May 2025 | Initial Study / Negative Declaration Fairfax High School Major Modernization Project

Prepared for:

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FAIRFAX HIGH SCHOOL

Major Modernization Project

<u>Secti</u>	ion		Page
1.	INTR	ODUCTION	
	11	Overview	1
	1.1	Background	1
	1.3	California Environmental Quality Act	2
	1.4	Environmental Process	3
	1.5	Initial Study	3
	110	1.5.1 Negative Declaration	4
		1.5.2 Tiering	4
		1.5.3 Project Plan and Building Design	
	1.6	Impact Terminology	
	1.7	Organization of the Initial Study	
2.	ENVI	RONMENTAL SETTING	9
	2.1	Project Location	9
	2.2	Surrounding Land Uses	
	2.3	Sensitive Receptors	
	2.4	Campus History	
	2.5	Existing Conditions	
	2.6	General Plan and Existing Zoning	
	2.7	Necessary Approvals	
		2.7.1 Responsible Agencies	
		2.7.2 Trustee Agencies	
		2.7.3 Reviewing Agencies	
3.	PROJ	ECT DESCRIPTION	25
	3.1	Background	
	3.2	Proposed Project	
		3.2.1 Campus Improvements	
		3.2.2 Site Access, Circulation, and Parking	
		3.2.3 Landscaping	
		3.2.4 Construction Phasing and Equipment	
4.	ENVI	RONMENTAL CHECKLIST AND ANALYSIS	
	I.	Aesthetics	
	II.	Agriculture and Forestry Resources	
	III.	Air Quality	
	IV.	Biological Resources	
	V.	Cultural Resources	
	VI.	Energy	74
	VII.	Geology and Soils	
	VIII.	Greenhouse Gas Emissions	
	IX.	Hazards and Hazardous Materials	
	Х.	Hydrology and Water Quality	
	XI.	Land Use and Planning	
	XII.	Mineral Resources	
	XIII.	Noise	
	XIV.	Pedestrian Safety	
	XV.	Population and Housing	

Sectior	1		Page
	XVI.	Public Services	
	XVII.	Recreation	
	XVIII.	Transportation and Circulation	
	XIX.	Tribal Cultural Resources	
	XX.	Utilities and Service Systems	
	XXI.	Wildfire	
	XXII.	Mandatory Findings of Significance	
5.	LIST O	OF PREPARERS	
	Lead A	gency	
	CEQA	Consultants	



APPENDICES

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

- A. Air Quality Study
- B. Arborist Report
- C. 2022 Historic Resource Evaluation Report
- D. 2025 Cultural Resources Technical Report
- E. Geologic and Environmental Hazards Assessment
- F. Phase I Environmental Site Assessment
- G. Methane Survey Report
- H. Noise Study
- I. Sacred Lands File Record Search
- J. Preliminary Environmental Assessment Equivalent

List of Figures

Figure Page Figure 1 Regional Location Map......17 Figure 2 Figure 3 Figure 4 Figure 5 Figure 6 Figure 7 Figure 8

List of Tables

	Page
Sensitive Receptors	
Existing Fairfax HS Campus	11
Proposed Project (Demolition, Remodel, and Construction)	
Construction Schedule and Equipment	
Unmitigated Maximum Regional Construction Emissions	53
Unmitigated Maximum Regional Operational Emissions	
Unmitigated Localized Construction Emissions	55
Unmitigated Localized Operational Emissions	
Ambient Noise Measurements	
Typical Maximum Noise Levels for Project Construction Equipment	
Construction Maximum Noise Estimates	
On-Site Construction Vibration Impacts – Building Damage	111
	Sensitive Receptors Existing Fairfax HS Campus Proposed Project (Demolition, Remodel, and Construction) Construction Schedule and Equipment Unmitigated Maximum Regional Construction Emissions Unmitigated Maximum Regional Operational Emissions Unmitigated Localized Construction Emissions Unmitigated Localized Construction Emissions Unmitigated Localized Operational Emissions Munitigated Localized Operational Emissions Construction Measurements Typical Maximum Noise Levels for Project Construction Equipment Construction Maximum Noise Estimates On-Site Construction Vibration Impacts – Building Damage



AAQS	ambient air quality standards
AB	Assembly Bill
ADA	Americans with Disabilities Act
AF	acre-feet
APN	Assessor Parcel Number
AQMP	air quality management plan
BMPs	best management practices
BOE	[LAUSD] Board of Education
BUG	Backlight-Uplight Glare
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Code
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CHPS	Collaborative for High-Performance Schools
CNDDB	California Natural Diversity Data Base
CNEL	community noise equivalent level
CNPS	California Native Plant Society
СО	carbon monoxide
CWC	California Water Code
dBA	A-weighted decibels
DSA	Division of the State Architect
DTSC	Department of Toxic Substances Control
EIA	Energy Information Administration
EIR	environmental impact report
EMF	electromagnetic field
EOP	Emergency Operation Plan
EPA	Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FETU	Facilities Environmental Technical Unit

FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GHG	greenhouse gas
НСМ	Historic Cultural Monument
HRA	Health Risk Assessment
HS	High school
HVAC	Heating, ventilation, and air conditioning
IDA	International Dark-Sky Association
IES	Illuminating Engineering Society
IRP	Integrated Resource Plan
IS	Initial Study
ITE	Institute of Transportation Engineer's
KWH	kilowatt-hour
LAA	Los Angeles Aqueducts
LACoFD	LA County Fire Department
LADBS	Los Angeles Department of Building and Safety
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAPD	Los Angeles Police Department
LASPD	Los Angeles Schools Police Department
LAUSD	Los Angeles Unified School District
LGBT	lesbian, gay, bisexual, and transgender
LID	low impact development
LSTs	Localized Significance Thresholds
LZ	lighting zones
MEP	Maximum Extent Practicable
MLO	Model Lighting Ordinance
MND	mitigated negative declaration
MW	megawatts
MWD	Metropolitan Water District of Southern California
ND	negative declaration
NMFS	National Marine Fisheries Services

NPDES	National Pollutant Discharge Elimination System
OEHS	Office of Environmental Health and Safety
OSHA	Occupational Safety & Health Administration
P.E.	physical education
PCBs	Polychlorinated Biphenyls
PDFs	Project design features
pLAn	Sustainable City pLAn
PM	particulate matter
PPV	peak particle velocity
PRC	Public Resources Code
PRDs	Permit Registration Documents
PSHA	pipeline safety hazard assessment
RAW	Removal Action Workplan
RSS	Rail Safety Study
SB	Senate Bill
SC	Standard Conditions of Approval
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District's
SCSN	Southern California and Southern Nevada Region
SDG	School Design Guide
SEA	Significant Ecological Area
SERRF	southeast Resources Recovery Facility
SLF	Sacred Lands File
SoCalGas	Southern California Gas Company
SOIS	Secretary of the Interior's Standards
SR	State Route
SR2S	Safe Routes to School
SUP	School Upgrade Program"
SUSMP	Standard Urban Stormwater Mitigation Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TACs	Toxic Air Contaminants

TCRs	Tribal cultural resources
USFWS	United States Fish and Wildlife Service
UWMP	Urban Water Management Plan
VOC	volatile organic compounds
WUI	Wildland Urban Interface

1.1 OVERVIEW

The Los Angeles Unified School District (LAUSD or District) is proposing a major modernization of Fairfax High School (Fairfax HS), located at 7850 Melrose Avenue, City of Los Angeles, Los Angeles County, California. Major Modernization Projects are designed to address the most critical physical needs of the building and grounds at the Fairfax High School Campus through building replacement, renovation, modernization, and reconfiguration. The proposed Fairfax High School Major Modernization Project (Project) is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This Initial Study provides an evaluation of the potential environmental consequences associated with this proposed Project.

1.2 BACKGROUND

The bond program began in 1997 with the initial focus on addressing overcrowded conditions – including the use of year-round multi-track calendars and busing of students to less crowded campuses – by providing new schools with traditional calendars. This goal was met with the opening of 131 new schools for K-12 students, allowing students to attend schools in their neighborhood's operation on a two-semester, single-track calendar. Since the completion of the New School Construction Program, the District's focus has shifted from constructing new facilities to correct decades of overcrowding, to now addressing aging existing school facilities. The District's priority now is to upgrade existing facilities and provide additional facilities to achieve the educational benefits of smaller learning environments.¹

In 2014, the District embarked on a new bond program known as the "School Upgrade Program" (SUP). Projects developed under the SUP framework focus on upgrading, modernizing, and replacing aging and deteriorating school facilities, updating technology, and addressing facilities inequities. Initially in 2014, \$7.85 billion was allocated for the development of projects. Over the course of the last seven years new sources of funds have been allocated to the program, increasing the total amount of funds to support the development of projects to \$9.2 billion. To date, nearly 2,000 projects valued at approximately \$1.5 billion have been funded by the SUP and completed by Facilities, and nearly 690 additional projects valued at approximately \$5.4 billion are underway.

Measure RR was passed in 2020 to help address the significant and unfunded needs of Los Angeles public school facilities. Measure RR is a \$7 billion bond measure aimed at continuing the funding for improvement of facilities and technology, upgrade of existing facilities, as well as increased safety measures amid the COVID-19 pandemic. In August 2021, the LAUSD Board of Education (BOE or Board) updated the SUP to allocate

¹ LAUSD. "Strategic Execution Plan." Page 1. Facilities Services Division. 2023.

the Measure RR funds, adjusted the categories and spending targets within the program, and approved the Measure RR Implementation Plan.

The bond program is now focused on improving equity between newer and older school so that every student has an equal opportunity for success. The updated SUP framework and the Measure RR Implementation Plan reflect the goals of and priorities for Measure RR, as outlined in the bond language approved by voters and the Proposed 2020 Bond Funding Priorities Package previously adopted by the Board. Moreover, they also reflect the input solicited earlier this year from Community of Schools Administrators and Local District leadership. The overarching goals and principals of the SUP which will drive the development of future projects to upgrade, modernize, and replace aging and deteriorating District school facilities, update technology, and address District school facilities inequities in order to provide students with physically and environmentally safe, secure, and updated school facilities that support 21st century learning.²

Based on past experience and the magnitude of the proposed updates to the SUP framework, LAUSD staff determined that a Subsequent Program EIR (SPEIR) should be prepared due to substantial changes in the goals and funding for the SUP from what was evaluated in the 2015 SPEIR. The 2023 SPEIR was prepared according to CEQA 14 CCR Section 15162(a) and certified by the LAUSD Board of Education on December 12, 2023.

On June 13, 2023, the Board approved the project definition for Fairfax HS. LAUSD proposes to complete a Major Modernization Project at Fairfax HS in an effort to provide facilities that are safe, secure, and aligned with the instructional program. The Project is designed to address the most critical physical concerns of the building and grounds at the Campus while providing renovations, modernizations, and reconfigurations as needed.³

1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT

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

California Public Resources Code (PRC) Section 21080(a) states that analysis of a project's environmental impact is required for any "discretionary projects proposed to be carried out or approved by public agencies..." In this case, LAUSD has determined that an initial study is required to determine whether there is substantial



² Based on LAUSD Facilities Services Division, Board of Education Report, Update to the School Upgrade Program to Integrate Measure RR Funding and Priorities, August 24, 2021.

³ LAUSD. LAUSD Board of Education Resolution 2023-17, Board Report 281-22/23, Redefinition of the Fairfax High School Major Modernization Project. Los Angeles, CA: LAUSD, 2023.

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

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

evidence that construction and operation of the proposed Project would result in environmental impacts. An initial study is a preliminary environmental analysis to determine whether an environmental impact report (EIR), a mitigated negative declaration (MND), or a negative declaration (ND) is required for a project.⁶

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

1.4 ENVIRONMENTAL PROCESS

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

- 1) An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100-65700.
- 2) An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.
- 3) An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies. (California Code of Regulations [CCR] § 15378[a])

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

1.5 INITIAL STUDY

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

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

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

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

Initial Study have determined that an ND is the appropriate level of environmental documentation for this Project.

1.5.1 Negative Declaration

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

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

1.5.2 Tiering

This type of project is one of many that were analyzed in the District's SUP SPEIR that was certified by the Board on December 23, 2023.⁹ The District's SUP SPEIR meets the criteria for a Program EIR under CEQA Guidelines Section 15168 (a)(4) as one "prepared on a series of actions that can be characterized as one large project and are related...[a]s individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

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

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



⁹ LAUSD. Subsequent Program EIR for the School Upgrade Program Report. https://www.lausd.org/ceqa.

¹⁰ LAUSD. Subsequent Program EIR for the School Upgrade Program Report. https://www.lausd.org/ceqa.

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

¹² Ibid, at 4-8.

¹³ Ibid, at 1-7.

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

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

The proposed Project is considered a site-specific project under the SPEIR; therefore, this ND is tiered from the SUP SPEIR. The SPEIR is available for review online at <u>https://www.lausd.org/ceqa</u> and at LAUSD's Office of Environmental Health and Safety, 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017.

1.5.3 Project Plan and Building Design

The Project is subject to the California Department of Education (CDE) design and siting requirements, and the school architectural designs are subject to review and approval by the California Division of the State Architect (DSA). The proposed Project, along with all other SUP-related projects, is required to comply with specific design standards and sustainable building practices. Certain standards assist in reducing environmental impacts, such as the California Green Building Code (CALGreen Code)¹⁴, LAUSD Standard Conditions of Approval (SC), and the Collaborative for High-Performance Schools (CHPS) criteria.¹⁵

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

Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects. Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects (SCs) were adopted by the BOE on December 12, 2023.¹⁶. SCs are environmental standards that are applied to District construction, upgrade, and improvement projects during the environmental review process by the OEHS California Environmental Quality Act (CEQA) team to offset potential environmental impacts. The most

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

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

¹⁶ LAUSD. Los Angeles Unified School District Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects. https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/135/ceqa/2023_Standard_Conditions_UPDATE_Final.pdf.

recently adopted SCs were updated in order to incorporate and reflect recent changes in the laws, regulations and the District's standard policies, practices and specifications (e.g., the Design Guidelines and Design Standards, which are routinely updated and are referenced throughout the Standard Conditions).

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

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

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

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

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



The specific CHPS prerequisite criteria and LAUSD SCs are identified in the tables under each CEQA topic.¹⁷ Federal, State, regional, and local laws, regulations, plans, and guidelines; CHPS criteria; PDFs; and SCs are considered part of the Project and are included in the environmental analysis.

1.6 IMPACT TERMINOLOGY

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

- A finding of *no impact* is appropriate if the analysis concludes that the Project would not affect the particular topic area in any way.
- An impact is considered *less than significant* if the analysis concludes that it would cause no substantial adverse change to the environment and requires no mitigation.
- An impact is considered *less than significant with mitigation incorporated* if the analysis concludes that it would cause no substantial adverse change to the environment with the inclusion of environmental commitments or other enforceable mitigation measures.
- An impact is considered *potentially significant* if the analysis concludes that it could have a substantial adverse effect on the environment. If any impact is identified as potentially significant, an EIR is required.

1.7 ORGANIZATION OF THE INITIAL STUDY

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

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

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

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

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

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

¹⁷ CHPS criteria are summarized. The full requirement can be found at <u>http://www.chps.net/dev/Drupal/California</u>.

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

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2.1 PROJECT LOCATION

The approximately 23.63-acre school site is located at 7850 Melrose Avenue (Assessor Parcel Number [APN] 5527-021-900] in the Fairfax District of the Hollywood Community Plan Area, City of Los Angeles, Los Angeles County. Regional access to the site is provided by Melrose Avenue and North Fairfax Avenue (see **Figure 1: Regional Location Map**).

The Project Site is bounded by Melrose Avenue to the north, North Genesee Avenue to the east, Rosewood Avenue to the south, and North Fairfax Avenue to the west. Regionally, the Project Site is approximately 0.64 miles from Santa Monica Boulevard (State Route 2) to the north, approximately 3.5 miles from US-101 to the east, and approximately 3.27 miles from Interstate 10 (I-10) to the south.

2.2 SURROUNDING LAND USES

Land uses surrounding the Project Site include single and multifamily residential, mixed-use commercial, commercial, and other institutional uses. Commercial uses are located to the north and west along Melrose Avenue and Fairfax Avenue, respectively. Walt Whitman Continuation High School is located on the southern edge of the campus along Rosewood Avenue. Residential uses including single family homes, duplexes, and apartment complexes are located to the east and south across Genesee Avenue and Rosewood Avenue (See **Figure 2: Surrounding Land Uses**). The Farmer's Market and the Grove LA, a large commercial shopping center, are located approximately 0.5 miles south of the Project Site. There is a gas station (76) north of the Project Site at the intersection of Melrose Avenue and Fairfax Avenue. The Melrose Trading Post is an arts-based marketplace that operates from the northern portion of the Project Site every Sunday. The market funds the Greenway Arts Alliance's arts education programming and provides employment and leadership development opportunities for students at Fairfax High School.

2.3 SENSITIVE RECEPTORS

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

In addition to students, sensitive receptors on the Project Site include Walt Whitman Continuation High School, and sensitive receptors in close proximity to the Project Site include single-family residences, multi-family residences, the Kennedy Care Center nursing home, and the Fairfax Senior Citizen Center (See Figure 3: Location of Sensitive Receptors and Table 1: Sensitive Receptors).

No.	Name	Address	Туре	Location	Distance from project site (ft)
1	Single Family Residence	602 North Genesee Avenue Los Angeles, CA 90036	Residential	East of the Project Site across Genesee Avenue	420
2	Multi-family Residence	467 North Orange Grove Avenue Los Angeles, CA 90036	Residential	South of the Project Site across Rosewood Avenue	430
3	nVe at Fairfax Apartment Building	639 North Fairfax Avenue Los Angeles, CA 90036	Residential	West of the Project Site across Fairfax Avenue	85
4	Kennedy Care Center	619 North Fairfax Avenue Los Angeles, CA 90036	Nursing Home	West of the Project Site across Fairfax Avenue Boulevard	85
5	Single Family Residence	715 North Orange Grove Avenue Los Angeles, CA 90046	Residential	North of the Project Site across Melrose Avenue	225
6	Fairfax Senior Citizen Center	7929 Melrose Avenue Los Angeles, CA 90046	Senior Center	North of the Project Site across Melrose Avenue	265
7	Walt Whitman High School	7795 Rosewood Avenue, Los Angeles, CA 90036	School	South of Project Site on Rosewood Avenue	320

Table 1Sensitive Receptors

2.4 CAMPUS HISTORY

In 1923, the Los Angeles Board of Education allocated more than \$1 million to upgrade schools in Hollywood, with over \$600,000 set aside for the construction of Fairfax HS at the corner of North Fairfax Avenue and Melrose Avenue. The District purchased a 25-acre plot from G. Allen Hancock for the development of a school site and commissioned John and Donald B. Parkinson of Parkinson & Parkinson architecture firm to design the campus. Their plans featured an Auditorium Building as the centerpiece, along with auxiliary facilities such as gymnasiums, a cafeteria, and sports amenities. Construction was completed in 1924, triggering a wave of real estate development in the surrounding area.

Over the years, Fairfax HS underwent various expansions and renovations to meet the needs of its growing student population. Temporary structures, including one-room bungalows, were erected in 1929 and 1930 to accommodate the increasing number of students. Architect A.S. Nibecker Jr. designed a one-story incinerator and a Social Hall for the school in 1939. Students built the Social Hall, which was designed to replicate the historic hunting lodge known as Greenway Court. In the mid-1960s, seismic safety concerns prompted a comprehensive reassessment, leading to the hiring of Albert C. Martin and Associates to redesign the campus in 1966. The resulting redevelopment, executed between 1967 and 1969, introduced a complex of modern buildings and facilities. Subsequent decades saw incremental enhancements, including the revitalization of the Social Hall in 1996 and the construction of new classroom buildings in 2004 and amenities in 2011.

By the 1950s and 1960s, Fairfax HS served as a hub for the Jewish population of the Beverly-Fairfax area, offering Modern Hebrew classes and maintaining a strong academic reputation. However, demographic shifts in the late 1960s prompted discussions regarding school boundaries and racial demographics, leading to the establishment of integration policies by the Board of Education in 1968. Fairfax HS implemented the desegregation policy during the 1968-1969 school year. Despite efforts towards integration, challenges such as discrimination persisted, as evidenced by protests against discriminatory practices targeting African American students in the late 1980s.

2.5 EXISTING CONDITIONS

Fairfax HS is a rectangle-shaped campus on an approximately 23.63-acre parcel, consisting of twelve (12) permanent buildings, two (2) arcades, and three (3) courtyards, as well as athletic fields and open spaces (see **Table 2** and **Figure 4**). Most of the buildings are located in the north and central portions of the campus with sports fields occupying most of the southern portion. The Auditorium Building is the central feature of the northern portion of the campus, set back from Melrose Avenue by an arcade and courtyard. The Auditorium Building is flanked to the east and west by two more landscaped courtyards and beyond these by the Administration and Classroom Building and the Shop Building, both set back from Melrose Avenue by surface parking lots. Further south are the Utility Building; Ticket Booth; the Gymnasium Building; the Transformer (Stage/Utility) Building; and the Cafeteria Building and arcade. South of the Gymnasium Building are the Social Hall; the Stadium Grandstand and Restroom; and Classroom Buildings A and B. The southwest portion of the campus is occupied by the track and field, and a small surface parking lot; the southeast portion is occupied by a baseball diamond and tennis courts. Walt Whitman Continuation High School is also located on the southern edge of the Fairfax HS campus, with frontage on Rosewood Avenue.

Feature Name	Approx. Square Footage	Year Built	Number of Stories	Historic District Status	
Auditorium	42,556	1924	4	Contributor	
Shop Building	32,646	1969	1 & 2	Contributor	
Gymnasium	41,425	1969	1	Contributor	
Main Classroom and Admin Building	205,825	1968	4	Contributor	

Table 2 Existing Fairfax HS Campus

Feature Name	Approx. Square Footage	Year Built	Number of Stories	Historic District Status
Cafeteria	11,409	1968	1	Contributor
Classroom Buildings A & B	15,674	2004	2	Non-Contributor
Stadium Grandstand & R.R.	15,574	2011	1	Non-Contributor
Social Hall	4,738	1942	1	Contributor
Ticket Office	50	1969	1	Contributor
Utility Building	1,782	1969	1	Contributor
Transformer Building	800	1968	1	Contributor
Courtyard #1		1968	N/A	Contributor
Courtyard #2		1968	N/A	Contributor
Courtyard #3		1968	N/A	Contributor
Arcade #1		1968	N/A	Contributor
Arcade #2		1968	N/A	Contributor

Notes: All numbers are provided in square feet (sf). All new square footages are approximate and subject to change during final site and architectural planning and design phases. These square footage changes would not significantly change the environmental analysis or findings in this IS. Square footage totals may not add up exactly due to rounding and the way usable space is calculated. All numbers are based on the Fairfax HS Major Modernization Project – Design Criteria.

Fairfax HS currently serves approximately 1,632 students, with approximately 82 teachers and 6 supporting staffs as of 2022-2023.¹⁸ The programs at Fairfax HS include a 9-12 grade traditional high school program and two magnet schools: the Police Academy Magnet with approximately 250 students¹⁹ and the Visual Arts Magnet with approximately 405 students.²⁰ Feeder schools to Fairfax HS include Bancroft Middle School, Emerson Middle School, Le Conte Middle School, and John Burroughs Middle School.

The west parking lot along Fairfax Avenue is primarily used for sporting and public events. It remains locked during school hours. The north parking lots on Melrose Avenue are used for student parking. Student-drop off and pick-up occurs at the northwest parking lot. There are no other designated loading/unloading zones around Campus and parents drop-off and pick-up students at various locations surrounding the school. The large parking lot at the corner of Melrose and Fairfax Avenues is used by the Melrose Trading Post Flea Market on Sundays. The Flea Market also utilizes exterior spaces within the Campus, such as the north courtyard, and north parking lot. Currently 260 parking spaces exist on site, and the proposed Project would maintain approximately the same number of parking spaces.

Transit routes near the Campus are utilized by some Fairfax HS Campus students. The 217 Washington/Fairfax Transit Hub Bus runs north-south and stops adjacent to the west of Campus at the intersection of Fairfax



¹⁸ LAUSD. "Fairfax High School." State Accountability Report Card. Accessed April 2024. http://search.lausd.net/cgibin/fccgi.exe?w3exec=sarc20222023&which=8621.

¹⁹ Fairfax High School. *Police Academy Magnet Recruitment Presentation*. Accessed April 2024. 2023-2024 https://www.fairfaxhs.org/m/pages/index.jsp?uREC_ID=420386&type=d

²⁰ Fairfax High School. Visual Arts Magnet Recruitment Presentation. Accessed April 2024. 2023-2024 https://www.fairfaxhs.org/m/pages/index.jsp?uREC_ID=344697&type=d.

Avenue and Melrose Avenue and the intersection of Fairfax Avenue and Rosewood Avenue.²¹ The 4 Metro Bus runs east-west and stops approximately 0.2 miles north of Campus at the intersection of Fairfax Avenue and Santa Monica Boulevard.²² Sidewalks exist on both sides of Melrose Avenue, North Genesee Avenue, Rosewood Avenue, and Fairfax Avenue within the school zone. Crosswalks exist at the intersections of Melrose Avenue and North Genesee Avenue, Melrose Avenue and Ogden Drive, and Melrose Avenue and Fairfax Avenue and Clinton Street to the west of Campus; and Fairfax Avenue and Rosewood Avenue to the south of Campus.

Regular school hours at Fairfax HS start at 8:30 a.m. and end at 3:36 p.m.²³

2.6 GENERAL PLAN AND EXISTING ZONING

The Project Site is designated by the City General Plan and the Hollywood Community Plan as "Public Facilities" or PF-1XL.²⁴ Public Facilities is the designation for the use and development of publicly owned land in order to implement the City's adopted General Plan. The existing use of the land falls under public elementary and secondary schools, which is allowed by the Public Facilities zoning designation, and would not change under the proposed Project. The Height District is 1XL.

The California legislature has granted school districts the power to exempt school property from local zoning requirements, provided the school district complies with the terms of Government Code Section 53094. On February 19, 2019, pursuant to Government Code Section 53094, the LAUSD Board of Education adopted a Resolution rendering all LAUSD school sites, including Fairfax HS, exempt from local land use regulations (*Board of Education Report No. 256-18-/19*).²⁵

2.7 NECESSARY APPROVALS

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

2.7.1 Responsible Agencies

A "Responsible Agency" is defined as a public agency other than the lead agency that has discretionary approval power over a project (CEQA Guidelines §15381). The Responsible Agencies, and their corresponding approvals, for individual projects to be implemented as part of the SUP may include the following:

California Department of General Services, Division of State Architect. Approval of site-specific construction drawings.

²¹ LA Metro System Maps. "Central LA/Westside Bus and Rail Service." Accessed April 2024. https://www.dropbox.com/scl/fi/h0bs78wkj6avfgoxg7vbc/24-0027 web MSwMap Cont AWastside 25:17 forel adOrlbart-behaferfab52bt7uagrikf4av8c

⁰⁹³⁷_web_MSysMap_CenLAWestside_35x17_final.pdf?rlkey=behnfmfsh53bti7uagxikf4pu&dl=0.

²² LA Metro System Maps. "Central LA/Westside Bus and Rail Service."

²³ Fairfax High School. "2023-2024 School Year, Fall Semester." *Bell Schedule*. Accessed April 2024.

https://www.fairfaxhs.org/m/bell_schedules/.

²⁴ LA City. "City Zone Information and Map Access System (ZIMAS)." Accessed April 2024. http://zimas.lacity.org/.

