. This location would require abandonment of East 54th Street, which would in turn require a General Plan Amendment, and the relocation of a natural gas pipeline located under East 54th Street.

[8] LAUSD Facilities Service Division, School Building Planning, Real Estate Acquisition and Asset Management, April 4, 2001.

Aesthetics. Aesthetic impacts associated with the proposed project would include potential lighting and glare to nearby residences. The school building under this alternative would be three- to four-stories in height, and buildings adjacent to Alternative Site 4 are up to two-stories in height. As with the proposed project, Alternative Site 4 would include measures to minimize impacts from nighttime and athletic field lighting. Therefore, Alternative Site 4 would have impacts similar to the proposed project.

Air Quality. Overall, air quality impacts from Alternative Site 4 would be similar to the proposed project. This alternative would require the clearance of existing structures at the proposed project site, as well as subsequent grading. Construction-related air quality emissions would be greater for Alternative Site 4 as it is larger in size than the proposed project site. During the operational phase, Alternative Site 4 would generate vehicle trips comparable to the proposed project site because the size of the school would be the same. Overall, this alternative would result in impacts similar to the proposed project.

Cultural Resources. This alternative site is located in the general vicinity of the proposed project. Because this alternative would not be expected to impact historic resources nor result in a cumulatively considerable impact to cultural resources, the impact of this alternative on cultural resources would be similar to the impact under the proposed project.

Noise. Noise levels during construction would be greater for Alternative Site 4 in comparison to the proposed project. Similar activities would be involved during construction, but a greater number of facilities would require demolition under this alternative. Operational impacts would be similar to the proposed project as the student population would be the same. Sensitive receptors are located in close proximity to this alternative site, similar to the proposed project. In addition, traffic impacts would be the same as those of the proposed project. Therefore, construction impacts and operational impacts under this alternative would be similar to those of the proposed project.

Pedestrian Safety. As with the proposed project, students would walk to school along streets and roadways that include sidewalks and traffic controls. Potential hazards related to the increase in student population above existing conditions would be similar to the proposed project. As a result, under this alternative, potential impacts to pedestrian safety would be similar to those generated by the proposed project.

Traffic. Under this alternative, the same number of vehicle trips would be generated as under the proposed project. Therefore, traffic impacts under this alternative would be similar to those under the proposed project.

Conclusion and Relationship to Project Objectives

Alternative Site 4 is similar to the proposed project in that it includes the development of a high school in LAUSD's Central Region Planning Area. Compared to the proposed project, Alternative Site 4 is neither environmentally superior nor inferior to the proposed project in the areas of aesthetics, air quality, cultural resources, noise, pedestrian safety and traffic. Although Alternative Site 4 would meet all of the objectives of the proposed project, Alternative Site 4

could require extensive mitigation for the natural gas pipeline located beneath East 54th Street and possibly preclude the abandonment of East 54th Street. Furthermore, Alternative Site 4 is currently developed and is under the jurisdiction of another public agency. LAUSD would be required to acquire or lease this property, the negotiations and approvals for which could delay construction of the new school.

4.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Of the alternatives analyzed in this document, the No Project/No Build Alternative is considered the environmentally superior alternative as it would avoid all of the potential environmental impacts related to the proposed project. However, the No Project/No Build Alternative would not meet the proposed project's objectives.

If the No Project/No Build Alternative is determined to be the environmentally superior alternative, another environmentally superior alternative must be identified among the remaining alternatives.[9] As such, the Reduced Project Alternative would result in the fewest environmental impacts as compared to the proposed project in the areas of aesthetics, air quality, noise, and traffic while achieving most of the objectives of the proposed project.

[9] *CEQA Guidelines*, California Code of Regulations (CCR), Title 14, Division 6, Chapter 3 §15126.6, ***2007*** ~~2006~~.

TABLE 4-2
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT

Environmental Issue Area	Proposed Project Impact (After Mitigation)	No Project/No Build Alternative	No Project/Reasonably Foreseeable Development Alternative	Less Dense Project Alternative	Alternative Site 4
I. AESTHETICS - Would the project:					
Have a substantial adverse effect on a scenic vista?	No Impact	Less	Similar	Similar	Similar
Damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Impact	Less	Similar	Similar	Similar
Substantially degrade the existing visual character or quality of the site and its surroundings?	***Less Than Significant***	Less	Similar	Similar or Less	Similar or Less
Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less Than Significant	Less	Similar	Similar	Similar
II. AGRICULTURAL 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 prepared by the California Department of Conservation as an optional model to use in assessing impacts on agricultural farmland. Would the project:					
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 in the California Resources Agency, to non-agricultural use?	No Impact	Similar	Similar	Similar	Similar
Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact	Similar	Similar	Similar	Similar
Involve other changes in the existing environment which, due to their location or nature, could individually or cumulatively result in loss of Farmland, to non-agricultural use?	No Impact	Similar	Similar	Similar	Similar

TABLE 4-2
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT (CONT.)

Environmental Issue Area	Proposed Project Impact (After Mitigation)	No Project/No Build Alternative	No Project/Reasonably Foreseeable Development Alternative	Less Dense Project Alternative	Alternative Site 4
III. AIR QUALITY - Where available, the significance criteria established by the applicable air quality management or pollution control district may be relied upon to make the following determinations. Would the project:					
Conflict with or obstruct implementation of the applicable air quality plan?	No Impact	Similar	Similar	Similar	Similar
Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Less Than Significant	Less	Similar	Similar	Similar
Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	Significant and Unavoidable	Less	Similar	Similar	Similar
Create or contribute to a non-stationary source "hot spot" (primarily carbon monoxide)?	Less Than Significant	Less	Similar	Similar	Similar
Expose Sensitive receptors to substantial pollutant concentrations?	Less Than Significant	Less	Similar	Similar	Similar
Create objectionable odors affecting a substantial number of people?	Less Than Significant	Less	Similar	Similar	Similar
IV. BIOLOGICAL RESOURCES – Would the project:			~~Similar~~		
Adversely impact, either directly or indirectly or through habitat modifications, any endangered threatened or rare species as listed in Title 14 of the California Code of Regulations (Section 670.2 or 670.5) or in Title 50 of the Code of Federal Regulations (Section 17.11 or 17.12)?	No Impact	Similar	Similar	Similar	Similar
Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate,	No Impact	Similar	Similar	Similar	Similar

TABLE 4-2
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT (CONT.)

Environmental Issue Area	Proposed Project Impact (After Mitigation)	No Project/No Build Alternative	No Project/Reasonably Foreseeable Development Alternative	Less Dense Project Alternative	Alternative Site 4
sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?					
Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	No Impact	Similar	Similar	Similar	Similar
Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No Impact	Similar	Similar	Similar	Similar
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 impeded the use of native wildlife nursery sites?	Less Than Significant	Similar	Similar	Similar	Similar
Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No Impact	Similar	Similar	Similar	Similar
Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No Impact	Similar	Similar	Similar	Similar
V. CULTURAL RESOURCES – Would the project:					
Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	Less Than Significant	Less	Similar	Similar	Similar
Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	Less Than Significant	Less	Similar	Similar	Similar
Directly or indirectly destroy a unique paleontological resource	Less Than Significant	Less	Similar	Similar	Similar

TABLE 4-2
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT (CONT.)

Environmental Issue Area	Proposed Project Impact (After Mitigation)	No Project/No Build Alternative	No Project/Reasonably Foreseeable Development Alternative	Less Dense Project Alternative	Alternative Site 4
or site or unique geologic feature?					
Disturb any human remains, including those interred outside of formal cemeteries?	Less Than Significant	Less	Similar	Similar	Similar
VI. GEOLOGY AND SOILS – Would the project:					
Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:			Similar		
Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	Less Than Significant	Similar	Similar	Similar	Similar
Strong seismic groundshaking?	Less Than Significant	Similar	Similar	Similar	Similar
Seismic-related ground failure, including liquefaction?	Less Than Significant	Similar	Similar	Similar	Similar
Landslides?	No Impact	Similar	Similar	Similar	Similar
Would the project result in substantial soil erosion or the loss of topsoil?	Less Than Significant	Less	Similar	Similar	Similar
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	Less	Similar	Similar	Similar
Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994) creating substantial risks to life or property?	Less Than Significant	Less	Similar	Similar	Similar
Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems, where sewers are not available for the disposal of wastewater?	No Impact	Similar	Similar	Similar	Similar

TABLE 4-2
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT (CONT.)

Environmental Issue Area	Proposed Project Impact (After Mitigation)	No Project/No Build Alternative	No Project/Reasonably Foreseeable Development Alternative	Less Dense Project Alternative	Alternative Site 4
VII. HAZARDS AND HAZARDOUS MATERIALS - Would the project:					
Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less Than Significant	Less	Similar	Similar	Similar
Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less Than Significant	Less	Similar	Similar	Similar
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	Less	Similar	Similar	Similar
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	Similar	Similar	Similar	Similar
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 for people residing or working in the project area?	No Impact	Similar	Similar	Similar	Similar
Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	No Impact	Similar	Similar	Similar	Similar
Expose people or structures to a significant risk of loss, injury, or death involving wild land fires, including where wild lands are adjacent to urbanized areas or where residences are intermixed with wildlands?	No Impact	Similar	Similar	Similar	Similar
Be located on a site that is (a) a current of former hazardous waste disposal site or solid waste disposal site and, if so, has the waste been removed; (b) a hazardous substance release	Less Than Significant	Similar	Similar	Similar	Similar

TABLE 4-2
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT (CONT.)

Environmental Issue Area	Proposed Project Impact (After Mitigation)	No Project/No Build Alternative	No Project/Reasonably Foreseeable Development Alternative	Less Dense Project Alternative	Alternative Site 4
site identified by the State Department of Health Services in a current list adopted pursuant to Section 25356 of Division 20 of the Health and Safety Code; or (c) a site that contains one or more pipelines, situated underground or above ground, which carries materials or hazardous wastes, unless the pipeline is a natural gas line which is used only to supply natural gas to that school or neighborhood?					
Be located within one-fourth mile of any facilities, which might be reasonably anticipated to emit hazardous or acutely hazardous materials, substances or waste?	Less Than Significant	Similar	Similar	Similar	Similar
Be located on a site where the property line is less than the following distance from the edge of respective power line easement:	No Impact	Similar	Similar	Similar	Similar
100 feet of a f0-133kV line,					
150 feet of a 220-230 kV line, or					
350 Feet of a 500-550 kV line?					
Be located on a site that is within 1,500 feet of a railroad track easement?	Less Than Significant	Similar	Similar	Similar	Similar
Be located on a site that is near a reservoir, water storage tanks or high-pressure water lines?	Less Than Significant	Similar	Similar	Similar	Similar
Be located within 1,500 feet of a pipeline that may pose a safety hazard?	Less Than Significant	Similar	Similar	Similar	Similar
Be located on a site that contains, or is near, propane tanks that can pose a safety hazard?	No Impact	Similar	Similar	Similar	Similar
Be located on a site that does not have a proportionate length to width ratio to accommodate the building layout, parking and play fields that can be safely supervised?	No Impact	Less	Similar	Similar	Similar

TABLE 4-2
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT (CONT.)

Environmental Issue Area	Proposed Project Impact (After Mitigation)	No Project/No Build Alternative	No Project/Reasonably Foreseeable Development Alternative	Less Dense Project Alternative	Alternative Site 4
Be located on a site where the existing or proposed zoning of the surrounding properties is incompatible with schools and may pose a health or safety risk to students?	Less Than Significant	Similar	Similar	Similar	Similar
Be located on a site with a traffic pattern for school buses that can pose a safety hazard?	Less Than Significant	Less	Similar	Similar	Similar
Be located on a site that is within 2,000 feet of a significant disposal of hazardous waste?	No Impact	Similar	Similar	Similar	Similar
VIII. HYDROLOGY AND WATER QUALITY – Would the project:					
Violate any water quality standards or waste discharge requirements?	Less Than Significant	Less	Similar	Similar	Similar
Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	Less Than Significant	Less	Similar	Similar	Similar
Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	Less Than Significant	Less	Similar	Similar	Similar
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?	Less Than Significant	Less	Similar	Similar	Similar
Otherwise substantially degrade water quality?	Less Than Significant	Less	Similar	Similar	Less
Place housing within a 100-year floodplain, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map	No Impact	Similar	Similar	Similar	Similar

TABLE 4-2
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT (CONT.)

Environmental Issue Area	Proposed Project Impact (After Mitigation)	No Project/No Build Alternative	No Project/Reasonably Foreseeable Development Alternative	Less Dense Project Alternative	Alternative Site 4
or other flood hazard delineation map?					
Place within a 100-year floodplain structures, which would impede or redirect flood flows?	No Impact	Similar	Similar	Similar	Similar
Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	Less Than Significant	Similar	Similar	Similar	Similar
Inundation by seiche, tsunami, or mudflow?	No Impact	Similar	Similar	Similar	Similar
IX. LAND USE AND PLANNING – Would the project:					
Physically divide an established community?	No Impact	Similar	Similar	Similar	Similar
Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	Less Than Significant	Similar	Significant and Unavoidable	Similar	Similar
Conflict with any applicable habitat conservation plan or natural community's conservation plan?	No Impact	Similar	Similar	Similar	Similar
X. MINERAL RESOURCES – Would the project					
Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	No Impact	Similar	Similar	Similar	Similar
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	Similar	Similar	Similar	Similar
XI. NOISE – Would the project result in:					
Exposure of persons to or generation of noise levels in excess	Significant and	Less	Similar	Similar	Similar

TABLE 4-2
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT (CONT.)

Environmental Issue Area	Proposed Project Impact (After Mitigation)	No Project/No Build Alternative	No Project/Reasonably Foreseeable Development Alternative	Less Dense Project Alternative	Alternative Site 4
of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, or a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	Unavoidable				
Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	Less Than Significant	Less	Similar	Similar	Similar
A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Less Than Significant	Less	Similar	Similar	Similar
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 expose people residing or working in the project area to excessive noise levels?	Less Than Significant	Similar	Similar	Similar	Similar
XII. PEDESTRIAN SAFETY – Would the project:					
Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less Than Significant	Less	Similar	Similar	Similar
Create unsafe routes to school for students walking from local neighborhoods?	Less Than Significant	Less	Similar	Similar	Similar
Be located on a site that is adjacent or near to a major arterial roadway or freeway that may pose a safety hazard?	Less Than Significant	Less	Similar	Similar	Similar
XIII. POPULATION AND HOUSING – Would the project:					
Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	No Impact	Similar	Similar	Similar	Similar

TABLE 4-2
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT (CONT.)

