April 2025 | Initial Study

SYLMAR CHARTER HIGH SCHOOL

Major Modernization Project

Prepared for:

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

Prepared by:

WSP USA, Inc.
104 West Anapamu Street, Suite 204A
Santa Barbara, California 93101
Contact: Sarah Anderson, CEQA Project Manager
805.962.0992

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Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ACCM	asbestos-containing construction material
ACM	asbestos-containing material
ADA	Americans with Disabilities Act of 1990
ADT	average daily trips
amsl	above mean sea level
AQMP	air quality management plan
bgs	below ground surface
BMP	best management practices
BOE	Board of Education
CandD	construction and demolition
CA FID UST	California Facility Inventory Database for Underground Storage Tanks
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CARB	California Air Resources Board
CCR	California Code of Regulations
CDE	California Department of Education
CEQA	California Environmental Quality Act
CFC	California Fire Code
CFR	Code of Federal Regulations
CHMIRS	California Hazardous Material Incident Report System
CHPS	Collaborative for High Performance Schools
CMP	Los Angeles County Congestion Management Program
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
dB	decibel
dBA	A-weighted decibel
dBA L_{eq}	equivalent continuous sound level, in decibels
DPM	diesel particulate matter
DPW	Department of Public Works
DSA	Division of the State Architect (under the California Department of General Services)
ECHO	Enforcement and Compliance History Online
EDR	Environmental Data Resources, Inc.
EIR	Environmental Impact Report

Abbreviations and Acronyms

ESA	Environmental Site Assessment
FETU	Facilities Environmental Technical Unit
FINDS	Facility Index System
FTA	Federal Transit Administration
GHG	greenhouse gas
HS	High School
HVAC	heating, ventilation and air conditioning
I-	Interstate
IPCC	Intergovernmental Panel on Climate Change
IS	Initial Study
kV	kilovolt
LADOT	Los Angeles Department of Transportation
LADPW	Los Angeles Department of Power and Water
LAFD	City of Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LASPD	Los Angeles School Police Department
LAUSD	Los Angeles Unified School District
lbs	pounds
L_{dn} or DNL	Day-Night Noise Level
L_{eq}	Equivalent Continuous Noise Level
LID	low-impact development
L_{max}	highest root-mean-square sound level measured over 1000 milliseconds in a slow response
LST	localized significance thresholds
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
MEP	Maximum Extent Practicable
Metro	Los Angeles County Metropolitan Transportation Authority
MM	Mitigation Measure
MND	Mitigated Negative Declaration
MPH	mile per hour
$MTCO_2e$	metric ton of CO_2e
MW	Materials and Waste Management
NAHC	Native American Heritage Commission
ND	Negative Declaration
NPDES	National Pollutant Discharge Elimination System
O_3	ozone
OEC	other environmental conditions

Abbreviations and Acronyms

OEHHA	Office of Environmental Health Hazard Assessment
OITC	outdoor-indoor transmission class
pCi/L	picoCuries per liter
PDF	project design features
PEA	Preliminary Environmental Assessment
PEA-E	Preliminary Environmental Assessment Equivalent
PEIR	Program Environmental Impact Report
PF	Public Facility
PM	particulate matter
PPV	peak particle velocity
PRC	Public Resources Code
RCRA-LQG	Resource Conservation and Recovery Act - Large Quantity Generators
REC	recognized environmental condition
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCS	Sustainable Communities Strategy
SF	square foot
SO_2	sulfur dioxide
SoCAB	South Coast Air Basin
SR	State Route
SRA	Source Receptor Area
STC	sound transmission class
SUP	School Upgrade Program
SUSMP	standard urban stormwater mitigation plan
SWEEPS	Statewide Environmental Evaluation and Planning System
SWPPP	stormwater pollution prevention plan
ULSD	ultra-low sulfur diesel
USEPA	U.S. Environmental Protection Agency
UST	underground storage tank
VdB	vibration decibel
VMT	vehicle miles traveled
VOC	volatile organic compounds

1. Introduction

1.1 OVERVIEW

The Los Angeles Unified School District (LAUSD or District) proposes a major modernization of the Sylmar Charter High School Campus (Campus or Sylmar Charter HS) located at 13050 Borden Avenue, City of Los Angeles, Los Angeles County, California. The proposed Sylmar Charter HS Major Modernization Project (Project) is intended to address the most critical physical needs and essential safety issues on the Campus through building replacement, renovation, modernization, and reconfiguration. The proposed Project would occur on approximately 4.8 acres of the 30.6-acre Campus (Project site). The proposed Project is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). The proposed discretionary action (i.e., approval of the proposed Project) by the District constitutes a "project" because approval of the Project would result in a direct physical change in the environment. This Initial Study (IS) provides an evaluation of the potential environmental consequences associated with this proposed Project.

1.2 BACKGROUND

The District's 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 operating 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). Initially in 2014, $7.85 billion was allocated for the development of projects. Over the course of the last 7 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 the Measure RR funds, adjusted the categories and spending targets within the program, and approved the Measure RR Implementation Plan.

[1] LAUSD Facilities Services Division, 2023, Strategic Execution Plan, Page 1.

1. Introduction

The bond program is now focused on improving equity between newer and older schools 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 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 (Subsequent PEIR) should be prepared due to substantial changes in the goals and funding for the SUP from what was evaluated in the 2015 PEIR. The 2023 Subsequent PEIR was prepared according to CEQA (14 California Code of Regulations [CCR] Section 15162[a]) and certified by the LAUSD Board of Education on December 12, 2023.

On December 7, 2021, the Board approved project definitions for the due diligence, planning, and feasibility activities necessary to propose scope recommendations, budgets, and schedules for the Sylmar Charter HS major modernization project. The purpose of the proposed Project is to provide facilities that are safe, secure, and aligned with the instructional program. On November 15, 2022, the Board approved the definition of the proposed major modernization project at Sylmar Charter HS that will address the most critical physical conditions and essential safety issues.

A Preliminary Site Analysis and Program Development Report (August 2023) was developed to present the findings of the first phase review and investigation of the existing campus and make recommendations for the major modernization of the Campus. Both discussion of existing conditions and the proposed Project design, as described herein, is based on findings of this analysis.

1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by CEQA[3] and the CEQA Guidelines, as amended.[4] 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 (e.g., 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.

[2] LAUSD Facilities Services Division, Board of Education Report, Update to the School Upgrade Program to Integrate Measure RR Funding and Priorities, August 24, 2021. https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/1431//BOC%20Home%20Documents/misc_Measure_RR_Proposed_Implementation_Plan.pdf

[3] California Public Resources Code, §21000 et seq (1970). https://codes.findlaw.com/ca/public-resources-code/prc-sect-21000/

[4] California Code of Regulations, Title 14, Division 6, Chapter 3, §15000 et seq. https://www.law.cornell.edu/regulations/california/title-14/division-6/chapter-3

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 IS is required to determine whether there is substantial evidence that construction and operation of the proposed Project would result in environmental impacts. An IS 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.[5]

When an IS identifies the potential for significant environmental impacts, the lead agency must prepare an EIR,[6] 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.[7]

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. (CCR § 15378[a])

The major modernization project proposed by the District constitutes 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 IS 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 IS, as described in the 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

[5] California Code of Regulations, Title 14, Division 6, Chapter 3, §15063. https://opr.ca.gov/ceqa/guidelines/
[6] California Code of Regulations, Title 14, Division 6, Chapter 3, §15064. https://opr.ca.gov/ceqa/guidelines/
[7] California Code of Regulations, Title 14, Division 6, Chapter 3, §15070. https://opr.ca.gov/ceqa/guidelines/

previously prepared EIR could be used with the project. The findings in this IS have determined that an EIR is the appropriate level of environmental documentation for the proposed Project.

1.5.1 Environmental Impact Report

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

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

1.5.2 Tiering

This type of project is one of many that were analyzed in the 2023 Subsequent PEIR that was certified by the LAUSD BOE on December 23, 2023.[8] The Subsequent PEIR meets the criteria for a PEIR 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 Subsequent PEIR enables LAUSD to streamline future environmental compliance and reduces the need for repetitive environmental studies. It 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.[9]

The Subsequent PEIR is applicable to all projects implemented under the SUP. It provides the framework for evaluating environmental impacts related to ongoing facility upgrade projects planned by the District.[10] Due to the extensive number of individual projects anticipated to occur under the SUP, projects were grouped into

[8] *Subsequent Program EIR for the School Upgrade Program. 2023*. http://achieve.lausd.net/ceqa.

[9] California Code of Regulations Title 14, § 3 Article 1-15152(a). https://casetext.com/regulation/california-code-of-regulations/title-14-natural-resources/division-6-resources-agency/chapter-3-guidelines-for-implementation-of-the-california-environmental-quality-act/article-10-considerations-in-preparing-eirs-and-negative-declarations/section-15152-tiering

[10] Ibid, at 4-8. https://www.lausd.org/ceqa

four categories based on project scope, type of construction and location of project. The four categories of projects are as follows:[11]

- 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 Subsequent PEIR.

The proposed Project is considered a site-specific project under the Subsequent PEIR; therefore, this IS is tiered from the Subsequent PEIR. The Subsequent PEIR is available for review online at https://www.lausd.org/ceqa 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 proposed Project is subject to the California Department of Education (CDE) design and siting requirements, and the school architectural designs are subject to review and approval by the California Division of the State Architect (DSA). The proposed Project, along with all other SUP-related projects, is required to comply with specific design standards and sustainable building practices. Certain standards assist in reducing environmental impacts, such as the California Green Building Code (CALGreen Code),[12] LAUSD Standard Conditions of Approval (SC), and the Collaborative for High-Performance Schools (CHPS) criteria.[13]

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 Greenhouse Gas (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.

[11] Ibid, at 1-7. https://www.lausd.org/ceqa
[12] California Green Building Standards Code, Title 24, Part 11. https://www.dgs.ca.gov/BSC/CALGreen
[13] The Board of Education's October 2003 Resolution on Sustainability and Design of High Performance Schools directs staff to continue its efforts to ensure that every new school and modernization project in the District, from the beginning of the design process, incorporate CHPS (Collaborative for High Performance Schools) criteria to the extent possible.