²⁵ LAUSD. "LAUSD Regular Meeting Stamped Order Of Business Report 256-18/19." *Board of Education Report.* February 19, 2019.

- Los Angeles Regional Water Quality Control Board. General Construction Activity Permit, including the Storm Water Pollution Prevention Plan.
- City of Los Angeles, Public Works Department. Permit for curb, gutter, and other offsite improvements.
- City of Los Angeles, Fire Department. Approval of plans for emergency access and emergency evacuation.
- City of Los Angeles, Department of Building & Safety. Approval of haul route.

2.7.2 Trustee Agencies

"Trustee Agencies" are state agencies that have jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California, including:

- California Department of Fish and Wildlife
- State Lands Commission
- California Department of Parks and Recreation
- University of California

2.7.3 Reviewing Agencies

Potential Reviewing Agencies for individual projects to be implemented under the SUP may include the following:

STATE

- California Office of Historic Preservation
- California Department of Transportation
- California Resources Agency

REGIONAL

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

LOCAL

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

- California Department of Conservation
- Native American Heritage Commission
- California Highway Patrol



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

Pursuant to Assembly Bill 52 (AB 52), LAUSD notified the Native American tribes/tribal representatives that are traditionally and culturally affiliated with the Project area. The LAUSD Office of Health and Safety sent Project notification to the Barbareño/Ventureño Band of Mission Indians, Chumash Council of Bakersfield, Coastal Band of the Chumash Nation, Fernandeno Tataviam Band of Mission Indians, Gabrieleño Band of Mission Indians - Kizh Nation, Gabrieleño/Tongva San Gabriel Band of Mission Indians, Gabrielino /Tongva Nation, Gabrielino Tongva Indians of California Tribal Council, Gabrielino-Tongva Tribe, Northern Chumash Tribal Council, San Fernando Band of Mission Indians, Santa Rosa Band of Cahuilla Indians, Santa Ynez Band of Chumash Indians, and the Soboba Band of Luiseno Indians. No requests for AB 52 consultation were received by these tribal organizations. No Native American tribes have requested consultation with LAUSD, pursuant to Public Resources Code Section 21080.3.1.

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

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SOURCE: Google Earth - 2024

FIGURE 1



Regional Location Map

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SOURCE: City of Los Angeles Department of City Planning, 2024

FIGURE 2



Surrounding Land Use

176-001-18

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SOURCE: Google Earth - 2024



Location of Sensitive Receptors

FIGURE 3

176-001-18

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FIGURE 4

Existing Site Plan

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3. Project Description

3.1 BACKGROUND

The school has been identified under the SUP as one of the schools most in need of critical upgrades and improvements. The goal of the SUP is to improve student health, safety, and education through the modernization of school facilities. The core principles of major modernization project scoping are as follows:

- Buildings meeting Assembly Bill 300 criteria for seismic evaluation may be addressed, to the extent feasible, with a focus on those determined to have a high seismic vulnerability, through retrofit, removal, or seismic modernization, which will be determined based on an assessment of the seismic vulnerability of the building(s), the historic context of the building/site, actual or potential impact to the learning environment, site layout, and the approach that best ensures compliance with DSA requirements.
- 2. The buildings, grounds and site infrastructure that have significant/severe physical conditions that already do or are highly likely in the near future to pose a health and safety risk, or negatively impact a school's ability to deliver the instructional program and/or operate may be addressed by repair or replacement.
- 3. The District's reliance on relocatable buildings, especially for K-12 instruction, should be reduced.
- 4. Necessary and prioritized upgrades will be made throughout priority school sites in order to comply with the program accessibility requirements of the ADA Title II Regulations, and the District's Self Evaluation and Transition Plan under Title II of the ADA.
- 5. The exterior conditions of the school site will be enhanced including landscape and hardscape improvements around new buildings and/or areas impacted by construction and the painting of building exteriors throughout the school site.
- 6. Outdoor learning environments will be developed where the site layout and project planning provide the opportunity.

3.2 PROPOSED PROJECT

The proposed Project involves building replacement, renovation, modernization, and reconfiguration on the Fairfax HS campus as part of the SUP. The scope consists of the modernization of a portion of the approximately 23.63 acres of the Fairfax HS campus in an effort to provide facilities that are safe, secure, and aligned with the instructional program. The Project is designed to address the most critical physical concerns of the building and grounds at the Campus while providing renovations, modernizations, and reconfigurations. Specifically, the proposed Project includes demolition of the existing Shop Building, Gymnasium, Utility Building, Ticket Office, and Relocatable Sanitary Building (See Figure 5: Site Demolition Diagram), and the construction of a new gymnasium, specialty classrooms, outdoor physical education courts, maintenance and

3. Project Description

operations facilities, and an Art Gallery Building (See Figure 6: Proposed Project Site Plan). The proposed Project also includes exterior painting of existing buildings, various landscape and hardscape improvements (See Figure 7: Site Landscape Diagram), and other accessibility upgrades as required.

3.2.1 Campus Improvements

The proposed Project would include the changes to the Campus Buildings identified in **Table 3: Proposed Project (Demolition, Remodel, and Construction)** and **Figure 6: Proposed Project Site Plan**.

Demolition and Removal

The proposed Project includes the demolition and removal of the Shop Building, Gymnasium, Utility Building, Ticket Office, and Relocatable Sanitary Building, including foundations and below-grade and above-grade utility infrastructure associated with these buildings and structures (See **Figure 5: Site Demolition Diagram**). Interim facilities would be provided, as required.

Unused utilities would be capped and abandoned-in-place if they do not conflict with any interim or permanent construction within the Development Zone. All existing site easements would be maintained, and HVAC services, wet/dry utilities, communication services, connectivity services, fire alarms, public address/intercom systems, and intrusion detection systems in active areas of campus would be maintained during demolition and construction.

New Construction

The proposed Project includes the construction of a new gymnasium, specialty classrooms, outdoor physical education courts, maintenance and operations facilities, and an Art Gallery Building. The new gymnasium building would house team rooms and locker rooms, as well as a public entrance and lobby providing access to the building from the west parking area along Fairfax Avenue. The five new classrooms will host Ceramics, Drama, Instrumental Music, Sports Medicine, and Dance classes. These programs may be incorporated into the Gymnasium building or be housed in a separate wing or adjacent building. The outdoor physical education courts would be comprised of approximately six (5) basketball/volleyball courts, adjacent areas with trees and seating, and P.E. equipment storage facilities. The proposed Project would include the construction of new maintenance and operation facilities, which would be located close to the loading area, trash area, and the school's service entrance. Additionally, the proposed Project would include the construction of an approximately 2,940 square foot art gallery building, with 1,600 square feet intended for use as gallery space.

Building Upgrades

The proposed Project also includes exterior painting of all remaining buildings to provide a uniform appearance; associated landscape, hardscape, parking improvements, and related infrastructure upgrades including, but not limited to, sanitary sewer, water, storm water, and electrical utilities, and; other improvements to ensure compliance with local, state, and federal requirements.
3. Project Description

Specifically, the proposed Project would include the changes to the Campus Buildings shown in Table 3: Proposed Project Demolition, Remodel and New Construction, and Figure 6: Proposed Project Site Plan.

Proposed Project (Demontion, Remodel, and Construction)				
Bldg. No.	Building	Demolition	New Construction	Existing to Remain
1	Auditorium			42,556
2	Shop Building	32,646		
3	Gymnasium	41,425		
4	Main Classroom and Admin Building			205,825
5	Relocatable Classrooms			1,792
6	Cafeteria			11,409
7	Metal Building			2,209
8	400 Classroom Building			15,674
9	Stadium Grandstand & R.R.			15,574
10	Storage Garage			806
11	Social Hall			4,738
12	Ticket Office	50		
13	Relocatable Sanitary Building	479		
14	Utility Building	1,782		
15	Transformer Building			800
16	Flammable Storage			66
17	Visitor Bleachers			1,625
	·	New Building Cons	truction	
	New Classrooms (5)		14,486	
	Support Facilities		2,636	
	New Gymnasium		49,281	
	New Maintenance and Operations Facility		3,031	

Table 3Proposed Project (Demolition, Remodel, and Construction)

3. Project Description

.....

Table 3				
Proposed Project (Demolition, Remodel, and Construction)				
D '1 1'			Exis	

Bidg. No.	Building	Demolition	New Construction	Remain	
	New Art Gallery Building		2,940		
	Campus Total* (does not include outdoor space)	76,382	72,374	303,074	
Note: All symptoms are in square foot. All new square footages are approximate and subject to change during foot site and					

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

* Square footage totals may not add up exactly due to rounding and the way usable space is calculated. All numbers are based on LAUSD Fairfax HS Major Modernization Project – Space Program. January 24, 2024.

Current total square footage = Existing + Remodel + Demolition (382,566). After Project square footage = Existing + Remodel + New (375,551). Decrease in campus square footage = 7,015 sq ft

3.2.2 Site Access, Circulation, and Parking

The proposed Project does not include any changes to pedestrian circulation, traffic circulation and parking, or student drop-off and pick-up areas. The proposed Project would maintain a fully functional campus during each construction phase which includes efficient and safe circulation throughout the campus for students and staff (including directional signage). The Melrose Trading Post flea market would continue to operate each Sunday throughout construction. Currently 260 parking spaces exist on site, and the proposed Project would maintain approximately the same number of parking spaces.

As shown in **Figure 8: Tree Location Diagram**, within the Development Zone there are approximately 106 trees. No protected trees are found in the Development Zone, and it is not anticipated that the proposed Project would result in any impacts to protected trees (see **Appendix B: Arborist Report**).

3.2.3 Landscaping

The proposed Project will include removal and replacement of existing landscaping and hardscape areas within the footprint of the campus. All landscaping and irrigation systems would comply with LAUSD School Design Guidelines and CHPS criteria would be implemented where appropriate. Plant material would comply with the LAUSD approved plant list and plantings would be placed in order to improve the oil quality and water holding capacity. New canopy and accent trees would be installed to increase canopy coverage and provide shade while complimenting the aesthetics of hardscape areas throughout the Campus.

A tree survey was conducted for the Project Site by Carlberg Associates in September 2022 (see **Appendix B**: **Arborist Report**). The survey inventoried 370 existing trees on Campus. As shown in **Figure 8**: **Tree Location Diagram**, within the Development Zone there are approximately 106 trees. No protected trees are found in the Development Zone, and it is not anticipated that the proposed Project would result in any impacts to protected trees. While as many existing trees will be preserved as possible, it is probable that some will need to

Project Description

be removed to accommodate implementation of the proposed Project. Any required tree removal activities would follow the procedure outlined in the LAUSD Tree Trimming and Removal Procedure.²⁶ If impacts to a protected tree are unavoidable and removal of the tree is necessary, a minimum 4:1 replacement ratio would be required.

As shown in Figure 7: Site Landscape Diagram, the proposed landscape plan includes six (6) new areas for outdoor learning and gathering spaces for students set in or surrounded by planted areas and trees, with amenities such as integrated seating, power, lighting, and data connectivity. Outdoor Area #1 would provide an outdoor performance breakout space for the Performing Arts programs. Outdoor Area #2 would provide an outdoor zone with programmatic spill out onto the campus with integrated site seating and a connection between Detter's Courtyard and the proposed new building. Outdoor Area #3 would provide a Habitat Plant Area offering a hands-on learning lab experience where students may experience native or pollinator plant environments. Outdoor Area #4 would be a multi-use outdoor environment that is primarily open lawn meant to be a place where students can sit on the grass informally as a hang-out space any time between activities and classes. Outdoor Area #5 would serve as a transitional space between the athletic courts and the west parking lot, and a walkway to the football field from the Gymnasium. Outdoor Area #6 would provide a green wall of plants and trees to screen the back of the bleachers, including site furniture for students to gather. The three (3) existing courtyards are to be protected in place, with improvements such as updated irrigation and landscaping.

3.2.4 Construction Phasing and Equipment

Construction is planned to start in the third quarter (Q3) 2026 and be completed by the fourth quarter (Q4) 2029 (approximately 42 months). Table 4: Construction Schedule and Equipment summarizes the proposed construction activities and schedule for implementation of the proposed Project.

Table 4

Construction Schedule and Equipment			
Phase	Schedule	Equipment	Number
Demolition of	July 2026 to	Concrete Industrial Saw	1
Existing Structures in	September 2026	Graders	1
Phase 1 area		Rubber Tired Dozer	2
		Tractors/Loaders/Backhoes	4
Preparation of	September 2026 to	Cranes	1
Phase 1 area	October 2026	Forklifts	1
		Generator Sets	1
		Tractors/Loaders/Backhoes	2
	October 2026 to	Cement and Mortar Mixers	2
	April 2029	Forklifts	2

LAUSD. "Tree Trimming and Removal Procedure." https://www.lausd.org/ceqa.

3. Project Description

Phase	Schedule	Equipment	Number
Construction of		Generator Sets	2
New Structures in Phase 1 area		Pavers	1
Thase Talea		Tractors/Loaders/Backhoes	2
Paving of asphalt	April 2029 to May	Cement and Mortar Mixers	1
surfaces of Phase	2029	Concrete/Industrial Saws	1
1 alca		Forklifts	1
		Generator Sets	1
		Graders	1
		Pavers	1
		Rubber Tired Dozers	2
		Tractors/Loaders/Backhoes	3
Interior Building Work and Application of	May 2029 to July 2029	Air Compressors	1
Architectural Coatings in Phase 1 area		Generator Sets	1
Demolition of	July to October 2029	Concrete Industrial Saw	1
Existing Structures in		Graders	1
Phase 2 area		Rubber Tired Dozer	2
		Tractors/Loaders/Backhoes	4
Preparation of	October 2029 to	Cranes	1
Phase 2 area	October 2029	Forklifts	1
		Generator Sets	1
		Tractors/Loaders/Backhoes	2
Paving of asphalt	October 2029 to	Cement and Mortar Mixers	1
surfaces of Phase 2	November 2029	Concrete/Industrial Saws	1
arca		Forklifts	1
		Generator Sets	1
		Graders	1
		Pavers	1
		Rubber Tired Dozers	2
		Tractors/Loaders/Backhoes	3

Table 4Construction Schedule and Equipment



Moridion

Consultants

FIGURE 5

Site Demolition Diagram

3. Project Description

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 FIGURE 6

Proposed Project Site Plan

3. Project Description

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SOURCE: FAIRFAX HIGH SCHOOL MAJOR MODERNIZATION PROJECT - 2024



FIGURE 7

Site Landscape Diagram

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3. Project Description

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SOURCE: FAIRFAX HIGH SCHOOL MAJOR MODERNIZATION PROJECT - 2024



FIGURE 8

Tree Location Diagram

3. Project Description

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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

On the basis of this initial evaluation:

I find that the proposed Project could not have a signific DECLARATION will be prepared.	cant effect on the environment, and a NEGATIVE		
I find that although the proposed Project could have a signific effect in this case because revisions on the Project have b MITIGATED NEGATIVE DECLARATION will be prepare	ant effect on the environment, there will not be a significant been made by or agreed to by the Project proponent. A d.		
I find the proposed Project MAY have a significant effect on REPORT is required.	the environment, and an ENVIRONMENTAL IMPACT		
I find that the proposed Project MAY have a "potentially si impact on the environment, but at least one effect 1) has l applicable legal standards, and 2) has been addressed by mitigat sheets. An ENVIRONMENTAL IMPACT REPORT is req addressed.	ignificant impact" or "potentially significant unless mitigated" been adequately analyzed in an earlier document pursuant to cion measures based on earlier analysis as described on attached uired, but it must analyze only the effects that remain to be		
I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.			
Chr	4/25/2025		
Signature	Date		
Carlos A. Torres	CEQA Officer for LAUSD		
Printed Name	Title		

EVALUATION OF ENVIRONMENTAL IMPACTS:

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



ENVIRONMENTAL IMPACT

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS		1		
Except as provided in Public Resources Code section 21099 (where a	aesthetic i	impacts shal	l not be co	onsidered
significant for qualifying residential, mixed-use residential, and employ	yment cei	nters), would	l the proje	ct:
a. Have a substantial adverse effect on a scenic vista?			\boxtimes	
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			\boxtimes	

Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact aesthetic and visual resources. Projects implemented under the SUP were identified as having less-than-significant impacts to scenic vistas, scenic resources within designated scenic highways, existing visual character, and day or nighttime views in the LAUSD region. LAUSD has SCs for minimizing impacts to aesthetic resources. Applicable SCs related to aesthetic resource impacts associated with the proposed Project are provided below:

LAUSD Sta	andard Conditions of Approval			
SC-AE-1	E-1 LAUSD shall review all designs to ensure that demolition of existing buildings or construction of new buildings its historic campuses are designed to ensure compatibility with the existing campus. The School Design Guide she be used as a reference to guide the design.			
	School Design Guide ²⁷			
	This document outlines measures for re-use rather than destruction of historical resources. It requires the consideration of architectural appearance/consistency and other aesthetic factors during the preliminary design review for a proposed school upgrade project. Architectural quality must consider compatibility with the surrounding community.			
SC-AE-2	LAUSD shall review all designs to ensure that methods from the current School Design Guide are incorporated throughout the planning, design, construction, and operation of the Project in order to limit aesthetic impacts.			

²⁷ The School Design Guide establishes a consistent level of functionality, quality and maintainability for all District school facilities. The document has design guidelines and criteria for the planning, design and technical development of new schools, modernizations, and building expansion projects; it includes by reference the Facilities Space Program, the Educational Specifications, the Guide Specifications, the Standard Technical Drawings of the District, and applicable codes, regulations and industry standards.

LAUSD Sta	andard Conditions of Approval				
	School Design Guide				
	This document outlines measures to reduce aesthetic impacts around schools, such as shrubs and ground treatments that deter taggers, vandal-resistant and graffiti-resistant materials, painting, etc.				
SC-AE-3	LAUSD shall assess the proposed project's consistency with the general character of the surrounding neighborhood, including, but not limited to, any proposed changes to the density, height, bulk, and setback of new buildings (including stadiums), additions, or renovations. Where feasible, LAUSD shall make appropriate design changes to reduce or eliminate viewshed obstruction and degradation of neighborhood character. Such design changes may include, but are not limited to, changes to the campus layout, height of buildings, landscaping, and/or the architectural style of buildings.				
SC-AE-4	LAUSD shall review all designs to ensure that the installation of a school marquee complies with Marquee Signs Bulletin BUL 5004.1.				
	Marquee Signs Bulletin BUL-5004.1				
	This policy provides guidance for the procurement and installation of marquee signs (outdoor sign with electronic message display) on District campuses. The policy includes requirements for the design, approval, placement, operation, and maintenance of electronic school marquees erected and operated at schools. The policy also includes measures to mitigate light and glare, such as the use of "luminaries" in connection with school construction.				
SC-AE 5	LAUSD shall review all designs and test new lights following installation to ensure that adverse light trespass and glare impacts are avoided.				
	School Design Guide				
	This document outlines Illumination Criteria, requirements for outdoor lighting and measures to minimize and eliminate glare that may impact pedestrians, drivers and sports teams, and to avoid light trespass onto adjacent properties.				
SC-AE 6	The International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used as a guide for environmentally responsible outdoor lighting. The MLO has outdoor lighting standards that reduce glare, light trespass, and skyglow. The MLO uses lighting zones (LZ) 0 to 4, which allow the District to vary the lighting restrictions according to the sensitivity of the community. The MLO also incorporates the Backlight-Uplight-Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. The MLO establishes standards to:				
	• Limit the amount of light that can be used.				
	• Minimize glare by controlling the amount of light that tends to create glare.				
	Minimize sky glow by controlling the amount of uplight.				
	Minimize the amount of off-site impacts or light trespass				

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

Less Than Significant Impact. Vistas provide visual access or panoramic views to a large geographic area. The field of view from a vista location can be wide and extend into the distance.²⁸ Panoramic views are usually associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, the ocean, or other water bodies.²⁹

The Project Site and surrounding area are flat and developed with urban land uses. Views from the Project Site are limited to commercial buildings located along Melrose Avenue and Fairfax Avenue and the residences to



²⁸ LA City Planning. "Chapter A." L.A. CEQA Thresholds Guide. 2006. Accessed April 2024. https://planning.lacity.gov/eir/CrossroadsHwd/deir/files/references/A07.pdf.

²⁹ LA City Planning. "Chapter A." L.A. CEQA Thresholds Guide. 2006.

the east and south of Campus. The proposed Project would replace the existing Shop Building, Gymnasium, Utility Building, Ticket Office, and Relocatable Sanitary Building in the southwestern portion of the Project Site with a new gymnasium, specialty classrooms, outdoor physical education courts, maintenance and operations facilities, and an Art Gallery Building. The construction of these new buildings would not obscure these existing views. Additionally, the SPEIR states that all impacts to scenic vistas with respect to all SUP projects would be less than significant, as the District is required to incorporate the LAUSD School Design Guide and **SC-AE-3** into the site-specific design and construction for the protection of unique scenic features and designated scenic vistas. For these reasons, impacts to scenic vistas would be less than significant. No mitigation or further analysis is required.

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

No Impact. The nearest designated State scenic highway to the Project Site is a portion of State Route (SR) 1, also known as the Pacific Coast Highway, located approximately 9.1 miles southwest of the Project Site.³⁰ The proposed new buildings, outdoor physical education courts and associated site improvements structures would not be visible from any designated State scenic highway. For these reasons, development of the proposed Project would not result in impacts to scenic resources within a designated State scenic highway, and no impact to scenic resources would occur. No mitigation or further analysis is required.

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

Less Than Significant Impact. Visual quality is a measure of the overall impression or appeal of an area as determined by the particular landscape's characteristics and scenic resources. It is possible for new structures to be compatible with the existing setting if they replicate existing forms, lines, colors, and textures of the surrounding environment and if the new structures do not appreciably change the balance of natural elements.

The Project Site is located in an urbanized area and would not conflict with any zoning and other regulations governing scenic quality. The Project Site and surrounding area are flat and developed with urban land uses. The Campus is comprised of one- to four-story Spanish Colonial Revival, American Colonial Revival, Late Modern, and Utilitarian buildings as well as outdoor courtyards and arcades. The proposed Project includes construction of a new gymnasium, specialty classrooms, outdoor physical education courts, maintenance and operations facilities, and an Art Gallery Building which would be designed to complement the character of the existing Campus and surrounding area.

LAUSD would implement **SC-AE-1** and **SC-AE-2** to ensure that methods outlined in the current School Design Guide are incorporated throughout the planning, design, construction, and operation of the Project with consideration given to architectural appearance, consistency, and other aesthetic factors in relation to the campus and surrounding community. Additionally, the SPEIR states that compliance with **SC-AE-3** would minimize the likelihood of degraded visual character or quality through appropriate design changes and

³⁰ Caltrans. "California State Scenic Highway System Map." Accessed April 2024.

https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa.

elimination of significant adverse aesthetic impacts from building or site design. LAUSD would also implement **SC-AE-5** to ensure that shade and shadow impacts are analyzed and mitigated through a shadow analysis.³¹ School upgrade/modernization projects, such as the proposed Project, may enhance the view amenities and aesthetic properties of a given neighborhood, especially where structures do not meet building codes and/or are dilapidated.³²

For these reasons, impacts to the visual character or quality of the Project Site and its surroundings would be less than significant. No mitigation or further analysis is required.

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

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

The Project Site is in an urban setting and is fully developed. The current uses generate nighttime light from security and parking lot lights, exterior building lights, and portable lights that are occasionally brought on Campus to light evening athletic events. Surrounding land uses also generate significant light from street lights, vehicle lights, parking lot lights, and exterior building security lights.

Exterior lighting would be incorporated in all newly constructed building areas and spaces. This exterior lighting includes egress lighting and site lighting, including sports lighting on the proposed outdoor physical education courts, in accordance with existing applicable regulations and guidelines for school operations. Specifically, the proposed outdoor areas including the outdoor physical education courts, performance breakout area, habitat plant area, and meadow area would incorporate new sources of exterior lighting. Design of the proposed Project would not introduce lights at substantially greater intensities than existing lights on and near the site. Nighttime illumination would be designed, arranged, directed, or shielded in accordance with existing applicable regulations and guidelines for school operations to ensure the proposed Project would have no impact on nighttime views.

LAUSD would implement **SC-AE-4**, **SC-AE-5**, and **SC-AE-6** to ensure adverse light trespass and glare impacts are avoided and ensure environmentally responsible outdoor lighting in adherence with the Model Lighting Ordinance outdoor lighting standards that reduce glare, light trespass, and skyglow. Methods such as the use of light hoods, filtering louvers, glare shields, and/or landscaping as well as painting lamp enclosures and poles to reduce reflection should be implemented to prevent excessive light and glare.³³ The SPEIR states that light and glare impacts would be less than significant with implementation of the required measures from the LAUSD School Design Guide and **SC-AE-4** through **SC-AE-6** to ensure that site lighting would have minimal off-site impacts.³⁴



³¹ LAUSD. School Upgrade Program EIR. Accessed April 2024. https://files.ceqanet.opr.ca.gov/284141-

^{2/}attachment/0 CRpktr1bFw7EGk4wzmRRM-8GGQv8GBEtSfSTad2rMJBck4k2dV1arXvtBmbvtcwK3qbd7l1HeDDJdyz0.

³² LAUSD. School Upgrade Program EIR.

³³ LAUSD. School Upgrade Program EIR.

³⁴ LAUSD. School Upgrade Program EIR.

The proposed Project would not introduce lights at substantially greater intensities than existing lights on and near the site, and the proposed Project would have no impact on nighttime views. With implementation of the required measures from the LAUSD School Design Guide and **SC-AE-4** through **SC-AE-6**, light and glare impacts would be less than significant. No mitigation or further analysis is required.

Impact Impact Impact Impact	Potentially Less Than Less Than No Significant Significant Significant Impac
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II. AGRICULTURE AND FORESTRY RESOURCES

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

a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?		
b.	Conflict with existing zoning for agricultural use or a Williamson Act contract?		\square
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526) or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?		
d.	Result in the loss of forest land or conversion of forest land to non-forest use?		\boxtimes
e.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?		\boxtimes

Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact agriculture and forestry resources. Projects implemented under the SUP were identified as having less-than-significant impacts to forest and farmland and would not conflict with the existing zoning of the LAUSD region. There are no Agriculture and Forestry Resources LAUSD SCs that apply to this Project.

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

No Impact. The proposed Project is located within a developed and highly urbanized area. According to the California Department of Conservation's "Los Angeles County Important Farmland 2018" map, the Project

Site is not designated as farmland but is identified as "Urban and Built-Up Land."³⁵ No farmland or agricultural activities exist on or near the Project Site. The Project Site is not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. As such, no impacts to farmland or agricultural resources would occur. No mitigation or further analysis is required.

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

No Impact. The Project Site is zoned PF-1XL and is designated a Public Facilities area in the Hollywood Community Plan.³⁶ The Public Facilities land use designation allows public elementary and secondary schools. The Project Site is not zoned for agricultural production and is not classified as farmland. As stated in threshold (a), the Project Site is identifies as "Urban and Built-Up Land" on the State Department of Conservation Los Angeles County Important Farmland 2018 No Williamson Act contracts are in effect for the Project Site.³⁷ Therefore, no impacts to land zoned for agricultural use or subject to a Williamson Act would occur. No mitigation or further analysis is required.

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

No Impact. As previously discussed, the Project Site is zoned PF-1XL and is designated a Public Facilities area in the Hollywood Community Plan. The Project Site is not zoned as forestland or timberland, and there is no timberland production at the Project Site. As such, no impacts would occur. No mitigation or further analysis is required.