Environmental Issue Area	Proposed Project Impact (After Mitigation)	No Project/No Build Alternative	No Project/Reasonably Foreseeable Development Alternative	Less Dense Project Alternative	Alternative Site 4
Displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere?	Less Than Significant	Less	Similar	Less	Similar
Displace substantial numbers of businesses or jobs necessitating the construction of replacement businesses elsewhere and/or creating longer travel distances for patrons and/or employees?	Less Than Significant	Less	Similar	Less	Similar
XIV. PUBLIC SERVICES					
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:					
Fire protection?	Less Than Significant	Less	Similar	Similar	Similar
Police protection?	Less Than Significant	Less	Similar	Similar	Similar
Schools?	No Impact	Greater	Less Than Significant	Greater	Similar
Other public facilities?	No Impact	Similar	Less Than Significant	Similar	Similar
XV. RECREATION – Would the project:					
Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	No Impact	Similar	Less Than Significant	Similar	Similar
Does the project 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	Less	Similar	Similar	Similar

TABLE 4-2
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT (CONT.)

Environmental Issue Area	Proposed Project Impact (After Mitigation)	No Project/No Build Alternative	No Project/Reasonably Foreseeable Development Alternative	Less Dense Project Alternative	Alternative Site 4
XVI. TRANSPORTATION/TRAFFIC – Would the project:					
Cause an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?		Less	Less	Similar	Similar
Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	Significant and Unavoidable	Less	Less	Similar	Similar
Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	No Impact	Similar	Less	Similar	Similar
Result in inadequate emergency access?	Less Than Significant	Less	Less	Similar	Similar
Result in inadequate parking capacity?	Less Than Significant	Less	Less	Similar	Similar
Conflict with adopted policies supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	Less Than Significant	Less	Less	Similar	Similar
XVII. UTILITIES AND SERVICE SYSTEMS – Would the project:					
Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	Less Than Significant	Less	Similar	Similar	Similar
Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Less Than Significant	Less	Similar	Similar	Similar
Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the	Less Than Significant	Less	Similar	Similar	Similar

TABLE 4-2
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT (CONT.)

Environmental Issue Area	Proposed Project Impact (After Mitigation)	No Project/No Build Alternative	No Project/Reasonably Foreseeable Development Alternative	Less Dense Project Alternative	Alternative Site 4
construction of which could cause significant environmental effects?					
Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	Less Than Significant	Less	Similar	Similar	Similar
Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less Than Significant	Less	Similar	Similar	Similar
Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	Less Than Significant	Less	Similar	Similar	Similar
Comply with federal, state, and local statues and regulations related to solid waste?	Less Than Significant	Less	Similar	Similar	Similar

CHAPTER 5.0
OTHER CEQA CONSIDERATIONS

This chapter presents the evaluation of other types of environmental impacts required by CEQA that are not covered within the other chapters of this EIR. The other CEQA considerations include environmental effects that were found not to be significant, growth-inducing impacts, and significant and unavoidable impacts.

5.1 ENVIRONMENTAL EFFECTS FOUND NOT TO BE SIGNIFICANT

The Initial Study for the proposed project, completed in May 2006 and included in the EIR as Appendix A, determined that the proposed project would result in either no impact or a less than significant impact to 11 environmental issue areas. These topic areas are not discussed in detail in this EIR. The issue areas determined to result in no impact or less than significant impact by the Initial Study are:

- Agriculture Resources
- Biological Resources
- ***Cultural Resources (potential paleontological and archaeological resources)***
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation and Parks
- Utilities and Service Systems

After a more detailed evaluation of the environmental issues associated with the proposed project, the Draft EIR determined that impacts would be less than significant with incorporation of project design features and mitigation measures, or, in the case of Aesthetics, would have no impact.

These issues include the following:

- Aesthetics
- Cultural Resources ***(potential historic resources)***
- Pedestrian Safety
- Traffic

The EIR determined that the following issue areas would result in significant and unavoidable impacts:

- Air Quality
- Noise

5.2 IRREVERSIBLE ENVIRONMENTAL CHANGES

According to the *CEQA Guidelines* Section 15126(c):

> *[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely.*[1] *Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

Therefore, the purpose of this analysis is to identify any significant irreversible environmental effects of project implementation that cannot be avoided.

Both construction and operation of the proposed project would necessarily lead to the consumption of limited, slowly renewable, and non-renewable resources, committing such resources to uses that future generations would be unable to reverse. The proposed project would require the commitment of resources that include: (1) building materials; (2) fuel and operational materials/resources; and (3) the transportation of goods and people to and from the proposed project site.

Construction of the proposed project would require consumption of certain types of lumber and other forest products, the raw materials in steel, metals such as copper and lead, aggregate materials used in concrete and asphalt such as sand and stone, water, petrochemical construction materials such as plastic, petroleum based construction materials and other similar slowly renewable or nonrenewable resources. Additionally, the use of construction vehicles and equipment would require the consumption of fossil fuels. In terms of proposed project operations, the following slowly renewable and nonrenewable resources would be required: natural gas and

[1] C*EQA Guidelines*, CCR, Title 14, Division 6, Chapter 3, Section 15126.2(d), ***2007*** ~~2006~~.

electricity; petroleum-based fuels; fossil fuels; and water. Title 24 of the California Code of Regulations regulates the amount of energy consumed by new development for heating, cooling, ventilation, and lighting purposes.

The commitment of building materials required for the construction and operation of the proposed project would limit the availability of such resources for future generations or for other uses during the life of the proposed project. However, continued use of such resources is necessary to address the anticipated growth and planned changes at the proposed project site and within the general vicinity.

The proposed project would result in commitment of the already developed land to school uses, eliminating other options for its use. The residential and commercial land uses, swap meet, and Johnson Opportunity High School, located on the proposed project site, would be replaced with a new high school. Along with the long-term commitment of land uses is an increased commitment of certain public services to the proposed land uses. This includes the provision of police, fire, and emergency medical services; water supply services; wastewater treatment services; and solid waste disposal. However, as indicated in the Initial Study (incorporated in this EIR as Appendix A), impacts associated with these public services would be less than significant.

5.3 GROWTH-INDUCING IMPACTS

According to the *CEQA Guidelines*, an EIR must address whether a project will directly or indirectly foster growth: [2]

> *[An EIR shall] discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of wastewater treatment plant, might, for example, allow for more construction in service areas). Increases in the population may further tax existing community service facilities so consideration must be given to this impact. Also discuss the characteristic of some projects, which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.*

As discussed in this section, this analysis evaluates whether the proposed project will directly or indirectly induce economic, population, or housing growth in the surrounding environment.

Direct Growth-Inducing Impacts in the Surrounding Environment

A project would directly induce growth if it would remove barriers to population growth such as a change to a jurisdiction's General Plan and Zoning Ordinance that allowed new residential development to occur. The goal of LAUSD in constructing more schools is to provide a higher-

[2] ***Ibid.*** ~~*CEQA Guidelines*, CCR, Title 14, Division 6, Chapter 3, Section 15126.2(d), 2006~~.

quality learning environment for its students relieving existing and projected overcrowded conditions at nearby schools.

LAUSD is mandated to educate those students residing in the District. Even with year round sessions, busing and large class sizes, it is becoming very difficult to meet the space needs for both existing and projected student enrollments. The construction of the proposed project is intended to relieve the current overcrowded conditions at nearby schools and provide capacity for projected students who will live in its attendance areas. The proposed project would not induce more growth, but accommodate that which already has occurred and which will continue to occur over time.

Indirect Growth-Inducing Impacts in the Surrounding Environment

A project would indirectly induce growth if it would increase the capacity of infrastructure in an area in which the infrastructure currently met demand. Examples would be increasing the capacity of a sewer treatment plant, or a roadway beyond that needed to meet existing demand. There is currently a shortage of schools in LAUSD. As evidenced by overcrowded conditions, the current demand for schools has not been met. As stated above, the construction of new schools would not induce more growth, but would meet the current and future demand of a population which will increase regardless of the number of schools in existence.

5.4 SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL IMPACTS

CEQA Guidelines Section 15126.2(b) requires a discussion of any significant impacts that cannot be reduced to less than significant levels.[3] While mitigation measures and project design features have been recommended to reduce most impacts to levels that are less than significant, the proposed project would nevertheless result in significant and unavoidable impacts to air quality and noise. The impacts are as identified below and are further discussed in Chapters 3B Air Quality, and 3D Noise:

- Cumulative air quality emissions of Reactive Organic Compounds and Nitrogen Dioxide during construction.
- Long-term noise impacts during project operations, and cumulative operational noise impacts.

[3] ***Ibid.*** ~~*CEQA Guidelines*, CCR, Title 14, Division 6, Chapter 3, Section 15126.2(b), 2006.~~

CHAPTER 6.0
FINAL EIR INTRODUCTION

This Final EIR has been prepared pursuant to the requirements of CEQA[1] and the *CEQA Guidelines*[2] for the Central Region High School No. 16, State Clearinghouse Number 2006061006. The Final EIR includes:

- The Draft EIR with changes in strikethrough and bold;
- Chapter 7: Community Outreach and Public Review Process, which summarizes public outreach conducted for the proposed project;
- Chapter 8: Response to Comments, which includes LAUSD's responses to all written comments received by agencies, private organizations, and the public, as well as verbal comments taken at the public meeting held for the Draft EIR;
- Chapter 9: Changes to the Draft EIR, which describes the clarifications and revisions made to the Draft EIR; and
- Chapter 10: Mitigation Monitoring and Reporting Program, which lists all the mitigation measures required for implementation of the proposed project, the phase in which the measures would be implemented, and the enforcement agency responsible for compliance.

6.1 ENVIRONMENTAL REVIEW PROCESS

In accordance with the requirements of CEQA and the *CEQA Guidelines*, LAUSD determined that an EIR should be prepared to analyze the potential impacts associated with the proposed Central Region High School No. 16 project.

On May 31, 2006, LAUSD circulated a NOP describing the proposed project and stating that LAUSD would prepare an EIR (Appendix A). The NOP was sent to the State Clearinghouse and various other local agencies and organizations (Appendix A). In accordance with the requirements of CEQA, LAUSD provided a 30-day period for responses to the NOP. LAUSD requested that each commenting party identify a written response to any specific topics of environmental concern that should be studied in the EIR.

The Draft EIR was circulated for a 45-day public review period as required by state law, beginning on or about June 15, 2007, and ending July 30, 2007. During the 45-day public review period, LAUSD received written comments on the Draft EIR. The *CEQA Guidelines* require that

[1] CEQA, Public Resources Code, §21000 et al., 2007.
[2] *CEQA Guidelines*, CCR, Title 14, Division 6, Chapter 3, §15000 et al., 2007.

the Lead Agency responsible for the preparation of an EIR evaluate comments on environmental issues received from parties who reviewed the Draft EIR and prepare a written response addressing each of the comments.[3] The responses to these comments follow in Chapter 8 of this Final EIR.

On June 19, 2007, LAUSD also received public input on the proposed project and the Draft EIR at a public hearing held at the 49th Street Elementary School. Revisions to the Draft EIR resulting from public, agency, and staff review are summarized in Chapter 9.0.

As provided in *CEQA Guidelines* Section 15088.5(a), the lead agency is authorized to include additional information in a Final EIR, including project modifications, changes in the environmental setting, additional data or other information. The modifications outlined above result from agency and public input, are minor in nature, and do not result in a new, substantial environmental impact or substantially increase the severity of an environmental impact already studied in the Draft EIR. The lead agency therefore determined that recirculation of the revised EIR was not required as specified in *CEQA Guidelines* Section 15088.5(b).

CEQA Guidelines Section 15088.5(b) does not require recirculation of an EIR as a matter of course, but only in limited circumstances, as follows:

- When the new information shows a new, substantial environmental impact resulting either from the project or from a mitigated measure;
- When new information shows a substantial increase in the severity of an environmental impact (unless mitigation measures reduce the impact to insignificance);
- When new information shows a feasible alternative or mitigation measure that clearly would lessen environmental impacts, but it is not adopted; or
- When the Draft EIR was so fundamentally inadequate and conclusory that meaningful public review and comment were precluded.

The modifications throughout this EIR do not meet any of these criteria, as demonstrated in the Chapter 3.0 Environmental Analyses and supporting studies to this Final EIR.

[3] *Ibid*, §15088, 2007.

CHAPTER 7.0

COMMUNITY OUTREACH AND PUBLIC REVIEW PROCESS

Notices informing the community of the public review periods and public meetings for the NOP/IS and Draft EIR were distributed using three methods: a NOP and NOA, an informational flier, and newspaper publication. The NOP and NOA were printed in English and Spanish and included information on where to view the NOP and Draft EIR, how to comment on the NOP and Draft EIR, and information on the public meetings. The public review period for the NOP/IS was from May 31, 2006 to June 29, 2006, and the public review period for the Draft EIR was from June 15, 2007 to July 30, 2007.