1. Introduction

Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects. The SCs for District Construction, Upgrade, and Improvement Projects were adopted by the Board on December 12, 2023.[14] SCs are environmental standards that are applied to District construction, upgrade, and improvement projects during the environmental review process by the Office of Environmental Health and Safety (OEHS) CEQA team to offset potential environmental impacts. The most recently adopted SCs were updated in order to incorporate and reflect recent changes in the laws, regulations and the District's standard policies, practices and specifications (e.g., the LAUSD Design Guidelines and Design Standards, which are routinely updated and are referenced throughout the SCs).

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. The District is committed to sustainable construction principles and has been a member of the CHPS since 2001. CHPS has established criteria for the development of high-performance schools to create a better educational experience for students and teachers by designing the best facilities possible. CHPS-designed facilities are healthy, comfortable, energy efficient, material efficient, easy to maintain and operate, commissioned, environmentally responsive site, a building that teaches, safe and secure, community resource, stimulating architecture, and adaptable to changing needs. The proposed Project would comply with CHPS and the District's 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, water-wise landscaping, collection of recyclables, and sustainable and/or recycled-content building materials.

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

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

- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.

[14] 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

- 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.[15] 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 CEQA Guidelines. The conclusions in this IS are that the proposed Project would have no significant impacts. This report has the following sections:

Chapter 1, *Introduction* identifies the purpose and scope of the IS 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

[15] CHPS criteria are summarized. The full requirement can be found at https://chps.net/chps-criteria

1. Introduction

CHPS criteria, PDFs, SCs, and mitigation measures, as applicable. Bibliographical references and individuals cited for information sources and technical data are footnoted throughout this IS; therefore, a stand-alone bibliography section is not required.

Chapter 5, *List of Preparers* identifies the individuals who prepared the IS and technical studies and their areas of technical specialty.

Appendices contain data supporting the analysis in this IS.

2. Environmental Setting

2.1 PROJECT LOCATION

Sylmar High School Campus is a 30.6-acre District-owned property located at 13050 Borden Avenue, Sylmar, California (Assessor's Parcel Number [APN] 2509-005-901. The Campus is in the northeast San Fernando Valley's Sylmar neighborhood in the City of Los Angeles. The Campus is approximately 20 miles northwest of Downtown Los Angeles, and just over a quarter mile west of the Interstate (I-) 210 and 1.73 miles east of the I-5 (see Figure 1, *Regional Location*). The Campus is bounded on the north by Dronfield Avenue, east by Raven Street, south by Borden Avenue, and west by Astoria Street (see Figure 2, *Local Vicinity Map*).

The Campus is approximately 1,261 feet above mean sea level (amsl) in elevation. The topography of the site is generally flat, with a slope to the south-southeast.[16] The total topographic relief across the site is approximately 175 feet. Elevations are higher at the Physical Education Building and field areas located in the northwest corner of the Campus, with the overall site stepping down and toward the southeast corner of the Campus. The Campus is not in an Alquist-Priolo Earthquake Fault Zone. The nearest fault is the Sylmar fault, mapped approximately 0.5 miles to the southeast of the Campus. The Campus is not located in a seismic hazard zone for soil liquefaction. The Campus is not within any mapped flood hazard zone or designated floodplain. The Campus is listed in the California Department of Toxic Substances Control (DTSC) Hazardous Waste Tracking System database for information pertaining to hazardous waste.[16] The Campus was historically identified as an active generator of hazardous waste (ID CAD982039414) first issued in 1988.

Transit service to the Campus is provided by the Los Angeles County Metropolitan Authority (Metro), which operates Bus Line 234 that has a stop at Borden Avenue and Astoria Street at the front entrance of the Campus. The closest passenger rail station is the Sylmar/San Fernando Metrolink located approximately one mile to the southeast of the Campus.

[16] Geosyntec Consultants. 2022. Phase I Environmental Site Assessment. Project SB1095. March 9, 2022.

2. Environmental Setting

Figure 1. Regional Location

Figure 2. Local Vicinity

2.2 EXISTING GENERAL PLAN AND ZONING

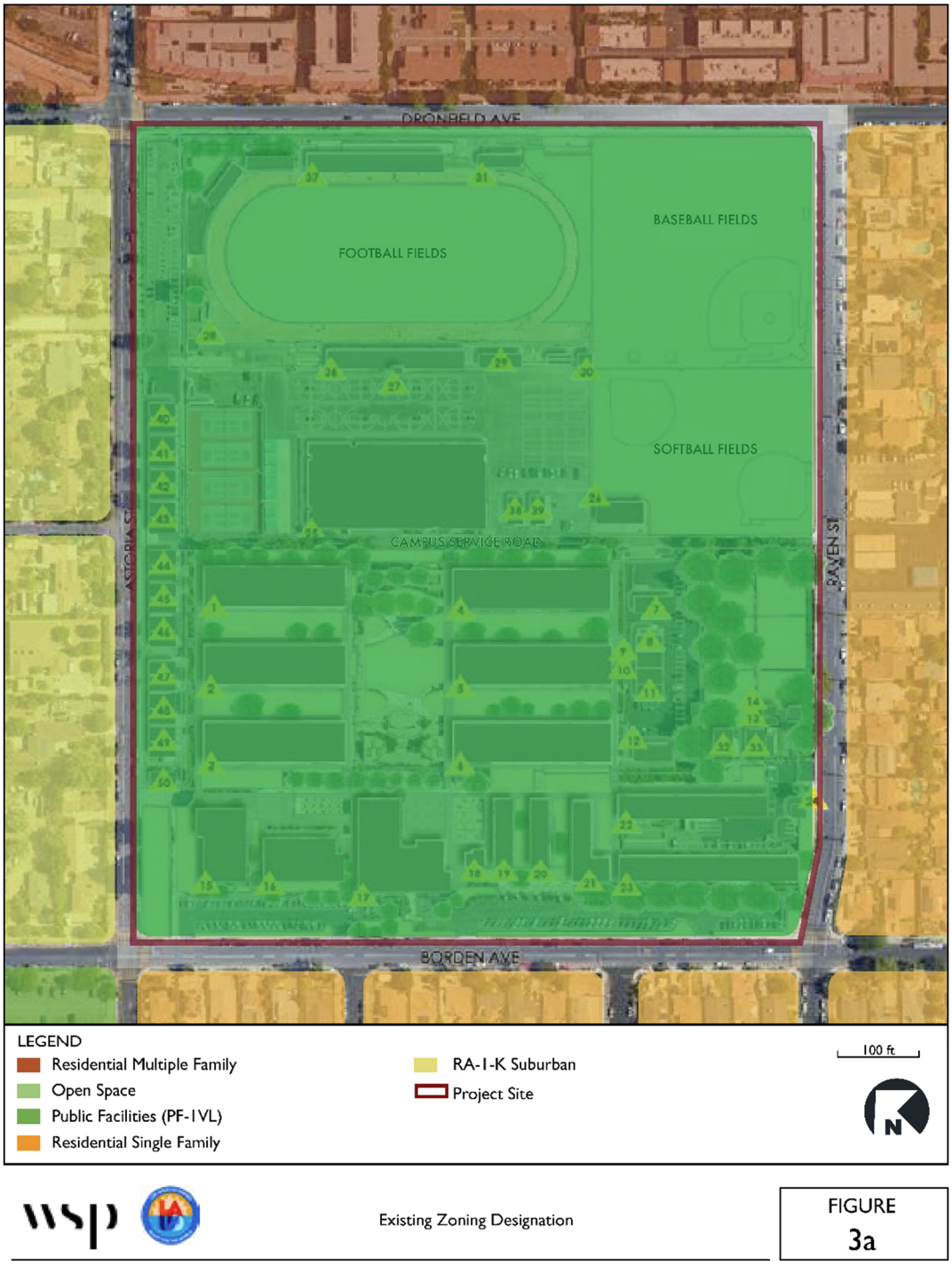
The Campus and surrounding development are located within the Sylmar Community Plan area, which is one of the 35 community plans that comprises the Land Use Element of the General Plan of the City of Los Angeles. The Project site is designated PF (Public Facilities) and zoned PF-1VL: Public Facility, Height District 1 – Very Low.[17] Surrounding residential land uses are designated Very Low I Residential, Low II Residential, and Medium Residential. Residential parcels surrounding the Campus are zoned R1-1 (Single Family Residential), RA-1-K (Suburban), and R3-1-CPIO (Multiple Family Residential) (see Figure 3a and 3b, *Existing Zoning and General Plan Land Use Designations*). On February 19, 2019, pursuant to Government Code Section 53094, the LA Unified Board of Education adopted a Resolution to exempt all District school sites, including Sylmar HS, from local land use regulations[18] and as a result, District 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.

2.3 SURROUNDING LAND USE

The surrounding areas are developed with low- to medium-density suburban land uses, including residential, commercial, institutional (educational and religious), and recreational properties. Iglesia Luz y Vida Los Angeles Church and the PUC Charter Elementary School are located at 14019 Sayre Street, approximately 60 to 120 feet southeast of the Campus across from Raven Street. Casa de Adoracion and 180 City Church are located at the same address, 14019 Sayre Street, approximately 200 feet southeast of the Campus. Across from the western corner of the Campus is the 20-acre Sylmar Park (see Figure 4). Land uses surrounding the Campus are developed primarily with postwar single-family tract housing and multi-family apartment complexes. Nearby major commercial thoroughfares include Foothill Boulevard to the east and San Fernando Boulevard to the west.

[17] City of Los Angeles. 2015. Sylmar Community Plan. https://planning.lacity.gov/plans-policies/community-plan-area/sylmar
[18] 15 California Education Code Sections 38130–38139.

Figure 3a. Existing Zoning



Existing Zoning Designation

FIGURE 3a

2. Environmental Setting

Figure 3b. General Plan Land Use Designations

Existing General Plan Land Use Designations

FIGURE 8b

2.4 SENSITIVE RECEPTORS

The District has defined sensitive receptors as residences, schools, daycares, 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. The District has identified the nearest sensitive receptors within 200 feet to the Campus (see Table 1 and Figure 4).