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

No Impact. As previously discussed, the Project Site is zoned PF-1XL and is designated Public Facilities in the Hollywood Community Plan. The Project site is not zoned as forestland and would not convert forest land to non-forest use. The closest forestland to the Project Site is the Angeles National Forest, approximately 23 miles north of the Project Site.³⁸ Therefore, no impacts resulting in the loss of forestland or conversion of forest land to non-forest use would occur. No mitigation or further analysis is required.

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

No Impact. Existing land uses surrounding the Project Site are composed of single and multifamily residential, mixed-use commercial, and other commercial uses (see **Figure 2: Surrounding Land Use**). No agricultural or forest uses exist on or near the Project Site. Additionally, the Project Site is not classified as farmland and is designated as "Urban and Built-Up Land." Therefore, the proposed Project would not involve other changes

³⁵ California Department of Conservation Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Accessed April 2024. https://maps.conservation.ca.gov/DLRP/CIFF/.

³⁶ LA City. "City Zone Information and Map Access System (ZIMAS)." Accessed April 2024. http://zimas.lacity.org/.

³⁷ California Department of Conservation. "California Williamson Act Enrollment Finder." Accessed April 2024. https://maps.conservation.ca.gov/dlrp/WilliamsonAct/.

³⁸ U.S. Department of Agriculture. "Forest Service, National Overview." Accessed April 2024. https://www.fs.usda.gov/visit/maps.

in the existing environment that could result in the conversion of farmland to non-agricultural use or the conversion of forest land to non-forest use. No impacts would occur. No mitigation or further analysis is required.



	Potentially Significant Impact	Less Than Significant with Mitigation Incorborated	Less Than Significant Impact	No Impact
III. AIR QUALITY Where available, the significance criteria established by the applicabl control district may be relied upon to make the following determinat	le air quali ions.	ty managem	ent or air	pollution
Are significance criteria established by the applicable air district available to rely on for significance determinations?		Xes Yes		No No
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?			\boxtimes	
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			\boxtimes	
c. Expose sensitive receptors to substantial pollutant concentrations?			\square	
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				

Explanation:

An Air Quality Study has been completed for the proposed Project and is included in **Appendix A: Air Quality Study**.

The SPEIR evaluated the potential for implementation of SUP-related projects to impact air quality. Projects implemented under the SUP were identified as having less-than-significant impacts on consistency with applicable air quality plans, exposing sensitive receptors to substantial pollutants concentrations, and creating objectionable odors in the LAUSD region; however, the SPEIR found potentially significant impacts relating to the generation of short-term emissions that would contribute to nonattainment designations. LAUSD has SCs for minimizing impacts to air quality emissions. Applicable SCs related to air quality impacts associated with the proposed Project are provided below:

	LAUSD Standard Conditions of Approval					
SC-AQ-2	Construction Contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.					
SC-AQ-3	Construction Contractor shall:					
	• Maintain speeds of 15 miles per hour (mph) or less with all vehicles.					
	• Load impacted soil directly into transportation trucks to minimize soil handling.					
	• Water/mist soil as it is being excavated and loaded onto the transportation trucks.					
	• Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site.					
	Minimize soil drop height into haul trucks or stockpiles during dumping.					

	LAUSD Standard Conditions of Approval					
	 During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks 					
	 Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed 					
	 Place stockpiled soil on polyethylene sheeting and cover with similar material 					
	 Place stockpiled soil in areas shielded from prevailing winds. 					
<u>SC AO 4</u>	I AUSD shall analyze air quality imports.					
3C-AQ-4	LAUSD shah analyze an quanty impacts.					
	regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduc air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds.					
	Construction bid contracts shall include protocols that reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. The Construction Contractor shall be responsible for documenting compliance with the identified protocols. Specific air emission reduction protocols include, but are not limited to, the following.					
	Exhaust Emissions					
	• Schedule construction activities that affect traffic flow to off-peak hours (e.g., between 10:00 AM and 3:00 PM).					
	• Consolidate truck deliveries and limit the number of haul trips per day.					
	Route construction trucks off congested streets, as permitted by local jurisdiction haul routes.					
	• Employ high pressure fuel injection systems or engine timing retardation.					
	• Use ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment.					
	• Use construction equipment rated by the United States Environmental Protection Agency as having at least Tier 4 (model year 2008 or newest available model) emission limits for engines between 50 and 750 horsepower.					
	• Restrict non-essential diesel engine idle time, to not more than five consecutive minutes.					
	• Use electrical power rather than internal combustion engine power generators.					
	• Use electric or alternatively fueled equipment, as feasible.					
	• Use construction equipment with the minimum practical engine size.					
	Use low-emission on-road construction fleet vehicles.					
	• Ensure construction equipment is properly serviced and maintained to the manufacturer's standards.					
	Fugitive Dust					
	• Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for 10 days or more).					
	Replace ground cover in disturbed areas as quickly as possible.					
	• Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).					
	• Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip.					
	• Pave unimproved construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles.					
	• Pave all unimproved construction access roads for at least 100 feet from the main road to the project site.					

	LAUSD Standard Conditions of Approval
•	Enclose, cover, water twice daily, or apply non-toxic soil binders according to manufacturers' specifications to exposed piles (i.e., gravel, dirt, and sand) with a 5% or greater silt content.
•	Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph).
•	Water disturbed areas of the active construction and unpaved road surfaces at least three times daily, except during periods of rainfall.
•	Limit traffic speeds on unpaved roads to 15 mph or less.
•	Prohibit fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD.
•	Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
٠	Limit the amount of daily soil and/or demolition debris loaded and hauled per day.
Gene	ral Construction
•	Use ultra-low VOC or zero-VOC surface coatings.
•	Phase construction activities to minimize maximum daily emissions.
•	Configure construction parking to minimize traffic interference.
•	Provide temporary traffic control during construction activities to improve traffic flow (e.g., flag person).
•	Prepare and implement a trip reduction plan for construction employees.
•	Implement a shuttle service to and from retail services and food establishments during lunch hours.
•	Increase distance between emission sources to reduce near-field emission impacts.

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O₃), carbon monoxide (CO), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), and lead (Pb). Areas are classified under the federal and California Clean Air Act as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SCAB), which is managed by South Coast Air Quality Management District (SCAQMD), is designated nonattainment for O₃, and PM_{2.5} under the California and National AAQS, nonattainment for PM₁₀ under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS.³⁹

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

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

Less Than Significant Impact. A project would have a significant impact if it conflicts with or delays implementation of the applicable air quality management plan (AQMP). The Project Site is located within the SCAQMD jurisdictional area.

³⁹ California Air Resources Board. "Area Designations Maps / State and National." August 22, 2014. Accessed April 2024. http://www.arb.ca.gov/desig/adm/adm.htm.

The proposed Project would not jeopardize the attainment of air quality standards in the 2022 AQMP for the SCAQMD and the Los Angeles County portion of the South Coast Air Basin through compliance with **SC-AQ-4**, which requires the implementation of all feasible measure to reduce air emissions below the SCAQMD regional and localized significance thresholds. Moreover, **Table 5: Unmitigated Maximum Regional Construction Emission** and **Table 7: Unmitigated Localized Construction Emissions** show the proposed Project would not exceed the significance thresholds for construction or operational emissions with the implementation of LAUSD SCs and compliance with Federal, State, and local air quality plans. The proposed Project would also not exceed the screening criteria for the localized significance thresholds. Without exceedances to the threshold, the Project would not increase the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP. Based on the requirements of the SPEIR, the proposed Project is not regionally significant and therefore, would not warrant a review by the Southern California Association of Governments (SCAG).⁴⁰

With the implementation of **SC-AQ-4** and compliance with all existing Federal, State, and local air quality plans, regulations, and programs, the proposed Project would have a less than significant impact to the implementation of the applicable air quality plan. No mitigation or further analysis is required.

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

Less Than Significant Impact.

Construction Emissions

Construction of the proposed Project has the potential to create air quality impacts through the use of heavyduty construction equipment and through vehicle trips generated from construction workers, haul trucks, and construction material delivery trucks traveling to and from the Project Site. Construction activities would involve the demolition and removal of existing uses, the transport and disposal of these materials and soil, and construction of new structures and related infrastructure. Fugitive dust emissions would result from demolition and construction activities and mobile source emissions would result from the use of haul trucks and on-site construction equipment such as dozers, loaders, and cranes. During the finishing phase of a building, paving operations and the application of architectural coatings (e.g., paints) and other building materials would potentially release VOCs. The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity (e.g., construction schedule), the specific type of operation and, for dust, the prevailing weather conditions.

Construction activities would cause short-term emissions of criteria air pollutants. The primary source of NOx, CO, and SOx emissions is the operation of construction equipment. The primary sources of particulate matter (PM10 and PM2.5) emissions include activities that disturb the soil, such as grading and excavation, as well as

⁴⁰ LAUSD. School Upgrade Program EIR. 2015. Accessed April 2024. https://www.lausd.org/cms/lib08/CA01000043/Centricity/domain/135/pdf%20files/Program_EIR_School_Upgrade_Progra m_Full.pdf

building demolition and construction. The primary source of VOC emissions is the application of architectural coating and off-gas emissions associated with asphalt paving.

Construction of the proposed Project would occur in two phases. Phase 1 involves construction and demolition activities on the northern portion of the Project Site. The existing Shop Building (Building #2) and Utility Building (Building #14) would be demolished to allow for the construction of the new gymnasium, classrooms, support facilities, art gallery building, and maintenance and operations facilities as shown in **Figure 6: Proposed Project Site Plan**. Construction of the new gymnasium, classrooms, support facilities, and maintenance and operation facilities would be completed before Phase 2 of construction would begin. Phase 2 involves construction and demolition activities on the southern portion of the Project Site, including the demolition of the existing gymnasium (Building #3), Ticket Building (Building #12), and Relocatable Sanitary Building (Building #13) and construction of outdoor physical education courts comprised of approximately six (6) basketball/volleyball courts, adjacent areas with trees and seating, and P.E. equipment storage facilities as shown in **Figure 6: Proposed Project Site Plan**.

The emission levels in Table 5 represent the maximum daily emissions projected to occur taking into consideration all of the construction phases. As presented in Table 5, the unmitigated daily maximum regional construction emissions would not exceed the SCAQMD daily significance thresholds for VOC, NOx, CO, SO2, PM10, and PM2.5. Therefore, regional construction would not result in potentially significant short-term regional air quality impacts during construction. Additionally, the Project would implement SC-AQ-2, SC-AQ-3, and SC-AQ-4. SC-AQ-2 would obligate construction contractors to have off-road equipment properly tuned and maintained in accordance with the manufacturer's specifications. SC-AQ-3 would implement methods for reducing onsite dust emissions during soil removal. These methods would include maintaining slow speeds for vehicles, applying water/mist to dirt as it is loaded and unloaded, minimizing soil drop heights, covering haul truck loads, and using polyethylene sheeting to cover excavated areas and dirt stockpiles. SC-AQ-4 is intended to reduce construction exhaust and fugitive dust emissions with a number of features, including, but not limited to, restricting diesel engine idling times to no more than five consecutive minutes, utilizing ultra-low sulfur diesel fuel, utilizing off-road construction equipment that is compliant with Tier 3 engine standards at a minimum, applying soil stabilizers, replacing ground cover as soon as possible, and installing wheel washers. Compliance with these requirements is consistent with, and meets, or exceeds, the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities and impacts would be less than significant. No mitigation or further analysis is required.

Table 5 Unmitigated Maximum Regional Construction Emissions						
Source	VOC	NOx	CO	SOx	PM10	PM2.5
Source			pound	ds/day		
	-	Phase 1				
Year 2026	3	26	29	<1	2	1
Year 2027	1	7	10	<1	1	<1
Year 2028	1	6	10	<1	1	<1
Year 2029	23	24	30	<1	1	1

Source	VOC	NOx	CO	SOx	PM10	PM2.5	
Source		pounds/day					
	-	Phase 2					
Year 2029	3	24	29	<1	2	1	
Maximum	22	24	30	<1	2	1	
SCAQMD Mass Daily Threshold	75	100	550	150	150	55	
Threshold exceeded?	No	No	No	No	No	No	

	Table 5	
Unmitigated Maximum	Regional Construction	Emissions

Source: Appendix A: Air Quality Study.

CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; SOx = sulfur oxides; VOC = volatile organic compounds.

Operational Emissions

Operational air quality impacts are assessed based on the incremental increase in emissions compared to existing conditions. The results of these net calculations are compared to the associated SCAQMD thresholds presented in Table 6: Unmitigated Maximum Regional Operational Emissions. The proposed Project would replace and upgrade facilities on the Campus, but it would not increase the number of students or faculty and would not introduce major new emission sources. Furthermore, building upgrades and replacement of old, energy-inefficient structures with those that use less energy would reduce emissions from space heating and other on-site sources. As shown in Table 6, the proposed Project would not exceed the regional daily significance thresholds for VOC, NOx, CO, SOx, PM10, and PM2.5 prior to mitigation and would result in less than significant impacts. No mitigation or further analysis is required.

Source	VOC	NOx	CO	SOx	PM10	PM 2.5
Source	pounds/day					
Area	14	8	100	<1	24	6
Energy	12	<1	16	<1	<1	<1
Mobile	<1	2	2	<1	<1	<1
Total	26	11	118	<1	24	6
Existing	30	15	150	<1	25	6
Net Total	—	_	—	—	_	—
SCAQMD Mass Daily Threshold	55	55	550	150	150	55
Threshold exceeded?	No	No	No	No	No	No

Source: Appendix A: Air Quality Study

Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations.

CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; SOx = sulfur oxides; VOC = volatile organic compounds.



c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Sensitive receptors in the Project area are defined as residences, schools, and places of worship adjacent to the proposed Project. In addition to on-site sensitive receptors, which include students and staff, the nearest off-site sensitive receptors include residential uses located to the east across Genesee Avenue, residential uses located to the south across Rosewood Avenue, residential uses and a nursing home located to the west across Fairfax Avenue, residential uses located to the north across Melrose Avenue, and Walt Whitman High School located adjacent to the south. During construction, sensitive receptors could be exposed to a variety of emissions including those from construction equipment. On-site emissions have the potential to expose nearby sensitive receptors to harmful pollutant concentrations. For a visual representation of the locations of sensitive receptors please refer to Figure 3: Location of Sensitive Receptors.

Construction Localized Significance Thresholds

SCAQMD developed Localized Significance Thresholds (LSTs) to determine if emissions of NO2, CO, PM10, and PM2.5 generated at a Project Site (off-site mobile-source emissions are not included in the LST analysis) would expose sensitive receptors to substantial concentrations of criteria air pollutants.⁴¹

Construction has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers, haul trucks, and construction material delivery trucks traveling to and from the Project Site. The assessment of construction air quality impacts considers each phase of the construction and the equipment potentially used. Construction emissions can vary substantially from day to day, depending on the level of activity (e.g., construction schedule), the specific type of operation and, for dust, the prevailing weather conditions.

The results of the construction LST analysis are provided in **Table 7: Unmitigated Localized Construction Emissions**. As shown in **Table 7**, the unmitigated emissions would not exceed the localized significance construction thresholds. Construction would be required to comply with the SCAQMD's Rule 403 (Fugitive Dust), which requires watering of the site during dust-generating construction activities, stabilizing disturbed areas with water or chemical stabilizers, and preventing trackout dust from construction vehicles. These measures would further reduce localized construction related emissions.

Unmit	Ta igated Localize	able 7 d Construction 1	Emissions			
	NOx	СО	PM10	PM2.5		
Source	Source On-Site Emissions (pounds/day)					
	Con	struction				
	Р	hase 1				
Total maximum emissions	25	28	1	1		
	Р	hase 2				
Total maximum emissions	24	28	1	1		

⁴¹ LAUSD. School Upgrade Program EIR. 2015. Accessed April 2024. https://www.lausd.org/cms/lib08/CA01000043/Centricity/domain/135/pdf%20files/Program_EIR_School_Upgrade_Progra m_Full.pdf

	NOx	СО	PM10	PM2.5
Source		On-Site Emissio	ons (pounds/day)	
LST threshold	121	1,292	11	6
Threshold Exceeded?	No	No	No	No
Source: Appendix A: Air Quality Study				

Notes:

Totals in table may not appear to add exactly due to rounding in the computer model calculations.

The net area/energy emissions of the Project represent the net difference between the existing operational uses that would be removed and the Project operational emissions.

CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns

Construction Emission Health Risk

Whenever a project would require 1) the use of chemical compounds that have been identified in SCAQMD Rule 1401, 2) the use of chemical compounds placed on CARB's air toxics list pursuant to Assembly Bill 1807 (AB 1807), Air Contaminant Identification and Control Act (1983), or 3) the use of chemical compounds placed on the EPA's National Emissions Standards for Hazardous Air Pollutants, an HRA is required by the SCAQMD.

Toxic Air Contaminants (TACs)

Sensitive receptors in the Project area are defined as residences, schools, and places of worship adjacent to the proposed Project. During construction, sensitive receptors could be exposed to a variety of emissions including those from construction equipment. However, due to the limited scale and the short duration of construction activities, the proposed Project would not expose sensitive receptors to substantial pollutant concentrations during construction.

Carbon Monoxide Hotspots

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

The proposed Project would not result in an increase in traffic at local intersections, therefore, the potential for creation of carbon monoxide "hotspots" would be negligible. CO hotspots were omitted from this analysis due to their negligible impact on the finding of this Project. No mitigation or further analysis is required.

Operation Localized Significance Thresholds

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

As discussed in **Table 6**, prior to mitigation efforts, criteria pollutant thresholds would not result in a significant impact. Localized operational air quality impacts are assessed based on the incremental increase in emissions compared to existing conditions. The results of the net operational LST analysis are compared to the localized operational emissions thresholds and provided in **Table 8**: **Unmitigated Localized Operational Emissions**. **Table 8** shows localized net operational emissions would also not exceed the localized significance operational thresholds.

With the implementation of regulatory compliance measures such as Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coating), the Project's construction and operational emissions are not expected to significantly contribute to cumulative emissions for CO, NOx, PM10, and PM2.5. Operational emissions associated with the proposed Project would likely be slightly less than the emissions currently occurring within the existing school due to a decrease in energy usage associated with the new building that will be designed and built to meet the most current Title 24 building energy standards and the LAUSD CHPS program that would result in a much more energy efficient structure than the existing buildings to be removed. No mitigation or further analysis is required.

	-			-			
Source	NOx	CO	PM10	PM2.5			
Source	On-Site Emissions (pounds/day)						
	OF	perational					
Project area/energy emissions	2	18	<1	<1			
Existing area/energy emissions	2	18	<1	<1			
Net total area/energy emissions	—	—	—				
LST threshold	121	1,292	3	2			
Threshold Exceeded?	No	No	No	No			

Table 8
Unmitigated Localized Operational Emissions

Source: Appendix A: Air Quality Study.

Totals in table may not appear to add exactly due to rounding in the computer model calculations.

The net area/energy emissions of the Project represent the net difference between the existing operational uses that would be removed and the Project operational emissions.

CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.

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

Less Than Significant Impact. During construction, the proposed Project would require earth moving activities and construction equipment that may potentially introduce low levels of odors. However, with the implementation of SC-AQ-2 and SC-AQ-4 the contractors would be required to keep the equipment properly tuned, which would reduce harmful emissions and odors. In addition, implementation of SC-AQ-4 would keep exhaust emissions and fugitive dust levels low. With the implementation of these SCs, construction emissions are expected to have a less than significant adverse impact on a substantial number of people.

The operation of the proposed Project is expected to have no impact since the Project is expected to reduced classroom capacity and construct newer, more efficient facilities. The functional nature of the Project is also not expected to produce odors during its operation. Therefore, the operational emissions are not expected to adversely affect a substantial number of people. No mitigation or further analysis is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES		1		
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?				
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				\boxtimes
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			\boxtimes	
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				\boxtimes

Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact biological resources. Projects implemented under the SUP were identified as having less-than-significant impacts to special-status species, riparian habitats, sensitive natural communities, State or federally protected wetlands, or migratory wildlife corridors, and would not conflict with any local policies or ordinances protecting biological resources and/or the provisions of any adopted local, regional, or State habitat conservation plan applicable to the LAUSD region.

An Arborist Report has been completed for the proposed Project and is included in Appendix B.

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

LAUSD Standard Conditions of Approval		
SC-BIO 1	• An LAUSD-qualified nesting bird Surveyor or Biologist shall identify plant and animal species and habitat within and near the project site. LAUSD will conduct a literature search, which shall consider a one-mile radius beyond the project construction site and shall be performed by a qualified nesting bird Surveyor or	

LAUSD Standard Conditions of Approval

	Biologist with knowledge of local biological conditions as well as the use and interpretation of the data
	sources identified below. Where appropriate, in the opinion of the Biologist, the literature search shall be supplemented with a site visit and/or aerial photo analysis. Resources and information that shall be investigated for each site should include, but not be limited to:
•	United States Fish and Wildlife Service (USFWS)
•	National Marine Fisheries Services (NMFS)
•	California Department of Fish and Wildlife (CDFW)
•	California Native Plant Society (CNPS)
•	County and/or city planning or environmental offices for sensitive species, habitat, and/or heritage trees that may not exist on published databases.
•	California Natural Diversity Data Base (CNDDB) California Native Plant Society (CNPS) Rare Plant Inventory
•	Local Audubon Society
•	Los Angeles County Department of Regional Planning for information on Significant Ecological Areas
•	California Digital Conservation Atlas for District-wide location of reserves, plan areas, and land trusts that may overlap with project sites.
Biolog	gical Resources Report
If a re constru- prepar- impact sensitiv	port is necessary and the LAUSD qualified nesting bird Surveyor or Biologist determines that a school action project will affect an identified sensitive plant, animal, or habitat, a biological resources report shall be ed. To provide a complete assessment of the flora and fauna within and adjacent to a site-specific project area, with particular emphasis on identifying endangered, threatened, sensitive, and locally unique species and we habitats, the biological resources report shall include the following.
•	Information on regional setting that is critical to the assessment of rare or unique resources.
•	A thorough, recent floristic-based assessment of special status plans and natural communities, following the CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. CDFW recommends that floristic, alliance- and/or association-based mapping and vegetation impact assessments be conducted at the project site and neighboring vicinity. The Manual of California Vegetation (Sawyer et al.) should also be used to inform this mapping and assessment. Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
•	A current inventory of the biological resources associated with each habitat type onsite and within the area of potential effect. CDFW's California Natural Diversity Data Base (CNDDB) should be contacted to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
•	An inventory of rare, threatened, and endangered, and other sensitive species onsite and within the area of potential effect. Species to be addressed should include all those identified in CEQA Guidelines Section 15380, including sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at appropriate time of year and time of day when sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the CDFW and USFWS.
•	A discussion of the potential adverse impacts from light, noise, human activity, exotic species, and drainage. Drainage analysis should address project-related changes on drainage patterns on and downstream from the site; the volume, velocity, and frequency of existing and post- project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site.

LAUSD Standard Conditions of Approval		
	• Discussions about direct and indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, wetland and riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas.	
	• Mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Measures should emphasize avoidance and reduction of biological impacts. For unavoidable impacts, onsite habitat restoration or enhancement should be outlined. If onsite measures are not feasible or would not be biologically viable, offsite measures through habitat creation and/or acquisition and preservation in perpetuity should occur. This measure should address restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.	
	• Plans for restoration and vegetation shall be prepared by qualified nesting bird Surveyor or Biologist with expertise in southern California ecosystems and native plant vegetation techniques. Plans shall include, at a minimum:	
	 Location of the mitigation site. 	
	 Plant species to be used, container sizes, and seeding rates. 	
	 Schematic depicting the mitigation area. 	
	– Planting schedule.	
	- Irrigation method.	
	- Measures to control exotic vegetation.	
	- Specific success criteria.	
	 Detailed monitoring program. Continuous about the support of the suppo	
	 Contingency measures should the success criteria not be met. Identification of the party responsible for meeting the success criteria and providing for conservation 	
	of the site in perpetuity.	
	LAUSD shall consult with the U.S. Army Corps of Engineers, USFWS and/or the CDFW and comply with any permit conditions or directives from those agencies regarding the protection, relocation, creation, and/or compensation of sensitive species and/or habitats.	
SC-BIO 2	LAUSD shall protect sensitive wildlife species from harmful or disruptive exposure to light by shielding light sources, redirecting light sources, or using low intensity lighting. All exterior light fixtures shall be listed as dark sky compliant as required under SC-AE-6 .	
SC-BIO 3	LAUSD shall comply with the following specifications related to bird and bat nesting sites. Project activities (including, but not limited to, staging and disturbances to native and non-native vegetation, structures, and substrates ⁴²) should occur outside of nesting season to avoid take of birds, bats, or their eggs. ⁴³	
	Bird Surveys—Construction Demolition or Vegetation Removal in or adjacent to Native Habitat	
	• For construction projects occurring in or adjacent to native habitat, a qualified LAUSD nesting bird Surveyor or qualified Biologist (Surveyor/Biologist) may determine that additional surveys are required outside of the breeding and nesting season (February 1st through August 31st, beginning January 1st for raptors) to determine if protected birds occupy the area (e.g., project site is adjacent to areas with suitable habitat for Southwestern willow flycatcher).	

⁴² Substrate is the surface on which a plant or animal lives.

⁴³ Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs and/or young resulting from disturbances that cause abandonment of active nests.)