Two public meetings on the CEQA process were held for the proposed project. The first public meeting was held at the 49th Street Elementary School auditorium at 6:00 P.M. on June 13, 2006 during the circulation of the NOP. The second public meeting was held public meeting was held at the 49th Street Elementary School auditorium at 6:00 P.M. on June 19, 2007 during the 45-day review period of the Draft EIR**.**

7.1 NOTICE OF PREPARATION/Initial Study

Pursuant to *CEQA Guidelines* Section 15082, a NOP/IS was prepared. The public outreach for the NOP/IS included distribution of the NOP using the following methods:

Distribution for PEA Meeting on March 22, 2007:

NOP sent by U.S. Postal Mail:

- Past Meeting Attendees – 357 fliers

Notices sent home with students at the following schools:

- Jefferson High School – 200 fliers
- Carver Middle School – 1,600 fliers
- Adams Middle School – 1,500 fliers
- Johnson Opportunity High School – 100 fliers
- Los Angeles Academy Middle School – 1,600 fliers

Notices walked door-to-door within a one-half mile radius of the following locations:

- One-half mile radius around 54th Street and Avalon – 2,500 fliers
- Notices delivered at key community places:
- Bilal Islamic Center – 50 fliers
- Mercado La Paloma – 100 fliers
- A Place Called Home – 50 fliers
- Children's Defense Fund – 50 fliers
- Dunbar Economic Development – 50 fliers
- Concerned Citizens of South Central Los Angeles – 50 fliers
- Avalon Carver Community Center – 50 fliers
- BAART Program – 25 fliers
- Youth Justice Coalition – 50 fliers
- SAJE – 50 fliers
- ACORN – 50 fliers
- The Children's Collective – 100 fliers
- Coalition for Community Health – 50 fliers
- Los Angeles Fire Department – 10 fliers
- Los Angeles Police Department – 50 fliers
- Vernon Public Library – 200 fliers
- Junipero Serra – 200 fliers
- St. Patrick's Catholic Church – 50 fliers
- Holy Cross Catholic Church – 500 fliers
- Hawkins Nature Park – 100 fliers
- Slauson Recreation Park – 100 fliers
- South Park Recreation Center – 200 fliers
- Avalon Swap Meet – 200 fliers
- Beverly Carniceria Market – 50 fliers
- St. Odalia Church – 50 fliers
- Mt. Zion Baptist Church – 50 fliers
- New Hope Missionary Church – 50 fliers
- Ebenezer Baptist Church – 50 fliers
- Everlasting True Vine – 50 fliers
- United House of Prayer – 50 fliers
- Juanita Tate Towers – 50 fliers
- Fred Roberts Recreation Center – 100 fliers

- Ross Snyder Recreation Center – 100 fliers
- Gilbert Lindsey Recreation Center – 100 fliers
- El Santo Nino Community Center – 50 fliers
- Esperanza Housing Corporation – 50 fliers
- Guardian Angels – 50 fliers
- California Conservation Corporation – 50 fliers
- Amity Foundation – 50 fliers
- Jefferson Parent Center – 100 fliers
- Carver Middle School Parent Center – 100 fliers
- LAAMS Parent Center – 100 fliers
- Adams Middle School Parent Center – 100 fliers
- Nevin Elementary School Parent Center – 100 fliers
- TAS Charter School – 100 fliers
- Richardo Lizzaraga ES – 100 fliers
- Avalon and 54th Street Businesses – 500 fliers

Notices delivered through radio, broadcast, print and/or electronic media:

- **E-Mail notifications sent to the following:**
  - Vernon Main Neighborhood Council
  - South East Central Avenue Neighborhood Council
  - Central Alameda Neighborhood Council
  - Board Member Monica Garcia
  - County Supervisor Yvonne Brathwaite Burke
  - Councilwoman Jan Perry
  - Assembly Speaker Fabian Nuñez
  - State Senator Gil Cedillo
  - U. S. Representative Maxine Waters
- **Fax notifications sent to the following:**
  - Vernon Main Neighborhood Council
  - South East Central Avenue Neighborhood Council
  - Central Alameda Neighborhood Council
  - Board Member Monica Garcia
  - County Supervisor Yvonne Brathwaite Burke
  - Councilwoman Jan Perry
  - Assembly Speaker Fabian Nuñez

  - State Senator Gil Cedillo
  - U. S. Representative Maxine Waters
- Posted on the LAUSD School Facilities website: www.laschools.org/find-a-school

Distribution for Preferred Site Community Meeting, January 25, 2006:

Notices sent by U.S. Postal Mail:

- Previous meeting attendees – 300 fliers

Notices sent home with students at the following schools:

- San Pedro Street Elementary School – 1,000 fliers
- Orthopaedic High School – 1,000 fliers
- Adams Middle School – 3,000 fliers
- 28th Street Elementary School – 2,000 fliers
- 20th Street Elementary School – 1,000 fliers
- Jefferson New Primary Center – 500 fliers
- Trinity Elementary School and Early Education Center – 1,000 fliers
- Wadsworth Elementary School – 1,500 fliers
- Jefferson High School – 4,000 fliers
- Nevin Elementary School – 1,000 fliers
- Ascot Elementary School/Arco – 1,500 fliers
- Carver Middle School – 3,000 fliers
- West Vernon Elementary School – 1,500 fliers
- 49th Street Elementary School – 2,000 fliers
- Hooper Elementary School – 2,000 fliers
- Johnson Opportunity High School – 250 fliers
- Jefferson Elementary School No. 2 – 1,500 fliers
- LA Academy Middle School – 3,000 fliers

Notices walked door-to-door within a one-half mile radius of the following location:

- 49th Street Elementary School – 2,500 fliers

Notices delivered at key community places:

- Field Office, Councilwoman Jan Perry – 250 fliers
- Second Baptist Church – 100 fliers
- Bethel Church of Christ – 100 fliers
- St. Philip Church – 250 fliers

- El Santo Nino – 100 fliers
- Bilal Islamic Center – 100 fliers
- Mercado La Paloma – 200 fliers
- ACORN – 250 fliers
- Health Access – 100 fliers
- Family Development Network/Children's Collective, Inc. – 100 fliers
- Community Health Coalition – 100 fliers
- Children's Defense Fund – 10 fliers
- California Conservation Corps – 100 fliers
- Esperanza Housing Corporat8ion and Head Start Center – 250 fliers
- Avalon Carver Center – 250 fliers
- All People's Center – 250 fliers
- Concerned Citizens So LA – 200 fliers
- Dunbar – 100 fliers
- People Coordinated Services – 100 fliers
- Rakestraw Community Center – 100 fliers
- Central Health Center – 200 fliers
- Serra Branch Library – 150 fliers
- A Place Called Home – 200 fliers

Notices delivered through radio, broadcast, print and/or electronic media:

- E-mail notifications sent to the following:
  - CANNDU Neighborhood Council
  - Vernon/Main Neighborhood Council
  - South East Central Avenue Neighborhood Council
  - Central Alameda Neighborhood Council
  - Canaan Housing Corporation
  - Neighbors for an Improved Community
  - The Children's Center, Inc.
  - LA Metro
- **Fax notifications sent to the following:**
  - Board Member Mike Lansing
  - County Supervisor Yvonne Brathwaite Burke
  - County Supervisor Gloria Molina
  - Councilwoman Jan Perry
  - Assembly Speaker Fabian Nuñez

- Assembly member Mark Ridley Thomas
- State Senator Gil Cedillo
- State Senator Kevin Murray
- U.S. Representative Xavier Becerra
- U.S. Representative Diane Watson

Other means of promoting community meetings:

- **Parent meetings at the following schools:**
  - 49th Street Elementary School
  - Main Street Elementary School
  - Carver Middle School
  - Santee Dairy High School

During the public review period, the NOP and Initial Study were made available for review at the following locations:

- LAUSD, Office of Environmental Health and Safety, 1055 West 7th Street, 9th Floor, Los Angeles
- LAUSD, Office of Communications, 333 South Beaudry Avenue, Los Angeles
- LAUSD, Local District 5, 2151 North Soto Street, Los Angeles
- Johnson Opportunity High School, 333 East 54th Street, Los Angeles
- Manual Arts High School, 4131 South Vermont Avenue, Los Angeles
- Santee Education Complex, 1921 South Maple Avenue, Los Angeles
- Junipero Serra Branch Library, 4607 South Main Street, Los Angeles
- Vernon-Leon H. Washington Jr. Memorial Branch Library, 4504 South Central Avenue, Los Angeles

Other means of promoting scoping meetings:

- Available online at the LAUSD Facilities Services Division website at www.laschools.org/find-a-school).

7.2 NOTICE OF AVAILABILITY FOR DRAFT ENVIRONMENTAL IMPACT REPORT

In accordance with *CEQA Guidelines* Section 15087(a), a NOA of the Draft EIR was prepared. Public outreach for the Draft EIR included distribution of the NOA using the following methods:

Newspaper publications:

- Published legal announcement of the NOA in Hoy Los Angeles.

NOA sent by U.S. Postal Mail:

- Citizens and businesses within 300 feet of Central Region High School No. 16 – 935 NOAs .
- Commenting agencies - 28 NOAs
- Past Meeting Attendees – 356 NOAs
- Santee Education Complex and Manual Arts High School students – 3,265 NOAs

Notices sent home with students at the following schools:

- Johnson Opportunity High School – 200 fliers
- Los Angeles Academy Middle School – 2,500 fliers
- Aurora Elementary School – 600 fliers
- 49th Street Elementary School – 1,200 fliers
- Main Street Elementary School – 900 fliers
- Santee Education Complex – 500 fliers

Notices walked door-to-door wtihin a one-half mile radius of the following locations:

- One-half mile radius around 54th Street and Avalon – 2,500 fliers

Notices delivered at key community places:

- A Place Called Home – 100 fliers
- Dunbar Economic Development – 200 fliers
- Concerned Citizens of South Central Los Angeles – 100 fliers
- Avalon Carver Community Center – 50 fliers
- BAART Program – 25 fliers
- Youth Justice Coalition – 50 fliers
- SAJE – 50 fliers
- ACORN – 100 fliers
- The Children's Collective – 100 fliers

- Coalition for Community Health – 25 fliers
- Los Angeles Fire Department – 10 fliers
- Los Angeles Police Department – 100 fliers
- Vernon Public Library – 150 fliers
- Junipero Serra – 100 fliers
- St. Patrick's Catholic Church – 200 fliers
- Bilal Islamic Center – 100 fliers
- Holy Cross Catholic Church – 100 fliers
- Hawkins Nature Park – 100 fliers
- Slauson Recreation Park – 100 fliers
- South Park Recreation Center – 200 fliers
- Avalon Swap Meet – 100 fliers
- Beverly Carniceria Market – 50 fliers
- Marcado la Paloma – 150 fliers

Notices delivered through radio, broadcast, print and/or electronic media:

- E-Mailed to the following key stakeholders:
  - Offices of Elected Officials
  - Community-Based Organizations
  - Vernon Main Neighborhood Council
  - Other Interested Parties
  - Faxed to the Vernon Main Neighborhood Council
  - Posted on the LAUSD School Facilities website: www.laschools.org/find-a-school

Other means of promoting community meeting:

- South Park Recreation Center/Health Fair (June 16, 2007) – 100 fliers

Presentations, briefings and one-on-one meetings:

- June 12, 2007, Santee Education Complex, ELAC Parent Meeting – 10 fliers
- June 13, 2007, Johnson Opportunity High School, Parent meeting hosted by Principal Victorio Gutierrez – 10 fliers

During the public review period, the NOA and Draft EIR were made available for review at the following locations:

- LAUSD Office of Environmental Health and Safety, 1055 West 7th Street, 9th Floor, Los Angeles;

- LAUSD Office of Communications, 333 South Beaudry Avenue, Los Angeles;
- LAUSD, Local District 5, 2151 North Soto Street, Los Angeles;
- Johnson Opportunity High School, 333 East 54th Street, Los Angeles;
- Manual Arts High School, 4131 South Vermont Avenue, Los Angeles;
- South Los Angeles Area New High School No. 1, 1921 South Maple Avenue, Los Angeles;
- 49th Street Elementary School, 750 East 49th Street, Los Angeles;
- Junipero Serra Branch Library, 4607 South Main Street, Los Angeles; and
- Vernon – Leon H. Washington Jr. Memorial Branch Library, 4504 South Central Avenue, Los Angeles.

7.3 NOTICE OF HEARING AND AVAILABILITY OF FINAL ENVIRONMENTAL IMPACT REPORT

CEQA Guidelines Section 15089(b) states the lead agency may provide an opportunity for members of the public to review the Final EIR before the project is approved, but the agency is not required to do so. Upon completion and revision of this Final EIR, the Final EIR and supporting documents were made available for public review prior to the certification hearing, scheduled for October 23, 2007, as follows:

- LAUSD Office of Environmental Health and Safety, 1055 West 7th Street, 9th Floor, Los Angeles;
- LAUSD Office of Communications, 333 South Beaudry Avenue, Los Angeles;
- LAUSD, Local District 5, 2151 North Soto Street, Los Angeles;
- Johnson Opportunity High School, 333 East 54th Street, Los Angeles;
- Manual Arts High School, 4131 South Vermont Avenue, Los Angeles;
- South Los Angeles Area New High School No. 1, 1921 South Maple Avenue, Los Angeles;
- 49th Street Elementary School, 750 East 49th Street, Los Angeles;
- Junipero Serra Branch Library, 4607 South Main Street, Los Angeles; and
- Vernon – Leon H. Washington Jr. Memorial Branch Library, 4504 South Central Avenue, Los Angeles.

CHAPTER 8.0
RESPONSE TO COMMENTS

This chapter includes written responses received on the Draft EIR, verbal comments received at the public meeting, and LAUSD's response to each comment.

8.1 INTRODUCTION

Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the Draft EIR are excerpted in this document, the sections are shown indented..

Table 8-1, below, provides a list of agencies and persons that provided written or verbal comments on the Draft EIR during the public review period and public meeting:

TABLE 8-1
LIST OF AGENCIES AND INDIVIDUALS SUBMITTING COMMENTS

Comment Reference	Commenting Person/Agency	Date of Comment	Page No.
A	Dave Singleton, Program Analyst Native American Heritage Commission	July 3, 2007	8-2
B	Sheryll Del Rosario, Associate Planner Southern California Association of Governments	July 12, 2007	8-7
C	Susan Chapman, Program Manager Metropolitan Transportation Authority	July 18, 2007	8-9
D	Mike Bagheri, Transportation Engineer Los Angeles Department of Transportation	August 8, 2007	8-12
E	Guadalupe Gonzalez	June 19, 2007	8-25

8.2 COMMENTS AND RESPONSES

The following information contains the comment letters received and responses to those comment letters.

STATE OF CALIFORNIA Arnold Schwarzenegger, Governor

NATIVE AMERICAN HERITAGE COMMISSION
915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
e-mail: ds_nahc@pacbell.net

July 3, 2007

Ms. Juliet Arroyo
Los Angeles Unified School District
1055 West 7th Street, 9th Floor
Los Angeles, CA 90071

Re: SCH#2006061002; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for **Central Region High School No. 16**; Los Angeles Unified School District; Los Angeles County, California

Dear Ms. Arroyo:

Thank you for the opportunity to comment on the above-referenced document. The Native American Heritage Commission is the state's Trustee Agency for Native American Cultural Resources. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per CEQA guidelines § 15064.5(b)(c). In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following action:

√ Contact the appropriate California Historic Resources Information Center (CHRIS). Contact information for the Information Center nearest you is available from the State Office of Historic Preservation (916/653-7278)/ http://www.ohp.parks.ca.gov/1068/files/IC%20Roster.pdf The record search will determine:

- If a part or the entire APE has been previously surveyed for cultural resources.
- If any known cultural resources have already been recorded in or adjacent to the APE.
- If the probability is low, moderate, or high that cultural resources are located in the APE.
- If a survey is required to determine whether previously unrecorded cultural resources are present.

√ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.

- The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure.
- The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.

A-1

√ Contact the Native American Heritage Commission (NAHC) for:

* A Sacred Lands File (SLF) search of the project area and information on tribal contacts in the project vicinity that may have additional cultural resource information. Please provide this office with the following citation format to assist with the Sacred Lands File search request: USGS 7.5-minute quadrangle citation with name, township, range and section; .

- The NAHC advises the use of Native American Monitors to ensure proper identification and care given cultural resources that may be discovered. The NAHC recommends that contact be made with Native American Contacts on the attached list to get their input on potential project impact (APE).

√ Lack of surface evidence of archeological resources does not preclude their subsurface existence.

- Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.

√ Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.

* CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.