Table 1. Nearby Sensitive Receptors

No.	Name	Address	Type	Location	Distance from the Project Site (ft)
1-15	Single Family Residence	12967-13057 Borden Avenue	Residential	Southwest of campus across Borden Avenue	66-150
16	Single Family Residence/Restaurant	14204 Berg Street	Residential	Southwest of campus across Borden Avenue	60
17	Single Family Residence	12952 Borden Avenue	Residential	Southeast of campus across Raven Street	100
18-34	Single Family Residence	13980-14139 Raven Street	Residential	Southeast of campus across Raven Street	60-81
35	Single Family Residence	13059 Dronfield Avenue	Residential	Southeast of campus across Raven Street	75
36-44	Multifamily Residence	13130-13058 Dronfield Avenue	Residential	Northeast of campus across Dronfield Avenue	71-98
45-53	Single Family Residence	14101-14201 Astoria Street	Residential	Northwest of campus across Astoria Street	74-96
54	Single Family Residence	13064 Borden Avenue	Residential	Northwest of campus across Astoria Street	116
55	PUC Community Charter Elementary School	14012 Raven Street	Education	Southeast of campus on Sayre Street	66
56	Iglesia Luz y Vida Los Angeles Church	14019 Sayre Street	Church	Southeast of campus on Sayre Street	120
57	Casa de Adoracion, 180 City Church	14019 Sayre Street	Church	Southeast of campus on Sayre Street	200
58	180 City Church	14019 Sayre Street	Church	Southeast of campus on Sayre Street	200
59	Sylmar Park	13109 Borden Avenue	Recreation	West of campus across Astoria St. and Borden Avenue	85
60	Single Family Residence	13007 Borden Avenue	Residential	Southwest of campus across Borden Avenue	121

2. Environmental Setting

Figure 4. Sensitive Receptors

2.5 CAMPUS HISTORY

As described in the Historic Resources Evaluation Report (HRER) prepared for the proposed Project, construction of the Sylmar High School Campus was completed in September 1961.[19] Prior to its development as a Campus, the Project site was used for agricultural (orchards) and rural residential purposes. The original Campus was designed with four general areas, separating various school classrooms, gathering, and outdoor recreation areas. The Campus' focal point was the landscaped central courtyard, or "mall," containing an outdoor stage for large programs and special events.

The Campus remained essentially unchanged through most of the 1970s. Minor work included the construction of a four-room portable classroom, the addition of a storage shed in the agricultural area, resurfacing of the tennis courts, and installation of TV antennas.

On February 9, 1971, the San Fernando Earthquake damaged the Campus's connecting arcades, walkways, and retaining walls. The floors in the Physical Education (PE) Building and Multipurpose Building (MPB) sustained damage as did the concrete columns at the cafeteria. Repair work was completed in the next year, and a new classroom building, Building #26, was constructed in the northwestern portion of the original softball field. Additionally, a series of five temporary, relocatable classroom buildings were erected on the asphalt-paved area north of the agricultural area, which remain in use today.[19] The Northridge Earthquake on January 17, 1994, damaged Campus buildings and arcades that were later repaired. In 1978, a small unused area in the northernmost corner of the Campus was carved out for the establishment of Evergreen Continuation High School. In 2016, Sylmar High School became an affiliated[20] charter school, the Sylmar Charter High School.

2.5.1 Potential Historic District

The Sylmar High School Campus has been identified as a potential historic district eligible for listing in the National Register of Historic Places (National Register), California Register of Historical Resources (California Register), and as a City of Los Angeles Historical-Cultural Monument (HCM) under significant Criteria A/1/1 for its association with postwar school development. The Campus displays elements of the condensed finger-plan and cluster-plan typologies, which were typical of LAUSD campus development in the 1960s.

The Sylmar High School Campus is an intact example of LAUSD postwar campus planning and design. The campus plan displays elements of the condensed finger-plan and cluster-plan typologies which were typical of LAUSD campus development in the 1960s and as such, contributing resources to the potential historic district include the character-defining features of the campus site plan and landscape design including the arcades; concrete walks, steps and ramps; landscaped courtyards; paved open patios; rusticated concrete block retaining and planter walls; square-tube and pipe metal handrails; metal fencing and gates along the front of the campus; and mature landscaping throughout the site.

As described in the HRER, most improvements to the Campus have been additive or have involved relatively minor facilities upgrades (Appendix A).

[19] Historic Resources Group. 2022. Historic Resources Evaluation Report. September 30, 2022.

[20] *Affiliated* charter schools function under the auspices of the LAUSD Board of Education. LAUSD typically administers all funding programs for affiliated schools. Affiliated charters can choose their own curriculum, opt to reduce class sizes or adjust classroom scheduling, offer more professional development and exercise more control over budgeting, hiring and school site decisions.

2. Environmental Setting

The significance of the resource is conveyed through the site plan and contributing resources. The period of significance is 1961 when the school was completed and opened. There are 22 contributing resources (or contributors) that date to the Campus' original 1961 construction. The Potential Historic District is further discussed in *Chapter 4.2, Section V, Cultural Resources.* The boundary of the potential historic district is shown on Figure 5 and contributing resources to the potential historic district are listed in Table 2 – *Existing School Campus and Potential Historic District Status.*

Figure 5. Sylmar High School Potential Historic District

2.6 EXISTING CONDITIONS

The Campus occupies approximately 30.6 acres. The Project site encompasses two schools: Sylmar Charter High School and Sylmar Biotech Health and Engineering Magnet (SBHEM), which are accessed through two entrances off Borden Avenue and one on Astoria Street. Two other schools, Evergreen Continuation High School and City of Angels are part of the Campus. These schools each have their own entrances off Dronfield Avenue and Astoria Street, respectively. The Project would relocate City of Angels within the Campus.

Sylmar Charter HS and SBHEM occupy separate classroom buildings and share Campus facilities such as the assembly area, athletic areas, food service, library, and student store. Their combined total of classrooms is 101 standard sized classrooms.[21] Sylmar Charter HS and SBHEM served a cumulative population of 1,830 students in grades 9 – 12 according to the 2023-2024 E-CAR[22]. The projected enrollment for planning purposes is 2,025. The proposed Project is not designed or expected to increase student enrollment or capacity of the Campus.

2.7 EXISTING CAMPUS USES

School Operations. The Campus's operations include Sylmar Charter High School, SBHEM, Evergreen Continuation High, and City of Angels – Sylmar High School Independent Study, which are two-semester, two-track high school programs that serve grades 9-12. The District establishes that schools have a total of 183 instructional days (2023-2024) and school hours are 8:00 AM to 3:23 PM including the hour-long Home Room Advisory period after classes.

School-Related Events. The school has after-school programs for students, such as special-interest clubs, and extracurricular activities that end approximately at 6:00 PM at the latest. The school's athletic programs hold games and practices that can take place between 8:00 AM to 9:00 PM. There are also occasional nighttime and weekend events during the school year. Some of these events are Campus-wide, such as school plays and open houses, while others are grade specific, such as commencement.

Community Use. In compliance with the Civic Center Act, (CA Education Code Sections 38130-38139), the Campus is available for community use at selected times when not in use by LAUSD.[23]

[21] LAUSD. 2023. Major Modernization Project Preliminary Site Analysis and Program Development Phase Critical Findings Presentation. July 21, 2023.
[22] Electronic Capacity Assessment Review (E-CAR) data. Provided by LAUSD June 21, 2024.
[23] 15 California Education Code Sections 38130–38139.

2.8 EXISTING BUILDINGS AND SITE IMPROVEMENTS

General Campus buildings, including the Administration Building, the Spartan Theater and Library Building, and the Multipurpose Building (MPB) and Lunch Pavilion are clustered along the front the Campus toward Borden Avenue. The centralized portion of the Campus is composed of a series of six parallel one-story classrooms separated by narrow landscaped courtyards and connected by a covered walkway canopy system, or "arcades," surrounding a main quad area. The southern portion of the Campus contains several specialized classroom buildings, two shop buildings, and an agricultural area. Recreational areas are concentrated in the northern portion of the Campus, including athletic fields for softball, baseball, and football, as well as paved tennis, handball, basketball, and volleyball courts. A 6,780-square-foot "safe-dispersal area" used during drills and emergencies is located at the hardcourts area adjacent to the softball field. A complete list of buildings and structures located on the Campus includes the following (see Figure 6). Photographs of key buildings related to the proposed Project are included as Figure 8a and 8b.

Table 2. Existing School Campus and Potential Historic District Contributor Status

Building Number	Building Name*	Approx. Square Footage*	Year Built**	Number of Stories*	Potential Historic District Status**
1	Business and Art	12,760	1961	1	Contributor
2	Home Economics	12,760	1961	1	Contributor
3	Building A Classroom	12,760	1961	1	Contributor
4	Building C Classroom	14,384	1961	1	Contributor
5	Building B Classroom	14,382	1961	1	Contributor
6	Science	14,384	1961	1	Contributor
7	Portable Classroom	1,844	1972	1	Non-Contributor
8	Portable Classroom	992	1998	1	Non-Contributor
9	Portable Classroom	992	1998	1	Non-Contributor
10	Portable Classroom	992	1998	1	Non-Contributor
11	Portable Classroom	993	1998	1	Non-Contributor
12	Chemistry	1,777	1961	1	Contributor
13	Greenhouse	174	1961	1	Non-Contributor
14	Greenhouse	360	1961	1	Non-Contributor
15	Library	8,461	1961	1	Contributor
16	Administrative	8,099	1961	1	Contributor
17	Multipurpose Building	19,052	1961	1	Contributor
18	Student Store	814	1961	1	Contributor
19	Music/Chorale*	3,257	1961	1	Contributor
20	Drafting Building (Classrooms)	2,849	1961	1	Contributor
21	Sylmar Biotech Health and Engineering Magnet	4,878	1961	1	Contributor