LAUSD Standard Conditions of Approval

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• If avoidance of the avian breeding season is not feasible, beginning 30 days prior to the initiation of th project activities, the Surveyor/Biologist with experience conducting nesting bird surveys shall conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the last survey being conducted ne more than three days prior to the initiation of project activities. In areas that contain suitable habitat for lister species, species-specific surveys shall be conducted by a qualified Biologist authorized by the regulator agencies.	
If a protected bird is observed, additional protocol-level surveys may be required to determine if the sighting was ransient individual or if the site is used as nesting habitat for that species. Project activities shall be delayed unt there is a final determination.	
If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests), or a determined by the Surveyor/Biologist shall be delayed until the nest is vacated and juveniles have fledged and ther s no evidence of a second attempt at nesting. Flagging, stakes, and/or construction fencing shall be used to demarcate the boundary of the 300- or 500-foot buffer between the project activities and the nest or tree. Project personnel, including all Construction Contractors working on site, shall be instructed on the sensitivity of the area Protective measures shall be documented to show compliance with applicable State and Federal laws pertaining to the protection of birds.	
If the Surveyor/Biologist determines that a narrower buffer between the project activities and active nests i warranted, a written explanation for the change shall be submitted to the LAUSD OEHS CEQA Project Manager If approved, the Surveyor/Biologist can reduce the demarcated buffer.	
A Surveyor/Biologist shall be present on site during all grubbing and clearing of vegetation to ensure that thes activities remain outside the demarcated buffer and that the flagging, stakes, and/or construction fencing ar maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. Th Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager during the grubbing and clearing of vegetation, and shall notify LAUSD immediately if project activities damage avian nests.	
Bird Surveys—Construction, Demolition, or Vegetation Removal at Existing Campuses	
• If avoidance of the avian breeding season is not feasible, the Surveyor/Biologist with survey experience sha conduct a nesting bird surveys to determine if active nests are within or adjacent to the work area.	
• The survey shall be conducted no more than 3 days prior to construction activities. A memo describin results of the survey shall be submitted to the OEHS CEQA Project Manager.	
• If an active bird nest is observed, the Surveyor/Biologist shall determine the appropriate buffer around th nest. Buffers are determined on species-specific requirements and nest location.	
The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager.	
• No construction activity shall occur within the buffer zone until nest is vacated, juveniles have fledged, and there is no evidence of a second attempt at nesting.	
Bat Surveys	
• Bat species inventories and habitat use studies shall be completed for demolition or new construction project in native habitat as well as projects that require the removal of mature conifer, cottonwood, sycamore or oal trees or abandoned buildings.	
• Bat surveys must be conducted by a qualified bat Surveyor or Biologist (Surveyor/Biologist). Th Surveyor/Biologist shall use the appropriate combination of structure inspection, sampling, exit counts, and acoustic monitors to survey an area that may be affected by the project.	
• If bats are found, the Surveyor/Biologist shall identify the species and evaluate the colony to determin potential impacts.	
• Mitigation measures shall be determined on a project-specific basis and may include:	
– Avoidance	

- Humane exclusion prior to demolition

LAUSD Standard Conditions of Approval			
	 Bats should not be evicted from roost sites during the reproductive period (May–September), or during winter hibernating periods to avoid direct mortality 		
	 Bats should be flushed from trees prior to felling or trimming. 		
	Off-site habitat improvements shall be conducted in coordination with the California Department of Fish and Wildlife.		
SC-BIO 4	LAUSD shall comply with the following conditions if a new school would be located in an area containing native habitat or if a protected tree would be removed from an existing campus:		
	New Construction in Native Habitat		
	LAUSD shall avoid constructing new schools in areas containing mature native protected trees to the extent feasible. If site avoidance is not feasible, individual trees should be protected. If protected trees may be impacted, the following condition(s) may be required:		
	• Translocation of rare plants is prohibited in most instances. CDFW, in most cases does not recommend translocation, salvage, and/or transplantation of rare, threatened, or endangered plant species, in particular oak trees, as compensation for adverse effects because successful implementation of translocation is rare. Even if translocation is initially successful, it will typically fail to persist over time.		
	• Permanent conservation of habitat. To ensure the conservation of sensitive plant species, the preferred method is permanent conservation of habitat containing these species; any translocation proposed shall only be an experimental component of a larger, more robust plan.		
	• Off-site acquisition of woodland habitat. Due to the inherent difficulty in creating functional woodland habitat with associated understory components, the preferred method is off-site acquisition of woodland habitat in the local area. All acquired habitat shall be protected under a conservation easement and deeded to a local land conservancy for management and protection.		
	• Creation of woodlands . Any creation of functioning woodlands shall be of similar composition, structure, and function of the affected woodland. The new woodland shall mimic the function, demonstrate recruitment, plant density, canopy, and vegetation cover, as well as other measurable success criteria before the measure is deemed a success.		
	 All seed and shrub sources used for tree and understory species in the new planting site shall be collected or grown from on-site sources or from adjacent areas and may be purchased from a supplier that specializes in native seed collection and propagation. This method should reduce the risk of introducing diseases and pathogens into areas where they might not currently exist. 		
	 Woodland species should be replaced by planting seeds. Monitoring efforts, including the exclusion of herbivores, shall be employed to maximize seedling survival during the monitoring period. 		
	 Monitoring period for woodlands shall be at least 10 years with a minimum of 7 years without supplemental irrigation. This allows the trees to go through one typical drought cycle. This should also be the minimal time needed to see signs of stress and disease and determine the need for replacement plantings. 		
	LAUSD shall request CDFW review and comment on any translocation plans, habitat preservation, habitat creation and/or restoration plans.		
	Removal of Protected Trees on Existing Campuses		
	LAUSD shall comply with the LAUSD OEHS Tree Trimming and Removal Policy. This policy ensures the management of District trees while ensuring that District activities will not conflict with locally adopted tree preservation policies and ordinances		
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact. The Project Site is fully developed and contains no native vegetation capable of supporting any special status plant or wildlife species. No known threatened, endangered, or rare species or their habitats, locally designated species, locally designated natural communities, riparian, or wetland habitats exist on the Project Site. The Project Site is not designated as a critical habitat for threatened or endangered species.⁴⁴ The Project Site and its surrounding area is not located within a Significant Ecological Area (SEA).⁴⁵ No impact would occur. No mitigation or further analysis is required.

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

No Impact. The Project Site does not contain any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations by the CDFW or USFWS.^{46,47} The Project Site is entirely developed and does not contain any natural drainage or water courses, which would potentially support riparian habitat, or natural undeveloped areas that may contain any other sensitive natural community. No impact would occur. No mitigation or further analysis is required.

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

No Impact. The Project Site is entirely developed and does not contain any waterways or undeveloped land capable of supporting federally protected wetlands. There are no protected wetlands within or adjacent to the Project Site.⁴⁸ Therefore, no impact to wetlands would occur through direct removal, filling, hydrological interruption, or other means. No mitigation or further analysis is required.

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

Less than Significant Impact. The Project Site does not contain any water sources or greenbelts for wildlife movement, or native vegetation and undeveloped land capable of supporting fish or the movement of wildlife,

⁴⁴ USFWS. "Mapping for Critical Habitat for Threatened and Endangered Species." Accessed April 2024. https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77.

⁴⁵ LA County Planning. *Significant Ecological Areas Program*. Accessed April 2024. https://planning.lacounty.gov/long-rangeplanning/significant-ecological-areas-program/resources/.

⁴⁶ LA County Planning. "Chapter 9: Conservation and Natural Resources Element." *General Plan.* Accessed April 2024. https://planning.lacounty.gov/wp-content/uploads/2022/11/9.0_gp_final-general-plan-ch9.pdf.

⁴⁷ LA County Planning. "Figure 9.2, Regional Habitat Linkages." Accessed April 2024. https://planning.lacounty.gov/wpcontent/uploads/2022/11/9.1_Chapter9_Figures.pdf.

⁴⁸ USFWS. "National Wetlands Inventory." Accessed April 2024. https://www.fws.gov/program/national-wetlandsinventory/wetlands-mapper.

particularly wildlife corridors. Therefore, the proposed Project would have no impact on the movement of any wildlife species or impede the use of migratory wildlife corridors.

Tree removal and building demolition have the potential to disrupt birds that are nesting in the trees or buildings during the avian breeding season (February 1 through August 31). Construction-related noise and vibration also have the potential to disrupt birds during avian breeding season. For this reason, construction activities (including demolition) have the potential to impact these nesting birds. However, the proposed Project would implement **SC-BIO-3**, as necessary. Following the completion of a pre-construction clearance survey, the implementation of measures provided in **SC-BIO-3** would reduce impacts to less than significant. These measures include completing tree removal and demolition activities outside of avian nesting season, if feasible. Additionally, the Project would also adhere to the requirements outlined in **SC-BIO-1**, **SC-BIO-2**, and **SC-BIO-4**. Therefore, impacts would be less than significant. No mitigation or further analysis is required.

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

Less than Significant Impact. The Project Site is located in a fully developed area and the surrounding development is not mapped within a Significant Ecological Area (SEA).⁴⁹

According to **Appendix B: Arborist Report**, there were 370 trees on the Project Site. As shown in **Figure 8: Tree Location Diagram**, there are approximately 106 trees within the Development Zone. No protected trees are found within the Development Zone, and it is not anticipated that development of the proposed Project would result in any impacts to protected trees.

Construction of the proposed Project may require the removal of existing trees on the Project Site. The proposed Project would include a landscape plan to offset the loss of trees on the Project Site. All recommendations contained in the project-specific Arborist Tree Report prepared by an LAUSD Tree Maintenance Personnel Certified Arborist would be incorporated into the proposed Project during construction activities. Replacement trees would be planted at the appropriate size at maturity for the space and would be selected from the LAUSD Approved Plant List.⁵⁰ The Project would comply with LAUSD's Tree Trimming and Removal Procedure⁵¹ for trees on the Campus and would complete the City's tree removal permit process if any street trees are removed. If impacts to a protected tree are unavoidable and removal of the tree is required, a minimum 4:1 replacement ratio would be required, which is consistent with the City's replacement mitigation ratio. Additionally, the LAUSD Tree Trimming and Removal Procedure encompasses all requirements of the City and would not conflict with any local policy or ordinances. Therefore, this would result in less than significant impacts of the proposed Project conflicting with local policies and ordinances, including tree protection ordinances, and no further analysis is required.



⁴⁹ LA County Planning. "Figure 9.3: Significant Ecological Areas and Coastal Resources Areas Policy Map." Accessed April 2024. https://planning.lacounty.gov/wp-content/uploads/2022/11/9.1_Chapter9_Figures.pdf.

⁵⁰ LAUSD. Garden Resources. LAUSD Approved Plant List. Accessed April 2024. https://www.lausd.org/Page/19903.

⁵¹ All tree trimming and removal conducted on District property is required to adhere to the procedures described in the LAUSD OEHS Tree Trimming and Removal Procedure. Compliance with this Procedure will ensure that District activities will not conflict with any tree preservation policies while ensuring the protection of breeding and nesting habitat of protected birds. Written approval from the Director of OEHS, Director of Maintenance & Operations, Local District Superintendent, and School Principal is required before any protected tree is relocated or removed. For more information, please contact OEHS at (213) 241-3199 or the District Arborist at (213) 745-1422.

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

No Impact. The Project Site is not located within a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.⁵² The Project Site is not located on or near any SEA, Land Trust, or Conservation Plan.⁵³ Therefore, no impacts would occur. No mitigation or further analysis is required.

⁵² CDFW. California Regional Conservation Plan. 2019. Accessed April 2024. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline.

 ⁵³ LA County Planning. "Figure 9.3: Significant Ecological Areas and Coastal Resource Areas Policy Map." Accessed April 2024. https://planning.lacounty.gov/wp-content/uploads/2023/02/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf.

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

Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact cultural resources. Projects implemented under the SUP that may impact a historic resource would include implementation of Standard Conditions **SC-CUL-1** through **SC-CUL-9** to reduce impacts from relocation, conversion, rehabilitation, alteration, damage or demolition of an historical resource. LAUSD Standard Conditions would reduce historic resource impacts to the extent feasible; however, no mechanism for the full mitigation has been established. Therefore, even with the federal, State regulatory compliance, and implementation of LAUSD Standard Conditions, project-specific impacts associated with the demolition or damage to a particular historic resource would require further evaluation.

A Historic Resource Evaluation Report and a Cultural Resources Technical Report have been completed for the proposed Project. These reports are included in **Appendix C: 2022 Historic Resource Evaluation Report** and **Appendix D: 2025 Cultural Resources Technical Report**.

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

LAUSD Standard Conditions of Approval					
SC-CUL-1	Historic Architect				
	For projects involving structural upgrades to historic resources, the Design Team shall include a qualified Historic Architect with demonstrated project-level experience in historic projects.				
	For campuses with qualifying historical resources under CEQA, the Design Team shall include a LAUSD-qualified Historic Architect. The Historic Architect/s shall meet the Secretary of the Interior's Professional Qualifications Standards and the standards described on page 8 of the LAUSD Design Guidelines and Treatment Approaches for Historic Schools.				
	Throughout the project design progress, the Historic Architect shall provide input to ensure compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD requirements and guidelines for the treatment of historical resources.				
	Role of the Historic Architect				
	The tasks of the Historic Architect on the Design Team shall include, but are not limited to:				
	• The Historic Architect shall work with the Design Team (including the Structural Engineer) and LAUSD to ensure that project components, including new construction and modernization of existing facilities, comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design				

	LAUSD Standard Conditions of Approval
	Guidelines and Treatment Approaches for Historic Schools. The Historic Architect shall work with the Design Team and LAUSD throughout the design process to develop project options that facilitate compliance with the applicable historic preservation standards.
	• For new construction, the Historic Architect shall work with the Design Team and LAUSD to identify options and opportunities for: (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors, and (2) ensuring that new construction is designed and sited in such a way that reinforces and strengthens, as much as feasible, character-defining site plan features, landscaping, and circulation corridors throughout campus.
	• For modernization and upgrade projects involving contributing (significant) buildings or features, the Historic Architect shall work with the Design Team and LAUSD to ensure that specifications for design and implementation of projects comply with the applicable historic preservation standards.
	• The Historic Architect shall participate in Design Team meetings during all phases of the project through 100% construction drawings, pre-construction, and construction phases, as applicable.
	• The Historic Architect shall prepare a memo at the 50% and at the 100% construction drawings stages, demonstrating how principal project components and treatment approaches comply with applicable historic preservation standards, including the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The memos shall be submitted to LAUSD OEHS for review.
	• The Historic Architect shall participate in pre-construction and construction monitoring activities, as appropriate, to ensure continuing conformance with Secretary's Standards and/or avoidance of a material impairment of the historical resources.
	• The Historic Architect shall provide specifications for architectural features or materials requiring restoration or removal, maintaining and protecting relevant features in place, or on-site storage. Specifications shall include detailed drawings or instructions where historic features may be impacted.
	• The Design Team and Historic Architect shall be responsible for incorporating LAUSD's recommended updates and revisions during the design development and review process.
SC-CUL-2	LAUSD shall follow the guidelines outlined in these documents to the maximum extent practicable when planning and implementing projects and adjacent new construction involving historical resources.
	The Design Team, Historic Architect, and Construction Contractor shall apply LAUSD School Design Guide and LAUSD Design Guidelines and Treatment Approaches for Historic Schools and the Secretary's Standards for all new construction and modernization projects. In keeping with the District's adopted policies and goals, historical resources shall be reused rather than destroyed, where feasible.
	General guidelines include:
	Retain and preserve the character of historic resources.
	• Repair rather than remove, replace, or destroy character-defining features; if replacement is necessary, replace in-kind to match materials, dimensions, and appearance.
	• Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity.
	• Where practical, conceal reinforcement required for structural stability or the installation of life safety or mechanical systems.
	Where necessary to halt deterioration and after the preparation of a condition assessment, undertake surface cleaning, preparation of surfaces, and other projects involving character-defining features using the least invasive, gentlest means possible. Avoid using any abrasive materials or methods including sandblasting and chemical treatments.
SC-CUL-3	Prior to any major alteration to or adjacent to a historic resource that may potentially damage historic resources (or previously identified historic features), the Historic Architect shall develop a Temporary Protection Plan that identifies potential risks to the historic resource. The Temporary Protection Plan shall be prepared in coordination with the Construction Contractor and LAUSD prior to demolition or construction. The Temporary Protection Plan may include, but not be limited to, the following components:

	LAUSD Standard Conditions of Approval
	Notation of the historic resource on construction plans.
	• Pre-construction survey to document the existing physical condition of the historic resource.
	• Procedures and timing for the placement and removal of temporary protection features, around the historic resource.
	• Monitoring of the installation and removal of temporary protection features by the Historic Architect, or designee.
	• Post-construction survey to document the condition of the historic resource after Project completion.
	• Preparation of a technical memorandum documenting the pre-construction and post-construction conditions of the historic resource and compliance with protective measures outlined Temporary Protection Plan.
SC-CUL-4	Prior to significant alteration or demolition of a historical resource, LAUSD shall retain an Architectural Photographer and/or a Historian or Architectural Historian who meet the Secretary of the Interior's Professional Qualifications Standards and who shall prepare a HABS-like Historic Documentation Package (Package).
	The Package shall include photographs and descriptive narrative. Documentation will draw upon primary- and secondary-source research including available studies prepared for the property (measured drawings are not required). The specifications for the Package include:
	• Photographs: Photographic documentation shall focus on the historical resources/features proposed to be significantly altered or demolished, with overview and context photographs for the campus and adjacent setting. A professional-quality camera will be used to take photographs of interior and exterior features of the buildings. Photographs will include context views, elevations/exteriors, architectural details, overall interiors, and interior details (if warranted). Digital photographs will be in black and white (as well as in color or as requested by the District) and provided in an electronic format.
	• Descriptive and Historic Narrative: The Historian or Architectural Historian shall prepare descriptive and historic narrative of the historical resources/features. Physical descriptions will detail each resource, elevation by elevation, with accompanying photographs and information on how the resource fits within the broader campus during its period of significance. The historic narrative will include available information on the campus design, history, architect/contractor/designer as appropriate, history of the area, and historic context. In addition, the narrative will include a methodology section specifying the name of researcher, date of research, and sources/archives visited, as well as a bibliography. Within the written history, statements shall be footnoted as to their sources, where appropriate.
	• Historic Documentation Package Submittal: Upon completion of the descriptive and historic narrative, all materials will be compiled in electronic format and presented to LAUSD for review and comment. Upon approval, one electronic copy and one hard copy shall be submitted to LAUSD OEHS. Photographs will be individually labeled and provided to LAUSD in electronic format.
SC-CUL-5	LAUSD shall comply with Design Specification 01 3591, Historic Treatment Procedures, as applicable. This Specification requires the Construction Contractor to submit a Historic Treatment Plan to the District for the protection, repair, and replacement of historic materials and features.
SC-CUL-6	LAUSD shall retain a qualified Archaeologist to be available on-call. The Archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology.
	To reduce impacts to previously undiscovered buried archaeological resources, following completion of the final grading plan and prior to any ground disturbance, a qualified archaeologist shall prepare an Archaeological Monitoring Program as described under SC-CUL-7.
SC-CUL-7	• The Construction Contractor shall halt construction activities within a 30 foot radius of the find and shall notify the LAUSD.
	• LAUSD shall retain an Archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology.



LAUSD Standard Conditions of Approval				
	• The Archaeologist shall have the authority to halt any project-related construction activities that could impact potentially significant resources.			
	• The Archaeologist shall be afforded the necessary time to recover and assess the find. Ground-disturbing activities shall not continue until the discovery has been assessed by the Archaeologist. With monitoring, construction activities may continue on other areas of the project site during evaluation and treatment of historic or unique archaeological resources.			
	• If the find is determined to be of value, the Archaeologist shall prepare an Archaeological Monitoring Program and shall monitor the remainder of the ground-disturbing activities.			
	• Significant archaeological resources found shall be curated as determined necessary by the Archaeologist and offered to a local museum or repository willing to accept the resource.			
	• Archaeological reports shall be submitted to the South Central Coastal Information Center at the California State University, Fullerton.			
	The Archaeological Monitoring Plan shall include:			
	- Extent and duration of the monitoring based on the grading plans			
	 At what soil depths monitoring of earthmoving activities shall be required 			
	 Location of areas to be monitored 			
	 Types of artifacts anticipated 			
	 Procedures for temporary stop and redirection of work to permit sampling, including anticipated radius of suspension of ground disturbances around discoveries and duration of evaluation of discovery to determine whether they are classified as unique or historical resources 			
	 Procedures for maintenance of monitoring logs, recovery, analysis, treatment, and curation of significant resources 			
	 Procedures for archaeological resources sensitivity training for all construction workers involved in moving soil or working near soil disturbance, including types of archaeological resources that might be found, along with laws for the protection of resources. The sensitivity training program shall also be included in a worker's environmental awareness program that is prepared by LAUSD with input from the Archaeologist, as needed. 			
	 Accommodation and procedures for Native American monitors, if required. 			
	 Procedures for discovery of Native American cultural resources. 			
	• The construction manager shall adhere to the stipulations of the Archaeological Monitoring Plan.			
SC-CUL-8	Cultural resources sensitivity training shall be conducted for all construction workers involved in ground-disturbing activities. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources and shall be included in a worker's environmental awareness program that is prepared by LAUSD with input from a qualified Archaeologist, as needed.			
SC-CUL-9	LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. If feasible, the Archaeologist shall prepare a Phase III Data Recovery/Mitigation Program to outline procedures to recover a statistically valid sample of the archaeological remains and to document the site and reduce impacts to be less than significant. All documentation shall be prepared in the standard format of the ARMR Guidelines, as prepared by the OHP. Once a Phase III Data Recovery/Mitigation Program is completed, an Archaeological Monitor shall be present to oversee the ground-disturbing activities to ensure that construction proceeds in accordance with the Program.			
SC-CUL-10	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified Archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.			

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

Less Than Significant Impact. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resources would be materially impaired.⁵⁴ Section 15064.5 of the State CEQA Guidelines defines a historical resource as (1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in an historical resources survey meeting certain State guideline; or (3) an object, building, structure, site, area, place, record or manuscript that a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, education, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. In terms of significant impacts, according to CEQA Guidelines Section 15064.5 (b)(3), a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or The Secretary of the Interior's Standards for Rehabilitating Historic Buildings (1995, revised 2017), Weeks and Grimmer, shall be considered as mitigated to a level of less than significant impact on the historical resource.

The 2022 Historic Resource Evaluation Report (**Appendix C**) identified a potential historic district at Fairfax HS that appears eligible for listing in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and for designation as a City of Los Angeles Historic Cultural Monument (HCM) under Criteria A/1/1 for its association with community activism and the ultimate desegregation of the school. As shown in **Figure 4: Existing Site Plan**, the potential historic district consists of nine (9) contributing buildings, three (3) contributing structures, and three (3) contributing site features with a period of significance of 1967 to 1969, which spans the years the school boundaries were redrawn for desegregation purposes. Two (2) buildings, the Auditorium Building and the Administration and Classroom Building, appear individually eligible for listing in the California Register and for designation as a City of Los Angeles Historic-Cultural Monument (HCM).

The proposed Project would include the demolition of the Shop Building, Gymnasium, Utility Building, and Ticket Office, which the 2022 Historic Resource Evaluation Report (**Appendix C**) identified as contributors to the Fairfax High School Campus historic district but not as individually eligible for designation at the national, State, or local levels.

The potential for implementation of SUP-related projects, such as the Fairfax High School Major Modernization Project, to impact historic resources was disclosed to the public in the 2023 SPEIR. The benefits of the proposed Project were found to outweigh potential significant impacts to historical resources, and a Statement of Overriding Considerations was adopted regarding this potential impact. The Standard Conditions of Approval documented in the SPEIR regarding direct or indirect effects on historical resources and new construction require implementation of LAUSD Standard Conditions **SC-CUL-1** through **SC-CUL-9** to reduce impacts from relocation, conversion, rehabilitation, alteration, damage or demolition of an historical resource. Compliance with federal, State, and local regulations and implementation of LAUSD Standard

⁵⁴ CEQA Guidelines, section 15064.5 (b)(1).

Conditions would reduce historic resource impacts to the extent feasible; however, full mitigation for the potential significant impact was not identified in the 2023 SPEIR.

Further analysis of the proposed Project was completed in the 2025 Cultural Resources Technical Report (**Appendix D**). According to the report, the proposed demolition of four of the fourteen buildings identified as contributing buildings to the Fairfax High School Campus historic district, including the Shop Building, Gymnasium, Utility Building, and Ticket Office, would not result in a loss of integrity of the historic district. The buildings proposed for demolition are located to the west and continue along the southwest boundary of the campus and are not considered to be primary contributors to the historic district. The Shop and Gymnasium buildings were identified as secondary contributors. The Ticket Office and Utility Building were identified as tertiary contributors. Furthermore, the Shop Building, Gymnasium, Utility Building, and Ticket Office do not primarily face onto Melrose Avenue and are set back from the Campus Arcade and Auditorium, which will remain as the primary entry and focal point of the campus on Melrose Avenue.

The report also determined that the contributing campus features to remain would sufficiently convey the feeling of significance the historic district possesses in its entirety. As previously discussed, the historic district was determined eligible for listing in the NRHP, CRHR, and as a City of Los Angeles HCM pursuant to Criterion A/1/1, for its association with desegregation within the context of the Civil Rights Movement (1954-1980). The significance of the period reflects initial desegregation within the LAUSD. The remaining contributing features will continue to convey the campus' association with the desegregation of schools because of community activism during the period of significance, 1967-1969.

Furthermore, the Auditorium Building and Administration and Classroom Building were determined individually eligible for listing in the CRHR and as City of Los Angeles HCM. The Auditorium Building appears individually eligible for listing in the California Register and for designation as a City of Los Angeles HCM under Criterion I/ I, as a 1920s school associated with the establishment and growth of the Jewish community in the Fairfax area, and under Criterion 3/3, for its notable Spanish Colonial Revival style architecture designed by master architects Donald and John Parkinson (Parkinson & Parkinson). The Auditorium Building has a period of significance of 1924, the date it was constructed. The Administration and Classroom Building also appears individually eligible for listing in the California Register and for designation as a City of Los Angeles HCM under Criterion 1/1, for its association with the notable LGBT program Project 10, and under Criterion 2/2, for its association with Dr. Virginia Uribe, notable LGBT advocate, teacher, and founder of Project 10. The Administration and Classroom Building has a period of significance of 1984, the year that Dr. Uribe founded Project 10 in the building.

Based on the determination of significance and eligibility of these individual buildings and as contributors to a historic district as a whole, the proposed demolition of two secondary buildings and two tertiary buildings would not impact the ability of the remaining contributing buildings to convey the association of the historic district with the period of significance and event (1967-1969) these buildings are associated with. Therefore, the proposed Project would not result in a substantial adverse change to a historical resource pursuant to CEQA Section 21084.1 and CEQA Section 15064.5 (b)(4) (Determining the Significance of Impacts to Archeological and Historical Resources).

As previously discussed, LAUSD Standard Conditions SC-CUL-1, SC-CUL-2, and SC-CUL-3, which require involvement of a Historic Architect through the entire design process and development of a Temporary

Protection Plan for those buildings to remain would be implemented. Additionally, LAUSD would retain an Architectural Photographer and/or Historian or Architectural Historian to prepare a Historic American Buildings Survey (HABS)-like Historic Documentation Package to include photographs and descriptive narrative, consistent with the requirements of LAUSD Standard Condition **SC-CUL-4**. Therefore, construction of the new buildings associated with the proposed Project would result in less than significant impacts to potential historical resources.

As required by **SC-CUL-1** and **SC-CUL-2**, a qualified Historic Architect will be part of the design team to ensure that the Project would be designed in compliance with the Secretary of Interior's Standards for the Treatment of Historic Properties (SOIS) and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The proposed Project includes construction of a new gymnasium, specialty classrooms, outdoor physical education courts, maintenance and operations facilities, and an Art Gallery Building, as well as additional hardscaping and landscaping features, and new construction would comply with SOIS to be compatible with the size, scale, and height of the remaining contributing buildings and landscape features and would not destroy spatial relationships that characterize the historic district. Per **SC-CUL-3** (and further defined by **SC-N-7**), a Temporary Protection Plan will be prepared to protect other contributors to the historic district during construction. **SC-CUL-4** requires that the contributing buildings be properly photo-documented prior to demolition. **SC-CUL-5** requires the construction contractor to submit a Historic Treatment Plan to protect, repair, and replace historic materials and features, as required by LAUSD Design Specification 01 3591. This includes provisions to reuse or display salvage materials and features that may have historic significance.

With implementation of **SC-CUL-1 through SC-CUL-5**, the proposed Project would result in less than significant impacts to historic resources. The proposed Project would not result in a substantial adverse change to a historical resource pursuant to CEQA Section 21084.1 and CEQA Section 15064.5 (b)(4) (Determining the Significance of Impacts to Archeological and Historical Resources). Therefore, the proposed Project would result in a less than significant impact. No mitigation or further analysis is required.

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

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

Soil on site is highly disturbed by construction of the existing and previous buildings, other structures and related site improvements. Per **SC-CUL-6**, an archeological program will be established as it pertains to the discovery of archeological resources, although, discovery is highly unlikely. Moreover, as part of the Project, **SC-CUL-7** through **SC-CUL-10** require the halting of work within a 30-foot radius in the event of a historical or unique archaeological resource discovery during construction activities. In the event of an archaeological discovery, LAUSD will retain a qualified archaeologist to make an evaluation of significance of the resources uncovered. If it is determined to be historical or a unique archaeological resource or if the discovery is not historical or unique but the archaeologist determines the possibility of further discoveries, a monitoring program will be prepared and implemented for the remainder of the earthwork activities.