A-2

√ Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the CEQA Guidelines mandate procedures to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.
√ Lead agencies should consider avoidance, as defined in § 15370 of the CEQA Guidelines, when significant cultural resources are discovered during the course of project planning.

A-3

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,

Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: List of Native American Contacts

Native American Contacts
Los Angeles County
July 3, 2007

Charles Cooke
32835 Santiago Road
Acton , CA 93510
(661) 269-1422
(661) 733-1812

Chumash
Fernandeno
Tataviam
Kitanemuk

Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Adminstrator
4712 Admiralty Way, Suite 172
Marina Del Rey , CA 90292
310-570-6567

Gabrielino Tongva

Beverly Salazar Folkes
1931 Shadybrook Drive
Thousand , CA 91362
805 492-7255

Chumash
Tataviam
Fernandeño

Gabrieleno/Tongva Tribal Council
Anthony Morales, Chairperson
PO Box 693
San Gabriel , CA 91778
ChiefRBwife@aol.com
(626) 286-1632
(626) 286-1758 - Home
(626) 286-1262 Fax

Gabrielino Tongva

LA City/County Native American Indian Comm
Ron Andrade, Director
3175 West 6th Street, Rm. 403
Los Angeles , CA 90020
(213) 351-5324
(213) 386-3995 FAX

Gabrielino/Tongva Council / Gabrielino Tongva Nation
Sam Dunlap, Tribal Secretary
761 Terminal Street; Bldg 1, 2nd floor
Los Angeles , CA 90021
office @tongvatribe.net
(213) 489-5001 - Officer
(909) 262-9351 - cell
(213) 489-5002 Fax

Gabrielino Tongva

Ti'At Society
Cindi Alvitre
6602 Zelzah Avenue
Reseda , CA 91335
calvitre@yahoo.com
(714) 504-2468 Cell

Gabrielino

Gabrielino Tongva Indians of California Tribal Council
Robert Dorame, Tribal Chair/Cultural Resources
5450 Slauson, Ave, Suite 151 PMB
Culver City , CA 90230
gtongva@verizon.net
562-761-6417 - voice
562-920-9449 - fax

Gabrielino Tongva

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native American with regard to cultural resources for the proposed SCH#2006061002; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for Cenral Region High School No. 16; Los Angeles Unified School District; Los Angeles County, California.

Native American Contacts
Los Angeles County
July 3, 2007

Gabrielino Tongva Indians of California Tribal Council
Mercedes Dorame, Tribal Administrator
20990 Las Flores Mesa Drive Gabrielino Tongva
Malibu , CA 90265
Pluto05@hotmail.com

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native American with regard to cultural resources for the proposed SCH#2006061002; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for Cenral Region High School No. 16; Los Angeles Unified School District; Los Angeles County, California.

RESPONSE TO LETTER A - NATIVE AMERICAN HERITAGE COMMISSION (NAHC) (JULY 3, 2007)

A-1 As noted in the Initial Study (see Appendix A), a records search was performed by the South Central Coastal Information Center (SCCIC) and a report was issued on March 22, 2006. The report states that no archaeological sites have been identified with a one-half mile radius of the project site. Although it states that "[t]his does not preclude the potential for archaeological sites to be identified during project activities" (p. 1), the Initial Study indicates that the site is located in an urbanized area within the City of Los Angeles and has been previously developed. The site has been subject to grading and ground disturbing activities during the construction of existing buildings. Therefore no further surveys of the site for archaeological resources are required.

Further, the PEIR already requires that if a unique archaeological resource is discovered during construction activities, the contractor would be required to halt construction activities in the immediate area and notify LAUSD. LAUSD would be required to hire a qualified archaeologist to make an immediate evaluation and describe appropriate treatment of the resource.

In terms of historic resources, according to SCCIC, two studies have been conducted within a one-half mile radius of the project site. One of the studies evaluates a portion of the project site. Because these studies are not on file in any local repositories, SCCIC recommended that a professional cultural resources consultant be retained to evaluate potential impacts on historic resources. LAUSD retained Kaplan Chen Kaplan to evaluate resources at the site. A complete discussion of Kaplan Chen Kaplan's findings is included as Chapter 3C Cultural Resources, of the Draft EIR.

A-2 The Native American Heritage Commission (NAHC) conducted a search of its Sacred Lands File (SLF) for this project and issued its report in March, 2006 (a duplicate was requested in August, 2007). No recorded sacred lands exist on or near the project site. A records search conducted at the SCCIC did not reveal any potentially significant historical resources or unique archaeological resources on the site or within a quarter-mile. The proposed project is located in a previously disturbed urban area within the County of Los Angeles. No native topography or natural features exist within the project area, which would further diminish the probability that any traditional cultural properties occur within the project area. If such resources are encountered at the time of final grading, during project construction or at any other time before project completion, all project work in the area of the resource would be required by the PEIR to cease until the area has been surveyed by a qualified archaeologist or paleontologist who can evaluate the nature and significance of the finds in conformance with the mitigation measures identified in the PEIR. In the event of an accidental discovery of human remains in a location other than a dedicated cemetery, all project work in the vicinity of the remains shall cease and LAUSD will require compliance with Health and Safety Code § 7050.5, Public Resources Code § 5097.98 and Sec. § 15064.5(d) of the *CEQA Guidelines*.

A-3 As described in the Initial Study completed for the proposed project (see Appendix A), no known human remains exist on the proposed project site. Portions of the site have been developed as early as the 1890s. As also noted in the Initial Study (p. 34):

> *Though it is unlikely that human remains are present on the proposed project site, it is possible that construction activity could unearth previously unknown human remains. If this were to occur during construction, LAUSD would implement the process specified by the California Health and Safety Code for the proper handling of human remains discovered outside of a dedicated cemetery.*

The protocol outlined in §§ 15064.5(d) and 15064.5(e) of the CEQA Guidelines is required by law under both the California Health and Safety Code, § 7050.5 and Public Resources Code § 5097.98. LAUSD is therefore required to comply with these codes. In the event of an accidental discovery of human remains in a location other than a dedicated cemetery, all project work in the vicinity of the remains shall cease and LAUSD will require compliance with Health and Safety Code § 7050.5, Public Resources Code § 5097.98 and Sec. § 15064.5(d) of the *CEQA Guidelines*.

In general, avoidance as a strategy to protect archaeological and historical resources is addressed throughout Section 15064.5 of the *CEQA Guidelines.*

SOUTHERN CALIFORNIA

ASSOCIATION of GOVERNMENTS

Main Office

818 West Seventh Street

12th Floor

Los Angeles, California

90017-3435

t (213) 236-1800

f (213) 236-1825

www.scag.ca.gov

July 12, 2007

Ms. Juliet M. Arroyo
CEQA Project Manager/Consultant
Office of Environmental Health and Safety
1055 W. 7th Street, 9th Floor
Los Angeles, CA 90071

RE: SCAG Clearinghouse No. I 20070384 Central Region High School No. 16

Dear Ms. Arroyo:

Thank you for submitting the **Central Region High School No. 16** for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the **Central Region High School No. 16**, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

B-1

A description of the proposed Project was published in SCAG's **June 16-30, 2007** Intergovernmental Review Clearinghouse Report for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1856. Thank you.

Sincerely,

SHERYLL DEL ROSARIO
Associate Planner
Intergovernmental Review

Doc #137844

SOUTHERN CALIFORNIA

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818 West Seventh Street

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July 12, 2007

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CEQA Project Manager/Consultant
Office of Environmental Health and Safety
1055 W. 7th Street, 9th Floor
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We have reviewed the **Central Region High School No. 16**, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

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The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1856. Thank you.

Sincerely,

SHERYLL DEL ROSARIO
Associate Planner
Intergovernmental Review

Doc #137844

Comment Letter C

Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952
213.922.2000 Tel
metro.net

Metro

July 18, 2007

Juliet Arroyo
CEQA Project Manager/Consultant
Los Angeles Unified School District
Office of Environmental Health and Safety
1055 West 7th Street, 9th Floor
Los Angeles, CA 90071

Dear Ms. Arroyo:

The Los Angeles County Metropolitan Transportation Authority (Metro) has received and reviewed the Draft Environmental Impact Report (DEIR) for Central Region High School No. 16. While Metro congratulates your efforts, the following issue must be addressed:

1. Metro Bus Line 108/358, which has bus stops at the intersection of Slauson Avenue and Avalon Boulevard, is likely to be the most heavily-utilized line by the students due to its close proximity to the proposed school. The route will not be deviated to serve the school as the busses are full at this location and a route deviation would delay passengers on board. **C-1**

2. LAUSD should be prepared to provide "Safe Passage" to and from the Line 108/358 bus stops. LAUSD should consider constructing a gate near the southeast corner of campus to allow bus riders the shortest possible walk to Slauson Avenue and Avalon Boulevard. **C-2**

3. Please note that Metro's South Park Shops facility at 5413 Avalon Boulevard is located adjacent to the school site. This property has been proposed to be developed as South Los Angeles Wetlands Park. **C-3**

Metro looks forward to reviewing the Final EIR. If you have any questions regarding this response, contact me at 213-922-6908 or by email at chapmans@metro.net. Please send the Final EIR to the following address:

Metro CEQA Review Coordination
One Gateway Plaza MS 99-23-2
Los Angeles, CA 90012-2952
Attn: Susan Chapman

Sincerely,

Susan F. Chapman
Program Manager, Long Range Planning

Cc: Scott Greene, Hassan Fakhro

RESPONSE TO LETTER C – METROPOLITAN TRANSPORTATION AUTHORITY (MTA) (JULY 18, 2007)

C-1 Comment noted.

C-2 Comment noted. LAUSD will consider locating an access gate at the southeast corner of the campus and will incorporate these bus stops into the Safe Routes to School Plan for this school.

C-3 The Draft EIR specifically addresses the potential effects of the South Los Angeles Wetlands Park project on the proposed Central Region High School No. 16 project. Please note that the South Los Angeles Wetlands Park project is listed in Table 2-1, *List of Related Projects*, in the Draft EIR. All of the calculations provided in Chapter 3F Traffic, are based on a traffic study prepared by KOA; the traffic study is provided as Appendix F. The traffic study states (p. 25):

Project trip distribution was based on the relative location of schools to be relieved by the project, local and sub-regional traffic routes, and regional traffic flows. *The vacation of 54th Street along the southern boundary of the project site, part of the planned South Los Angeles Wetlands Park project, was incorporated into the analyzed project trip distribution pattern*. [Italics added.]

The results of the project trip generation and project trip distribution calculated by KOA were subsequently incorporated in the analysis provided in Chapters 3B Air Quality, and 3D. Noise.

Comment Letter D

CITY OF LOS ANGELES
CALIFORNIA

GLORIA J. JEFF
GENERAL MANAGER

ANTONIO R. VILLARAIGOSA
MAYOR

DEPARTMENT OF TRANSPORTATION

100 S. Main Street, 10th Floor
LOS ANGELES, CA 90012
213- 972-8470
FAX (213) 972-8410

http://www.lacity.org/ladot/

54th St and Avalon Bl
DOT Case No. CEN 06-3140

August 8, 2007

Hoan Tang
Los Angeles Unified School District
Office of Environmental Health and Safety
355 S. Grand Avenue, 15th Floor
Los Angeles, CA 90071

TRAFFIC ASSESSMENT FOR THE PROPOSED LOS ANGELES UNIFIED SCHOOL DISTRICT'S (LAUSD) CENTRAL REGION HIGH SCHOOL NO. 16 LOCATED ON THE NORTHWEST CORNER OF 54TH STREET AND AVALON BOULEVARD

The Los Angeles Department of Transportation (LADOT) has reviewed the traffic study, prepared by traffic consultant Katz, Okitsu and Associates, for the proposed Central Region High School No. 16 project located on the northwest corner on 54th Street and Avalon Boulevard. The traffic study analyzed eight intersections and determined that one of the study intersections would be significantly impacted (see Attachments 1 and 2). Except as noted, the study adequately evaluated the project's traffic impacts on the surrounding community. **D-1**

DISCUSSION AND FINDINGS

Project Description

The project consists of the construction of a new high school which will provide 2,025 two-semester seats for grades nine through twelve. The new school will provide 75 classrooms, including 15 classrooms for adult evening education. The site is currently occupied by the Johnson Opportunity High School, single-family, multi-family, a swap meet, and other commercial uses. All of these will be replaced by the new school. The school will provide 188 parking spaces. Access will be provided by a driveway on 52nd Street. Parent loading/unloading will be provided along 53rd Street. Bus loading/unloading will be provided along Towne Avenue. The school is expected to be completed by Year 2011. **D-2**

Trip Generation

The project will generate approximately 3,545 net daily trips with 615 net AM peak hour trips and 344 net PM peak hour trips (see Attachment 3). **D-3**

Significant Traffic Impact Locations

The proposed project will experience a significant traffic impact at the intersection of Avalon Boulevard and Slauson Avenue. D-4

PROJECT REQUIREMENTS

A. Avalon Boulevard and Slauson Avenue

The project shall fund a proportionate share of the cost of the design and construction of the Coliseum/Florence ATSAC/ATCS System at this intersection. The project's proportionate share of the cost of the ATSAC/ATCS System is equal to the average ATSAC/ATCS System cost per intersection. The current cost of the Coliseum/Florence ATSAC/ATCS System is $128,800 per intersection. ATSAC/ATCS improvements shall be guaranteed through cash payment of $128,800, prior to the issuance of any building permit. ATSAC/ATCS improvements are reviewed and adjusted periodically. The actual cost may change depending on when payment is made. D-5

B. Traffic Signal at 52nd Street and Avalon Boulevard

A traffic signal warrant study for a pedestrian crossing at the intersection of 52nd Street and Avalon Boulevard was not prepared as a part of the traffic study. LAUSD should prepare and submit the traffic signal warrant study to LADOT. If a new traffic signal is found to be warranted by LADOT Central District office, LAUSD shall pay the cost of planning, design, and construction of a new traffic signal through the Bureau of Engineering (BOE) B-permit process. D-6

C. Neighborhood Traffic Management Plan (NTMP)

The study indicated that residential street segments surrounding the project may experience adverse impacts from the project related trips and it recommended that LAUSD contribute towards a NTMP. LADOT supports the concept of a NTMP. The exact amount of funding will be determined by LADOT to cover the cost to plan, develop and implement traffic calming measures. The plan should include a separate amount of monies for implementation of a preferential parking district if requested by the neighborhood and found warranted by LADOT. The actual amount of funding for the NTMP and preferential parking program are still to be determined. D-7

D. Special Event Parking

The traffic study indicated that during a special event the school would have a parking demand of approximately 450 parking spaces. 188 parking spaces are available on-site. LAUSD proposes to use available on-street parking spaces to meet the parking demand for special events. DOT has determined that there is a potential parking impact on the residential neighborhoods surrounding the school site. D-8