2. Environmental Setting

Building Number	Building Name*	Approx. Square Footage*	Year Built**	Number of Stories*	Potential Historic District Status**
	(SBHEM) Administration				
22	Industrial Arts #2 (shop building)	10,331	1961	1	Contributor
23	Industrial Arts #1 (shop building)	14,029	1961	1	Contributor
24	Storage Unit #1 (garage)	383	1961	1	Non-Contributor
25	Physical Education	39,374	1961	2	Contributor
26	2 – Story Classroom	5,496	1972	2	Non-Contributor
27	Announcers Booth	115	1961	1	Non-Contributor
28	Ticket Booth	90	1965	1	Non-Contributor
29	Sanitary #1	884	1961	1	Non-Contributor
30	Storage	367	1974	1	Non-Contributor
31	Sanitary #2	893	1961	1	Non-Contributor
32	Agriculture Unit	1,331	1961	1	Contributor
33	Lathe House	1,336	1961	1	Non-Contributor
36	Bleachers 1 West	7,022	2002	1	Non-Contributor
37	Bleachers 2 East	3,541	2002	1	Non-Contributor
38	DSA BLDG – 21726	994	2000	1	Non-Contributor
39	DSA BLDG - 21727	993	2000	1	Non-Contributor
40	DSA BLDG - 21243	1,920	2004	2	Non-Contributor
41	DSA BLDG - 21246	1,920	2004	2	Non-Contributor
42	DSA BLDG - 21467	1,920	2004	2	Non-Contributor
43	DSA BLDG - 20952	1,920	2004	1	Non-Contributor
44	DSA BLDG - 21757	1,954	2000	1	Non-Contributor
45	DSA BLDG - 22740	1,920	2000	1	Non-Contributor
46	DSA BLDG - 22118	1,920	2000	1	Non-Contributor
47	DSA BLDG - 22122	1,920	2000	1	Non-Contributor
48	DSA BLDG - 22124	1,920	2000	1	Non-Contributor
49	DSA BLDG - 21626	1,920	1998	1	Non-Contributor
50	A-3960 - 22060	993	1998	1	Non-Contributor
Outdoor Spaces					
A	Central Courtyard and Outdoor Stage	35,368	1961	-	Contributor
B	Parking Area	17,890	1961	-	Contributor
C	Parking Area	38,950	1961	-	Contributor

Building Number	Building Name*	Approx. Square Footage*	Year Built**	Number of Stories*	Potential Historic District Status**
D	Site Plan/Landscape Design[24]	-	1961	-	Contributor
E	Football Field and Track	166,650	1961	-	Non-Contributor
F	Tennis Courts	23,600	1961	-	Non-Contributor
G	Handball Courts	5,418	1961	-	Non-Contributor
H	Basketball and Volleyball Courts	43,336	1961	-	Non-Contributor
I	Baseball Field	128,390	1961	-	Non-Contributor
J	Softball Field	86,500	1961	-	Non-Contributor
K	Agriculture/Planting Area	43,921	1961	-	Non-Contributor
L	Parking Area	18,350	1961	-	Non-Contributor
M	Marquee Sign	-	2008	-	Non-Contributor

*Source: LAUSD, 2023
**Source: HRG, 2022

[24] Features of the campus site plan and landscape design include the arcades; concrete walks, steps and ramps; landscaped courtyards; paved open patios; rusticated concrete block retaining and planter walls; square-tube and pipe metal handrails; metal fencing and gates along the front of the campus; and mature landscaping throughout the site (HRG, 2022).

2. Environmental Setting

Figure 6. Aerial Map

Existing Sylmar Charter High School Campus

FIGURE 6

Figure 7a. Photo Location

Figure 7b. Site Photographs

Photo 1 SBHEM Main Entrance and Library (Building 15)

Photo 2 Administration (Building 16)

Photo 3 Multipurpose Building (Building 17), exterior

Photo 4 Multipurpose Building, interior

Photo 5 Multipurpose Building, interior

Photo 6 Multipurpose Building & Lunch Pavilion, looking toward food service

Photo 7 Main Electrical Switch Board at Multipurpose Building

Photo 8 Parking Area at SBHEM Entrance, Borden Ave.

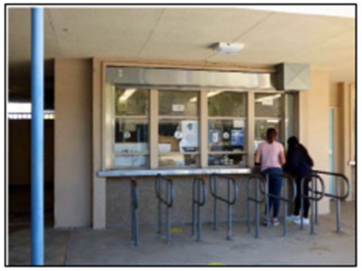


Photo 9 Student Store (Building 18)

Photo 10 Music/Chorale (Building 19)

Photo 11 Drafting Building/Classroom (Building 20)

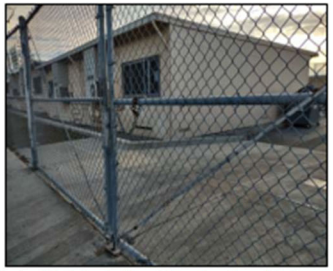


Photo 12 Astoria St. at Service Road Entrance; DSA Buildings to be removed

2. Environmental Setting

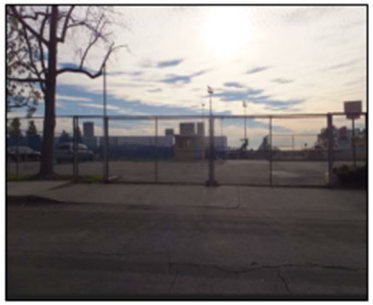


Photo 13 Astoria St. Parking Entrance (Lot No. 1)

Photo 14 DSA Buildings #38 and #39

Photo 15 Row of DSA Buildings to be removed for Parking Lot expansion

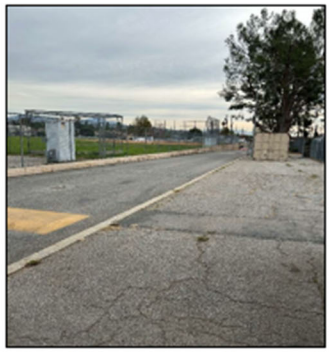


Photo 16 Service Road looking toward Softball Field

Photo 17 Service Road looking toward Buildings #38 and #39

Photo 18 Outdoor Seating, looking toward Main Quad

Photo 19 Main Quad

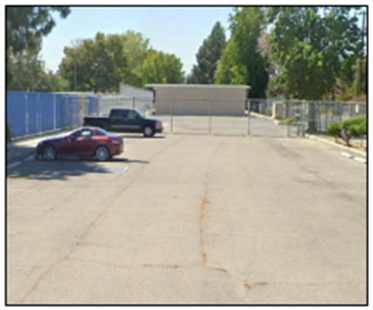


Photo 20 Astoria Street Parking (Lot No. 1)

2.9 EXISTING CAMPUS ACCESS AND PARKING

The roadway network within the vicinity of the Campus is oriented in a grid on an approximate 45-degree angle. The Campus is bounded by Astoria Street (west), Dronfield Avenue (north), and Borden Avenue (south), and Raven Street (south). All are two-lane roadways and are designated as Collectors except for Raven Street, which is designated as Local. Vehicular traffic controls include 4-way and 1-way stops.

Pedestrian and Bicycle

Existing public sidewalks and pedestrian facilities are also provided along the Campus frontages. Public sidewalks are approximately eight feet wide (excluding landscaping) and are provided along the Campus frontage on Astoria Street and Borden Avenue and seven feet wide along Raven Street and Dronfield Avenue. There is no posted signage for formal drop-off/pick-up loading zones along Astoria Street, Raven Street, Dronfield Avenue, or Borden Avenue.

The nearest designated bikeways are a Class III Bicycle Route (shared with roadway) on Dronfield Avenue, and a Class III Neighborhood Enhanced System on Astoria Street (shared with roadway). The nearest Class II (designated striped) bicycle lane is on west Polk Street, approximately 0.35 miles west of the Campus.

Traditional yellow continental style pedestrian crosswalks are provided at the following intersections in the direct vicinity of the Campus:

- Two legs of Astoria Street/Dronfield Avenue
- Three legs of Astoria Street/Borden Avenue
- Two legs of Raven Street/Borden Avenue

Transit

Transit service to the Campus is provided by the Los Angeles County Metropolitan Authority (Metro), which operates Bus Line 234 that has a stop at Borden Avenue and Astoria Street at the front entrance of the Campus. The closest passenger rail station is the Sylmar/San Fernando Metrolink located approximately 1 mile to the southeast of the Campus. Most of the school bus loading/unloading activities occur along the Campus frontage on the west side of Raven Street. The school buses include Special Education buses, a Magnet bus, and school buses for athletic students. Signage indicating "Tow Away No Stopping – School Buses Exempted" between 7:00 AM and 5:00 PM on school days (Mondays through Fridays) is posted along the west side of Raven Street between the internal campus service roadway and Borden Avenue.

Parking and Vehicular Access

There are five parking areas on the Campus, as further described below and depicted in Figure 3. There are a total of 197 total parking marked stalls within the Campus: 185 standard stalls, and 12 accessible stalls compliant with the Americans with Disabilities Act of 1990 (ADA). There are nine unmarked stalls in Parking Area No. 5. The District Standard for this size of Campus is 258 parking stalls. Bicycle parking and skateboard storage are provided adjacent to Buildings #15 and #17.