If archaeological resources are discovered, **SC-CUL-10** would be implemented for handling and recovery. With the incorporation of **SC-CUL-6** to **SC-CUL-10**, archaeological impacts would be less than significant. No mitigation or further analysis is required.

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

Less Than Significant Impact. During previous construction of the Campus, extensive earthwork (excavation and grading) occurred; therefore, human remains are not anticipated. In the unlikely event that human remains are uncovered during Project demolition, grading, or excavation, Government Code Sections 27460 et seq. mandate that there shall be no further excavation or soil disturbance until the Los Angeles County Coroner has determined that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of death, and the required recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in PRC Section 5097.98.

Pursuant to California Health and Safety Code Section 7050.5, the coroner shall make his or her determination within two working days of notification of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe that they are those of a Native American, he or she shall contact the Native American Heritage Commission within 24 hours. The NAHC must immediately notify the Most Likely Descendant (MLD) of the deceased Native American. The MLD shall complete their inspection within 48 hours of being granted access to the site. The MLD would then determine, in consultation with the District, the disposition of the human remains. Compliance with existing regulations would ensure that impacts to human remains would be less than significant. No mitigation or further analysis is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. ENERGY		1		
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			\boxtimes	
b. Conflict with or obstruct a state or local plan for renewable energy efficiency?				

Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact energy resources. Projects implemented under the SUP were identified as having less-than-significant impacts on energy use and were consistent with plans for renewable energy efficiency in the LAUSD region.

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

LAUSD Standard Conditions of Approval				
SC-AQ-1	LAUSD shall complete a Health Risk Assessment for new campus locations that would place classrooms or play areas within close proximity (less than 0.25 mile) of existing sources of adverse emissions.			
	LAUSD shall identify all permitted and non-permitted stationary sources, freeways and other busy traffic corridors, railyards, and large agricultural operations within 0.25 mile of the project. Once identified, make a determination about the need for qualitative evaluation, screening level evaluation in accordance with air district specific guidance and tools, or a refined evaluation with air dispersion modeling, to determine the if risks constitute an actual or potential endangerment of public health to persons who would attend or be employed at the school.			
	For freeways and other busy traffic corridors within 500 feet, air dispersion modeling must be used to make the health risk determination (no screening, no qualitative discussion, etc.).			
	The Health Risk Assessment shall comply with 'Air Toxics Health Risk Assessment (HRA).' This document includes guidance on HRA protocols for permitted, non-permitted, and mobile sources that might reasonably be anticipated to emit hazardous air emissions and result in potential long-term and short-term health impacts to student and staff at the school site.			
	The HRA must find that health risks are below criteria thresholds. If health risks which exceed air district criteria thresholds are identified, the school campus shall be redesigned or relocated to a site farther from the emissions generator.			
SC-AQ-2	Construction Contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.			
SC-GHG-1	During operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.			
SC-GHG-2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.			
SC-GHG-3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.			

LAUSD Standard Conditions of Approval				
SC-GHG-4	LAUSD shall develop a water budget for landscape (both nonrecreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources.			
SC-GHG-5	LAUSD shall ensure that the designed time dependent valued energy shall be at least 10 percent, with a goal of 20 percent less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the Division of the State Architect.			
SC-USS-1	Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities:			
	School Design Guide. Establishes a minimum nonhazardous construction and demolition (C&D) debris recycling requirements of 75 percent by weight. Construction and demolition waste shall be recycled to the maximum extent feasible.			
	Construction & Demolition Waste Management. This document outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of nonhazardous waste materials generated during demolition and/or new construction to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling, salvaging and/or reusing a minimum of 75 percent of the C&D waste generated by weight.			
SC-USS-2	LAUSD shall coordinate with the City Department of Water and Power or other appropriate jurisdictions and departments prior to relocating or upgrading any water facilities to reduce the potential for disruptions in service.			
SC-USS-3	LAUSD shall provide an easily accessible area that services the entire school and is dedicated to the collection and storage of materials for recycling, including (at a minimum) paper, cardboard, glass, plastics, metals, and landscaping waste. There shall be at least one centralized collection point (loading dock), and the capacity for separation of recyclables where waste is disposed of for classrooms and common areas such as cafeterias, gyms, or multipurpose rooms.			

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

Less Than Significant Impact.

Electricity

Electricity to Fairfax HS is provided by the Los Angeles Department of Water and Power (LADWP). LADWP supplies over 21 million megawatt hours of electricity a year to the City' approximately 1.6 million users. LADWP is the largest municipal electric utility in the nation and its residential customers constitute the largest group of users for LADWP. Each residential user uses about 5,900 kilowatt-hours of electricity per year on average. However, the largest users of electricity in the City are the businesses and the industries, who consume approximately 70 percent of the total electricity provided by LADWP.⁵⁵ In addition, LADWP provides electricity for public services such as streetlights, the water system, and sells electricity to other utility providers.⁵⁶

⁵⁵ LADWP. Our History. Accessed April 2024. https://www.ladwp.com/who-we-are/our-

history#:~:text=Business%20and%20industry%20consume%20about,sells%20electricity%20to%20other%20utilities./. 56 LADWP. Past and Present. Accessed April 2024. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-

pastandpresent?_adf.ctrl-state=179urhlety_4&_afrLoop=198429219464879.

LADWP is capable of providing over 8,000 MW from a diverse mix of energy sources while the peak demand on record was reached on August 31, 2017, at 6,502 MW.⁵⁷ LADWP is composed of 34 generation plants, with over 3,600 miles of transmission circuits.⁵⁸

Electricity would be required during construction of the proposed Project for construction trailers, lighting, and electronic equipment. However, the electricity required for construction is expected to be minor as the primary energy used by most construction equipment would be petroleum based (i.e., gasoline and diesel). During operation electricity consumption of the proposed Project is expected to be similar or reduced from that of the existing energy consumption level, as the facility replacements and upgrades would reduce the total building area on the Campus and are expected to increase the school's operational efficiency. During operation, the Campus's combined energy consumption, including new buildings, is projected to require 2,494,711 KWH⁵⁹ per year as compared to 2,508,685 KWH⁶⁰ per year for the existing buildings on the campus.

The upgraded facilities and energy efficient features would also help reduce the amount of energy required for operation. Furthermore, the compliance with energy efficiency programs Title 24 standards, CALGreen, L.A.'s Green New Deal, LAUSD CHPS, LAUSD sustainability guidelines, LAUSD Board of Education Resolution 018-19/20, and existing energy standards and regulations would require the implementation of energy efficient facilities and renewable energy capabilities on campus. Therefore, the wasteful or unnecessary electricity consumption during construction and operation would be less than significant.

Natural Gas

Southern California Gas Company (SoCalGas) is the natural gas provider for the Project Site and the surrounding area. SoCalGas expects the abnormal peak demand in 2024-2025 to peak at 3,070 million cubic feet per day, with a maximum available supply of 4,108 million cubic feet per day. In addition, the demand for natural gas is expected to decrease over the years due to increase in energy storage resources, additional renewable resources, and the retirement of older gas-fired plants.⁶¹

Natural gas would primarily be used to support electricity output during the operation of the proposed Project. The proposed Project would replace and upgrade facilities on campus at Fairfax HS. Due to the age of the existing campus, the facility upgrades are expected to increase the school's operational efficiency and reduce the existing usage of natural gas. In addition, the reduction of the Campus' total building area would also further reduce the amount of natural gas needed on-campus during operation. Compliance with energy efficient programs including LAUSD CHPS and the CALGreen Code would also lower natural gas consumption from existing levels. Therefore, less than significant impact for unnecessary or wasteful natural gas consumption is expected.

⁵⁷ LADQP. Briefing Book 2018-2019.

⁵⁸ LADWP. Facts and Figures. Accessed April 2024. https://www.ladwp.com/who-we-are/power-system/facts-figures.

⁵⁹ Appendix A, Attachment 1.1, Section 5.11 Operational Energy Consumption.

⁶⁰ Appendix A, Attachment 1.4, Section 5.11 Operational Energy Consumption.

⁶¹ SoCal Gas. *California Gas Report.* 2022. Accessed April 2024. https://www.socalgas.com/sites/default/files/Joint_Utility_Biennial_Comprehensive_California_Gas_Report_2022.pdf.

Petroleum

Petroleum products that would be primarily used by the proposed Project would be composed of gasoline and diesel. Based on the data provided by the US Energy Information Administration (EIA), in 2013 the Southern California and Southern Nevada Region (SCSN Region) was able to produce roughly 526.8 thousand barrels/day, or an estimated 91 percent of the 606.6 thousand barrels/day demand in the region. Additional fuel supply enters the region primarily from refineries in Northern California and Washington State. There is also imports from the global market if demand is not met by the local suppliers. Distillate (including diesel) supply in the SCSN Region is produced entirely within the region itself. In 2013, the SCSN Region produced approximately 182.5 thousand barrels/day of diesel which represents roughly 117 percent of the regionwide consumption of 155.5 thousand barrels/day.⁶² Additionally, the EIA estimates a total crude oil supply of 16.6 million barrels per day in 2025.⁶³

Construction of the proposed Project would include demolition, grading, building construction, landscaping, utility installation, and building upgrades in different phases. Petroleum would be the primary fuel source used during construction to power heavy-duty equipment, operate haul trucks and delivery trucks, and operate temporary power for lighting and electronic equipment. The use of petroleum fuel during construction would comply with **SC-AQ-1** and **SC-AQ-2**, which would reduce the amount of petroleum products used through more up to date and efficient equipment that are properly maintained. With the implementation of **SC-AQ-1**, **SC-AQ-2** and compliance with local, State, and Federal requirements, the impacts of unnecessary or wasteful petroleum use is expected to be less than significant.

Overall, the proposed Project would comply with the Title 24 standards, CALGreen, L.A.'s Green New Deal, LAUSD CHPS, LAUSD sustainability guidelines, LAUSD Resolution 018-19/20, and existing energy standards and regulations. Furthermore, the proposed Project would implement the energy efficiency measures outlined in **SC-AQ-2**; **SC-GHG-1** through **SC-GHG-5**; and **SC-USS-1** through **SC-USS-3**. Therefore, there would be less than significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.⁶⁴ No mitigation or further analysis is required.

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

Less Than Significant Impact.

Renewable Energy

In 2007, the LADWP Integrated Resource Plan (IRP) was published to provide a roadmap for reaching at least 20 percent renewable energy by the end of 2010. The IRP also laid out a strategy for reducing GHG emissions to meet the California Global Warming Solutions Act of 2006. The IRP was updated in 2010 to continue increasing renewable energy and reducing GHG emissions from the LADWP power plant. By 2010 LADWP

⁶² EIA. West Coast Transportation Fuels Markets. September 2015. Accessed April 2024.

https://www.eia.gov/analysis/transportationfuels/padd5/pdf/transportation_fuels.pdf.

⁶³ EIA. "Table 11. Petroleum and Other Liquids Supply and Disposition." *Annual Energy Outlook.* 2023. Accessed April 2024. https://www.eia.gov/outlooks/aeo/data/browser/#/?id=11-AEO2023®ion=0-

^{0&}amp;cases=ref2023&start=2021&end=2025&f=A&linechart=ref2023-d020623a.3-11-AEO2023&sourcekey=0.

⁶⁴ Due to the number of players and processes that is involved in the construction material production process, the energy use of the material production process cannot be reasonably estimated in this study document.

has met its goal of 20 percent renewables as a number of wind projects came online and has already reduced the carbon emissions from the power plants to 22 percent below 1990 levels.⁶⁵ LADWP has increased its renewable energy portfolio to 35 as of 2021, and is aiming for 100 percent by the end of 2045.⁶⁶ As an entity that is serviced by LADWP, the utility usage at Fairfax HS is directly impacted by the improvements and upgrades at its facilities. The renewable energy improvements at LADWP directly shifts the electricity portfolio used by the Campus.

In addition to the improvements at LADWP, the LAUSD Board of Education (Board) passed a resolution on December 3rd, 2019 to transition all of its operations to 100 percent clean, renewable energy.⁶⁷ Fairfax HS will achieve 100 percent renewable energy through its electricity provider at LADWP by 2045.

Energy Efficiency

LADWP began upgrading its Generating Stations to cleaner and more efficient versions starting in 1989 and under the 2000 IRP. Since the upgrades, nitrogen oxide emissions have been reduced by approximately 90 percent, efficiency has been increased by 30 percent to 40 percent, and carbon dioxide emissions from these plants have been reduced by 30 percent to 40 percent.⁶⁸

Additionally, LAUSD has developed a CHPS program that will incorporate energy saving features to minimize energy consumption. The proposed Project is also required to comply with Title 24 of the State policy on new building energy efficiency. Both Title 24 and the CHPS program aims to improve energy efficiency in buildings, minimize impacts during peak energy-usage periods, and reduce impacts on State energy needs.

The proposed Project would comply with the Title 24 standards, CALGreen, City' Green New Deal, LAUSD CHPS, LAUSD sustainability guidelines, LAUSD Resolution 018-19/20, and existing energy standards and regulations. Furthermore, the proposed Project would implement the energy efficiency measures outlined in **SC-AQ-2**; **SC-GHG-1** through **SC-GHG-5**; and **SC-USS-1** through **SC-USS-3**. Therefore, impacts during construction and operation of the proposed Project would be less than significant. No mitigation or further analysis is required.



⁶⁵ LADWP. Power Past & Present. Accessed April 2024. https://www.ladwp.com/who-we-are/our-history/power-past-present.

⁶⁶ LADWP. Renewable Energy Program. Accessed April 2024. https://www.ladwp.com/who-we-are/power-system/renewableenergy/renewable-energy-program.

⁶⁷ LAUSD. Board of Education. Accessed April 2024. https://www.lausd.org/site/default.aspx?PageType=3&DomainID=4&ModuleInstanceID=4466&ViewID=6446EE88-D30C-497E-9316-3F8874B3E108&RenderLoc=0&FlexDataID=84166&PageID=1.

⁶⁸ LADWP. Power Past & Present.

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

Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to result in impacts to geology and soils. Projects implemented under the SUP were identified as having less-than-significant impacts related to seismic activity or unstable soils; additionally, projects would not require the use of septic tanks, and projects would not destroy a paleontological resource or unique geological feature in the LAUSD region.

A Report of the Geotechnical Investigation has been completed for the proposed Project and is included in **Appendix E: Report of Geotechnical Investigation**.

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

LAUSD Standard Conditions of Approval				
SC-GEO-2	LAUSD shall retain a Paleontological Monitor to oversee specific ground-disturbing activities as determined by the scope of work and final grading plan. The Monitor shall provide the construction			

	LAUSD Standard Conditions of Approval				
	crew(s) with a brief summary of the sensitivity, the rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources. If paleontological resources are uncovered, the Construction Contractor shall halt construction activities within a 30-foot radius of the find and shall notify the LAUSD.				
	• Ground-disturbing activities shall not continue until the discovery has been assessed by the Paleontologist.				
	• The paleontologist shall have the authority to halt construction activities to allow a reasonable amount of time to identify potential resources.				
	Significant resources found shall be curated as determined necessary by the Paleontologist.				
SC-HWQ-1	LAUSD shall design and construct the project to meet or exceed the current and applicable stormwater Guidelines.				
	Stormwater Technical Manual				
	This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). These guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) and the mandated post-construction element of the NPDES program requirements.				
SC-HWQ-2	LAUSD shall implement the applicable stormwater requirements during construction activities.				
	Compliance Checklist for Storm Water Requirements at Construction Sites This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.				

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

No Impact. Alquist-Priolo Earthquake Fault Zones are regulatory zones that encompass surface traces of active faults that have a potential for future surface fault rupture. The purpose of the Alquist-Priolo Earthquake Fault Zoning Act is to identify hazards associated with surface fault ruptures and to prevent the construction of buildings on active faults.⁶⁹ Proposed development needs to be proven through geologic investigation to not be located across active faults before a city or county can permit the implementation of projects.

The proposed Project is not mapped within an Alquist-Priolo Earthquake Fault Zone. The nearest Alquist-Priolo Earthquake Fault Zone to the Project Site is known as Hollywood Fault Zone, located approximately 1.1 miles northwest of the site.⁷⁰ Another Alquist-Priolo Earthquake Fault Zone, known

⁶⁹ LA County Planning. "Chapter 12: Safety Element." *General Plan.* Accessed May 2024. https://planning.lacounty.gov/long-range-planning/general-plan/general-plan-elements/.

⁷⁰ California Department of Conservation. "Geological Survey, Earthquake Zones of Required Investigation." Accessed April 2024. https://maps.conservation.ca.gov/cgs/EQZApp/app/.

as the Santa Monica Fault Zone, is located approximately 9.1 miles southwest of the Project Site.⁷¹ The proposed Project involves the renovation of an existing school site and would not include any activities that would exacerbate any existing conditions related to faults, fault rupture, ground shaking or landslides that would directly expose people, or structures, to the risk of loss, injury, or death due to rupture of a known earthquake fault. Additionally, the proposed Project would be designed and constructed in accordance with current engineering practices and the California Building Code to ensure that development of the Project Site would be safe for construction and operation. The Project would not increase exposure of people or structures to fault rupture impacts, as renovation and new building construction would occur within an existing utilized campus. Impacts would be less than significant. No mitigation or further analysis is required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. Southern California is a highly active seismological area. The Project would not increase exposure of people or structures to earthquake impacts, as renovation and new building construction would occur within an existing utilized campus. Since the Project is mapped within 2 miles of the Hollywood Fault Zone, it is probable that the Project Site would experience moderate to strong ground motion due to earthquakes.

Of the 16 buildings on campus, 5 buildings would be demolished under the proposed Project. The Project would also construct a new gymnasium, specialty classrooms, outdoor physical education courts, maintenance and operations facilities, and an Art Gallery Building. The new building and paved surface courts would be designed and constructed in accordance with the California Building Code (CBC) and DSA standards. As a public school, Fairfax HS would comply with the California Code of Regulations Title 24 requirements and the California Geological Survey Checklist for Review of Geologic/Seismic Reports. Development of the proposed Project related to strong seismic ground shaking would be less than significant. No mitigation or further analysis is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction occurs when loose, cohesionless, and water-saturated soils (generally fine-grained sand and silt) are subjected to strong seismic ground motion of a single sudden motion or through repeated cyclic durations. Such soils essentially behave like liquids, losing shear strength. Improvements constructed on these soils may buckle, tilt, or settle when the soils liquefy. Liquefaction more often occurs in earthquake-prone areas underlain by young, sandy alluvium where the groundwater table is less than 50 feet below the ground surface.

According to **Appendix E: Geotechnical Investigation**, the Project Site is not located in an area where soils are susceptible to liquefaction and seismically induced settlement.⁷² The Geotechnical Investigation estimates that seismically-induced and liquefaction-induced settlement of soils above the groundwater level beneath the Project Site would be on the order of ¹/₂ inch or less in the event of the Maximum

⁷¹ California Department of Conservation. "Geological Survey, Earthquake Zones of Required Investigation."

⁷² City of Los Angeles. "Zone Information and Map Access System (ZIMAS)." Accessed April 2024. https://zimas.lacity.org/.

Considered Earthquake (magnitude 6.8). Impacts from ground failure and/or liquefaction would be less than significant. No mitigation or further analysis is required.

iv. Landslides?

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

The general topography of the Project Site is relatively flat.⁷³ The Project is not located within an area identified to have a potential for seismic slope instability or near, or within the path of, any known landslides.⁷⁴ In the absence of significant slopes, the potential for seismically induced landslides to affect the Project Site are considered negligible. As the Project would not exacerbate any existing conditions, no impacts would occur. No mitigation or further analysis is required.

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

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

Construction Phase

The Project would not result in substantial soil erosion or loss of topsoil. The native topsoil was removed and/or compacted during initial development of the existing site; therefore, redevelopment of the Project Site would not result in loss of topsoil.

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



⁷³ See Appendix E: Geotechnical Investigation.

⁷⁴ See Appendix E: Geotechnical Investigation.

Operational Phase

After completion of the Project, ground surfaces at the school campus would be either hardscape or maintained landscaping, and no large areas of exposed soil would be left to erode off the campus. The Project would incorporate **SC-HWQ-1**, which would be consistent with the Low Impact Development Standards Manual (LID Standards Manual) issued by the County of Department of Public Works in February 2014.⁷⁵ Therefore, operation-phase soil erosion impacts would be less than significant. No mitigation or further analysis is required.

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

Less Than Significant Impact. Hazards arising from liquefaction and seismically induced settlement and landslides would be less than significant, as discussed in sections a.(iii) and (iv). The Project would be designed and constructed in accordance with current engineering practices and the California Building Code, and impacts would be less than significant. No mitigation or further analysis is required.

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

Less Than Significant Impact. Expansive soils shrink or swell as the moisture content decreases or increases. This activity can shift, crack, or break structures built on such soils. As stated above in section a.(ii), (iii), and (iv) all potential impact from soil quality would be reduced through compliance with proper design and construction practices. Therefore, impacts would be less than significant. No mitigation or further analysis is required.

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

No Impact. The proposed Project would not include the installation or use of septic tanks or alternative water disposal systems. The proposed Project would connect to the existing sanitary sewer system for wastewater disposal. Thus, no impact related to alternative wastewater disposal systems would occur. No mitigation or further analysis is required.

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

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

As discussed above, the Project Site has been previously disturbed, and therefore, it is unlikely that undisturbed paleontological resources exist on the Project Site. Any surficial paleontological resources, which may have existed at one time, have likely been unearthed or disturbed to accommodate building foundations, and shallow excavation, or surface grading, is unlikely to uncover any paleontological resources. Earth moving and grading

⁷⁵ LA County. Low Impact Development Standards Manual. May 9, 2016. Accessed April 2024. https://pw.lacounty.gov/wmd/dsp_LowImpactDevelopment.cfm.

activities could potentially exceed the depth of prior grading activities and therefore, unanticipated discovery of unique paleontological resources is possible. As part of the Project implementation, **SC-GEO-2** requires that a paleontological monitoring program be prepared and implemented for earthwork activities. In the unlikely event that paleontological resources are uncovered, construction within a 30-foot radius would stop and LAUSD would be notified. For these reasons, impacts to paleontological resources would be less than significant. No mitigation or further analysis is required.



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

Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to result in impacts from greenhouse gas emissions. Projects implemented under the SUP were identified as having less-than-significant impacts resulting from the generation of greenhouse gas emissions and were consistent with greenhouse gas reduction plans in the LAUSD region. LAUSD has SCs for minimizing impacts to greenhouse gas emissions. Applicable SCs related to greenhouse gas emissions impacts associated with the proposed Project are provided below:

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

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

Less Than Significant Impact. Significant legislative and regulatory activities directly and indirectly affect climate change and GHGs in California. The primary climate change legislation in California is AB 32, the California Global Warming Solutions Act of 2006. AB 32 focuses on reducing greenhouse gas emissions in California, and AB 32 requires that GHGs emitted in California be reduced to 1990 levels by the year 2020. In addition to AB 32, Executive Order B-30-15 was issued on April 29, 2015, that aims to reduce California's GHG emissions 40 percent below 1990 levels by 2030. In September 2016, AB 197 and SB 32 codified into statute the GHG emission reduction targets provided in Executive Order B-20-15.

The CalEEMod model used to calculate the criteria pollutant emissions was also utilized to calculate the GHG emissions associated with construction and operation of the proposed Project. For the results of the CalEEMod model, please refer to **Appendix A: Air Quality Study**. As shown in **Table 7** and **Table 8** in **Section III: Air Quality**, the construction and operational emissions unmitigated would be considerably lower than the SCAQMD threshold for the duration of the project. Therefore, net localized construction and operational emissions would not exceed localized thresholds.

The proposed Project would not generate direct GHG emissions from new vehicle trips or on-site sources due to capacity increase or change in operation. Additionally, no indirect emissions from off-site energy production required for on-site activities, water use, and waste disposal would be generated. Implementation of the proposed Project would not increase the school capacity or result in any new sources of GHG emissions once construction of the Project is complete. Therefore, there is no operational impact of the proposed Project related to GHG emissions. In addition, it is not anticipated that construction would generate GHG emissions that would exceed the SCAQMD significance thresholds.

In addition, the proposed Project would implement **SC-GHG-1** through **SC-GHG-5** which require water and energy efficient features and measures to be included prior to operation of the proposed Project. As such, impacts relating to the generation of GHGs would be less than significant. No mitigation or further analysis is required.

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

Less Than Significant Impact. In response to concern regarding GHGs and global climate change, the State passed AB 32, also known as the California Global Warming Solutions Act of 2006. AB 32 (Health and Safety Code Section 38500 et. seq.) mandated a reduction in the State's GHG levels. AB 32 is the basis for reduction of GHG emissions in California. Local agencies such as the SCAQMD base their planning and regulations on the requirements included in AB 32, which include a reduction of GHG emissions to 1990 rates by 2020. The SCAQMD adopted the GHG significance thresholds specifically to meet AB 32 requirements within its jurisdiction, and so plans and projects that meet those thresholds can be assumed to meet the requirements of AB 32.

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

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

In addition, SB 375 passed by the State of California in 2009, requires metropolitan regions to adopt transportation plans and sustainable communities strategy that reduce vehicle miles traveled. In accordance with SB 375, SCAG prepared and adopted the 2024 Regional Transportation Plan/Sustainable Communities Strategy with the primary goal of enhancing sustainability by increasing multimodal transportation options and identifying land use strategies that focus new housing and job growth in areas served by public transit.



Moreover, LAUSD has committed to 100 percent renewable energy, which would also reduce GHG emissions.⁷⁶ Development of the proposed Project would not conflict with any plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Impacts would be less than significant. No mitigation or further analysis is required.

⁷⁶ LAUSD. Los Angeles Unified School Board Commits to Transitioning to 100 percent Clean, Renewable Energy. Accessed April 2024. https://www.lausd.org/site/default.aspx?PageType=3&DomainID=4&ModuleInstanceID=4466&ViewID=6446EE88-D30C-497E-9316-3F8874B3E108&RenderLoc=0&FlexDataID=84166&PageID=1.

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

Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to result in impacts from hazards and hazardous materials. Projects implemented under the SUP were identified as having less-thansignificant impacts resulting from the routine transport, use, or disposal of hazardous materials or the accidental release of hazardous materials, and projects were consistent with local, State, and federal policies and regulations pertaining to hazardous materials in the LAUSD region.

A Phase I Environmental Site Assessment has been completed for the proposed Project and is included in **Appendix F: Phase I Environmental Site Assessment**. A Preliminary Environmental Assessment Equivalent Report was completed for the proposed Project and is included in **Appendix J**.

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

LAUSD Standard Conditions of Approval		
SC-HAZ-4	The Construction Contractor shall comply with the following OEHS Site Assessment practices and requirements (as applicable):	
	• District Specification Section 01 4524, Environmental Import / Export Materials Testing.	
	Removal Action Workplan or Remedial Activities Workplan.	
	California Air Resources Board Rule 1466.	
	• Guidelines and Procedures to Address Polychlorinated Biphenyls (PCBs) in Building Materials - particularly applicable to buildings that were constructed or remodeled between 1959 and 1979.	
	• Lead and asbestos abatement requirements identified by the Facilities Environmental Technical Unit (FETU) in the Phase I / Phase II, or abatement plan(s).	
SC-T-4	Implementation of SC-T-4 .	