E. Construction Impacts

LADOT recommends that a construction work site traffic control plan be submitted to LADOT for review and approval prior to the start of any construction work. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. LADOT also recommends that all construction related traffic be restricted to off-peak hours. **D-9**

F. School Signs, School Crosswalks, Passenger and School Bus Loading Zones, Pedestrian Routes to School Map and Crossing Guards

Six months prior to opening of the new school, LAUSD should contact LADOT's Citywide Traffic Control Programs Section telephone (213) 977-6737 for preparation of a "Pedestrian Routes to School" map. Also that four months prior to opening of the new school, LAUSD's School Traffic and Safety Education Section shall contact LADOT's Central District Office, telephone (213) 972-4990, to coordinate the installation of appropriate traffic controls, school warning and speed limit signs, school crosswalk and pavement markings, passenger loading zones and school bus loading zones. LADOT's District Office in consultation with LAUSD, shall determine what signs, pavement markings, parking restrictions and loading zones shall be installed. After the new school opens, LAUSD should also coordinate with LADOT's Crossing Guard Operations Section, telephone (323) 913-4645 to investigate any request for crossing guards. **D-10**

G. Highway Dedication and Street Widening Requirements

Avalon Boulevard is classified as a Major Highway Class II which requires a 40-foot half-width roadway on a 52-foot half-width right-of-way. Based upon existing conditions, a 7-foot dedication and 10-foot widening are required along the project frontage. **D-11**

San Pedro Street is classified as a Secondary Highway which requires a 35-foot half-width roadway on a 45-foot half-width right-of-way. Based upon existing conditions, a 15-foot dedication and 15-foot widening is required along the project frontage. **D-12**

52nd Street is classified as a Local Street which requires a 20-foot half-width roadway on a 30-foot half- width right-of-way. No further dedication or widening is required. **D-13**

53rd Street is also classified as a Local Street. DOT recommends an additional 8-foot dedication/widening, beyond local street standards, for the proposed student drop-off/pick up zone. **D-14**

54th Street is classified as a Collector Street which requires a 22-foot half-width roadway on a 32-foot half- width right-of-way. Based upon existing conditions, a 2-foot dedication is required along the project frontage. **D-15**

Towne Avenue is also classified as a Local Street. DOT recommends an additional 8-foot dedication/widening, beyond local street standards, for the proposed bus loading/unloading zone. **D-16**

It appears that additional highway dedication and street widening may be required for streets fronting the proposed project. LAUSD must check with the Bureau of Engineering's (BOE) Land Development Group to determine the highway dedication, street widening and sidewalk requirements for the project. D-17

H. Parking Requirements

The project proposes 188 parking spaces for the school. LAUSD consult with the Los Angeles Building and Safety Department on the parking requirements. D-18

I. Driveway Access and Circulation

The review of this study does not constitute approval of the driveway access circulation scheme, loading/unloading and drop-off/pick-up areas for the project. Those require separate review and approval and should be coordinated as soon as possible with DOT's Citywide Planning Coordination Section (201 N. Figueroa Street, 4th Floor, Station 3, @ 213-482-7024) to avoid delays in the building permit approval process. In order to minimize and prevent last minute building design changes, it is highly imperative that the applicant, prior to the commencement of building or parking layout design efforts, contact DOT for driveway width and internal circulation requirements so that such traffic flow considerations are designed and incorporated early into the building and parking layout plans to avoid any unnecessary time delays and potential costs associated with late design changes. All driveways should be Case 2 driveways and 30 feet and 18 feet wide for two-way and one-way operations, respectively. The project's site plan is included as Attachment 4. D-19

If you have any questions, please contact Wes Pringle of my staff at (213) 972-8482.

Sincerely,

MIKE BAGHERI, Transportation Engineer
Los Angeles Department of Transportation

Letters\CEN06-3140_central_region_hs_#16.wpd

cc: Greg Fischer, Council District No. 9
Martha Stephenson, Central District, LADOT
Taimour Tanavoli, Citywide Planning Coordination Section, LADOT
Hadar Plafkin, City Planning
Carl Mills, Central District, BOE
Katz, Okitsu and Associates

Attachment 1

LEVEL OF SERVICE DEFINITIONS FOR SIGNALIZED INTERSECTION[1]

Level of Service	Volume/Capacity Ratio	Definition
A	0.000 - 0.600	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	0.601 - 0.700	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	0.701 - 0.800	GOOD. Occasionally, drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	0.801 - 0.900	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	0.901 - 1.000	POOR. Represents the most vehicles that intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	Greater than 1.000	FAILURE. Backups from nearby intersections or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.

SIGNIFICANT TRANSPORTATION IMPACT CRITERIA

1. A transportation impact on an intersection shall be deemed "significant" in accordance with the following table except as otherwise specified in a TSP, ICO or CMP:

SIGNIFICANT TRANSPORTATION IMPACT

Level of Service	Final V/C Ratio	Project-Related Increase In V/C
C	> 0.701 - 0.800	equal to or greater than 0.040
D	> 0.801 - 0.900	equal to or greater than 0.020
E, F	> 0.901	equal to or greater than 0.010

[1]Source: Transportation Research Board, Interim Materials on Highway Capacity, Transportation Research Circular No. 212, January 1980.

Table 6 – Determination of Project Impacts - AM Peak Period

Intersection	Existing Conditions (Year 2006)		Future Base Conditions (Year 2011)		Future Base with Project Conditions (Year 2011)		Diff.	Signif?
	V/C	LOS	V/C	LOS	V/C	LOS		
1. San Pedro St & E.51st St	0.421	A	0.481	A	0.558	A	0.077	No
2. Avalon Blvd & E.51st St	0.586	A	0.630	B	0.678	B	0.048	No
3. San Pedro St & E.52nd St [a]	0.339	A	0.404	A	0.497	A	0.093	No
4. Towne Ave & E.52nd St [a]	0.079	A	0.083	A	0.299	A	0.216	No
5. San Pedro St & E.53rd St	0.248	A	0.304	A	0.516	A	0.212	No
6. San Pedro St & E.54th St	0.375	A	0.622	B	0.657	B	0.035	No
7. San Pedro St & Slauson Ave	0.662	B	0.828	D	0.846	D	0.018	No
8. Avalon Blvd & Slauson Ave	0.965	E	1.103	F	1.132	F	0.029	Yes

Note:
[a] Stop-controlled intersection. LOS was calculated based on the 1,200 capacity utilizing the Circular 212 methodology.

Table 7 – Determination of Project Impacts - PM Peak Period

Intersection	Existing Conditions (Year 2006)		Future Base Conditions (Year 2011)		Future Base with Project Conditions (Year 2011)		Diff.	Signif?
	V/C	LOS	V/C	LOS	V/C	LOS		
1. San Pedro St & E.51st St	0.364	A	0.408	A	0.451	A	0.043	No
2. Avalon Blvd & E.51st St	0.636	B	0.680	B	0.716	C	0.036	No
3. San Pedro St & E.52nd St [a]	0.235	A	0.258	A	0.350	A	0.092	No
4. Towne Ave & E.52nd St [a]	0.064	A	0.066	A	0.211	A	0.145	No
5. San Pedro St & E.53rd St	0.180	A	0.201	A	0.279	A	0.078	No
6. San Pedro St & E.54th St	0.309	A	0.484	A	0.514	A	0.030	No
7. San Pedro St & Slauson Ave	0.776	C	0.900	D	0.908	E	0.008	No
8. Avalon Blvd & Slauson Ave	0.905	E	1.006	F	1.014	F	0.008	No

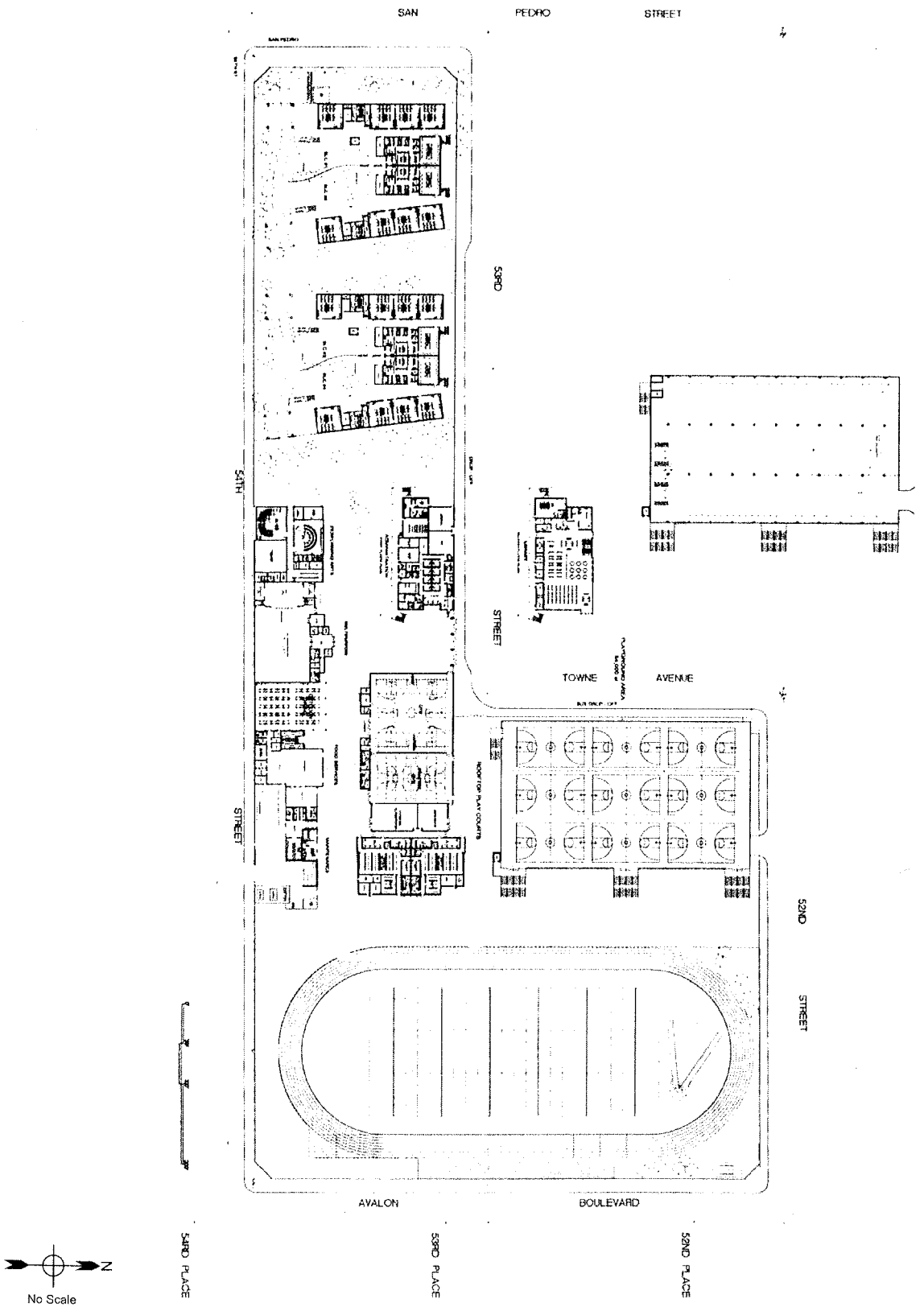
Note:
[a] Stop-controlled intersection. LOS was calculated based on the 1,200 capacity utilizing the Circular 212 methodology.

Table 4 – Project Trip Generation Estimates

Land Use	Intensity	Units	Daily	Weekday AM Peak Hour			Weekday PM Peak Hour		
			Weekday	Total	In	Out	Total	In	Out
Trip Rates									
High School [1]	-	student	1.71	0.34	56%	44%	0.14	47%	53%
Single Family Residential (ITE 210)	-	d.u.	9.57	0.75	25%	75%	1.01	63%	37%
Muli-Family Residential (ITE 220)	-	d.u.	6.72	0.51	20%	80%	0.62	65%	35%
Adult Evening School [2]	-	student	1.20	n/a	n/a	n/a	0.12	64%	36%
Sports Fields [3]	-	field	58.00	n/a	n/a	n/a	29.00	48%	52%
Trips									
Existing Uses Credit									
High School	(140)	student	(239)	(48)	(27)	(21)	(20)	(9)	(11)
Single Family Residential (ITE 210)	(9)	d.u.	(86)	(7)	(2)	(5)	(9)	(6)	(3)
Muli-Family Residential (ITE 220)	(37)	d.u.	(249)	(19)	(4)	(15)	(25)	(15)	(8)
Proposed Project									
High School [1]	2,025	student	3,463	689	385	304	284	133	151
Adult Evening School [2]	450	student	540	n/a	n/a	n/a	54	35	19
Sports Fields [3]	2	field	116	n/a	n/a	n/a	58	28	30
NET TRIPS			**3,545**	**615**	**352**	**263**	**344**	**166**	**178**

[1] Morning peak hour rates were based the Memorandum of Cooperation (MOC) between City of Los Angeles and LAUSD, June 24, 2005. Daily and afternoon peak hour rates were based on ITE Trip Generation Manual, 7th Edition.
[2] Adult evening school rates were based on Community College rates from the ITE Trip Generation Manual.
[3] Sport fields are designated for football, soccer, baseball or softball practices only since bleachers are not typically provided on all fields. Trip generation rates were based on the results of the survey of soccer practices/scrimmages conducted by Katz, Okitsu & Associates (August 2006).

Attachment 4



Katz, Okitsu & Associates *Planning & Engineering*	LAUSD Central Region High School #16	Figure 2 Project Site Plan

RESPONSE TO LETTER D – LOS ANGELES DEPARTMENT OF TRANSPORTATION (LADOT) (AUGUST 8, 2007)

D-1 Comment noted.

D-2 The project is described correctly.

D-3 The daily trips and peak hour trips calculated by KOA on pages 24 and 25 of the traffic study (see Appendix F) and incorporated into the Draft EIR on page 3F-11 are described correctly.

D-4 The significant impact to the intersection of Avalon Boulevard and Slauson Avenue was described on page 3F-15 of the Draft EIR and on page 18 of the KOA traffic study (see Appendix F). Mitigation Measure M-3F.1 requires that LAUSD contribute an impact-based fair share contribution towards the installation of ATSAC System at this intersection.[1] This is a feasible mitigation measure that would require implementation by LADOT. Installation of the ATSAC system would reduce traffic-related impacts to the intersection of Avalon Boulevard and Slauson Avenue.

D-5 Please see Response to Comment D-4 above. LAUSD will coordinate with LADOT regarding payment of the costs associated with the proposed ATSAC/ATCS System. This payment shall be made prior to the opening of the proposed school. LAUSD does not obtain building permits from the City of Los Angeles.