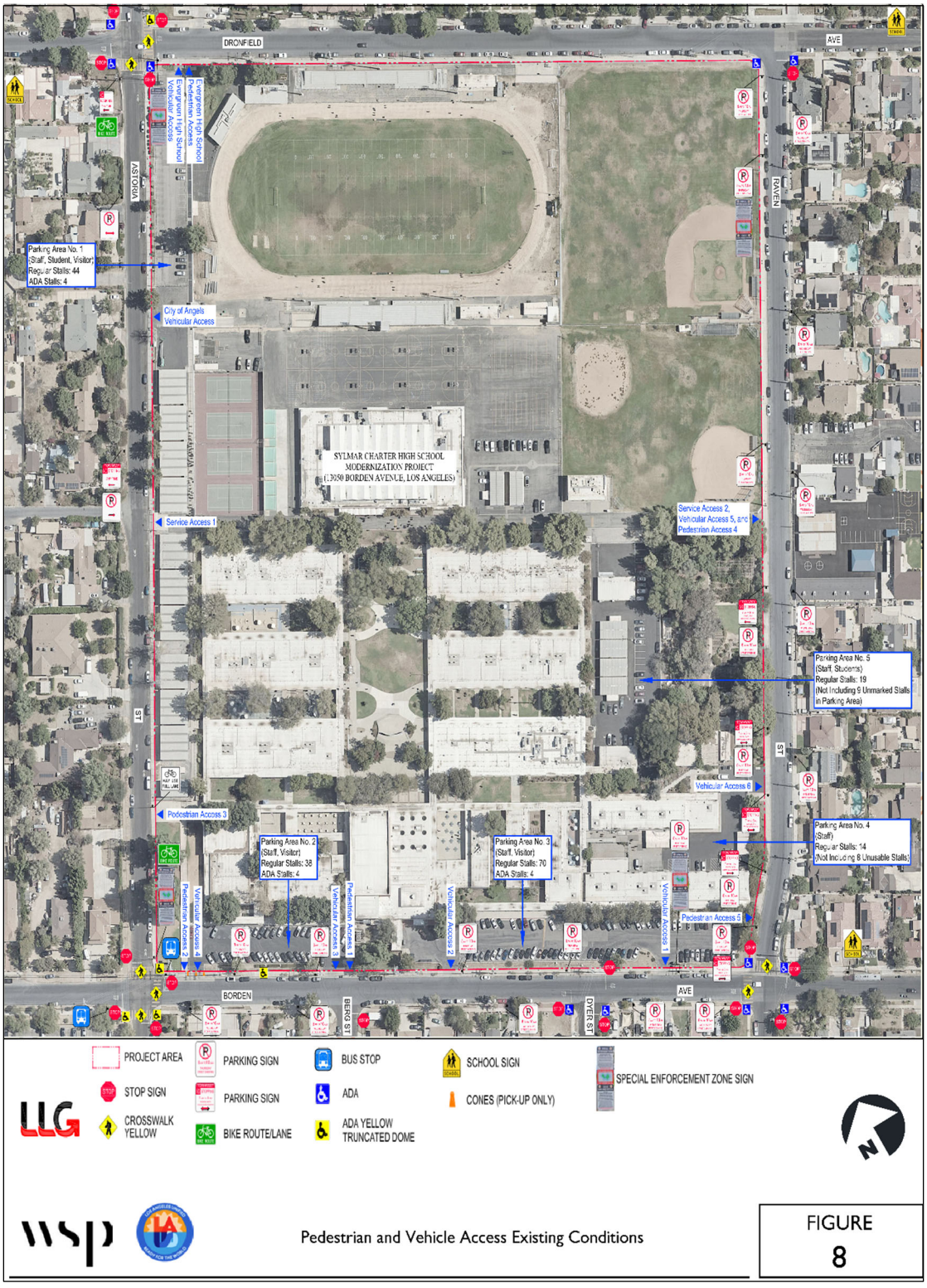
- Parking Area No. 1, located at the northern corner of Campus on Astoria Street: 44 regular stalls, four ADA stalls (48 total stalls).

- Parking Area No. 2, located at the main SCHS Campus entrance along Borden Ave: 38 regular stalls, four ADA stalls (42 total stalls).
- Parking Area No. 3, located at the main SBHEM Campus entrance along Borden Ave: 70 regular stalls, four ADA stalls (74 total stalls).
- Parking Area No. 4, separated in two locations among industrial arts buildings: 14 regular stalls
- Parking Area No. 5, located adjacent to portable classroom buildings: 19 regular stalls, nine unmarked spaces (28 total stalls).

Primary visitor parking is in Parking Areas No. 2 and No. 3 along Borden Avenue. There is additional parking for teachers and staff in the parking lot located at the northwest side of the Campus adjacent to the football field (Parking Area No. 1). The lot is shared with athletics and the Evergreen Continuation HS that operates at the northwest corner of the Campus. Smaller parking areas exist adjacent to the Industrial Arts Building #1 and #2 (Parking Area No. 4), as well as areas adjacent to Buildings #7, #8, #9 and Greenhouse area (Parking Area No. 5). These parking areas do not comply with current ADA codes; no entrance signage is provided and wheelchair access from the city sidewalk (public right-of-way) to the main entrance has not been provided for SBHEM main office. There are no electric vehicle (EV) charging stations provided at parking areas on the Campus.

Vehicular access to the on-site parking areas is provided via nine existing driveways: four driveways along the north side of Borden Avenue, two driveways along the east side of Astoria Street, one driveway along the south side of Dronfield Avenue (Evergreen Continuation HS vehicular access), and two driveways along the west side of Raven Street. All on-site parking spaces are currently utilized by Campus staff/administration and visitors, with some reserved for Permit Parking only, and not available to visitors. Parking and vehicular access are provided in Figure 8 *Pedestrian and Vehicle Access Existing Conditions*.

Figure 8. Pedestrian and Vehicle Access Existing Conditions



2.10 EXISTING UTILITIES AND INFRASTRUCTURE

The City of Los Angeles Department of Public Works (DPW) and the Los Angeles Department of Water and Power (LADWP) provide citywide infrastructure and services for water, wastewater, stormwater, solid waste management, and energy (power).

Electrical

There are eight electrical substations on Campus that serve existing buildings. The majority of electrical distribution throughout the Campus was originally constructed in 1960 and is in poor condition.[25] Newer 5 kilovolt (kV) distribution was added in 1995 to support a heating, ventilation, and air conditioning (HVAC) upgrade. The main electrical distribution vault is an LADWP above-ground transformer located on Borden Avenue. This vault transforms utility power from overhead DPW utility lines located at the street on Borden Avenue, Raven Street, and Dronfield Avenue and runs power underground from the main switchboard to an underground 5kV electrical line. The Campus currently does not have a renewable energy system.

Natural Gas

Natural gas is fed to each building individually from a Campus gas connection. Natural gas is used in buildings for either water heating, space heating and/or teaching and science functions. Unless previously renovated, the existing natural gas systems are largely original.

Domestic and Fire Water

The Campus is served by an 8-inch LADWP mainline running along the service road, south of the gymnasium. This main line provides both fire and domestic water and is connected to the 12-inch public main line on Astoria Street. There is another water connection to the southwest of Campus along Borden Avenue. This connection is connected to a fire department connection. There are 12 public fire hydrants around the frontage of Campus; there are five along Dronfield Avenue, one along Astoria Street, four along Borden Avenue, and two along Raven Street. There is one on-site hydrant at the northwest corner of classroom Building #4, facing the PE Building.

Stormwater

Campus stormwater runoff is captured by an on-site underground storm drain system. There are various low points around the site that generally have an inlet that collects the surface runoff.[26] The main storm drain servicing classroom buildings is a line running along the corridor between Buildings #3 and #6, and Buildings #15 to #21. This main storm drain discharges to the street as an 18-inch line connected to a 7.5-foot-wide parkway drain that discharges to Raven Street Additionally, the fields north of the gym and classrooms have separate storm drain lines that discharge to Raven Street with multiple parkway drains.

Per available as-built drawings, the minimum size of storm drainpipes is six inches. There are several locations around Campus with documented ponding and flooding issues associated with rain events, such as at Lunch area west of Building #17 and north of Building #16.

[25] LAUSD. 2023. Preliminary Site Analysis and Program Development Report. August 2023.
[26] Ibid

2. Environmental Setting

Sanitary Sewer

There are two public sewer connections at the southwest of the Campus along Raven Street. The public main on Raven Street is an 8-inch vitrified clay pipe (VCP) line. Building #23 has a separate 3-inch sewer lateral that connects to the public main on Raven Street. The sewer lateral north of this lateral serves most buildings, including the portable classroom buildings on Campus. The main sewer main starts at the northwest of Campus along the portable classrooms then routes southeasterly within the service road, then routes southwesterly along Buildings #4 to #6. The main sewer serving the Campus connects to the public lateral through an 8-inch VCP north of the Industrial Arts #2 Building (Building #22). Each building has an individual sanitary sewer system that exits the building to the Campus sewer system(s). Unless previously renovated, the existing sewer systems are mostly original and are assumed to be in fair to poor condition.[27]

[27] Ibid

3. Project Description

3.1 BACKGROUND

The proposed Project's would involve construction on an approximately 4.8-acre portion of the 30.6-acre Sylmar Charter HS Campus. The proposed Project would involve the use of a "progressive/alternative design-build" construction delivery method. The size and general locations for proposed buildings have been identified (within or immediately proximate to the existing structures to be removed); however, detailed architectural drawings and elevations are not yet available for inclusion in this CEQA document.

3.2 PROPOSED PROJECT

The proposed Project consists of a major modernization at the Sylmar Charter HS Campus to provide facilities that are safe, secure, and aligned with the instructional program. The proposed Project would involve the demolition of up to approximately 35,640 square feet (SF) of existing building floor area and up to 73,000 square feet of new construction (see Table 3 and Table 4). The proposed Project also includes Campus-wide utility upgrades; parking reconfiguration; accessibility upgrades, exterior painting of existing buildings, landscaping, and hardscaping. The construction and use of interim facilities would be required to allow the school to remain operational during the proposed Project. These temporary facilities would include portable classrooms, food service building(s), trash enclosure, lunch shelter, a portable restroom building(s), and contractor trailers. The proposed Project would not increase student enrollment or capacity and total number of standard-sized classrooms would decrease by two (see Figure 9, *Proposed Project Overview*).

3.2.1 Demolition and Removal

The proposed Project involves the demolition of four permanent buildings: the MPB (Building #17), Student Store (Building #18), Music (Building #19), and Classroom (Building #20). Additionally, four portable buildings (Buildings #40, #41, #42, and #43) along Astoria Street would be removed and two portable buildings (Buildings #38 and #39) along the Campus Service Road would be removed for a total of six portable buildings for removal. City of Angels Independent Study School which currently occupies Building #40 would be relocated to a different place on Campus. Demolition also includes adjacent areas and features adjacent to these buildings such as food services and lunch shelter area, outdoor dining areas, electrical vault, landscaping, and covered walkways and arcades. Buildings #17, #18. #19, and #20 and Parking Areas No. 1 and No. 3 are contributors to the Sylmar High School Campus Potential Historic District.