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

Less Than Significant Impact. The findings of the Phase I Environmental Site Assessment (Phase 1 ESA) (**Appendix F**) indicate that the Project Site has the potential to contain organochloride pesticides, lead, and arsenic contamination in shallow soils around drip lines of buildings resulting from the use of termiticides, herbicides, and pesticides at locations where buildings may be demolished.

A Preliminary Environmental Assessment – Equivalent (PEA-E) investigation was conducted to investigate the potential environmental conditions identified in the Phase I ESA. These environmental conditions include historical site activities such as an auto shop, clarifier, septic wells, hydraulic lifts, and hazardous waste storage. Existing environmental conditions include lead from lead-based paint, arsenic, OCPs, polychlorinated biphenyls (PCBs), and asbestos around existing buildings. Additional testing was also conducted for contaminants in fill soils and volatile organic compounds (VOCs) from onsite and offsite sources. The findings of the PEA-E reported that there were no contaminants above EPA and DTSC regulatory screening levels and no further action is required for soil.

As part of the PEA-E, soil vapor was also investigated for VOCs across the Major Modernization boundaries and at focused locations where hazardous material activities occurred at the Site (e.g., clarifier, auto shop, hydraulic lists, hazardous waste storage, and septic wells). The soil vapor investigation resulted in benzene and tetrachloroethene (PCE) detections above DTSC residential screening levels. In response a screening risk assessment was completed using the DTSC Johnson & Ettinger Model (released in November 2024). The incremental cancer risks and hazard indices using the conservative residential exposure scenario and maximum detected benzene and PCE concentrations were found to *de minimis*, or significantly below the EPA and DTSC health risk screening level of 1E-06. As a result, no further action is required for soil vapor. Additionally, the findings of the Phase I ESA indicate that the Project Site is located within an EPA Radon Zone 2 area. No radon sampling results were available for the Project Site, however based upon location in an EPA Radon Zone 2 and slab-on-grade construction, radon is not expected to represent a recognized environmental condition at the Project Site.

The buildings designated for demolition for the proposed Project were constructed prior to 1976, before the Toxic Substances Control Act came into effect, addressing the production, importation, use, and disposal of chemicals including asbestos, radon, polychlorinated biphenyls (PCBs) and lead. Hazardous materials are also regulated by the United States Environmental Protection Agency (US EPA), Department of Toxic Substances Control (DTSC), Occupational Safety & Health Administration (OSHA), SCAQMD, and the Los Angeles Fire Department (LAFD). Given the age of the buildings, the materials and features of the structures to be demolished may contain substances that would be considered hazardous. Demolition, modernization, and associated construction activities would alter the structure and materials potentially releasing hazardous waste components if not properly contained. However, testing will be done prior to any demolition or alterations required for the proposed Project. If any hazardous materials are found, proper containment and removal procedures would be followed and carried out by licensed professionals. In addition, any transport, use, or disposal of construction-related hazardous materials would occur in conformance with all applicable local, State, and federal regulations governing such activities.

The proposed Project is an educational facility which would not involve routine transport, use, or disposal of hazardous materials during operation. Required maintenance supplies such as pesticides, cleansers, lubricants, and paints would be used and stored on site. Proper maintenance of storage areas and appropriate storage of hazardous materials on campuses would be required. All hazardous materials would be contained, stored, and used according to manufacturers' instructions and handled in compliance with applicable standards and regulations.

The proposed Project would comply with the Toxic Substances Control Act and existing federal, State, and local standards and regulations regarding hazardous waste. Compliance with existing standards and regulations would minimize associated risks to a less than significant level and the proposed Project would not pose a significant impact to the public or the environment. No mitigation or further analysis is required.

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

Less Than Significant Impact The proposed Project construction may require the transportation, use, and disposal of hazardous waste materials. As referred to within Threshold (a), the buildings designated for demolition are built before the enactment of the Toxic Substances Control Act came into effect in 1976 and may contain materials and chemicals that would be considered hazardous. In addition, the handling of the hazardous waste materials is regulated by the US EPA, DTSC, OSHA, SCAQMD, LAFD. The proposed Project will comply with all applicable local, State, and federal regulations governing such activities.

During the operation of the proposed Project, hazardous waste use would be minimal and in small quantities. The hazardous waste material will be properly used and stored according to the manufacturers' instructions and follow any additional health and safety requirements stipulated by LAUSD OEHS, including Chemical Hygiene, Safe School Inspections, and Environmental Compliance Programs.⁷⁷

A Methane Survey Report (Appendix G) prepared for the proposed Project did not detect methane and hydrogen sulfide within the Project Site. However, the Project Site is located within an identified Methane



⁷⁷ LAUSD. Office of Environmental Health & Safety. Accessed April 2024. https://achieve.lausd.net/Page/2562.

Zone. Methane systems would be designed to follow Los Angeles Department of Building and Safety (LADBS) guidelines and would be reviewed by the DTSC during the Division of the State Architect's review of the proposed Project.

The Phase I Environmental Site Assessment included a review of DTSC's EnviroStor database which revealed that five (5) listed sites located within a one-mile search radius of the Project Site. No violations have been reported in association with these sites, and due to their status, distance, and being located downgradient to the Project Site, the listed sites do not constitute recognized environmental concerns regarding the proposed Project. The nearest cleanup site is 0.7 miles northwest of the proposed Project Site at the intersection of Santa Monica Boulevard and N. Sweetzer Avenue. This is an active voluntary cleanup site, and currently developed as a three-suite, single-story commercial/industrial facility that includes a café, a dry cleaner and a used clothing store.

The proposed Project would comply with the Toxic Substances Control Act and existing federal, State, and local standards and regulations regarding hazardous waste, including the LADBS methane mitigation requirements described above. Hazardous release impacts during construction and operation of the proposed Project would be less than significant. No mitigation or further analysis is required.

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

Less Than Significant Impact. The proposed Project is located in a mixed-use neighborhood with both commercial and residential development. Schools within one-quarter mile include Walt Whitman High School which is adjacent to the southern edge of the campus on Rosewood Avenue. The proposed Project Site is a school as well and impacts may occur if hazardous waste materials were to be released on campus.

As presented in Thresholds (a) and (b), the proposed Project will include demolition and alteration of existing buildings constructed prior to 1976, the enactment of the Toxic Substances Control Act. Due to the ages of the existing buildings, material and parts of the buildings designated for demolition may contain hazardous waste materials. The proposed Project will require routine transport, use, and disposal of materials with the potential to contain hazardous chemicals. However, the handling of hazardous waste is regulated by the US EPA, DTSC, OSHA, SCAQMD, and LAFD. In addition, the proposed Project would implement **SC-HAZ-4** and **SC-T-4** to reduce the amount of hazardous waste materials emitted during construction.

During operation, the proposed Project is expected to continue its current functions with minimal uses of hazardous materials on site. Any hazardous chemicals used would be properly handled and stored according to manufacturer's instructions. Operation of the proposed Project would also follow applicable LAUSD regulations including LAUSD OEHS Chemical Hygiene, Safe School Inspections, and Environmental Compliance Programs. Procedures and systematic evacuation instructions are also available in the event that an unintended hazardous waste emission takes place. In addition, the proposed Project would comply with all applicable local, State, and federal regulations governing such activities, decreasing the impact of handling the hazardous waste materials to less than significant.

Additionally, the Phase I Environmental Site Assessment identified potential sources of PCBs, organochlorine pesticides/arsenic, asbestos, and lead-containing materials associated with construction of historic autobody,

woodworking, paint, and electrical shop buildings formerly located on the west portion of the Project Site, based on the age of their construction. Various Southern California Edison transformers located in the quad area were also identified as potential sources of PCB-containing materials based on date of construction. Site plans from March 1927 indicated various cesspools at the northwest, northeast, and north central portion of the campus, however the disposition of the cesspools is unknown. Proper testing would be completed prior to any demolition or alterations required for the proposed Project. If any hazardous waste materials are found, proper containment and removal procedures would be followed and carried out by licensed professionals. In addition, any transport, use, or disposal of construction-related hazardous materials would occur in conformance with all applicable local, State, and federal regulations governing such activities. Therefore, the proposed Project would not create a significant hazard to the public or the environment. Impacts would be less than significant. No mitigation or further analysis is required.

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

Less Than Significant Impact. The Phase I Environmental Site Assessment included a review of DTSC's EnviroStor database, EPA's National Priorities List, and SWRCB's GeoTracker which indicated the Project Site is not located on, or in the general vicinity of, any hazardous materials sites compiled pursuant to Government Code Section 65962.5.

Review of the DTSC's EnviroStor database revealed that five (5) listed sites are located within a one-mile search radius of the Project Site. No violations have been reported in association with these sites, and due to their status, distance, and/or downgradient to the Project Site, the listed sites do not constitute recognized environmental concerns regarding the proposed Project. Review of the EPA's National Priorities List revealed that the Project Site is not listed as a site and no listed site is located within a 1.0-mile search radius of the Project Site. Review of the SWRCB's GeoTracker database revealed that 18 State Active Underground Storage Tank Facilities sites are located within a 0.25-mile search radius of the Project Site. No violations have been reported in association with these sites, and due to their status, distance, and/or downgradient to the Project Site, the listed sites do not constitute recognized environmental concerns regarding the proposed Project. The Project Site is not 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, development of the proposed Project would not create a significant hazard to the public or the environment. Therefore, impacts would be less than significant. No mitigation or further analysis is required.

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

No Impact. The proposed Project is not located within an airport land use plan or within two miles of a public airport. The closest airport to the proposed Project is the Santa Monica Airport approximately 6.5 miles southwest of the proposed Project Site. Given the nature and location of the proposed Project, no safety hazards or excessive noise impacts would occur due to the proximity of an airport. No mitigation or further analysis is required.

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

Less Than Significant Impact. Since public schools are designed as critical community facilities, the campuses are often used as evacuation centers during disasters. Construction for the proposed Project will be conducted in phases to allow partial use of campus facilities as emergency resources. In addition, LAUSD schools are required to comply with the California Education Code Sections 32281-32289 dealing with the preparation of "Safe School Plans." The Safe School Plans develop emergency response protocols during an emergency on a District site during renovation, modification, and contracted work. The Safe School Plans are updated annually to capture the most up to date policy advances and protocol improvements. In addition, contractors on site would also develop an emergency response plan in the event of an unforeseen emergency. During an emergency during construction, all applicable protocols would be followed.

The function and operation of the proposed Project Site will remain unchanged. LAUSD has developed an Emergency Operation Plan (EOP) that provides protocols and assigned personnel in response to recovery efforts in the event of an emergency. The EOP functions in coordination with the local ordinances and would not interfere with locally adopted emergency response plan and emergency evacuation plans. Therefore, the operation of the proposed Project is not expected to interfere with an adopted emergency response plan and emergency evacuation plan. Impacts would be less than significant. No mitigation or further analysis is required.

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

No Impact. The Project Site is in an urbanized area characterized as "Urban and Built-Up Land" with no wildland susceptible to wildfire on or near the Project Site. ⁷⁸ The Project Site and adjacent areas are not classified under a Fire Hazard Severity Zone or WUI zone by the California Department of Forestry and Fire Prevention (CAL FIRE) and the U.S. Forest Service. ^{79,80} Given the nature and location of the proposed Project, no exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. No mitigation or further analysis is required.

⁷⁸ California Department of Conservation. "California Important Farmland Finder." Accessed April 2024. https://maps.conservation.ca.gov/DLRP/CIFF/.

⁷⁹ CAL FIRE. "Fire Hazard Severity Zones." Accessed April 2024. https://osfm.fire.ca.gov/what-we-do/community-wildfirepreparedness-and-mitigation/fire-hazard-severity-zones.

⁸⁰ U.S. Forest Service. "Wildland Urban Interface." Accessed April 2024. https://datausfs.hub.arcgis.com/documents/7804d89ed1094ccb9aae753228e8d89a/explore.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY		1		
 a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? 				
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial on- or offsite erosion or siltation;			\boxtimes	
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;				\boxtimes
 iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or 				
iv) Impede or redirect flood flows?				\boxtimes
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				\square
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?				\boxtimes

Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact hydrology and water quality. Projects implemented under the SUP were identified as having less-than-significant impacts on surface and groundwater quality and stormwater drainage systems, and projects were consistent with local, State, and federal policies and regulations pertaining to hydrology and water quality in the LAUSD region.

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

	LAUSD Standard Conditions of Approval
SC-HWQ-1	LAUSD shall design and construct the project to meet or exceed the current and applicable stormwater guidelines.
	Stormwater Technical Manual
	This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water

LAUSD Standard Conditions of Approval		
	quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). These guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) and the mandated post-construction element of the NPDES program requirements.	
SC-HWQ-2	LAUSD shall implement the applicable stormwater requirements during construction activities.	
	Compliance Checklist for Storm Water Requirements at Construction Sites	
	This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.	
SC-HWQ-3	LAUSD shall implement the following programs and procedures, as applicable:	
	• Environmental Training Curriculum – a qualified environmental Monitor shall provide a worker's environmental awareness program that is prepared by LAUSD for the project.	
	Hazardous Waste Management Program (Environmental Compliance/Hazardous Waste).	
	Medical Waste Management Program.	
	Environmental Compliance Inspections.	
	Safe School Inspection Program.	
	Integrated Pest Management Program.	
	Fats Oil and Grease Management Program.	
	Solid Waste Management Program.	
	• Other related programs overseen by OEHS.	

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

Less Than Significant Impact. The proposed Project Site is located in a highly developed neighborhood in the City, surrounded by residential, mixed-use commercial, and other commercial uses. New construction projects can produce short-term impacts through construction activity and long-term impacts through an increase of impervious surfaces. Impervious surfaces can increase the concentration of pollutants, such as oils, trash, pesticide, and sedimentation from storm runoff.

Section 13050 of the California Water Code (CWC) defines significant impact on surface water quality if the discharge will include pollution, contamination, or nuisance. A significant impact may occur if the proposed Project would produce discharge to surface water which does not meet the quality standards of the regulating agencies. Construction of the proposed Project would include the transportation of soil, grading, and excavating. Prior to the start of the demolition or soil-disturbance, the District is required to file Permit Registration Documents (PRDs) to the SWRCB electronically per LAUSD Reference Guide REF-6286.0. LAUSD REF-6286.0 requires projects which involve demolition, clearing, grading and excavation on land areas equal to or greater than one acre to comply with SWRCB Order No. 2009-0009-DWQ. REF-6286.0 outlines the process and requirements for compliance with Order No. 2009-0009-DWQ.

The proposed Project would be designed to maintain the existing and historic patterns and storm water discharge locations within and along the perimeter of the Project Site. Construction of new structures would

generally occur within the footprint of demolished structures, and implementation of the proposed Project is not anticipated to increase impervious surfaces on Campus. The existing drainage system is designed to accommodate existing runoff from the Project Site, and the design of the proposed Project would intercept and capture stormwater runoff within the Project Site to the extent feasible. Irrigation systems and other water delivering features would be selected in accordance with the LAUSD standards to maintain water efficiency on campus and reduce discharge. The expected volume of discharge during operation is anticipated to be comparable to the existing discharge volume at the site.

The proposed Project would implement a SWPPP, BMPs, and monitoring for storm water discharge to ensure that sedimentation of downstream waters remain within regulatory limits per **SC-HWQ-2**. The proposed Project would also comply with all applicable regulations from Federal, State, and local levels, including Section 402 of the Clean Water Act, the US EPA's NPDES program, and **SC-HWQ-1** through **SC-HWQ-3**. The implemented measures will minimize the water discharged to a less than significant level. No mitigation or further analysis is required.

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

Less Than Significant Impact. The Project Site is located within the Hollywood Sub-basin of the Coastal Plain of the Los Angeles Groundwater Basin. According to the Geotechnical Investigation (**Appendix X**) prepared for the Project, the historic-high groundwater level is between 30 and 40 feet below ground surface (bgs). Ground water at the site is currently measured at depths between 23 and 35 feet bgs.

A significant impact would occur if the proposed Project would substantially deplete or interfere with existing groundwater recharge. As referred to within Threshold (a), the Project Site is currently developed with little existing permeable surface area. The proposed Project would not add significant impermeable surface to the existing Project Site and would, therefore, not significantly interfere with existing groundwater recharge. The proposed Project would also not increase capacity at the school site or significantly increase its water usage. Additionally, the Project Site is not designated as part of the Sole Source Aquifer Program or designated as an area for groundwater recharge activities.⁸¹ For these reasons, the proposed Project's groundwater impacts would be less than significant. No mitigation or further analysis is required.

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

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

Less Than Significant Impact. Construction of the proposed Project would involve grading and excavating of the Project Site. The loose soil from construction, when exposed to rainfall or runoff would create onor off-site erosion or siltation. However, as mentioned in Threshold (a), the proposed Project would implement a SWPPP, BMPs, and monitoring for stormwater discharge to ensure that sedimentation of the downstream waters remain within regulatory limits per **SC-HWQ-2**. The proposed Project would also comply with all applicable regulations from Federal, State, and local levels, including Section 402 of the



⁸¹ EPA. Ground Water, Sole Source Aquifer. Accessed April 2024. https://archive.epa.gov/region9/water/archive/web/html/ssa.html.

Clean Water Act, the US EPA's NPDES program, and **SC-HWQ-1** through **SC-HQ-3**. The programs to be implemented and compliance with the existing regulations would reduce the impacts of on- and off-site erosion or siltation to less than significant impact. No mitigation or further analysis is required.

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

No Impact. Construction of the proposed Project would produce surface runoff from water used for dust control and other construction activities. However, the amount of runoff would be minimal. During operation, as mentioned within Threshold (a), the proposed Project would be designed to maintain the existing and historic patterns and storm water discharge locations of the Project Site. Runoff from the site would be designed to be intercepted and captured within the Project Site to the extent feasible. Irrigation systems and other water delivering features would be selected in accordance with the LAUSD standards to maintain water efficiency on campus and reduce discharge. The expected volume of discharge generated by operation of the Project Site will be comparable to the existing discharge volume at the site because the Project will only result in small changes to the existing drainage characteristics of the site The Project will not substantially increase the rate or amount of surface runoff from the Project Site and would not result in flooding on- or off-site for this reason. No mitigation or further analysis is required.

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

Less Than Significant Impact. The proposed Project would produce runoff during construction through dust control measures and other construction related activities. However, the amount of runoff created would be minimal. During Project operation, as mentioned within Threshold (a), the proposed Project would be designed to intercept and capture runoff within the Project Site to the extent feasible and minimize polluted runoff from the Project Site. In addition, the operation of the proposed Project is expected to produce similar runoff volume as the existing operation of the Project Site. Therefore, the impact of the proposed Project would be less than significant. No mitigation or further analysis is required.

iv) Impede or redirect flood flows?

No Impact. The proposed Project Site is not located within the Special Flood Hazard Areas or Other Areas of Flood Hazard according to the National Flood Hazard Layer FIRMette provided by FEMA.⁸² The proposed development is also not located within the Tsunami Inundation Zone.⁸³ The proposed Project Site is also not located adjacent to a river body, as the closest water body is the Hollywood Reservoir, approximately 3 miles northeast of the proposed Project Site. The proposed Project would not impede or redirect flood flows. Impacts would be less than significant, and no mitigation or further study is required. No mitigation or further analysis is required.

⁸² FEMA. "National Flood Hazard Layer FIRMette." Accessed April 2024. https://hazardsfema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd.

⁸³ California Department of Conservation. "Los Angeles County Tsunami Inundation Maps." Accessed April 2024. https://www.conservation.ca.gov/cgs/tsunami/maps/Los-Angeles.

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

No Impact. As referred to within Threshold (c)(iv), the proposed Project Site is not located within the Special Flood Hazard Areas or Other Areas of Flood Hazard according to the National Flood Hazard Layer FIRMette provided by FEMA. The proposed Project Site is also not located within the Tsunami Inundation Zone according to the California Department of Conservation.⁸⁴ Therefore, the proposed Project is at no risk of releasing pollutants due to project inundations. Impacts would be less than significant. No mitigation or further analysis is required.

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

No Impact. As mentioned in Threshold (a), the proposed Project would implement a SWPPP, BMPs, and monitoring for stormwater discharge to ensure that sedimentation of downstream waters remain within regulatory limits per **SC-HWQ-2**. The proposed Project would also comply with all applicable regulations from Federal, State, and local levels, including Section 402 of the Clean Water Act, the USA EPA's NPDES program, and **SC-HWQ-1** through **SC-HWQ-3**. In addition, as referred to in Threshold (b), the Project Site is not designated as an area for groundwater recharge and would not significantly increase water usage where it would significantly impact existing groundwater usage. Therefore, the proposed Project would not conflict with the implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant. No mitigation or further analysis is required.

⁸⁴ California Department of Conservation. "Los Angeles County Tsunami Inundation Maps."
	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING		1		
Would the project:				
a. Physically divide an established community?				\bowtie
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				

Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact land use and planning. Projects implemented under the SUP were identified as having less-than-significant impacts on an established community, and projects were consistent with land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect in the LAUSD region.

There are no Land Use and Planning LAUSD SCs that apply to this Project.

a) Physically divide an established community?

No Impact. The physical division of an established community generally refers to the construction of a feature such as an interstate highway or railroad tracks, or removal of a means of access, such as a local road or bridge that would impact mobility within an existing community or between a community or outlying area. The proposed Project would be constructed on an existing school campus and would not change the use of the Project Site. The Project would not introduce any components that would physically divide the Fairfax District of the Hollywood Community Plan Area in which the Project Site is located. Therefore, no impact would occur. No mitigation or further analysis is required.

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

No Impact. The Project Site is zoned PF-1XL and is designated Public Facilities in the Hollywood Community Plan. The Public Facilities land use designation allows public elementary and secondary schools. New construction of the campus would not change the land use of the Project Site and would not conflict with existing plans, policies, or regulation adopted for the purpose of avoiding or mitigating environmental effects. On February 19, 2019, the LAUSD Board of Education adopted a resolution to exempt all LAUSD school sites from local land use regulations under Government Code Section 53094. LAUSD school sites are exempt from all local ordinances, such as those pertaining to building height, parking, preservation and replacement of trees, construction permits (except those in the public right-of-way), recordation of parcel maps, signage, site plan review, and inspection. For a visual representation of the Project's surrounding land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No impact would occur. No mitigation or further analysis is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES		1		
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				\square
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				\boxtimes

Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact mineral resources. Projects implemented under the SUP were identified as having less-than-significant impacts on any known mineral resources, and projects were consistent with local general plans, specific plans, and other land use plans as they pertain to locally important mineral resource recovery sites in the LAUSD region.

There are no Mineral Resources LAUSD SCs that apply to this Project.

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

No Impact. The primary mineral resources within the City are rock, gravel and sand deposits. Natural mineral deposits are nonrenewable resources that cannot be replaced once they have been depleted.⁸⁵ The Project Site is located within the Fairfax District of the Hollywood Community Plan Area in the City of Los Angeles. Land uses surrounding the Project Site are composed of single and multifamily residential, mixed-use commercial, and other commercial uses. The City's General Plan does not identify any mineral resources within the Project Site, and the existing Project Site is already developed.⁸⁶

Additionally, the SPEIR states that school campuses are not available as mining sites; as such, new construction and modernization on existing schools would not result in an impact on the loss of availability of a known mineral resource or recovery site. Therefore, the development of the Project would not cause the loss of the availability of a known mineral resource that would be of value to the region and to residents of the State. No impact would occur. No mitigation or further analysis is required.

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

No Impact. As previously discussed, there are no identified mineral resources within the Project Site. According to the City's General Plan Conservation Element, the Project Site is not located in a mineral resource zone, surface mining district, oil drilling district, or State-designated oil field.⁸⁷ Additionally, as discussed above, the SPEIR identified that new construction and modernization on existing schools would not result in an



⁸⁵ City of Los Angeles. "Conservation Element, Exhibit A: Mineral Resources." *General Plan.* Accessed April 2024. https://planning.lacity.gov/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf.

⁸⁶ City of Los Angeles. "Conservation Element, Exhibit A: Mineral Resources." *General Plan.*

⁸⁷ City of Los Angeles. "Conservation Element, Exhibit A: Mineral Resources." *General Plan.*

impact on mineral resources as school campuses are not available as sites available for the extraction of mineral resources. Therefore, the development of the Project would not cause the loss of availability of a locally important mineral resource recovery site, and no impacts would occur. No mitigation or further analysis is required.

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

Explanation:

A Noise Study has been completed for the proposed Project and is included in **Appendix H: Noise Study**.

The SPEIR evaluated the potential for implementation of SUP-related projects to result in impacts from noise and vibration. Projects implemented under the SUP were identified as having potentially significant impacts relating to the generation of temporary or permanent increase(s) in noise and vibration levels in excess of established standards in the LAUSD region. The SPEIR also found that Projects implemented under the SUP were identified as having less-than-significant impacts relating to projects located within vicinity of an airport. LAUSD has SCs for minimizing impacts to noise. Applicable SCs related to noise impacts associated with the proposed Project are provided below:

	LAUSD Standard Conditions of Approval
SC-N-4	LAUSD or its Construction Contractor shall consult and coordinate with the school principal or site administrator, and other nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. Coordination between the school, nearby land uses and the Construction Contractor shall continue on an as-needed basis throughout the construction phase of the project to reduce school and other noise sensitive land use disruptions.
SC-N-6	For projects where pile driving activities are required within 150 feet of a structure, a detailed vibration assessment shall be provided by an acoustical engineer to analyze potential impacts related to vibration to nearby structures and to determine feasible mitigation measures to eliminate potential risk of architectural damage.
SC-N-7	 LAUSD shall meet with the Construction Contractor to discuss alternative methods of demolition and construction for activities within 25 feet of a historic building to reduce vibration impacts. During the preconstruction meeting, the Construction Contractor shall identify demolition methods not involving vibration-intensive construction equipment or activities. For example: sawing into sections that can be loaded onto trucks results in lower vibration levels than demolition by hydraulic hammers. Prior to construction activities, the Construction Contractor shall inspect and report on the current foundation and structural condition of the historic building.

	LAUSD Standard Conditions of Approval
	• The Construction Contractor shall implement alternative methods identified in the preconstruction meeting during demolition, excavation, and construction, such as mechanical methods using hydraulic crushers or deconstruction techniques.
	• The Construction Contractor shall avoid use of vibratory rollers and packers adjacent to the building.
	• During demolition, the Construction Contractor shall not phase any ground-impacting operations near the building to occur at the same time as any ground impacting operation associated with demolition and construction.
	During demolition and construction, if any vibration levels cause cosmetic or structural damage to the building or structure, a "stop-work" order shall be issued to the Construction Contractor immediately to prevent further damage. Work shall not restart until the building is stabilized and/or preventive measures to relieve further damage to the building are implemented.
SC-N-8	Projects within 500 feet of a non-LAUSD sensitive receptor, such as a residence, shall be reviewed by OEHS to determine what, if any, feasible project specific noise reduction measures are needed.
	The Construction Contractor shall implement project specific noise reduction measures identified by OEHS. Noise reduction measures may include, but are not limited to, the following:
	Source Controls
	• Time Constraints – prohibiting work during sensitive nighttime hours.
	• Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential: only between 7:00 AM and 7:00 PM).
	• Equipment Restrictions – restricting the type of equipment used.
	• Substitute Methods – using quieter methods and/or equipment.
	• Exhaust Mufflers – ensuring equipment has quality mufflers installed.
	• Lubrication & Maintenance – well maintained equipment is quieter.
	• Reduced Power Operation – use only necessary size and power.
	• Limit Equipment On-Site – only have necessary equipment on-site.
	Noise Compliance Monitoring – technician on site to ensure compliance.
	• Quieter Backup Alarms – manually-adjustable or ambient sensitive types.
	Path Controls
	• Noise Barriers – semi-permanent or portable wooden or concrete barriers.
	• Noise Curtains – flexible intervening curtain systems hung from supports.
	• Enclosures – encasing localized and stationary noise sources.
	• Increased Distance – perform noisy activities farther away from receptors, including operation of portable equipment, storage and maintenance of equipment.
	Receptor Controls
	• Window Treatments – reinforcing the building's noise reduction ability.
	Community Participation – open dialog to involve affected residents.
	• Noise Complaint Process – ability to log and respond to noise complaints. Advance notice of the start of construction shall be delivered to all noise sensitive receptors adjacent to the project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the Construction Contractor and the District. In the event of noise complaints noise shall be monitored from the construction activity to ensure that construction noise is not obtrusive.