D-6 LAUSD will prepare the warrant analysis and, if warranted implement Mitigation Measure M-3E.3 of the Draft EIR, as described in Chapter 3E Pedestrian Safety, and in the KOA traffic study, which is included as Appendix F. Mitigation Measure M-3E.3 requires that prior to opening the proposed school, LAUSD install a traffic signal at the intersection of 52nd Street and Avalon Boulevard.

D-7 In this response, LADOT approves Mitigation Measure M-3F.2, as described in Chapter 3F Traffic, Mitigation Measure M-3F.2, and which requires that LAUSD coordinate with LADOT to develop a NTMP for the roadway segments. LAUSD will contact LADOT to begin working on this plan. LAUSD will coordinate with LADOT on funding for the NTMP.

LADOT does not indicate why a preferential parking district may be required. In the City of Los Angeles, parking will be considered excessively impacted by on-street parking of commuter vehicles on streets in a proposed preferential parking district when:

a. More than 75 percent of the legal on-street parking spaces are occupied by resident and non-resident vehicles; and

[1] An ATSAC system is a computer-based traffic signal control system that monitors traffic conditions and system performance, and selects appropriate strategies based on the passage of vehicles, vehicle speed, and level of congestion through a system of sensors.

b. More than 25 percent of the legal on-street parking spaces are occupied by non-resident motor vehicles on a minimum of four (4) blocks within the proposed district.

The traffic study prepared by KOA (included as Appendix F) indicates that parking demand for students is approximately 0.06 vehicles per student resulting in a demand for 160 off-site parking spaces. The student parking ratio is based on empirical data collected by LAUSD for high schools, including nearby Fremont High School, when school was in session. This study is confirmed by the results of other studies of high school student drivers.

The parking surveys performed by KOA identified 450 parking spaces within the ¼-mile radius from the project site. Further, the parking surveys performed by KOA determined that approximately 290 on-street parking spaces would be available within walking distance (¼-mile) of the school during school hours and 320 on-street parking spaces would be available within walking distance (¼-mile) for stadium-related events. Demand for off-site parking generated for the project is expected to be 160 spaces during regular school hours and 297 for stadium related events. However, since less than 75 percent of the legal, on-street parking spaces in this area are occupied by resident and non-resident vehicles, the criteria for establishment of a preferential parking district are not met.

D-8 Stadium-related events will generate demand for approximately 485 spaces. Of those, 188 may be accommodated on-site. The remaining 297 vehicles would park off-site. The parking surveys performed by KOA identified 320 on-street parking spaces would be available within walking distance (¼-mile) for stadium-related events. Therefore, all parking demand generated by a stadium-related event at the school would be accommodated within ¼-mile of the site. Therefore, the impact is less than significant.

D-9 LAUSD BMPs (see PEIR, p. 2-29) already require that LAUSD's contractors submit a construction worksite traffic control plan to LADOT for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods.

D-10 In this comment, LADOT approves Mitigation Measures M-3E.2 and M-3E.4, as described in Chapter 3E Pedestrian Safety, which already require that six months before the proposed project is open to students, LAUSD's OEHS will contact LADOT to coordinate preparation of a final "Pedestrian Routes to School Plan." Mitigation Measure M-3E.2 already requires that four months prior to opening the proposed new school, LAUSD's OEHS will contact LADOT to coordinate the installation of appropriate traffic controls, school crosswalks, speed limit signs, and pavement markings. Crossing Guards are not provided for high schools. Therefore no coordination will take place in this regard.

D-11 As required by the PEIR, LAUSD would meet with the applicable local jurisdiction or other applicable city agency to coordinate street dedications and street improvements on a project-by-project basis in conjunction with the applicable city or county department (see PEIR, p. 3.1-15).

D-12 As required by the PEIR, LAUSD would meet with the applicable local jurisdiction or other applicable city agency to coordinate street dedications and street improvements on a project-by-project basis in conjunction with the applicable city or county department (see PEIR, p. 3.1-15).

D-13 Comment noted.

D-14 Comment noted. Project design includes an 8-foot curb cut.

D-15 As required by the PEIR, LAUSD would meet with the applicable local jurisdiction or other applicable city agency to coordinate street dedications and street improvements on a project-by-project basis in conjunction with the applicable city or county department (see PEIR, p. 3.1-15).

D-16 Buses associated with the proposed project would be exclusively used to transport special needs students. It is anticipated that only two buses will be needed. Therefore, LAUSD has determined that signage reserving the bus drop-off area along Towne Avenue would be sufficient, and the additional curb-cut would not be required.

D-17 See Responses to Comments D-11 through D-16, above. As required by the PEIR, LAUSD would meet with the applicable local jurisdiction or other applicable city agency to coordinate street dedications and street improvements on a project-by-project basis in conjunction with the applicable city or county department (see PEIR, p. 3.1-15).

D-18 LAUSD's parking threshold for off-site parking impacts, as documented in the PEIR, is that the proposed project would "[c]ause the demand for parking to exceed the available supply in the vicinity of a proposed project." The traffic study prepared by KOA (included as Appendix F) indicates that parking demand for students is approximately 0.06 vehicles per student resulting in a demand for 160 off-site parking spaces. The student parking ratio is based on empirical data collected by LAUSD for high schools, including nearby Fremont High School, when school was in session and is confirmed by the results of other studies of high school student drivers. Demand for stadium-related events would be 297 off-site spaces.

The parking surveys performed by KOA identified 450 parking spaces within the ¼-mile radius from the Site. Further, the parking surveys performed by KOA determined that approximately 290 on-street parking spaces would be available within walking distance (¼-mile) of the school during school hours and 320 on-street parking spaces would be available within walking distance (¼-mile) for stadium-related events. Therefore, the proposed project would not cause a parking demand that would exceed the supply.

D-19 Comment noted. The proposed project has been designed to comply with LAUSD's Pedestrian Safety Guidelines, developed in conjunction with LADOT. No separate review and approval is required. LAUSD does not obtain building permits from the City of Los Angeles.

Comment Letter E

Distrito Escolar Unificado de Los Ángeles
Central Region High School #16
INFORME BORRADOR DE IMPACTO AMBIENTAL
Tarjeta para Comentarios del Público

Nombre: Guadalupe Gonzalez Teléfono: (323) 2324304

Dirección, Ciudad, Código Postal: 1331 1/4 E 45 st LA 90011

Comentario
(Enviar no mas tarde de
30 de Julio del 2007): Es muy bueno saber que la comunidad no va a tener impacto negativo del Medio Ambiente

E-1a

Por favor regrese esta forma a:

LAUSD Office of Environmental Health & Safety
Attn: Juliet Arroyo
1055 West 7th Street, 9th Floor
Los Angeles, CA 90017
(213) 893-7412 Fax

Los Angeles Unified School District
Central Region High School #16
DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)
Public Comment Card

Name: Translation Phone:

Address:

Comments
(due July 30, 2007): Its good to know that the community will not be negatively impacted by the school.

E-1b

Please submit to:

LAUSD Office of Environmental Health & Safety
Attn: Juliet Arroyo
1055 West 7th Street, 9th Floor
Los Angeles, CA 90017
(213) 893-7412 Fax

June 19, 2007

COMMENT E – GUADALUPE GONZALEZ

E-1a Es muy bueno saber que la comunidad no va a tener impacto negativo del medio ambiente. [Comment translated below]

Response to Comment: See Response to Comment E-1b, below.

E-1b It's good to know that the community will not be negatively impacted by the school.

Response to Comment: Comment noted. No additional response is required.

CHAPTER 9.0
CHANGES TO DRAFT EIR

This Errata section identifies changes made to the Draft EIR to correct or clarify the information contained in the document. (Changes such as periods, commas, typographical and formatting errors that do not change the meaning of the sentence, paragraph or footnote are not included in this chapter.) Changes made to the Draft EIR are identified here in strikeout text to indicate deletions and in bold and italics to signify additions.

0.0 EXECUTIVE SUMMARY

Page ES-5 is hereby modified to provide the full conclusion, as follows:

Alternative 3: Reduced Project Alternative

Under this alternative, a smaller high school would be built on the proposed project site. The remaining project site would be open space. The Reduced Project Alternative would provide approximately 1,645 two-semester seats compared to 2,025 two-semester seats under the proposed project, which is approximately 81.25 percent of the proposed 2,025 seats. The Reduced Project Alternative would include a stadium that would not accommodate Level IV (competitive) athletics. The 400 high school students that would not be accommodated by this alternative would continue to attend the relief schools that are currently overcrowded. *This is the environmentally superior alternative, but in general, it would attain few of the project objectives provided on pages ES-1 and ES-2.*

1.0 INTRODUCTION

Pages 1-2 through 1-5 of Chapter 1.0 Introduction, are hereby modified in order to include information on the Final EIR and to update information provided in the Draft EIR, as follows:

1.3 AVAILABILITY OF THE ~~DRAFT~~ EIR

The Draft EIR for the proposed project was ~~will be~~ directly distributed to numerous agencies, organizations, interested groups and persons for comment during the comment period. The Draft EIR was ~~is~~ also available at the following locations:

- LAUSD Office of Environmental Health and Safety, 1055 West 7th Street, 9th Floor, Los Angeles;
- LAUSD Office of Communications, 333 South Beaudry Avenue, Los Angeles;

- LAUSD, Local District 5, 2151 North Soto Street, Los Angeles;
- Johnson Opportunity High School, 333 East 54th Street, Los Angeles;
- Manual Arts High School, 4131 South Vermont Avenue, Los Angeles;
- ***Santee Education Complex*** ~~South Los Angeles Area New High School No. 1~~, 1921 South Maple Avenue, Los Angeles;
- 49th Street Elementary School, 750 East 49th Street, Los Angeles;
- Junipero Serra Branch Library, 4607 South Main Street, Los Angeles; and
- Vernon – Leon H. Washington Jr. Memorial Branch Library, 4504 South Central Avenue, Los Angeles.

In addition, the Draft EIR is available online at the LAUSD Facilities Services Division website (www.laschools.org/find-a-school). ***This Final EIR will be distributed directly to numerous agencies, organizations, interested groups, and persons as required, and will also be available at the above locations.***

1.4 PUBLIC MEETINGS AND HEARINGS

LAUSD ~~will~~ receive***d*** public input regarding the proposed project and the Draft EIR at a meeting at 6:00 P.M. on June 19, 2007 at 49th Street Elementary School (located at 750 East 49th Street, Los Angeles). Comments from the community and interested parties are ~~also~~ encouraged at all public hearings before the Facilities Committee and the Board of Education.

1.5 COMMENTS ON THE DRAFT EIR

~~If this document includes information necessary for to meet any statutory responsibilities related to the proposed project, LAUSD needs to know your views regarding the scope and content of the environmental information included in this Draft EIR. City departments, for example, may need to use the environmental documents prepared by LAUSD when considering any permit or other approvals necessary to implement the proposed project.~~

The environmental topics studied by LAUSD are provided in this ***Final*** ~~Draft~~ EIR. ~~If the topics of concern have already been identified for analysis, a public agency may not need to provide a response to this document.~~ The project description, location, and the environmental issues ~~to be~~ addressed in ***the*** ~~this~~ Draft EIR are contained in the Executive Summary and in other relevant sections of this document. ***As required by CEQA, the Draft EIR was circulated for review and comment by public and interested parties for a period of 45 days after publication.***[1] Due to the time limits mandated by state law, ~~your responses~~ ***comments on the Draft EIR were required for submittal*** ~~**must be sent**~~ to LAUSD ~~**at the earliest possible date but not**~~ no later than July 30, 2007, which ~~is~~ was 45 days after publication of this document.

[1] *CEQA Guidelines*, (CCR), Title 14, Chapter 3, §15105(a), 2006.

~~Please send your~~ *Responses were sent to*:

> ***Grace Estevez*** ~~Juliet Arroyo~~, CEQA Project Manager/Consultant
> Los Angeles Unified School District
> Office of Environmental Health and Safety
> 1055 West 7th Street, 9th Floor
> Los Angeles, CA 90017

The Board Meeting to act on this Final EIR is tentatively scheduled for September 11, 2007 and the decision regarding certification date will be held September 25, 2007. Please contact the Board Secretariat Office at (213) 241-7002 to confirm the date and time of the upcoming Board meeting.

1.6 FINAL EIR ORGANIZATION

The Final EIR is organized into the following chapters so the reader can easily obtain information about the project and its specific issues:

- ***Executive Summary - Presents a summary of the proposed project and alternatives, potential impacts and mitigation measures, and impact conclusions regarding growth inducement and cumulative impacts.***
- ***Chapter 1: Introduction - Describes the purpose and use of the ~~Draft~~ EIR, provides a brief overview of the proposed project, and outlines the organization of the ~~Draft~~ EIR.***
- ***Chapter 2: Project Description and Environmental Setting - Describes the project location, project details, project setting, existing physical conditions, and the LAUSD's overall objectives for the proposed project.***
- ***Chapter 3: Environmental Analysis - Describes the existing conditions or setting before project implementation, methods and assumptions used in impact analysis, thresholds of significance, impacts that would result from the proposed project, and applicable mitigation measures that would eliminate or reduce significant impacts for each environmental issue.***
- ***Chapter 4: Alternatives Analysis - Evaluates the environmental effects of project alternatives, including the No-Project Alternative and Environmentally Superior Project Alternative.***
- ***Chapter 5: Other CEQA Considerations - Includes a discussion of issues required by CEQA that are not covered in other chapters. This includes unavoidable adverse impacts, impacts found not to be significant, irreversible environmental changes, and growth inducing impacts.***
- ***Chapter 6: Final EIR Introduction - Provides background on the review process for the NOP/IS and Draft EIR and provides guidelines about recirculation.***
- ***Chapter 7: Community Outreach and Public Review Process - Provides information related to the distribution of the NOP/IS and the Draft EIR, such as, where the documents are available, how many copies were distributed, and to whom.***

- ***Chapter 8: Response to Comments - Presents a discussion on the comments received from the Draft EIR public review period.***
- ***Chapter 9: Changes to the Draft EIR - Lists the changes made to the Draft EIR, where those changes are located, and what was changed.***
- ***Chapter 10: Mitigation Monitoring and Reporting Plan - This section provides a discussion and a table of the project impacts along with their mitigation measures. The table in this chapter provides who will be monitoring each impact to make sure the mitigation measure is being applied.***
- ***Chapter 11: Acronyms and Abbreviations - This chapter provides a list of all the acronyms and abbreviations used throughout the entire document.***
- ***Chapter 12: References - Shows a list of all the references used in each section***
- ***Chapter 13: Report Preparation - Provides information on who participated in the production and creation of this EIR***
- ***Appendices - Present data supporting the analysis or contents of this EIR. The Appendices include the following:***

  Appendix A: *Notice of Preparation (NOP)/ ~~and~~ Initial Study, Scoping Meeting Summary, Comments Received on NOP/Initial Study, and Draft EIR Public Meeting Summary*
  Appendix B: *Air Quality Analysis*
  Appendix C: *CO Hotspot Analysis*
  Appendix D: *Historic Resources Assessment*
  Appendix E: *Noise Worksheets*
  Appendix F: *Traffic Study*

Additional documents referenced in this Final EIR that are not included in the appendices are available at LAUSD's Office of Environmental Health and Safety located at 1055 West 7th Street, 9th Floor, Los Angeles.