Table 3. Proposed Demolition

Existing Building/Structure Name	Classrooms	Demolition (square feet)
Building 17 - Multipurpose Building	None	19,052
Building 18 - Student Store	None	814

3. Project Description

Building 19 – Music/Chorale	2	3,257
Building 20 – Drafting Building (Classrooms)	4 small	2,849
Building 38 - DSA BLDG - 21726 Portable Classroom	1	994
Building 39 - DSA BLDG – 21727 Portable Classroom	1	994
Building 40 - AA-2371 – 22926 Portable Classroom	2	1,920
Building 41 - DSA BLDG - 21810 Portable Classroom	2	1,920
Building 42 - DSA BLDG - 21809 Portable Classroom	2	1,920
Building 43 - DSA BLDG - 21808 Portable Classroom	2	1,920
Demo Total	**12 standard classrooms**	35,640

3.2.2 Construction

The proposed Project would construct a new, two-story, 53-foot high, approximately 71,543-square-foot Multipurpose Building (MPB) with lunch shelter and new Student Store. The ground floor of the MPB (57,819 SF) would include a performing arts space, dining areas, kitchen, and four classrooms. The second floor (13,724 SF) would include a deck, a staff workroom, and six classrooms. An approximately 7,500 SF covered lunch pavilion would be constructed off the new MPB. The new Student Store building (1,200 SF) would be constructed to the north of the new MPB.

The proposed Project would include the provision of interim facilities including four portable classroom buildings, lunch shelter, food service building(s), trash enclosure, and portable restroom building(s) on the existing Volleyball Courts. In addition, a temporary contractor trailer building would be installed. The two interim lunch shelters would remain as permanent structures following the completion of the proposed construction activities. All other interim facilities would be removed and the Volleyball Courts would be restored.

The proposed Project would also replace all electrical distribution equipment including substations, panelboard prior to a renovation completed in 1995, and main feeders.

Table 4. Proposed Building Construction

Building/Structure	Classrooms	New Square Footage*
Multipurpose Building	10	73,219
• *First Floor*	*(4)*	*61, 184*
• *Second Floor*	*(6)*	*12,035*
Student Store	-	1,200
Total	10	74,419**

*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.
** Net Increase in Campus square footage =38,779. New building square footage represents the gross total square footage.

3.2.3 Landscaping and Other Site improvements

There are approximately 286 trees on Campus.[28] The only trees that are considered protected pursuant to the District's Tree Trimming and Removal Procedure are three California western sycamores. Trees within 50 feet of construction, grading or excavation would be evaluated for necessary removal or measures needed to protect it in place. Approximately 21 trees would be removed in and around the site of the new MPB; no California western sycamores would be removed (refer to Figure 10, *Tree Removal*). Landscaping and hardscaping would be used to create outdoor learning environments that will be placed in areas around the new MPB as well as other portions of the Campus. These outdoor learning areas are intended as gathering spaces for small groups or classes and includes seating and tables integrated into a landscaped setting that includes trees. The proposed landscaping would be designed to be compatible with the Campus and incorporate, to the extent possible, native plants and vegetation. All plants and vegetation proposed for the Campus will be selected from the District's approved plant list.

The number and tree locations may be subject to change as the proposed design is refined and finalized. All tree removal would comply with the District's Tree Trimming and Removal Procedure and would further implement Tree Preservation Specifications as described in Section 4, *Biological Resources*. Any new marquee sign would be designed to comply with the District's School Marquee (Outdoor Sign with Electronic Message Display) policy BUL 5004.2.[29]

[28]. Arborists Tree Survey Report. Arborgate Consulting, Inc. prepared for the Sylmar Charter High School Preliminary Site Analysis and Program Development Report. August 2023.
[29] Los Angeles Unified School District. 2021. School Marquee (Outdoor Sign with Electronic Display Message) (BUL-5004.2). Facilities Services Division, August 16, 2021. https://my.lausd.net/webcenter/wccproxy/d?dID=113482. Accessed March 5, 2025.

Figure 9. Proposed Project Overview

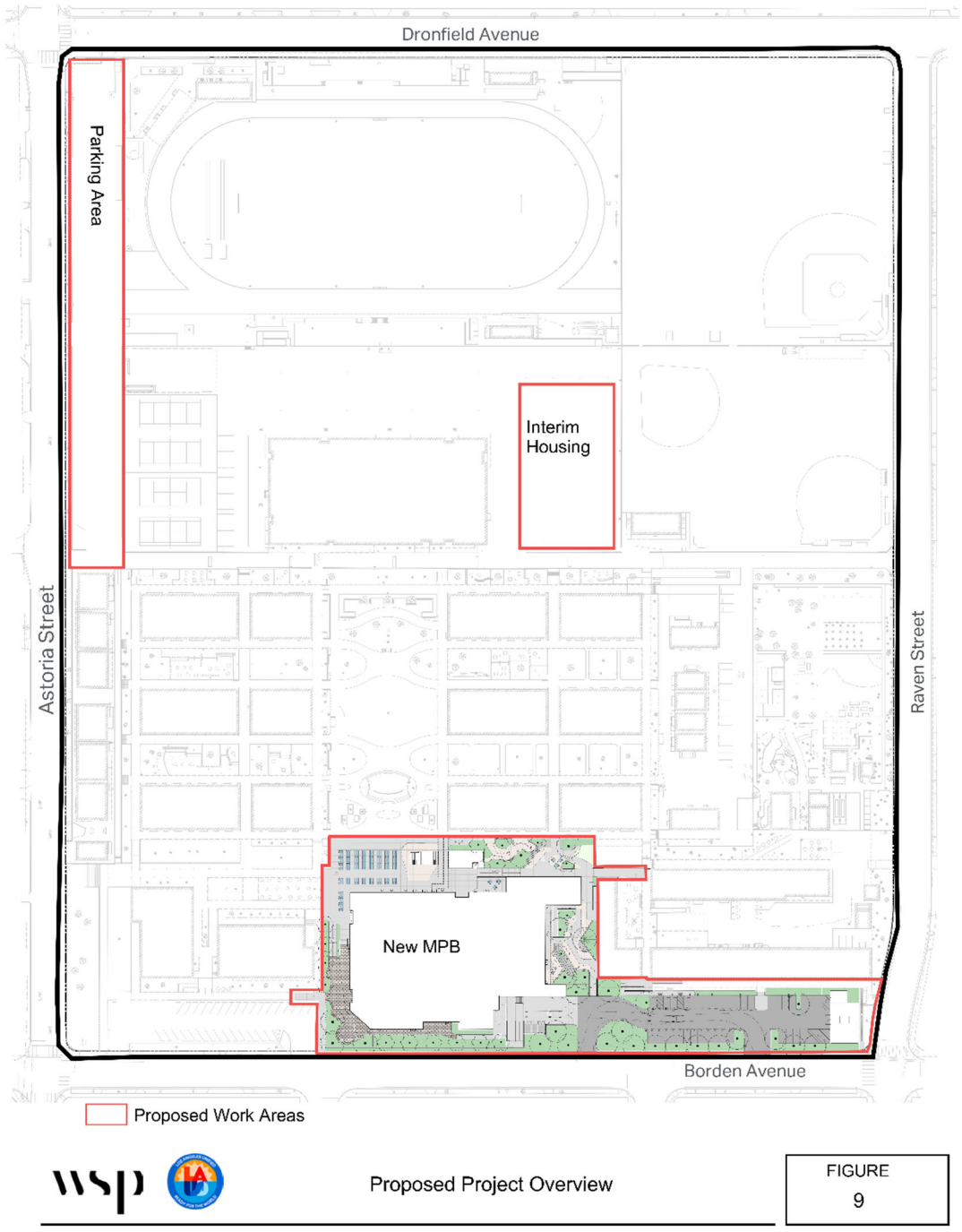
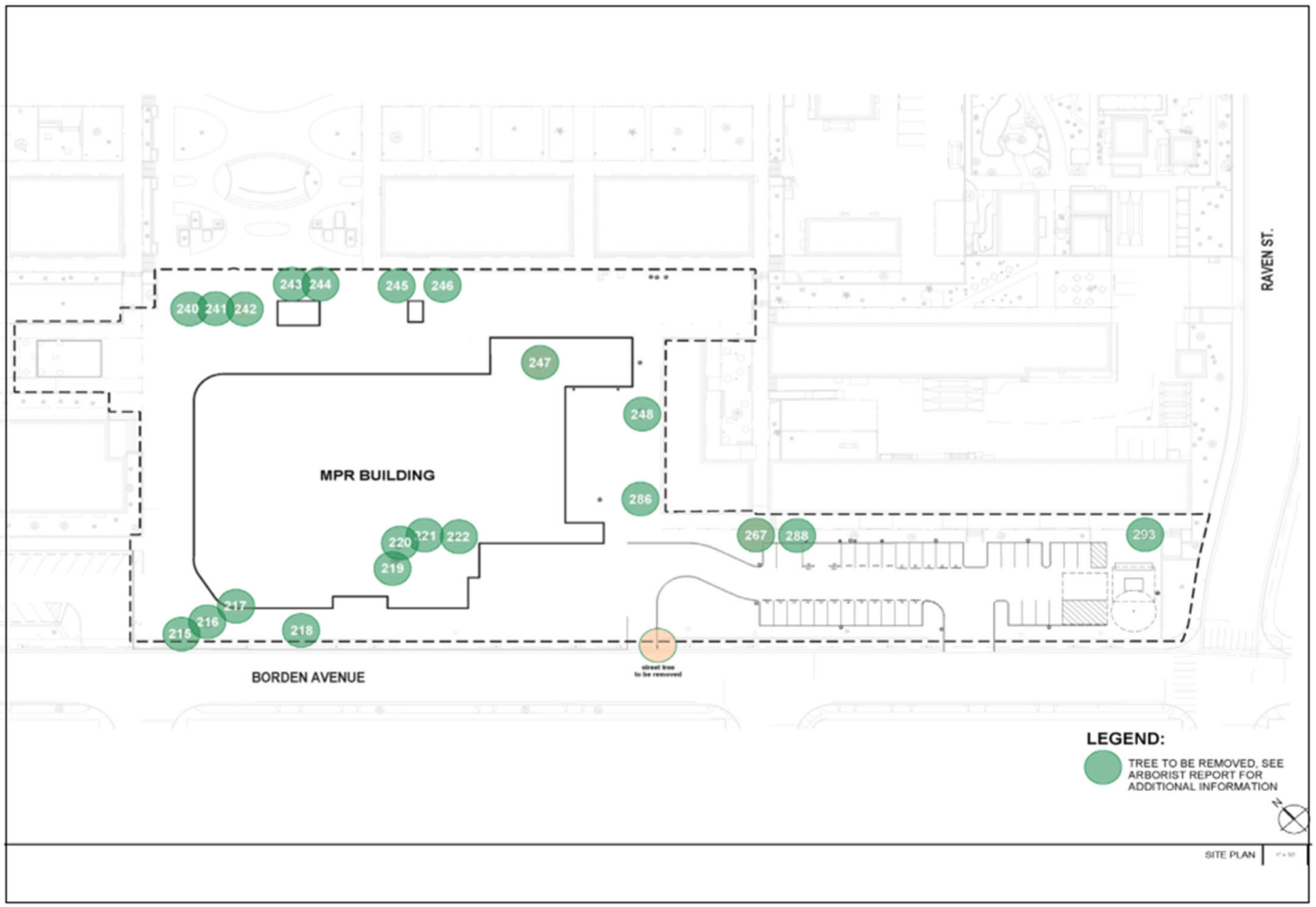