	LAUSD Standard Conditions of Approval
SC-N-9	Construction Contractor shall ensure that LAUSD interior classroom noise and exterior noise standards are met to the maximum extent feasible, or that construction noise is not disruptive to the school environment, through implementation of noise control measures, as necessary. ⁸⁸ Noise control measures may include, but are not limited to:
	Path_Controls
	• Noise Attenuation Barriers ⁸⁹ – Temporary noise attenuation barriers installed blocking the line of sight between the noise source and the receiver. Intervening barriers already present, such as berms or buildings, may provide sufficient noise attenuation, eliminating the need for installing noise attenuation barriers.
	Source Controls
	• Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential areas: only between 7:00 AM and 7:00 PM).
	• Substitute Methods – using quieter methods and/or equipment.
	• Exhaust Mufflers – ensuring equipment has quality mufflers installed.
	• Lubrication & Maintenance – well maintained equipment is quieter.
	• Reduced Power Operation – use only necessary size and power.
	• Limit Equipment On-Site – only have necessary equipment on-site.
	• Quieter Backup Alarms – manually-adjustable or ambient sensitive types.
	If OEHS determines that the above noise reduction measures will not reduce construction noise to below the levels permitted by LAUSD's noise standards LAUSD shall mandate that construction bid contracts include the following receptor controls:
	Receptor Controls
	• Temporary Window Treatments - temporarily reinforcing the building's noise reduction ability.
	• Temporary Relocation – in extreme otherwise unmitigable cases, students shall be moved to temporary classrooms / facilities away from the construction activity.

The primary sources of noise within the study area are vehicle traffic on Melrose Avenue and Fairfax Avenue, other local roads, and Santa Monica Boulevard (State Route 2), located as near as 0.5 miles to the north of the Project Site; aircraft overflights; and on-site activities that include student interactions outside. In order to quantify the existing noise environment as well as to quantify noise sources that may be altered as part of the proposed Project, five noise measurements were taken in the vicinity of the Project Site. All noise measurements were taken for a period of 15 minutes and the results of the noise level measurements are presented in **Table 9: Ambient Noise Measurements**. The noise measurement printouts are provided in **Appendix H**, which also has a figure that depicts the locations of the noise measurements and a photo index showing the locations of the noise measurements.



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

⁸⁹ While the height and Sound Transmission Class (STC) rating of the Noise Attenuation Barrier needed will depend on the project specific conditions, an example of the specifications for a Noise Attenuation Barrier would be: Noise Attenuation Barriers shall be a minimum height of 12 feet and have a minimum Sound Transmission Class rating of 25 (STC-25).

Ambient Noise Measurements					
	Location Number/Description	Nearest Use	Time Period	Noise Source	dBA Leq
1	West of the Project site across Fairfax Avenue	Residential/ School/ Nursing Home	9:56 AM–10:11 AM	Pedestrian flow and high traffic along Fairfax Avenue, light school activity	74.1
2	South of the Project site across Rosewood Avenue	Residential/ School	10:17 AM–10:32 AM	Pedestrian flow and light traffic along Rosewood Avenue, light school activity	58.1
3	East of the Project site across Genesee Avenue	Residential/ School	10:39 AM-10:54 AM	Pedestrian flow and light traffic along North Genesee Avenue and Clinton Street, light school activity	62.6

Table 9

Source: Refer to Appendix H: Attachment A for noise monitoring data sheets.

Notes: dBA = A-weighted decibels; Leq = average equivalent sound level.

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

Less Than Significant Impact. Two criteria were used for judging noise impacts. First, noise levels generated by the proposed Project must comply with all relevant Federal, State, and local standards and regulations. Noise impacts on the surrounding community are limited by local noise ordinances, which are implemented through investigations in response to nuisance complaints. It is assumed that all existing regulations for the construction and operation of the proposed Project will be enforced.

The second measure of impact used in this analysis is a significant increase in noise levels above existing ambient noise levels as a result of the introduction of a new noise source. An increase in noise level due to a new noise source has the potential to adversely impact people. According to LAUSD guidelines, a proposed Project would have a significant noise impact if it would do any of the following:

- Create a maximum exterior noise level exceeding 67 dBA Leq.
- Result in a maximum interior classroom noise level exceeding 45 dBA Leq. •
- Result in a permanent increase in noise levels at nearby sensitive land uses exceeding 3 dBA CNEL.

The following additional criteria are from the City. A proposed Project would have a significant noise impact if it would do any of the following:

- Generate operational noise from traffic and on-site sources that would cause the ambient noise levels at the property line of affected uses to increase by 3 dBA CNEL and noise levels reach or are within the "normally unacceptable" or "clearly unacceptable" category or increase by 5 dBA CNEL or greater.
- Generate noise from operational stationary sources that causes ambient levels to increase by more than 5 dB.
- For construction activities lasting more than one day, exceed existing exterior ambient levels by 10 dBA or more at a noise sensitive use.
- For construction activities lasting more than ten days in a three-month period, exceed existing exterior ambient levels by 5 dBA or more at a noise sensitive use.

• For construction activities between 9:00 PM and 7:00 AM Monday through Friday, before 8:00 AM or after 6:00 PM on Saturday, or at any time on Sunday, exceed the ambient level by 5 dBA at a sensitive receiver.

The following section calculates the potential noise emissions associated with the temporary construction activities and long-term operations of the proposed Project and compares the noise levels to the LAUSD and City standards.

On-Site Construction Noise

Construction activities that would occur during the construction phases (demolition, site preparation, building construction, building interiors, and paving) would generate both steady-state and episodic noise that would be heard both on and off the Project Site. Each phase involves the use of different types of construction equipment and, therefore, has its own distinct noise characteristics.

Typical maximum noise levels and duty cycles of representative types of equipment that would potentially be used during construction for this Project are presented in **Table 10: Typical Maximum Noise Levels for Project Construction Equipment**. Construction equipment noise would not be constant because of the variations of power, cycles, and equipment locations. For maximum noise events, this analysis considers equipment operating at the edge of the property line of the Project Site.

Equipment Description	Typical Duty Cycle (percent)	Spec Lmax (dBA)	Actual Lmax (dBA)		
Air Compressor	40	80.0	77.7		
Backhoe	40	80.0	77.6		
Compactor	20	80.0	83.2		
Concrete Mixer Truck	40	85.0	78.8		
Concrete Pump Truck	20	82.0	81.4		
Crane	16	85.0	80.6		
Crusher	40	N/A	86.5		
Dump Truck	40	84.0	76.5		
Excavator	40	85.0	80.7		
Flatbed Truck	40	85.0	74.3		
Gradall	40	85.0	83.4		
Impact Pile Driver	20	95.0	101.3		
Jackhammer	20	85.0	88.9		
Loader	40	80.0	79.1		
Roller	20	85.0	80.0		
Trencher	50	82.0	80.4		

Table	2 10
Typical Maximum Noise Levels for	Project Construction Equipment

4.0

Source: Appendix H: Noise Study

Note: N/A = not available.

Sound generated by a construction noise source typically diminishes at a rate of 6 dBA over hard surfaces, such as asphalt, and 7.5 dBA over soft surfaces, such as vegetation, for each doubling of distance. Barriers—such as walls, berms, or buildings, and elevation differences—can also reduce sound levels by up to 20 dBA.⁹⁰

Impacts to Neighborhood Sensitive Receptors

The potential noise impact generated during construction depends on the phase of construction and the percentage of time the equipment operates over the workday. However, construction noise estimates used for the analysis are representative of worst-case conditions because it is unlikely that all the equipment contained on site would operate simultaneously. As would be the case for construction of most land use development projects, construction of the proposed Project would require the use of heavy-duty equipment with the potential to generate audible noise above the ambient background noise level.

The City has not established noise limits for temporary construction noise. The Federal Transit Administration recommends a daytime noise level criteria of 90 dBA Leq (1-hour) for residential receptors, 100 dBA Leq (1-hour) for commercial and industrial receptors.⁹¹ The noise levels from construction activity at the previously identified sensitive receptors are shown in **Table 11: Construction Maximum Noise Estimates**. As shown, construction noise levels would not exceed the residential significance threshold. Additionally, the implementation of LAUSD's SCs would further reduce noise levels.

The proposed Project would implement **SC-N-4** and **SC-N-8** which require site-specific noise control measures to be implemented during construction. Implementation of **SC-N-8** would schedule the noisiest operations to occur between 7:00 AM to 7:00 PM and would delay noise generation until class instruction at the nearest classrooms has ended. Additionally, **SC-N-8** includes the use of exhaust mufflers would reduce construction noise levels by approximately 10 dB or more.⁹² As such, maximum construction noise levels would not exceed the daytime noise level criteria of 90 dBA Leq (10-hour) for residential receptors. Impacts would be less than significant.

Table 11 Construction Maximum Noise Estimates				
Nearest Off-Site Building Structures	Distance from Project site (feet)	Max Leq	Significance Threshold (dBA)	Maximum Noise Increase over Significance Threshold (dBA)
	Phase 1			
Residences east of the Project site across Genesee Avenue	420	66.4	90.0	+0.0
Residences south of the Project site across Rosewood Avenue	430	70.3	90.0	+0.0
Multi-family residential uses west of the Project site across Fairfax Avenue	85	82.6	90.0	+0.0

⁹⁰ Caltrans, Technical Noise Supplement (1998), 33-40, 123-131.

⁹¹ Federal Transit Administration. Transit Noise and Vibration Impact Assessment. September 2018. Accessed April 2024. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impactassessment-manual-fta-report-no-0123_0.pdf

⁹² FHWA. Special Report—Measurement, Prediction, and Mitigation. Updated June 2017. Accessed April 2024. https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm.

Nearest Off-Site Building Structures	Distance from Project site (feet)	Max Leq	Significance Threshold (dBA)	Maximum Noise Increase over Significance Threshold (dBA)
High School south of the Project site along Rosewood Avenue	320	71.5	90.0	+0.0
	Phase 2			
Residences east of the Project site across Genesee Avenue	55	73.8	90.0	+0.0
Residences south of the Project site across Rosewood Avenue	60	72.6	90.0	+0.0
Multi-family residential uses west of the Project site across Fairfax Avenue	85	74.5	90.0	+0.0
High School south of the Project site along Rosewood Avenue	320	74.8	90.0	+0.0

Table 11
Construction Maximum Noise Estimates

Assumed impact pile driving would not occur within 100 feet of nearest sensitive receptors.

Source: FHWA, RCNM, version. 1.1. Refer to Appendix H: Noise Study

On-Campus Receptors

Existing buildings will be demolished, and new structures will be built on a functioning, full-time high school campus. Most of the noise-generating construction activities will, for several days at a time, be near classroom buildings which would create potential for noise disturbance. As shown above, construction noise levels within 55 feet from construction activities that have a direct line of sight may experience exterior noise levels as high as 88.7 dBA. With a typical 25 dB exterior-to-interior noise reduction, interior noise levels may be as high as 63.7 dBA.

LAUSD's interior noise threshold is 45 dBA and depending on the classroom activity, interior levels above this threshold may be disruptive to the learning environment. However, low-intensity construction phases would generate lower noise levels and would be less likely to result in disruptions due to excessive interior noise environments. Implementation of **SC-N-4** would require LAUSD or its Construction Contractor to coordinate with the school to schedule high noise or vibration producing activities at times that minimize disruption to classes. Coordination between the school, nearby land uses and the construction contractor shall continue on an as-needed basis throughout the construction phase of the project to reduce school and other noise sensitive land use disruptions. Additionally, implementation of **SC-N-8** would require source controls (time construction noise by 15 dBA), and/or receptor controls (notification and noise complaint process) to reduce noise impacts. If construction noise disruption cannot be avoided the contractor would implement noise reduction measures, including but not limited to the installation of noise barriers as appropriate to limit construction noise levels (**SC-N-9**). Impacts would be less than significant through compliance with existing measures.

Off-Site Construction Noise

Construction of the proposed Project would require haul and vendor truck trips to and from the site to export demolition debris and soil and deliver supplies to the site. Approximately 906 total hauling trips would take



place during the demolition phase. Haul truck traffic would take the most direct route to the appropriate freeway ramp.

Noise associated with construction truck trips were estimated using the Caltrans FHWA Traffic Noise Model based on the maximum number of truck trips in a day. Project truck trips which includes medium- and heavyduty trucks would generate noise levels of approximately 50.6to 54.5 dBA, respectively, measured at a distance of 25 feet along Melrose Avenue. As shown in **Table 9**, existing noise levels at the Project Site ranged from 58.1 dBA to 74.1 dBA. The noise level increases from truck trips would be below the significance threshold of 5 dBA.

Construction noise impacts to nearby residents would be limited through the implementation of **SC-N-4** and **SC-N-8**. With the implementation of **SC-N-9**, which would minimize construction noise impacts to the students and staff in the classrooms during active instruction, as well as the adherence to allowable construction times provided in Section 41.40(a) of the City Municipal Code, the construction activities for the proposed Project would not generate a substantial temporary increase in ambient noise levels that are in excess of applicable noise standards. Noise impacts during construction would be less than significant. No mitigation or further analysis is required.

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

Less Than Significant Impact. Implementation of LAUSD Standard Condition **SC-N-4** would require the construction contractor to consult with the school and nearby land uses prior to performing construction activities that have the potential to create high noise or vibration levels. However, the City has not adopted a significance threshold to assess vibration impacts during construction. Thus, the Caltrans Transportation and Construction Vibration Guidance Manual⁹³ is used as a screening tool to assess the potential for adverse vibration effects related to structural damage.

Construction Impacts

Table 12: On-Site Construction Vibration Impacts–Building Damage presents construction vibration impacts associated with on-site construction in terms of building damage. As shown in Table 12, the forecasted vibration levels due to on-site construction activities would not exceed the building damage significance threshold of 0.2 peak particle velocity (PPV) inches per second (ips) at the nearby residential uses or at the other nearby buildings. In the event that construction requires pile driving, the Project will comply would implement SC-N-6 to analyze potential impacts related to vibration to nearby structures. Furthermore, the proposed Project would comply with the SPEIR Recommendations and LAUSD SCs, including SC-N-4 through SC-N-7 which include site-specific vibration control measures. As such, vibration impacts during construction would be less than significant.

Groundborne noise originates from groundborne vibration at higher frequencies, specifically in the range from about 30 Hz to about 200 Hz. In this vibration range, groundborne vibration may excite bending resonances in the floors and walls of buildings, which then radiate a rumbling noise directly into the rooms. Since the

⁹³ Caltrans. Transportation and Construction Vibration Guidance Manual. September 2013. Accessed April 2024. https://cityofdavis.org/home/showdocument?id=4521.

proposed Project would not produce groundborne vibration at 30 Hz or above (see **Table 12**), the proposed Project would not produce excessive groundborne noise level. No mitigation or further analysis is required.

	On-Site	e Construe	, ction Vibr	Table 12 ation Imp	oacts – Bu	uilding Da	image	
Nearest	Estim	ated Vibrati fron	on Velocity n the Projec	Levels at th t Construct	ne Nearest (ion Equipn	Off-Site Stru nent	ictures	Significance
Building Structures	Pile Driver (impact)	Vibratory Roller	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack- hammer	Small bulldozer	Threshold (PPV ips)
		FT	A Reference	Vibration Le	evels at 25 fee	et		
	0.644	0.210	0.089	0.089	0.076	0.035	0.003	_
Residences east of the Project site across Genesee Avenue (420 feet)	0.009	0.003	0.001	0.001	0.001	0.001	0.000	0.2
Residences south of the Project site across Rosewood Avenue (430 feet)	0.009	0.003	0.001	0.001	0.001	0.000	0.0010	0.2
Multi-family residential uses west of the Project site across Fairfax Avenue (85 feet) ^a	0.103	0.033	0.014	0.014	0.012	0.006	0.000	0.2
Nursing home west of the Project site across Fairfax Avenue (85 feet) ^a	0.103	0.033	0.014	0.014	0.012	0.006	0.000	0.2
Residences north of the Project site across Melrose Avenue (225 feet)	0.024	0.008	0.003	0.003	0.003	0.001	0.000	0.2
Senior Center north of the Project site along Melrose Avenue (265 feet)	0.019	0.006	0.003	0.003	0.002	0.001	0.000	0.2
Walt Whitman High School south of the Project site	0.014	0.005	0.002	0.002	0.002	0.001	0.000	0.2



Table 12
On-Site Construction Vibration Impacts – Building Damage

Nearest Off-Site	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from the Project Construction Equipment							Significance
Building Structures	Pile Driver (impact)	Vibratory Roller	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack- hammer	Small bulldozer	Threshold (PPV ips)
along Rosewood Avenue								

^a Assumed impact pile driving would not occur within 100 feet of nearest sensitive receptors.

Source: US Department of Transportation, Federal Transportation Authority, Transit Noise and Vibration Impact Assessment.

Source: Refer to Appendix H Attachment C for construction vibration worksheets.

Operation Impacts

School operations do not involve sources that cause substantial ground-borne vibration. Therefore, the proposed Project would not result in long-term significant impacts due to ground-borne vibration or noise levels. No groundborne vibration or noise impacts are expected during operation. No mitigation or further analysis is required.

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

No Impact. The proposed Project would not expose people residing or working in the Project area to excessive noise levels from aircraft. The nearest airport is the Santa Monica Airport, located approximately 6.5 miles southwest of the Project Site. The Project Site is located outside of the 60 dBA CNEL noise contours of Santa Monica Airport.⁹⁴ No impacts would occur from aircraft noise. No mitigation or further analysis is required.

⁹⁴ City of Santa Monica. Calendar Year 2021 CNEL Contours Santa Monica Municipal Airport. May 2022. Accessed April 2024. https://www.santamonica.gov/media/Public%20Works/Airport/noise%20reports/2021_CNEL_annual_report.pdf.

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

Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact pedestrian safety. Projects implemented under the SUP were identified as having less-than-significant impacts due to design features, incompatible uses, or adjacency to major arterial roadways or freeways, and projects would not result in unsafe routes to schools in the LAUSD region.

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

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

	LAUSD Standard Conditions of Approval
	• Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades.
SC-PED-4	LAUSD shall design the project to comply with the traffic and pedestrian guidelines in the School Traffic Safety Reference Guide.
	School Traffic Safety Reference Guide REF- 4492.1.
	This Reference Guide replaces Reference Guide 4492.0, School Traffic Safety, September 30, 2008. Updated information is provided, including new guidance on passenger loading zones and the Safety Valet Program. This guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.
SC-PED-5	LAUSD shall design new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide.
	School Design Guide.
	The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.
SC-T-4	Implementation of SC-T-4 .

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

Less Than Significant Impact. The proposed Project would not incorporate new student drop-off, pick-up, bus loading areas, or parking areas. The proposed Project would maintain a fully functional campus during each construction phase, which includes efficient and safe circulation throughout the campus for students and staff, including directional signage. Compliance with SC-PED-1 through SC-PED-5 would ensure that potential pedestrian safety impacts during construction would be less than significant. During construction, the contractors would be required to submit and implement a Construction Worksite Traffic Control Plan to OEHS for review, per SC-T-4, to ensure pedestrian safety measures, access, and warning signs during construction are properly implemented. The proposed Project would not interfere with public right-of-way, except for construction vehicle entry and exiting from the site and traffic from construction activities.

There are currently 260 parking spaces that exist on site, all of which will be maintained. Vehicular traffic surrounding the Project Site would not be impacted since the Project footprint would be entirely contained within the limits of the Fairfax HS Campus and would not alter the existing vehicle flow surrounding the Project Site through changes to ingress and egress. The proposed Project would be designed to comply with the requirements and recommendations associated with the Caltrans Safe Routes to School (SR2S) program, the OEHS Traffic and Pedestrian Safety Program, the School Traffic Safety Reference Guide, and the School Design Guide, per **SC-PED-1** through **SC-PED-5**. Furthermore, the proposed Project would not increase the existing capacity of the school and would not alter the nature of existing operations. Therefore, no impacts to pedestrian safety would occur. No mitigation or further analysis is required.

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

Less Than Significant Impact. During construction, the contractors would be required to submit and implement a Construction Worksite Traffic Control Plan to OEHS for review, per SC-T-4, to ensure pedestrian safety measures, access, and warning signs during construction are properly implemented. The proposed Project would also be required to comply with all Federal, State, and local regulations and programs. Specifically, the proposed Project would be designed to comply with the requirements and recommendations associated with the Caltrans Safe Routes to School (SR2S) program, per SC-PED-1. Impacts to students walking from local neighborhoods would be reduced to less than significant during construction.

During operation, the proposed Project would not alter any existing routes to Fairfax HS as all proposed Project components are contained within the Campus and no alterations to egress and ingress would occur. For these reasons, there would be no operational impacts on students walking from local neighborhoods. No mitigation or further analysis is required.

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

No Impact. The existing Project Site is not located adjacent to a freeway. According to the City of Los Angeles Complete Streets Design Guide, Melrose Avenue and N Fairfax Avenue are designated as arterial streets. Arterial streets carry a large volume of regional through traffic not typically handled by the freeway system, and are typically characterized by commercial uses, as well as some single-family and multi-family uses.⁹⁵ Specifically, Melrose Avenue is designated Modified Avenue II,⁹⁶ N Fairfax Avenue is designated Modified Boulevard II north of Melrose Avenue, and is designated Avenue II south of Melrose Avenue.⁹⁷ Avenue II designations may vary in their land use context, with some streets passing through both residential and commercial areas, and typically contain 1-2 lanes in each direction with an average speed limit of 30 miles per hour (mph).⁹⁸ Boulevard II designations represent the City's widest streets that typically provide regional access to major destinations, characterized by 2-3 lanes in each direction and an average speed limit of 35 mph.⁹⁹

The proposed Project will be designed to comply with the requirements and recommendations associated with the Caltrans Safe Routes to School (SR2S) program, the OEHS Traffic and Pedestrian Safety Program, the School Traffic Safety Reference Guide, and the School Design Guide, per **SC-PED-1** through **SC-PED-5**.

The proposed Project would not alter any existing pedestrian travel routes for students and staff walking to Campus. Since all components of the proposed Project are located within the Project Site, no impacts to existing pedestrian safety relating to an adjacent major arterial roadway or the freeway is expected. Therefore, there would be no impacts. No mitigation or further analysis is required.



⁹⁵ City of Los Angeles. "Complete Streets Design Guide." *Planning Department*. Accessed May 2024.

https://planning.lacity.gov/odocument/c9596f05-0f3a-4ada-93aa-e70bbde68b0b/Complete_Street_Design_Guide.pdf.

⁹⁶ City of Los Angeles. "NavigateLA. Accessed May 2024. https://navigatela.lacity.org/navigatela/.

⁹⁷ City of Los Angeles. "NavigateLA.

⁹⁸ City of Los Angeles. "Complete Streets Design Guide." *Planning Department*.

⁹⁹ City of Los Angeles. "Complete Streets Design Guide." *Planning Department*.

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

Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact population and housing. Projects implemented under the SUP were identified as having less-than-significant impacts to population growth and would not generate new students, and projects were consistent with local, State, and federal policies and regulations pertaining to housing in the LAUSD region.

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

Less Than Significant Impact. The scope of the proposed Project includes demolition of the existing Shop Building, Gymnasium, Utility Building, Ticket Booth, and Portable Restroom Building (**See Figure 5: Site Demolition Diagram**), and the construction of a new gymnasium, specialty classrooms, outdoor physical education courts, maintenance and operations facilities, and an Art Gallery Building (**See Figure 6: Proposed Project Site Plan**). The proposed Project would make physical changes to the Fairfax HS Campus and would not increase enrollment or student capacity. In addition, the proposed Project does not include features such as new homes or businesses that may induce growth. The proposed Project also does not include the extension of roads or other infrastructure that could indirectly induce growth. The SPEIR determined that modernization projects would generate short-term construction employment to be absorbed from the regional labor force rather than attracting new workers into the region.¹⁰⁰ As such, no impacts would occur. No mitigation or further analysis is required.

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

No Impact. The Project Site is currently operating as an educational facility and is not used for housing. The proposed Project would not displace existing people or housing resulting in the need for replacement housing. Further, the SPEIR determined that modernization projects of existing campuses would not displace any

¹⁰⁰ LAUSD. School Upgrade Program EIR. Accessed April 2024. https://files.ceqanet.opr.ca.gov/284141-

^{2/}attachment/0 CRpktr1bFw7EGk4wzmRRM-8GGQv8GBEtSfSTad2rMJBck4k2dV1arXvtBmbvtcwK3qbd7l1HeDDJdyz0.

existing people or housing and no impacts would occur.¹⁰¹ As such, no impacts would occur. No mitigation or further analysis is required.



¹⁰¹ LAUSD. School Upgrade Program EIR. Accessed April 2024.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. PUBLIC SERVICES		-		

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

\square a. Fire protection? \boxtimes b. Police protection? \boxtimes c. Schools? \boxtimes d. Parks? e. Other public facilities? \boxtimes

Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact public services. Projects implemented under the SUP were identified as having less-than-significant impacts to population growth and would not generate new students; therefore, the SUP would not generate increased demand on public services. Projects were consistent with local, State, and federal policies and regulations pertaining to public services in the LAUSD region.

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

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

a) Fire protection?

Less Than Significant Impact. The Los Angeles County Fire Department (LACoFD) currently provides fire protection and emergency medical services to the Project Site. The Project Site is served by Los Angeles Fire Department Fire Station 58, located approximately 3.5 miles southwest of the Project Site.

Design of the proposed Project would include a new fire access lane, new services lanes, and new fire hydrants to serve all areas of the Project Site. The fire alarm system for the new buildings and existing buildings would be modernized to meet all codes, regulations, and safety requirements of the City of Los Angeles, LACoFD, the Division of the State Architect (DSA), and LAUSD School Design Guide (SDG). LAUSD is required to coordinate with LACoFD regarding fire equipment access during construction and specifications for the new emergency access driveways in compliance with **SC-PS-1**.

In addition, the proposed Project would not make any programmatic changes and would not increase the student population; therefore, it would not increase the need for fire protective services and would not require construction of new or expanded fire stations. For these reasons, impacts would be less than significant. No mitigation or further analysis is required.

b) Police protection?

Less Than Significant Impact. LAUSD's Los Angeles School Police Department (LASPD) is responsible for providing police protection services to the Project Site and creating safe passages for students, staff, and the community.¹⁰² Fairfax HS is under the jurisdiction of the LASPD. However, the everyday campus activities are overseen by the principal, vice principal, teachers and other staff members. The Los Angeles Police Department (LAPD) would provide additional police protection services to the Project Site. As explained above, the changes to Campus access and circulation would be less than significant after the implementation of the **SC-PS-1**. Further, as the Project is not expected to increase student capacity or size of the site, current government facilities would be sufficient to properly serve the campus. Therefore, the proposed Project would have a less than significant impact on these public services. No mitigation or further analysis is required.

c) Schools?