1.7 AGENCY COMMENTS

In compliance with CEQA Guidelines Section 15088, commenting agencies were provided with responses to their comments on the Draft EIR ten days prior to the tentatively scheduled certification date of September 25, 2007. Responses to all comments are provided in Chapter 8.0 of this Final EIR.

1.8 REVISIONS TO THE DRAFT EIR

Revisions to the Draft EIR resulting from public, agency, and staff review are summarized in Chapter 9.0. As provided in CEQA Guidelines Section 15088.5(a), the lead agency is authorized to include additional information in a Final EIR, including project modifications, changes in the environmental setting, additional data or other information. The modifications provided herein are minor in nature, and do not result in a new, substantial environmental impact or substantially increase the severity of an environmental impact already studied in the

Draft EIR. The lead agency therefore determined that recirculation of the revised EIR was not required as specified in CEQA Guidelines Section 15088.5(b).

CEQA Guidelines Section 15088.5(b) does not require recirculation of an EIR as a matter of course, but only in limited circumstances, as follows:

- ***When the new information shows a new, substantial environmental impact resulting either from the project or from a mitigated measure;***
- ***When new information shows a substantial increase in the severity of an environmental impact (unless mitigation measures reduce the impact to insignificant);***
- ***When new information shows a feasible alternative or mitigation measure that clearly would lessen environmental impacts, but it is not adopted; or***
- ***When the Draft EIR was so fundamentally inadequate that meaningful public review and comment were precluded.***

The modifications throughout this Final EIR do not meet any of these criteria, as demonstrated in the Chapter 3.0 Environmental Analyses and supporting studies to this Final EIR.

2.0 PROJECT DESCRIPTION

No substantive changes have been made to Chapter 2.0 Project Description.

3.0 ENVIRONMENTAL ANALYSIS

No changes have been made to Chapter 3.0 Environmental Analysis.

3A AESTHETICS

A change is made to Section 3A.2 Existing Environmental Setting in Chapter 3A Aesthetics, to clarify the meaning of this section, as follows:

3A.2 EXISTING ENVIRONMENTAL SETTING

In general, urban and suburban residential land uses dominate much of the land area within Los Angeles County. Additionally, commercial and industrial land uses are prevalent along freeway and railway rights-of-way and major urban roadways such as boulevards and streets. The proposed project site is located in a highly urbanized area of the City of Los Angeles, in the community of Southeast Los Angeles. The area surrounding the project site is characterized by residential, commercial, and industrial land uses.

The proposed project site includes single- and multi-family residences, commercial land uses, and the Johnson Opportunity High School.[2] The existing high school was built in the 1970s and is of no architectural significance***. The site includes*** ~~with~~ modern institutional buildings painted a light brown color and ***is*** surrounded by streets lined with trees and utility poles with overhead wires.[3] Ornamental trees and shrubs are located throughout the proposed project site, including a number of *Eucalyptus* trees, but no oak trees are present.[4] The proposed project site is across the street from one- to two-story single- and multi-family residential houses along San Pedro Street, East 53rd Street, Towne Avenue, and East 52nd Street. These residences use general nighttime lighting such as porch lights.

3B AIR QUALITY

No substantive changes have been made to Chapter 3B Air Quality.

3C CULTURAL RESOURCES

A change is made to the first paragraph of Section 3C.2 Existing Enviornmental Setting in Chapter 3C Cultural Resources, to correct the number of parcels occupied by single-family, multi-family, commercial, and other uses, and the accompanying descriptions, as follows:

3C.2 EXISTING ENVIRONMENTAL SETTING

The proposed 13.4-acre project site is located along East 52nd Street between Avalon Boulevard and South San Pedro Street. The proposed project site contains ***ten (10)*** ~~nine (9)~~ single-family parcels, ***eleven (11)*** ~~thirteen (13)~~ multi-family parcels ***(including one parcel with two single-family homes)***, five (5) commercial ***and/or industrial*** parcels, a swap meet, and an existing LAUSD facility, Johnson Opportunity High School.[5] A portion of East 53rd Street, an east-west alley running parallel to East 52nd Street and East 53rd Street between Towne Avenue and Avalon Boulevard, and a north-south alley running parallel to Avalon Boulevard**,** between East 52nd Street and East 53rd Street**,** currently bisect the proposed project site.

The following change is made to Table 3C-1 on p. 3C-3 of Chapter 3C Cultural Resources, to add a residential parcel inadvertently combined with an adjacent parcel:

[2] ESA, Site visit, March 6, 2006.
[3] Kaplan Chen Kaplan, *LAUSD Central Region High School No. 16 Site Historic Evaluation,* May 11, 2007.
[4] ESA, Site visit, March 6, 2006.
[5] LAUSD, *Parcel Map*, February 23, 2006.

TABLE 3C-1
DESCRIPTION OF BUILDINGS ON THE PROPOSED PROJECT SITE

Parcel Number	Address	Date Built	Building Type
5109-026-016	400 E. 52nd Street, 5206-5208 S. Towne Avenue, and 5212 S. Towne Avenue	1905 and 1924	Multi-Family Residences
5109-026-015	406 E. 52nd Street	1905	Single-Family Residence
5109-026-014	412 E. 52nd Street	1908	Single-Family Residence
5109-026-013	416 E. 52nd Street	1905	Single-Family Residence
5109-026-012	424 E. 52nd Street	1912	Single-Family Residence
5109-026-011	426 E. 52nd Street	1907	Single-Family Residence
5109-026-010	428 E. 52nd Street	1910	Single-Family Residence
5109-026-009	430 E. 52nd Street	1924	Multi-Family Residence
5109-026-008	436 E. 52nd Street	1913 and 1958	Multi- and Single-Family Residences
5109-026-017	***5222 S. Towne Avenue***	***1897***	***Single-Family Residence***
5109-026-018	401 E. 53rd Street	1905 and 1995	Multi-Family Residence
5109-026-019	407 E. 53rd Street	1905	Single-Family Residence
5109-026-020	409 E. 53rd Street	1905	Single-Family Residence
5109-026-021	411 E. 53rd Street	1905	Single-Family Residence
5109-026-022	417 E. 53rd Street	1905	Triplex
5109-026-023	421 E. 53rd Street		Vacant Lot
5109-026-024	425 E. 53rd Street	1902	Single-Family Residence
5109-026-025	433 E. 53rd Street	1923 and 1947	Single-Family Residence
5109-026-026	437 E. 53rd Street	1948	Duplex
5109-026-030	443 E. 53rd Street	1984	Single-Family Residence
5109-026-031	445 E. 53rd Street	1984	Triplex
5109-026-029	5201 S. Avalon Boulevard	1947	Commercial
5109-026-003	5207 S. Avalon Boulevard	1910	Multi-Family Residence
5109-026-028	5213 S. Avalon Boulevard	1926	Commercial
5109-026-005	5219-21 S. Avalon Boulevard	1925 and 1916	Commercial
5109-026-006	5223 S. Avalon Boulevard	1927	Commercial
5101-001-002	5301 S. Avalon Boulevard	1904, 1940, and 1960	Industrial
5101-001-900	5300 S. San Pedro Street	C1970s	Institutional

SOURCE: Kaplan Chen Kaplan, *LAUSD Central Region High School No. 16 Site Historic Resource Evaluation*, ***May 11, 2007*** ~~July 18, 2006~~.

The following change is made to the p. 3C-7 of Chapter 3C Cultural Resources, to the description of 401 East 53rd Street, which included the description of another adjacent structure, located on a separate parcel at 5222 Towne Avenue, as follows:

> **401 East 53rd Street (Multi-Family Residence) -** Constructed in 1995, this two-story duplex features a cross-gable roof form and has an attached garage. This building is less than 50 years old. It is located on the northwest corner of East 53rd Street and Towne Avenue.
>
> ***5222 Towne Avenue (Single-Family Residence) -*** At the rear of ***401 East 53rd Street is another parcel with a*** ~~the lot is another~~ residence that was originally constructed in 1897 ~~1905~~. It appears that the two-story wing with front-facing gable was the original house.

The house has been radically altered with the addition of a one-story horizontal surface that is clad in random sized face stones. ***Stucco has been placed on the original form and windows changed to aluminum sliders.*** This structure does not retain any historic character-defining features and has no historic architectural integrity.[6]

3D NOISE

The following change is made to Section 3D.3.1 Noise, to direct the reader to the correct location of Table 3D-3:

No federal noise regulations directly apply to the Program. Certain federal programs, however, influence the audible landscape. Most transportation-related sources of noise are within federal jurisdiction. Vehicle noise emissions standards and requirements for mufflers are set by the USEPA, but are normally enforced locally to avoid potential conflicts.[7] The Federal Highway Administration (FHWA) requires abatement of highway traffic noise for highway projects.[8] The Federal Transit Administration (FTA) recommends noise and vibration assessments for mass transit projects through comprehensive guidelines.[9] For transportation projects that trigger abatement requirements, the normal result is to shield the existing buildings from traffic noise with sound walls or retrofitted noise insulation. The FHWA criteria specify that noise abatement should be provided if a highway project would cause exterior noise levels at any affected school to approach or exceed 67 dBA $L_{eq\ (h)}$ or 70 dBA L_{10}. Table 3D-3***, below,*** ~~on page 9~~ provides examples of protective noise levels recommended by the EPA. The Occupational Safety and Health Administration (OSHA) regulations protect the hearing of workers exposed to occupational noise.[10]

3E PEDESTRIAN SAFETY

The following change is made to Mitigation Measure M-3E.3, found on page 3E-7, as follows:

M-3E.3 *Prior to opening the proposed high school, LAUSD~~'s OEHS shall contact LADOT to coordinate the installation of~~* ***shall install*** *a traffic signal at the intersection of Avalon Boulevard and East 52nd Street.*

3F TRAFFIC

A change is proposed to the discussion of the residual impacts of Impact 3F1 on p. 3F-18, which inadvertently states that the proposed ATSAC system would also reduce impacts to local street segments. Mitigation Measure M-3F.2 proposes the mitigation measure to reduce impacts to affected local street segments by requiring submission of a Neighborhood Traffic Management Plan.

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6 *Ibid.*
7 U.S. Environmental Protection Agency (USEPA), 49 CFR 190.
8 Federal Highway Administration (FHWA), 23 CFR 772.
9 US Department of Transportation (USDOT), Federal Transit Administration (FTA): Noise and Vibration Impact Guideline, April 1995,.
10 Occupational Safety and Health Administration (OSHA), 29 CFR Section 1910.95.

Residual Impacts

The installation of an ATSAC system at the intersection of Avalon Boulevard and Slauson Avenue would reduce the traffic-related impacts to a less than significant level at all this intersection. ~~Furthermore, the traffic-related impact to the roadway segments of East 52nd Street between San Pedro Street and Towne Avenue, and Towne Avenue (north of East 52nd Street), and East 53rd Street west of San Pedro Street, would also be less than significant.~~ After the installation of the ATSAC system, the intersection Avalon Boulevard and Slauson Avenue would operate at LOS F during the A.M. peak hour and LOS F during the P.M. peak hour. However, because the project's contribution to the V/C ratio (or delay) is not substantial (less than 0.029), the impact with the proposed mitigation measure would be considered less than significant.

An additional change is proposed to the last paragraph in the discussion of cumulative impacts (Impact 3F4) on p. 3F-21, which also inadvertently states that the proposed ATSAC system would also reduce impacts to local street segments. Mitigation Measure M-3F.2 proposes the mitigation measure to reduce impacts to affected local street segments by requiring submission of a Neighborhood Traffic Management Plan.

The installation of an ATSAC system at the intersections of Avalon Boulevard and Slauson Avenue would reduce the traffic-related impacts to a less than significant level at this intersection. ~~Furthermore, the traffic-related impact to the roadway segments of East 52nd Street between San Pedro Street and Towne Avenue, and Towne Avenue (north of East 52nd Street), and East 53rd Street west of San Pedro Street would also be less than significant.~~ After the installation of the ATSAC system, the intersection of Avalon Boulevard and Slauson Avenue would operate at LOS F during the A.M. peak hour and LOS F during the P.M. peak hour. However, because the project's contribution to the V/C ratio (or delay) is not substantial (less than 0.029), the impact with the proposed mitigation measure would be considered less than significant.

4.0 ALTERNATIVES

A change is made to **Table 4-2**, Comparison of Alternatives to the Proposed Project under I. Aesthetics on p. 4-14. This table omitted the entry for the proposed project on the third question of whether or not the project would "Substantially degrade the existing visual character or quality of the site and its surroundings?" The response for the proposed project is changed to ***Less Than Significant.***

5.0 OTHER CEQA CONSIDERATIONS

The following changes are made to Section 5.1 Environmental Effects Found Not to be Significant, in order to clarify why cultural resources appears on both the list of issue areas determined to result in no impact or less than significant impact by the IS and on the list of topics considered in the Draft EIR and determined to have no impact or a less significant impact with mitigation incorporated:

The IS for the proposed project, completed in May 2006 and included in the EIR as Appendix A, determined that the proposed project would result in either no impact or a less than significant impact to 11 environmental issue areas. These topic areas are not discussed in detail in this EIR. The issue areas determined to result in no impact or less than significant impact by the Initial Study are:

- Agriculture Resources
- Biological Resources
- Cultural Resources ***(Potential Paleontological and Archaeological Resources)***
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation and Parks
- Utilities and Service Systems

After a more detailed evaluation of the environmental issues associated with the proposed project, the Draft EIR determined that impacts would be less than significant with incorporation of project design features and mitigation measures, or, in the case of Aesthetics, would have no impact. These issues include the following:

- Aesthetics
- Cultural Resources ***(Potential Historic Resources)***
- Pedestrian Safety
- Traffic

CHAPTER 10.0
MITIGATION MONITORING AND REPORTING PLAN

10.1 INTRODUCTION

Pursuant to CEQA[1] and the *CEQA Guidelines*,[2] when a Lead Agency makes findings of significant effects in certifying the EIR, the agency must also adopt a plan for the monitoring of mitigation measures identified in the EIR. The primary purposes of the monitoring plan are to ensure that the mitigation measures identified in the EIR are implemented and that environmental effects are minimized. Additionally, the monitoring plan provides: (1) a mechanism for giving agency staff and decision-makers feedback on the effectiveness of their actions; (2) a learning opportunity for improved mitigation measures on future projects; and (3) a means of identifying corrective actions, if necessary, before irreversible environmental damage occurs.