Figure 10. Tree Removal



wsp

Tree Removal

FIGURE 10

3.2.4 Site Access, Circulation, Parking

The existing surface parking lot along the east side of campus along Borden Avenue (Parking Area No. 3) would be reduced to accommodate the new MPB construction and site work. This parking lot would be reduced from 74 to approximately 30-40 stalls and would include the proposed electric service yard. A new curb cut and driveway would be constructed off Borden Avenue to accommodate the parking reconfiguration of this lot and maintain a total of two driveways for ingress/egress purposes.

The proposed Project would expand the existing Parking Area No. 1 by removing four existing portable classroom buildings. It would be restriped to accommodate up to approximately 102 parking stalls, an increase from the existing 48 parking stalls. To access the newly expanded parking area, a new driveway would be constructed off Astoria Avenue just north of the existing Service Road.

The existing Basketball Courts would be used as a temporary staff parking area during construction before being repaired.

Parking Area No. 3 would be upgraded to meet current CALGreen requirements using drought-tolerant planting, shade trees, lighting and EV chargers. Lighting fixtures in parking areas would be controlled via outdoor photoelectric cell(s) and time clock function of the centralized lighting control.

3.3 CONSTRUCTION PHASING AND EQUIPMENT

The proposed Project would be constructed over three Phases, beginning in June 2026 and anticipated completion by May 2029 (see Table 5 *Phasing Schedule and Description*). The proposed construction schedules are based on a conservative phasing plan but may be subject to change as the proposed design is refined. Construction staging would occur on-site. Construction access would be provided from Raven Street, with access to the staging areas provided via the Campus service road. Staging, interim facilities, and construction activities in general would be required to be kept separate from student access areas, such as the safe dispersal area that is located between the hardcourts and softball field.

Table 5. Phasing Schedule and Description

Phase	Description	Start Date	End Date
1	**Interim Housing/Make Ready** including construction of interim housing and temporary parking, removal of bungalows (buildings #38 and #39), new electrical service, new chiller, and slurry/restripe of Parking Area No. 1 (7 Months).	Q2-2026	Q4-2026
2A	**Abatement and Demolition** of MPB, cafeteria, student store, lunch shelter, and buildings 19 & 20 (4 Months)	Q4-2026	Q1-2027
2B	**Construction** of new MPB, food service, student store, lunch shelter, 10 classrooms. and site work (20 Months).	Q1-2027	Q3-2028
	Barrier Removal Construction with the majority of work occurring in the summer months of 2026, 2027, and 2028.	Q2-2026	Q4-2028
3	**Remove Interim Housing**, Restore volleyball courts, demolish portable buildings 40, 41, 42 & 43, restoration of parking lots 1A and 3 (4 Months).	Q4-2028	Q1-2029
	Demobilize – Remove construction equipment and materials (1 Month).	Q1-2029	Q1-2029
N/A	**Schedule Contingency/Final Completion (6 Months)**	Q-2029	Q3-2029

Temporary relocation of sports and recreational activities is expected to occur throughout construction. Public parks and/or other recreational facilities near the school site may provide temporary recreational accommodations for Sylmar Charter HS students while sports facilities on Campus are unavailable during construction. Table 6 *Construction Phase and Equipment* summarizes anticipated construction equipment to be used to help evaluate the Project's environmental impacts.

Table 6. Construction Phase and Equipment

Phase	Equipment	Number
Phase 1 Install interim housing, setup Contractor trailer with new electrical service, restripe existing Parking Lot 1 for interim staff parking, provide temporary staff parking at basketball courts, new chiller yard and installation of new chiller line; demolition of bungalow buildings # 38 & 39.	Concrete/Industrial Saws	1
	Cranes	1
	Forklifts	1
	Generator Sets	1
	Rubber Tired Dozers	1
	Tractors/Loaders/Backhoes	1
	Air Compressor	1
	Generator Set	1
Phase 2A Abatement & demolition of existing MPB/Food Service and Buildings 19 & 20.	Concrete/Industrial Saws	1
	Cranes	1
	Forklifts	1
	Generator Sets	1
	Rubber Tired Dozers	1
	Tractors/Loaders/Backhoes	1
	Air Compressors	1
	Generator Sets	2

Phase 2B Construct new building and site work &barrier removal construction.	Cranes	1
	Forklifts	2
	Generator Sets	2
	Pavers	1
	Rollers	1
	Tractors/Loaders/Backhoes	2
	Welders	2
	Air Compressor	1
	Generator Set	1
Phase 3 Remove interim housing and reinstall volleyball courts. Remove fencing for temporary staff parking and repair existing basketball courts. Remove four existing portables and restore Parking Lot No. 1. Remove Construction trailers and restripe parking at Parking Lot No. 3.	Air Compressor	1
	Generator Sets	2
Occupancy of New MPB and Campus exterior painting.	Air Compressors	1
	Generator Sets	1
	Crane	1
	Forklift	2
	Tractor/Loader/Backhoe	1

To the extent feasible, construction related activities would be scheduled during daylight hours. Construction-related traffic and deliveries would be scheduled to avoid student pick-up, drop-off hours, and during noise sensitive times as coordinated with the school administration. Consistent with the City of Los Angeles Municipal Code §41.40(b), all non-emergency construction activities would occur between 7:00 a.m. and 9:00 p.m., Monday through Friday and 8:00 a.m. to 6:00 p.m. on Saturdays. No construction would occur on national holidays or Sundays.

3.4 AGENCY REVIEWS AND APPROVALS

It is anticipated that the proposed Project would include agency review and approvals from the following entities:

- California Department of Fish and Game as a Trustee Agency
- California Department of General Services, Division of State Architect (DSA)
- California Department of Transportation (Caltrans)
- State Water Resources Control Board (SWRCB)
- South Coast Air Quality Management District (South Coast AQMD)
- City of Los Angeles, Public Works Department
- City of Los Angeles, Fire Department
- Los Angeles Department of Water and Power

4. Environmental Checklist and Analysis

4.1 PROJECT INFORMATION

1. **Project Title:** Sylmar Charter High School Major Modernization Project

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

3. **Contact Person and Phone Number:**
   Bryan Ramos Fernandez, AICP, CEQA Project Manager
   (213) 241-4210

4. **Project Location:** The 30.6-acre District-owned property is at 13050 Borden Avenue, Sylmar, California. APN 2509-005-901. The Campus is in the northeast San Fernando Valley's Sylmar neighborhood in the City of Los Angeles. The Campus is approximately 20 miles northwest of Downtown Los Angeles and approximately 0.35 miles west from the I-210. The Campus is bounded on the north by Dronfield Avenue, east by Raven Street, south by Borden Avenue, and west by Astoria Street.

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

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

7. **Zoning:** PF-1VL (Public Facilities; Height District 1VL)

8. **Description of Project:** LA Unified proposes to complete a major modernization project at the Sylmar Charter HS Campus to provide facilities that are safe, secure, and aligned with the instructional program (proposed Project or Project). The Project would demolish up to four permanent buildings (Multipurpose Building/Food Services including Lunch Pavilion and shelter, Student Store, and two Classroom Buildings) and six portable classroom buildings. To replace the structures, the Project would construct one permanent building to replace the core facilities demolished. The Project's space program proposes to accommodate building spaces for performing arts, library/media center, career center, special education, and ten new classrooms. The Project also includes utility upgrades, parking reconfiguration, accessibility upgrades, painting of exterior buildings, landscaping, and hardscaping including outdoor learning areas. The Project would also include the installation of interim facilities to allow the school to remain operational during construction. The Project would not increase student enrollment or capacity and total number of standard-sized classrooms would decrease by approximately two.

4. Environmental Checklist and Analysis

9. Surrounding Land Uses and Setting:
The Campus is predominantly surrounded by single- and multi-family residences. An elementary school and religious institution are located across the Campus on Raven Avenue. Sylmar Park is located across from the western corner of the Campus.

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

- California Department of Fish and Game as a Trustee Agency
- California Department of General Services, Division of State Architect (DSA)
- California Department of Transportation (Caltrans)
- State Water Resources Control Board (SWRCB)
- South Coast Air Quality Management District (South Coast AQMD)
- City of Los Angeles, Public Works Department
- City of Los Angeles, Fire Department
- Los Angeles Department of Water and Power

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

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

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

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

4. Environmental Checklist and Analysis

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

On the basis of this initial evaluation:

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

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

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

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

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

Signature	*Date* 4/4/25
Carlos A. Torres	CEQA Officer for LA Unified
Print Name	*Title*

4. Environmental Checklist and Analysis

4.2 EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

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

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

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

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

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside

document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

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

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

9. The explanation of each issue should identify:

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

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

4.3 LAUSD STANDARD CONDITIONS

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

4. Environmental Checklist and Analysis

4.4 ENVIRONMENTAL CHECKLIST AND ANALYSIS

ENVIRONMENTAL IMPACTS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Except as provided in Public Resources Code Section 21099[30] would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a state scenic highway?	☐	☐	☐	☒
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

EXPLANATION:

LA Unified applies Standard Conditions of Approval (SCs) for minimizing impacts to aesthetic resources. Applicable SCs related to aesthetic resource impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-AE-1	LAUSD shall review all designs to ensure that demolition of existing buildings or construction of new buildings on its historic campuses are designed to ensure compatibility with the existing campus. The School Design Guide shall be used as a reference to guide the design. **School Design Guide** This document outlines measures for re-use rather than destruction of historical resources. It requires the consideration of architectural appearance/consistency and other aesthetic factors during the preliminary design review for a proposed school upgrade project. Architectural quality must consider compatibility with the surrounding community.