Less Than Significant Impact. The proposed Project would make physical changes to the existing high school campus to enhance existing programs. The proposed Project would not induce growth in the community, increase students or staff on the Campus, or otherwise increase demand for school services. The Project would not have an adverse physical impact on any existing schools and would have a beneficial impact on Fairfax HS. Therefore, impacts would be less than significant. No mitigation or further analysis is required.

d) Parks?

Less Than Significant Impact. The proposed Project would include the demolition and removal of the Shop Building, Gymnasium, Utility Building, Ticket Office, and Relocatable Sanitary Building. The existing Gymnasium would not be demolished until construction of the new gymnasium is complete, to prevent interruptions to associated programming and events, and interim facilities to accommodate the demolition of other structures would be provided as required. Therefore, the Project would not result in the need for construction of new recreational facilities. The Project would not induce growth in the community, increase students or staff, or otherwise increase the demand for parks. For these reasons, impacts would be less than significant. No mitigation or further analysis is required.

e) Other public facilities?

Less Than Significant Impact. As mentioned above, the proposed Project would include the demolition and removal of the Shop Building, Gymnasium, Utility Building, Ticket Office, and Relocatable Sanitary Building. The existing Gymnasium would not be demolished until construction of the new gymnasium is complete, to prevent interruptions to associated programming and events, and interim facilities to accommodate the demolition of other structures would be provided as required. The Project would not induce growth in the

¹⁰² Los Angeles School Police Department (LASPD). "About LASPD." Accessed April 2024. https://www.lausd.org/Page/15609.

community, increase student or staff population, or increase the demand for other public facilities. Therefore, impacts to other public facilities would be less than significant. No mitigation or further analysis is required.

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

Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact recreation. Projects implemented under the SUP were identified as having less-than-significant impacts to population growth and would not generate new students; therefore, the SUP would not generate increased demand on recreational facilities in the LAUSD region.

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

Less Than Significant Impact. Parks located near the Fairfax HS Campus include Kings Road Park, approximately 1.3 miles northwest of the Campus; Poinsettia Recreation Center, approximately 1.5 miles northeast of the campus; Plummer Park, approximately 1.4 miles northeast of the Campus; and Pan Pacific Park, approximately 1.4 miles south of the Campus. The proposed Project would address the most critical physical concerns of the building and grounds at the Campus, and would include the demolition of the Shop Building, Gymnasium, Utility Building, Ticket Office, and Relocatable Sanitary Building. The existing Gymnasium would not be demolished until construction of the New Gymnasium is complete to prevent interruptions to associated programming and events, and interim facilities to accommodate the demolition of other structures would be provided as required. The proposed Project would not increase the use of existing neighborhood and regional parks or other recreation facilities, and impacts to existing parks or other recreational facilities would be less than significant. No mitigation or further analysis is required.

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

Less Than Significant Impact. The proposed Project includes construction of a new gymnasium and outdoor physical education courts within the existing school Campus. The environmental effects of the construction and operation of the Project, including the new recreational facilities, are considered throughout the environmental analysis in this Negative Declaration. As previously discussed, the proposed Project would not require the construction or expansion of recreational facilities outside of LAUSD-owned property. Therefore, environmental impacts related to community recreational facilities would be less than significant. No mitigation or further analysis is required.

		Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	Nø Impact
X	VIII. TRANSPORTATION AND CIRCULATION		1		
W	ould the project:				
a.	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?			\boxtimes	
b.	Conflict or be inconsistent with CEQA Guidelines section 15064.3(b), which pertains to vehicle miles travelled?			\boxtimes	
c.	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			\boxtimes	
d.	Result in inadequate emergency access?			\boxtimes	

Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact transportation and circulation. Projects implemented under the SUP were identified as having less-than-significant impacts due to design features or incompatible uses, and projects were consistent with CEQA Guidelines Section 15064.3(b), and programs, plans, ordinances, and policies addressing the circulation system in the LAUSD region.

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

	LAUSD Standard Conditions of Approval
SC-T-4	LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.

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

Less Than Significant Impact.

Existing Conditions

The proposed Project is bounded by Melrose Avenue to the north, North Genesee Avenue to the east, Rosewood Avenue to the south, and North Fairfax Avenue to the west. The Project Site is accessed regionally by Santa Monica Boulevard (State Route 2) approximately 0.64 miles north of the Project Site; the US-101 approximately 3.5 miles east of the Project Site; and the Interstate 10 (I-10) approximately 3.27 miles south of the Project Site. The 217 Washington/Fairfax Transit Hub Bus runs in a north-south direction and stops adjacent to the west of Campus at the intersection of Fairfax Avenue & Melrose Avenue and the intersection

of Fairfax Avenue & Rosewood Avenue.¹⁰³ The 4 Metro Bus runs east-west and stops approximately 0.2 miles north of Campus at the intersection of Fairfax Avenue & Santa Monica Boulevard.¹⁰⁴

Construction

Construction equipment, haul trucks, and construction personnel are expected to temporarily add to the existing traffic circulation of the area. Construction contractors are required to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction, as per **SC-T-4**. The plan would show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. The contractor would also provide traffic control to adjacent streets during the construction period to ensure construction does not impede existing vehicle and multimodal traffic flow on surrounding streets. In the event street closure is needed, the contractors and LAUSD would coordinate with the City to minimize any impacts to the travelling public and to ensure the safety of student and staff. LAUSD would also encourage that the contractor limit construction-related truck traffic to off-peak commute periods as much as is feasible.

Operation

The operation of the proposed Project would remain the same as the existing operation conditions at Fairfax HS without increasing capacity. As development of the proposed Project would be confined to areas on Campus, the transportation operation of the surrounding area is expected to remain the same.

The proposed Project would comply with all Federal, State, and local ordinances, policies, plans, and programs, and would not conflict with existing plans and programs addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant. No mitigation or further analysis is required.

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

Less Than Significant Impact. The proposed Project would involve construction equipment and additional vehicles for construction workers to reach the Project Site. Construction equipment would primarily remain on site for the duration of the construction with the exception of haul trucks. An estimated 906 total hauling trips are expected during construction of the proposed Project.¹⁰⁵ LAUSD encourages carpooling for construction contractors getting to and from the Project Site and will work with the contractor to minimize vehicle trips to the extent feasible. Construction equipment and contractor travels to the Project Site would be temporary in nature, ceasing at the completion of the proposed Project.

During operation, the proposed Project would not include any capacity increase and the nature of the operation would remain the same. The proposed Project would have no impact pertaining to vehicle miles travelled during



¹⁰³ LA Metro System Maps. "Central LA/Westside Bus and Rail Service." Accessed April 2024. https://www.dropbox.com/scl/fi/h0bs78wkj6avfgoxg7vbc/24-0027 mult Marchael Cont AWastside 25:17 Such ad Others to be for fit 52bt/7coord/fit 64:08

 $^{0937\}_web_MSysMap_CenLAWestside_35x17_final.pdf?rlkey=behnfmfsh53bti7uagxikf4pu\&dl=0$

¹⁰⁴ LA Metro System Maps. "Central LA/Westside Bus and Rail Service."

¹⁰⁵ See Appendix H: Noise Background and Modeling Data.

operation and a less than significant impact during construction. Impacts would be less than significant. No mitigation or further analysis is required.

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

Less Than Significant Impact. During construction, the proposed Project would temporarily require construction equipment to move in and out of the Project Site. The construction contractor is required to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction which would present the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies per SC-T-4. In the event that road closure and/or large equipment maneuver is required, the construction contractor would provide traffic control personnel to ensure the safety of all surrounding transportation users. Additionally, the proposed Project would comply with all Federal, State, and local ordinances.

During operation, the improvements associated with the proposed Project would be contained within the existing campus. No roadway designs or alterations to roadways surrounding the Project Site would be included in the design of the proposed Project. The proposed Project would not substantially increase hazards due to a geometric design feature or incompatible uses, and impacts would be less than significant. No mitigation or further analysis is required.

d) Result in inadequate emergency access?

Less Than Significant Impact.

Access to the Project site would continue to accommodate emergency ingress and egress. All access features are subject to and must satisfy State Fire Marshall design requirements. The proposed Project would not result in inadequate emergency access. Therefore, no impacts would occur. No mitigation or further analysis is required.

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

Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact tribal cultural resources. Projects implemented under the SUP that may impact previously undiscovered archaeological resources, human remains, or tribal cultural resources were identified as having less-than-significant impacts and would be consistent with local, State, and federal policies and regulations pertaining to tribal cultural resources in the LAUSD region. A Sacred Lands File record search was completed by the Native American Heritage Commission (NAHC) and is included in **Appendix I: Sacred Lands File Record Search**.

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

LAUSD Standard Conditions of Approval						
SC- TCR-1	All work shall stop within a 30 foot radius of the discovery. Work shall not continue until the discovery has assessed by a qualified Archaeologist. Based on this initial assessment the affiliated Native American T representative has contacted and consulted to provide as-needed monitoring or to assist in the accurate assessment recordation, and if appropriate, recovery of the resources, as required by the District.					
SC- TCR-2	 In the event that Tribal cultural resources are identified, the Archaeologist will retain a Native American Monitor to begin monitoring ground disturbance activities. The Native American Monitor shall be approved by the District and must have at least one or more of the following qualifications: At least one year of experience providing Native American monitoring support during similar construction activities. 					
	 Be designated by the Tribe as capable of providing Native American monitoring support. 					

LAUSD Standard Conditions of Approval

Have a combination of education and experience with Tribal cultural resources.

Prior to reinitiating construction, the construction crew(s) will be provided with a brief summary of the sensitivity of Tribal cultural resources, the rationale behind the need for protection of resources, and information on the initial identification of Tribal cultural resources. This information shall be included in a worker's environmental awareness program that is prepared by LAUSD for the project (as applicable).

Subsequently, the Monitor shall remain on-site for the duration of the ground-disturbing activities to ensure the protection of any other potential resources.

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

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

Less Than Significant Impact. AB 52 requires meaningful consultation with California Native American Tribes on potential impacts to Tribal cultural resources (TCRs), as defined in PRC Section 21074. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to California Native American tribe that are either eligible or listed in the California Register of Historical Resources.¹⁰⁶

A Sacred Lands File (SLF) search was requested for the Project Site on May 21, 2024. The results for local tribal resources were negative and included a list of 16 individuals representing seven Tribes/Bands who may have knowledge of cultural resources within or near the Project area (See **Appendix I**). Letters summarizing the Project description and location were sent via email to the NAHC-listed contacts on May 21, 2024, and June 6, 2024, and four responses have been received to date. These responses are summarized in the 2025 Cultural Resources Technical Report (**Appendix D**).

Because no documentation has been received to date providing evidence of the presence of TCRs on the Project Site, the results of the SLF search were negative, and no requests for formal consultation under AB 52 have been received, Native American monitoring for TCRs during all ground disturbances is not required. In the unlikely event that construction-related ground disturbance results in the discovery of potential TCRs, compliance with **SC-TCR-1** and **SC-TCR-2** would ensure that potential impacts to TCRs are avoided. Therefore, impacts to Tribal Cultural Resources would be less than significant. No mitigation or further analysis is required.

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

¹⁰⁶ California Natural Resources Agency. AB 52 Regulatory Update. Accessed April 2024. https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/ab52/Final%20AB%2052%20Notice%20of%20Proposed%20Rulemaki ng%20for%20Appendix%20G%20Update_revised%20Feb%2011%202016.pdf

the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant Impact. In order to comply with CEQA and reduce any potential significant impacts associated with Tribal Cultural Resources, LAUSD would implement SC-TCR-1 and SC-TCR-2. Under LAUSD's SC-TCR-1, if evidence of Native American resources is uncovered, all work shall stop within a 30-foot radius of the discovery. In the unlikely event that Tribal Cultural Resources are identified, the Archaeologist will retain a Native American Monitor to begin monitoring ground disturbance activities. If Tribal Cultural Resources are discovered during construction, LAUSD shall implement SC-TCR-2 for evaluating and appropriately treating such resources.

Two Native American Tribes, the Gabrieleño Band of Mission Indians–Kizh Nation and the Fernandeño Tataviam Band of Mission Indians, requested notification through PRC Section 21080.3.1 process with LAUSD. Pursuant to AB 52, LAUSD notified the Native American tribes/tribal representatives that are traditionally and culturally affiliated with the Project area, as identified by the NAHC. LAUSD sent Project notifications to the following Tribes: Barbareño/Ventureño Band of Mission Indians; Chumash Council of Bakersfield; Coastal Band of the Chumash Nation; Fernandeño Tataviam Band of Mission Indians; Gabrieleño Band of Mission Indians – Kizh Nation (two separate contacts); Gabrieleño/Tongva San Gabriel Band of Mission Indians; Gabrielino/Tongva Nation; Gabrielino Tongva Indians of California Tribal Council (two separate contacts); Gabrielino-Tongva Tribe (two separate contacts); Northern Chumash Tribal Council; San Fernando Band of Mission Indians; Santa Rosa Band of Cahuilla Indians; Santa Ynez Band of Chumash Indians (four separate contacts); and Soboba Band of Luiseño Indians (two separate contacts). No Native American tribes have requested consultation with LAUSD, pursuant to PRC Section 21080.3.1. With implementation of **SC-TCR-1** and **SC-TCR-2**, the impacts of the proposed Project pursuant to criteria set forth in PRC Section 5024.1(c) would be less than significant. No mitigation or further analysis is required.



		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X	K. UTILITIES AND SERVICE SYSTEMS		1		
W	ould the project:				
a.	Require or result in the relocation or construction of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?				
b.	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			\boxtimes	
c.	Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?				
d.	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			\boxtimes	
e.	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			\boxtimes	

Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact utilities and service systems. Projects implemented under the SUP were identified as having less-than-significant impacts to water, wastewater treatment or stormwater drainage, solid waste, electric power, natural gas, or telecommunication facilities; and projects were consistent with federal, State, and local management and reduction statutes and regulations pertaining to utilities and service systems in the LAUSD region.

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

LAUSD Standard Conditions of Approval						
SC-USS-1	Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities:					
School Design Guide.						
	Establishes a minimum non-hazardous construction and demolition (C&D) debris recycling requirements of 75% by weight. Construction and demolition waste shall be recycled to the maximum extent feasible.					
Construction & Demolition Waste Management.						
	This document outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of non-hazardous waste materials generated during demolition and/or new construction to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or					

LAUSD Standard Conditions of Approval						
	recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling, salvaging and/or reusing a minimum of 75% of the C&D waste generated by weight.					
SC-USS-2	LAUSD shall coordinate with the City of Los Angeles Department of Water and Power or other appropriate jurisdictions and departments prior to relocating or upgrading any water facilities to reduce the potential for disruptions in service.					
SC-USS-3	LAUSD shall provide an easily accessible area that services the entire school and is dedicated to the collection and storage of materials for recycling, including (at a minimum) paper, cardboard, glass, plastics, metals, and landscaping waste. There shall be at least one centralized collection point (loading dock), and the capacity for separation of recyclables where waste is disposed of for classrooms and common areas such as cafeterias, gyms, or multi-purpose rooms.					
SC-GHG-1	During operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.					
SC-GHG-2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.					
SC-GHG-3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.					

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

Less Than Significant Impact. The Project Site is located in a highly developed area with existing utility services including water, wastewater treatment and stormwater drainage, electric power, natural gas, and telecommunication facilities. Construction at the Project Site would require temporary additional usage of water, electric power, diesel, and natural gas. However, the additional utility usage during construction would be minimal and well within the capacity of the existing utility facilities.

The operation of the proposed Project would not increase utility consumption through capacity increase or modification to existing operations. Due to the age of the existing structures and facilities, the new structures and facilities would be more resource efficient when compared to the existing structures and facilities. All new schools and modernization projects are designed to meet CHPS green building criteria and exceed the energy efficiency requirements of Title 24 of the California Green Code.¹⁰⁷ Energy efficient building components would be incorporated to minimize energy use on Campus.

Design of the proposed Project would incorporate new site utility infrastructure and new connections to utility lines in the public right-of-way as required, including but not limited to sewer, storm water, domestic water, fire water, low voltage, and electrical. These improvements would comply with SC-USS-2, SC-USS-3, SC-GHG-1, SC-GHG-2, and SC-GHG-3,

With the incorporation of LAUSD CHPS, storm water mitigation, **SC-USS-1** to **SC-USS-3**, and **SC-GHG-1** to **SC-GHG-3**, the construction of new site utility infrastructure would not cause significant environmental effects. The Campus' resource consumption and stormwater production are not expected to increase with

¹⁰⁷ LAUSD. *High Performance Schools*. Accessed April 2024. http://learninggreen.laschools.org/high-performance-schools.html.

implementation of the proposed Project. Therefore, impacts would be less than significant. No mitigation or further analysis is required.

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

Less Than Significant Impact. LADWP provides water to the existing Project Site. The primary water sources for LADWP are from the Los Angeles Aqueducts (LAA), local groundwater, State Water Project (supplied by Metropolitan Water District of Southern California (MWD)), and Colorado River Aqueduct (supplied by MWD). Additional sources include recycled water and other imported water sources.

The historical usage of water in the region depends on a number of factors, including population growth, weather, water conservation, drought, and economic activity. The 30-year average water demand in the LADWP's Service Area is 588,611 AF (Acre-Feet).¹⁰⁸ According to the 2020 Urban Water Management Plan (UWMP) the water demand projected by fiscal year 2045 is 565,751 AF.¹⁰⁹ The UWMP has set a target to reduce potable water use per capita by 22.5 percent by 2025 and 25 percent by 2035, and to maintain or reduce 2035 per capita water use through 2050 under its Sustainable City pLAn (pLAn) with additional passive and active conservation action plans.¹¹⁰ Based on the overall service area reliability assessment in compliance with California Water Code Section 10635(a), LADWP anticipates all demands would be met by the available supplies under all hydrologic scenarios up to the projected water demand in 2045.¹¹¹

Water use on the Project Site would be expected to temporarily increase during the construction of the proposed Project due to dust suppression measures and related construction activities. However, the water usage during construction would be minimal and would not impact the availability of the existing water supply. During operation, the proposed Project would not increase the existing capacity at Fairfax HS or change the nature of its operation to require additional water usage. The proposed Project is expected to result in a reduction in water demand as new structures and facility upgrades would be more water efficient than the existing conditions on Campus.

Lastly, the proposed Project does not qualify under SB 610's definition of a "project" and, therefore, does not require the completion of a Water Supply Assessment. The proposed Project would have a less than significant impact on available water supply to serve the proposed Project during normal to dry years. No mitigation or further analysis is required.

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

Less Than Significant Impact. As previously referred to in Threshold (a), construction of the proposed Project will involve a minor increase in wastewater production due to construction activities and construction personnel. However, the minor increase in wastewater production is temporary and would cease once

¹⁰⁸ Los Angeles Department of Water and Power (LADWP). Urban Water Management Plan. 2020. Accessed April 2024. https://www.ladwp.com/sites/default/files/documents/LADWP_2020_UWMP_Web.pdf.

¹⁰⁹ LADWP. Urban Water Management Plan. 2020.

¹¹⁰ LADWP. Urban Water Management Plan. 2020.

¹¹¹ LADWP. Urban Water Management Plan. 2020.

construction is completed. The operation of the proposed Project would not include expansion or increase in capacity. Installation of newer facilities would also reduce the amount of wastewater generated. Therefore, the proposed Project would have a less than significant impact on the adequacy of the local wastewater treatment capacity. No mitigation or further analysis is required.

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

Less Than Significant Impact.

During construction, the proposed Project would generate demolition and construction related solid waste. However, the amount of solid waste would be minimized per **SC-USS-1** requirements. **SC-USS-1** requires the minimum recycling of 75 percent of the nonhazardous construction debris by weight. In addition, the proposed Project would comply with all waste recycling/reuse requirements in the California Green Building Code and the LAUSD School Design Guide & Specification 01340, Construction & Demolition Waste Management which requires the collection and separation of all construction and demolition waste materials on-site and that they be reused or recycled to the extent feasible. Along with the implementation of the SCs and compliance with all Federal, State, and local regulations and programs, the solid waste generated by the proposed Project would be less than significant.

During operation, the proposed Project would not expand on existing uses or increase enrollment capacity to serve additional students. The proposed Project would also implement **SC-USS-3**, which would implement recycling programs on Campus to reduce solid waste production. With the reduced capacity and the implementation of **SC-USS-3**, the proposed Project is expected have a less than significant impact during operation on solid waste production.

The proposed Project would not generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant. No mitigation or further analysis is required.

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

Less Than Significant Impact. The proposed Project would comply with all federal, State, and local management and reduction statutes and regulations related to solid waste. As referred to in threshold (d), the proposed Project during construction would incorporate SC-USS-1 to recycle at least 75 percent of the construction and demolition solid waste. Operationally, SC-USS-3 would reduce the solid waste generated on site by incorporating an on-site recycling program. Therefore, the proposed Project would have a less than significant impact on federal, State, and local management and reduction statutes and regulations related to solid waste. No mitigation or further analysis is required.

XXI. WILDFIRE	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	
Is the project located in or near state responsibility areas or lands severity zones?	s classifi	ed as high i	lire haza	ırd	
		Yes		No	
If located in or near state responsibility areas or lands classified a zones, would the project:	If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?				\boxtimes	
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?					
c. Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				\boxtimes	
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?					

Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to wildfire risk. Projects implemented under the SUP were identified as having less-than-significant impacts and would not impair an adopted emergency plan, exacerbate wildfire risks, and/or expose people or structures to significant wildfire risk. and projects would be consistent with local, State, and federal policies and regulations pertaining to wildfire in the LAUSD region.

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

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

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

No Impact. The proposed Project would meet all codes, regulations and safety requirements of the City, LACoFD, DSA, and LAUSD SDG. Additionally, the Project would comply with **SC-PS-1**, which requires that the local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval. Furthermore, in accordance with **SC-PS-2** an Integrated Safe School Plan would be prepared to ensure emergency preparedness and response procedures are implemented. For these reasons, no impact would occur. No mitigation or further analysis is required.

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

No Impact. The Project Site and adjacent areas are not located within a Fire Hazard Severity Zone (FHSZ) or Wildland Urban Interface (WUI) zone as determined by the California Department of Forestry and Fire Prevention (CAL FIRE).^{112,113} The proposed Project would not expose occupants to pollutant concentrations from a wildfire or to the uncontrolled spread of a wildfire. No impact would occur. No mitigation or further analysis is required.

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

No Impact. The Project Site is located in a highly developed area with existing utility services including water, wastewater treatment and stormwater drainage, electric power, natural gas, and telecommunication facilities. Design of the proposed Project would incorporate new site utility infrastructure and new connections to utility lines in the public right-of-way as required, including but not limited to sewer, storm water, domestic water, fire water, low voltage, and electrical. These improvements would be designed in accordance with the facility requirements of the LA Bureau of Engineering, Department of Public Works, Bureau of Sanitation and Storm Water, and the County of Los Angeles, and would not exacerbate fire risk or result in temporary ongoing impacts to the environment.

As stated above, the Project Site and adjacent areas are not classified under a Fire Hazard Severity Zone. No impacts would occur. No mitigation or further analysis is required.

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

No Impact. The Project Site is in a highly urbanized area that has relatively flat topography. There are no vegetated slopes susceptible to wildfire in the surrounding area. Development of the proposed Project would not lead to the exposure of people or structures to significant risks including downslope or downstream



¹¹² CAL FIRE. "Fire Hazard Severity Zones." Accessed April 2024. https://osfm.fire.ca.gov/what-we-do/community-wildfirepreparedness-and-mitigation/fire-hazard-severity-zones.

¹¹³ U.S. Forest Service. "Wildland Urban Interface." Accessed April 2024. https://datausfs.hub.arcgis.com/documents/7804d89ed1094ccb9aae753228e8d89a/explore.

flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.¹¹⁴ No impacts would occur. No mitigation or further analysis is required.

¹¹⁴ City of Los Angeles. "Zone Information and Map Access System (ZIMAS)." Accessed April 2024. https://zimas.lacity.org/.

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

Explanation:

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

Less Than Significant Impact. The proposed Project is located in a highly developed area and not located near or on any designated habitat that could support a fish, wildlife, or plant community. As discussed in Section IV: Biological Resources, the proposed Project would also incorporate SCs to comply with the Migratory Bird Treaty Act for any trees being removed. The Project would comply with applicable Federal and State regulations, in addition to LAUSD's Tree Trimming and Removal Procedure. Therefore, impacts related to degrading the quality of the biological environment would be less than significant impact.

As previously discussed in **Section V: Cultural Resources**, a potential historic district has been identified at Fairfax HS that appears eligible for listing in the National Register and California Register, and for designation as a City of Los Angeles Historic Cultural Monuments (HCM). The potential historic district consists of nine (9) contributing buildings, three (3) contributing structures, and three (3) contributing site features. Two (2) buildings, the Auditorium Building and the Administration and Classroom Building, appear individually eligible for listing in the California Register and for designation as a City of Los Angeles HCM. For the purpose of this CEQA analysis, these buildings would be considered historical resources under CEQA.

According to the 2025 Cultural Resources Technical Report (**Appendix D**), the proposed Project will result in a less than significant impact to a historical resource. The demolition of Fairfax HS campus historic district contributors will not result in a loss of significance to the historic district. Following implementation of the
4. Environmental Checklist and Analysis

proposed Project, the remaining contributing buildings, hardscapes, and landscaping will sufficiently convey the feeling of significance the historic district possesses in its entirety. The 2025 Cultural Resources Technical Report evaluated the proposed Project against the Secretary of the Interior's Standards for Rehabilitation and the LAUSD Design Guidelines and Treatment for Historic Schools (**SC-CUL-5**) and determined that the proposed Project meets those requirements. Additionally, since the Project site has been highly disturbed and is covered by fill soils, discovery of archaeological and paleontological resources during excavation activities is unlikely. Therefore, impacts related to archaeological, paleontological, and historic resources and human remains would be less than significant. No mitigation or further analysis is required.

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

Less Than Significant Impact. Based on the assessments provided in this document, the proposed Project would not contribute to cumulatively considerable impacts through compliance with existing regulations, policies, and programs, and the incorporations of SCs. Furthermore, the proposed Project is expected to reduce existing resource usage through reduced operating capacity and more efficient facilities. Therefore, the Project would not be contributing to an adverse cumulative impact. No mitigation or further analysis is required.

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

Less Than Significant Impact. Based on the assessment provided in this study, there are no significant impacts. LAUSD SCs and LAUSD School Design Guidelines will be incorporated to minimize the potential impacts of the proposed Project. In addition, the proposed Project would comply with comply with applicable Federal, State, and local regulations and programs, further reducing any potential adverse effects the proposed Project may have on human beings. The proposed Project would have a less than significant impact on human beings either directly or indirectly. No mitigation or further analysis is required.

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5. List of Preparers

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5. List of Preparers

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Appendix

Appendices are available at https://www.lausd.org/ceqa.

- A. Air Quality and Greenhouse Gas Emissions Background and Modeling Data
- B. Arborist Report
- C. 2022 Historic Resource Evaluation Report
- D. 2025 Cultural Resources Technical Report
- E. Geologic and Environmental Hazards Assessment
- F. Phase I Environmental Site Assessment
- G. Methane Survey Report
- H. Noise Background and Modeling Data
- I. Sacred Lands File Record Search
- J. Preliminary Environmental Assessment Equivalent

Appendix

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