10.2 PROJECT LOCATION AND DESCRIPTION

The proposed project site is located in the City of Los Angeles approximately five miles south of downtown Los Angeles. The proposed project site is approximately 0.6 miles east of Interstate 110 (I-110, Harbor Freeway) and approximately 2.7 miles south of Interstate 10 (I-10, Santa Monica Freeway).[3] Figure 2.2 depicts the regional location of the proposed project site. As shown in Figure 2.3, the proposed project site is "L" shaped and is generally bound by East 52nd Street and East 53rd Street to the north, Avalon Boulevard to the east, East 54th Street to the south, and South San Pedro Street and Towne Avenue to the west.

The proposed project involves approximately 200,000 square feet of new building development, including 75 classrooms, a library/media center, a multi-purpose room, gymnasium, performing arts area, administration offices, and a food service area. This new development would primarily be located on the west and southwestern areas of the site. The proposed school would be divided into four learning communities. Each classroom building would be one- to three-stories in height. Playfields would be provided along Avalon Boulevard and East 52nd Street. The proposed project includes a football stadium and track field facilities with bleachers. Figure 2.6 shows the proposed conceptual site plan. Nighttime field lighting would be provided for evening sporting events. The proposed project also includes exterior safety lighting and a public address system.

1 CEQA, PRC, §21000 et al., 2005.
2 *CEQA Guidelines*, CCR, Title 14, Division 6, Chapter 3, §§15091 (d) and 15097, 2005.
3 Rand McNally and Company, *The Thomas Guide, Los Angeles and Orange Counties*, 2005 Edition.

10.3 ROLES AND RESPONSIBILITIES

LAUSD is acting as the Lead Agency under CEQA for the project. Acting as the Lead Agency, LAUSD is required to monitor the development and operation of the project to ensure that the mitigation measures identified in the adopted EIR are implemented.[4,5] However, because of the nature of some of the mitigation measures identified in the EIR, LAUSD may delegate duties and responsibilities to environmental monitors or other professionals as warranted.

LAUSD would be required to comply with all applicable plans, permits, and conditions of approval. The contractor bid packages would include the mitigation measures/project commitments required to complete the construction of the new Central Region High School No. 16 Addition and their implementation schedule. The mitigation measures presented in **Table 10-1** on the following pages would be implemented before construction, during construction, and during operation of the proposed project. The following agencies will be responsible for enforcing the measures identified in this report:

- Los Angeles Unified School District (LAUSD) Facilities Services Division – New Construction;
- Los Angeles Unified School District (LAUSD) Office of Environmental Health and Safety; and
- County of Los Angeles Department of Public Works (LACDPW).

[4] CEQA, PRC, §21081.6, 2005.
[5] *CEQA Guidelines*, CCR, Title 14, Division 6, Chapter 3, §§15091 (d) and 15097, 2005.

TABLE 10-1
LOS ANGELES UNIFIED SCHOOL DISTRICT
CENTRAL REGION HIGH SCHOOL NO. 16
MITIGATION MONITORING AND REPORTING PLAN

Impact		Mitigation Measures	Responsible Monitoring Party	Responsible Implementing Agency	Implementation Phase	Completion Date/Initials
3B. Air Quality						
Impact 3B3: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors).	**M-3B.1**	If the electrical connections are available, petroleum powered construction equipment shall utilize electricity from power poles rather than temporary diesel power generators and/or gasoline power generators.	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	During construction of the Project	
	M-3B.2	On-site mobile equipment shall be powered by alternative fuel sources (for example, methanol, natural gas, propane or butane), as feasible.	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	During construction of the Project	
	M-3B.3	All construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	During construction of the Project	
	M-3B.4	Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 30 minutes. Diesel-fueled commercial motor vehicles with gross vehicular weight ratings of greater than 10,000 pounds shall be turned off when not in use for more than five minutes.	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	During construction of the Project	

TABLE 10-1 (Continued)
CENTRAL REGION HIGH SCHOOL NO. 16
MITIGATION MONITORING AND REPORTING PLAN

Impact		Mitigation Measures	Responsible Monitoring Party	Responsible Implementing Agency	Implementation Phase	Completion Date/Initials
3D. Noise						
Impact 3D1: Expose people to or generate noise levels in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies.	**M-3D.1**	LAUSD's construction contractor shall comply with Los Angeles Municipal Code Section 112.05 such that construction activities shall be performed in accordance with LAUSD's and applicable City of Los Angeles noise standards. Noise Ordinance Section 41.40 of the Los Angeles City Municipal Code restricts construction noise to between the hours of 7 a.m. and 9 p.m., Monday through Friday (8 a.m. to 6 p.m. on Saturday and national holidays). No construction is allowed on Sundays. No noise-intensive construction or repair work shall be performed between the hours of 9 p.m. and 7 a.m. on any weekday, or before 8 a.m. or after 6 p.m. on any Saturday, or at any time on Sundays or federal holidays. The Noise Ordinance, Municipal Code Section 41.40(b), also permits an exception for various construction activities, including those that are "effected with the public interest." In the event that the construction contractor requires a waiver from the specifications of the Noise Ordinance, the construction contractor may in a written application request the Board of Police Commissioners to grant a waiver from the time limitations for	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	During construction of the Project	

TABLE 10-1 (Continued)
CENTRAL REGION HIGH SCHOOL NO. 16
MITIGATION MONITORING AND REPORTING PLAN

Impact		Mitigation Measures	Responsible Monitoring Party	Responsible Implementing Agency	Implementation Phase	Completion Date/Initials
		construction activity. (Construction)				
	M-3D.2	LAUSD's construction contractor shall require all construction equipment, stationary and mobile, be equipped with properly operating and maintained muffling devices. (Construction)	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	During construction of the Project	
	M-3D.3	LAUSD's construction contractor shall provide advance notification to adjacent property owners and post notices adjacent to the proposed project site with regard to the schedule of construction activities. (Construction)	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	During construction of the Project	
	M-3D.4	LAUSD's construction contractor will place all stationary construction equipment and vehicle staging areas to be placed such that noise is directed away from sensitive receptors, as feasible. (Construction)	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	During construction of the Project	

TABLE 10-1 (Continued)
CENTRAL REGION HIGH SCHOOL NO. 16
MITIGATION MONITORING AND REPORTING PLAN

Impact	Mitigation Measures	Responsible Monitoring Party	Responsible Implementing Agency	Implementation Phase	Completion Date/Initials
	M-3D.5 LAUSD's construction contractor shall implement the use of sound blankets along the northern and western portions of the proposed project's property lines located between the proposed site and the adjacent residential units. In addition, sound blankets shall be located long the proposed project's property line with Avalon Boulevard to reduce noise levels at residential units set back from Avalon Boulevard. Such attenuation measures could be expected to reduce noise levels by 8 to 10 dBA. (Construction)	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	During construction of the Project	
	M-3D.6 LAUSD shall incorporate sound barriers, or other special design features, to ensure that exterior ambient noise levels do not exceed 67 dBA Leq along the portion of the project site bordering Avalon Boulevard. This feature shall include, but is not limited to, an eight-foot high wall along the portion of the project site bordering Avalon Boulevard. (Operations)	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	Prior to and during project operation	
Impact 3D3: Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the proposed project.	See Mitigation Measures M-3D.1 through M-3D.5 above.	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	During construction of the Project	
3E. Pedestrian Safety					

TABLE 10-1 (Continued)
CENTRAL REGION HIGH SCHOOL NO. 16
MITIGATION MONITORING AND REPORTING PLAN

Impact	Mitigation Measures	Responsible Monitoring Party	Responsible Implementing Agency	Implementation Phase	Completion Date/Initials
Impact 3E1: Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible land uses.	**M-3E.1** Four months prior to opening of the proposed school, LAUSD's OEHS shall contact the Los Angeles Department of Transportation (LADOT) to coordinate the installation of signage to create passenger loading zones. The signage for the passenger loading zones would state, "Passenger Loading only 6:30 a.m – 9 a.m. and 1:30 p.m. – 4 p.m., and 2-Hour Parking 9 a.m. to 1:30 p.m.," or "15-Minute Parking 7 a.m. to 5 p.m. on School Days," or provide other notice as deemed appropriate by LAUSD. The precise locations and lengths of the restricted on-street parking zones would be jointly determined by LAUSD and LADOT.	LAUSD, Office of Environmental Health and Safety	LAUSD, Office of Environmental Health and Safety	Prior to project operation	
Impact 3E2: Create unsafe routes for students walking from local neighborhoods.	See Mitigation Measure M-3E.1 above.	LAUSD, Office of Environmental Health and Safety	LAUSD, Office of Environmental Health and Safety	Prior to project operation	
	M-3E.2 Four months prior to opening the proposed high school, LAUSD's OEHS shall contact LADOT to coordinate the installation of appropriate traffic controls, school warning and speed limit signs, school crosswalks, and pavement markings.	LAUSD, Office of Environmental Health and Safety	LAUSD, Office of Environmental Health and Safety	Prior to project operation	
	M-3E.3 Prior to opening the proposed high school, LAUSD shall install a traffic signal at the intersection of Avalon Boulevard and East 52nd Street.	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	LAUSD Facilities Services Division – New Construction	Prior to project operation	

TABLE 10-1 (Continued)
CENTRAL REGION HIGH SCHOOL NO. 16
MITIGATION MONITORING AND REPORTING PLAN

Impact		Mitigation Measures	Responsible Monitoring Party	Responsible Implementing Agency	Implementation Phase	Completion Date/Initials
	M-3E.4	Six months prior to opening of the proposed high school, LAUSD's OEHS shall contact LADOT's citywide traffic control program section for preparation of a final "Pedestrian Routes to School Plan" for the safe arrival and departure of students in accordance with the "School Area Pedestrian Safety Manual."[6] The plan shall include a "Pedestrian Routes to School Map" for distribution to all students and parents. Parents and students shall be notified to use the existing traffic safeguards. The Map shall encourage students to cross San Pedro Street at East 53rd Street for travel west of the project site.	LAUSD, Office of Environmental Health and Safety	LAUSD, Office of Environmental Health and Safety	Prior to project operation	
3F. Traffic						
Impact 3F1: Cause a substantial increase in traffic in relation to the existing traffic load and capacity of the street system (for example, result in a substantial increase in either the number of vehicle trips, the V/C ratio on roads, or congestion at intersections).	**M-3F.1**	LAUSD shall contribute impact-based fair share funding towards the installation of an ATSAC system at the intersection of Avalon Boulevard and Slauson Avenue. This mitigation measure appears to be feasible, provided that the responsible agency, LADOT, considers it and agrees to enforce it.	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	LAUSD Facilities Services Division – New Construction	Prior to project operation	
	M-3F.2	LAUSD shall coordinate with LADOT to develop a Neighborhood Traffic Management Plan for the roadway segments of East 52nd Street between San Pedro Street and Towne Avenue; Towne Avenue, north of East 52nd Street and East 53rd	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	LAUSD Facilities Services Division – New Construction	Prior to project operation	

[6] Caltrans, *School Area Pedestrian Safety Manual*, 1997.

TABLE 10-1 (Continued)
CENTRAL REGION HIGH SCHOOL NO. 16
MITIGATION MONITORING AND REPORTING PLAN

Impact	Mitigation Measures	Responsible Monitoring Party	Responsible Implementing Agency	Implementation Phase	Completion Date/Initials
	Street, west of San Pedro Street. This mitigation measure appears to be feasible, provided that the responsible agency, LADOT, considers it and agrees to enforce it.				
Impact 3F4: Result in a cumulatively considerable impact with respect to traffic.	See Mitigation Measures M-3F.1 and M-3F.2 above.	LAUSD, Office of Environmental Health and Safety	LAUSD, Office of Environmental Health and Safety	Prior to project operation	

CHAPTER 11.0
ACRONYMS AND ABBREVIATIONS

$\mu g/m^3$	micrograms per cubic meter
ADT	Average Daily Trips
ANSI	American National Standards Institute
AQMP	Air Quality Management Plan
ASHRAE	American Society of Heating, Refrigeration and Air Conditioning Engineers
ASTM	American Society for Testing and Materials
ATSAC	Automated Traffic Surveillance and Control
Board	Los Angeles Board of Education
BMP	Best Management Practice
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
Caltrans	California Department of Transportation
Cal/OSHA	California Occupational Safety and Health Administration
CARB	California Air Resources Board
CCR	California Code of Regulations
CDE	California Department of Education
CDMG	California Division of Mines and Geology
CEQA	California Environmental Quality Act
CHPS	Collaborative for High Performance Schools
City	City of Los Angeles
CMA	Critical Movement Analysis
CMP	Congestion Management Program
CNEL	community noise equivalent level
CO	carbon monoxide
CRHR	California Register of Historical Resources

dB	decibel
dBA	A-weighted decibel
DHS	Department of Health Services
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
HVAC	Heating Venting Air Condition
IS	Initial Study
ITE	Institute of Transportation Engineers
LACMTA	Los Angeles County Metropolitan Transportation Authority
LADOT	Los Angeles Department of Transportation
LAMC	Los Angeles Municipal Code
LAUSD	Los Angeles Unified School District
L_{dn}	day-night level
L_{eq}	equivalent sound level
L_{max}	maximum sound level
L_{min}	minimum sound level
LOS	level of service
LST	Localized Significance Threshold
MMRP	Mitigation Monitoring and Reporting Program
MOC	Memorandum of Cooperation
MOU	Memorandum of Understanding
mph	miles per hour
MTA	Metropolitan Transportation Authority
NAAQS	National Ambient Air Quality Standards
NO	nitric oxide
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NO_x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System

NRHP	National Register Historic Places
O_3	ozone
OEHS	Office of Health and Safety
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
Pb	lead
PEIR	Program Environmental Impact Report
PM_{10}	particulate matter
PPM	parts per million
PPV	peak particle velocity
ROC	reactive organic compounds
RMS	root mean square
RWQCB	Regional Water Quality Control Board
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	Southern California Air Quality Management District
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SO_2	sulfur dioxide
SO_4	sulfates
SO_x	sulfur oxides
SWPPP	Storm Water Pollution Prevention Plan
TAC	toxic air contaminants
TIA	transportation impact assessment
US EPA	United States Environmental Protection Agency
V/C	volume-to-capacity ratio
VOC	volatile organic compounds

CHAPTER 12.0
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CHAPTER 13.0
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