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

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

Would the proposed Project:

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

No Impact. Scenic vistas provide visual access or panoramic views to a large geographic area. The field of view from a scenic viewpoint can be wide and extend into the distance. Panoramic views are usually associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies.[31]

The Campus and surrounding area are flat and characterized by urban development, including residential, educational, institutional, and recreational land uses. The existing Campus includes 28 permanent single and

[31] City of Los Angeles, 2006, *LA CEQA Thresholds Guide*, Chapter A.

4. Environmental Checklist and Analysis

multi-story buildings, 18 single-story relocatable buildings, numerous canopy structures, surface parking, hardcourts, student gathering areas, trees, and landscaping. Although the Campus includes views of the surrounding San Gabriel Mountains to the east, these views are common in the area and are not designated as scenic or otherwise protected, therefore demolition and construction of new buildings would not obscure any scenic vistas. The proposed construction and modernization/renovation elements included in the proposed Project have been designed to conform with the existing historic architectural style of the existing site (refer to SC-AE-1 and see SC-CUL-1 and SC-CUL-2). None of these elements would obscure existing views across the Campus. Additionally, as described in the Subsequent PEIR, the proposed Project would comply with all applicable requirements of the LAUSD School Design Guide. Therefore, there is no opportunity for the proposed Project to impact any potential views from the surrounding public right of ways and no impacts to scenic vistas would occur.

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

No Impact. The California Scenic Highway Program seeks to preserve and protect areas of outstanding natural beauty that are visible from State highways.[32] There are two officially designated State scenic highways in Los Angeles County: State Route (SR) 2, the Angeles Crest Highway, part of the Angeles Crest Scenic Byway, from near La Cañada-Flintridge north to the San Bernardino County line approximately 20 miles east of the Campus, and a portion of State Route (SR-27), the Topanga Canyon Highway, approximately 25 miles southwest of the Campus.[33] The new buildings would not be visible from SR-2 or SR-27. Additionally, the Campus is not visible from other eligible roadways in Los Angeles County (including the Arroyo Seco Historic Parkway, SR-1, and I-210).[33] Therefore, the proposed Project would not result in impacts to scenic resources within a designated State scenic highway. No mitigation or further analysis is required.

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

Less Than Significant Impact. The Campus is in a fully developed area and surrounded by adjacent residential, recreational, religious, and institutional land uses. The Project site is zoned PF-1VL (Public Facilities, Height District 1VL), which allows the use and development of publicly owned land, including public high schools. Height District 1VL has a structure limit of 45-foot and three stories.[34] The proposed Project would construct a new 53-foot high MPB that would exceed the 45-foot height limit. However, the California Legislature granted school districts the authority to exempt school properties from local zoning requirements, provided the school district complies with the terms of Government Code Section 53094.[35] On February 19, 2019, the BOE Adopted a Resolution to exempt all LA Unified school sites from local land use regulations

[32] California Department of Transportation (Caltrans). California Scenic Highway Program. https://dot.ca.gov/caltrans-near-me/district-3/d3-programs/d3-maintenance/d3-scenic-hwy-program

[33] California Department of Transportation, 2024, California State Scenic Highway System Map. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa.

[34] City of LA, 2024. Zoning Code Summary. https://planning.lacity.gov/odocument/eadcb225-a16b-4ce6-bc94-c915408c2b04/Zoning_Code_Summary.pdf

[35] Government Code Section 53094. https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOVandsectionNum=53094.

under Government Code Section 53094.[36] Therefore, the proposed Project would not conflict with regulations protecting scenic quality.

The Subsequent PEIR states that impacts to views with respect to all SUP projects would be less than significant as the District is required to incorporate measures from the Los Angeles Unified School District School Design Guide into site-specific Project design for the protection of character and quality of site surroundings. With implementation of SC-AE-1, SC-AE-2, and SC-AE-3, impacts to the visual character and quality of the Campus and the surrounding community would be less than significant. No mitigation or further study is required.

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

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

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

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

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

4. Environmental Checklist and Analysis

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526) or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

EXPLANATION:

There are no agriculture and forestry resources LAUSD SCs

Would the proposed Project:

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

No Impact. The proposed Project includes redevelopment at an existing high school Campus. The Campus is identified as Urban Built-Up Land by the California Department of Conservation's (DOC's) Important Farmland Finder and is not identified as an area of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[37] The Campus is surrounded by residential properties on all four sides and there is no agricultural or farm use on or in the vicinity of the Campus; thus, no Project-related farmland conversion would occur. Therefore, no impact would occur and no further analysis is required.

[37] California Important Farmland Finder, 2024, https://maps.conservation.ca.gov/dlrp/ciff/.

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

No Impact. Williamson Act contracts restrict the use of privately owned land to agriculture and compatible open space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. The Campus is not subject to a Williamson Act contract, and the existing zoning is PF-1 (Public Facilities),[38] allows the use and development of publicly owned land, including public elementary and secondary schools. Thus, the proposed Project would not conflict with agricultural zoning or a Williamson Act contract. No impact would occur and no further analysis is required.

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

No Impact. The proposed Project would not conflict with existing zoning for forest land, timberland, or timberland production. Forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits."[39] Timberland is defined as "land….which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees."[40] The Project site is zoned PF-1, for the use and development of public facilities, including schools, and is not zoned for forest land or timberland use.[41] Therefore, no impact would occur and no further analysis is required.

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

No Impact. The proposed Project would include the modernization of an existing high school Campus within a built-up urban area, and no significant forest land uses are present on-site nor in the immediate vicinity. No vegetation on-site is cultivated for forest resources, and any existing vegetation is limited to ornamental trees and shrubs. Construction of the proposed Project would not require any changes to the existing environment that could result in the loss or conversion of forest land to non-forest use. Therefore, no impact would occur and no further analysis is required.

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

No Impact. The Campus is completely within a built-out and urbanized area of the City of Los Angeles, and no significant agricultural uses or forest land uses are present on-site nor in the immediate vicinity. The Campus houses an agricultural program at the 43,921-square-foot Agriculture/Planting Area that was constructed in 1961 and is an original campus feature. The Agriculture/Planting Area is in the southern portion of the Campus along Raven Street and it consists of a series of six square planting areas divided by concrete block walls. It contains a range of features, including multiple gabled wood-frame sheds with corrugated metal cladding; concrete walks; wood raised planter beds; wood pergolas; brick, stone, and pattered concrete paving; and

[38] City of Los Angeles. Zoning Map. https://zimas.lacity.org/
[39] California PRC Section 12220(g). https://codes.findlaw.com/ca/public-resources-code/prc-sect-12220/
[40] California PRC Section 4526. https://codes.findlaw.com/ca/public-resources-code/prc-sect-4526/
[41] City of Los Angeles. Zoning Map. https://zimas.lacity.org/

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various mature trees and shrubs. The agricultural area is enclosed with chain-link fencing and gates. However, the site is not a mapped farmland and the agriculture program is part of the school's instructional program where no economic use of agricultural activities occurs. The proposed Project would not affect any portion of the Agriculture/Planting Area. Additionally, there is no mapped important farmland or forest land on or near the Campus, and the proposed development would not indirectly cause conversion of such land to nonagricultural or non-forest use. Therefore, no impact would occur, and no further analysis is required.

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

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Are significance criteria established by the applicable air district available to rely on for significance determinations?		☒ Yes		☐ No
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?	☒	☐	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O_3), carbon monoxide (CO), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), and lead (Pb). Areas are classified under the federal and California Clean Air Act as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the South Coast Air Quality Management District (SCAQMD), is designated nonattainment for O_3, and $PM_{2.5}$ under the California and National AAQS, nonattainment for PM_{10} under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS.[42]

EXPLANATION:

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

LAUSD Standard Conditions of Approval	
SC-AQ-2	Construction Contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.

[42] Area Designation Maps / State and National. Accessed February 4, 2025. https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations

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

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

Would the proposed Project:

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

Potentially Significant Impact. The proposed Project may violate an air quality standard or contribute substantially to an existing or projected air quality violation. The proposed Project would temporarily expose sensitive receptors to air pollutant concentrations during construction. The Draft EIR will thus analyze this impact and will identify applicable air quality standards and the federal and state attainment status for pollutants

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within the SoCAB. The Draft EIR will also include an analysis of the estimated emissions associated with construction and operation of the proposed Project, as well as an analysis of cumulative impacts associated with emissions of criteria pollutants.

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?

Potentially Significant Impact. The proposed Project may result in a cumulatively considerable net increase of a criterial pollutants during construction, for which the proposed Project region is in non-attainment under an applicable federal or state ambient air quality standard. The Draft EIR will thus analyze this impact and will identify air quality standards and the federal and state attainment status for pollutants within the SoCAB. The Draft EIR will also include an analysis of the estimated emissions associated with construction and operation of the proposed Project, as well as an analysis of cumulative impacts associated with emissions of criteria pollutants.

c) Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. The proposed Project may expose sensitive receptors to substantial pollutant concentrations. The Draft EIR will thus analyze this impact and will identify applicable air quality standards and the federal and state attainment status for pollutants within the SoCAB. The Draft EIR will also include an analysis of the estimated emissions associated with construction and operation of the proposed Project and will also include an analysis of impacts to nearby sensitive receptors associated with emissions of criteria pollutants.

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

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

According to the California Air Resource Board (CARB's) Air Quality Handbook,[43] land uses associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. There are no land uses typically associated with the generation of nuisance odors in the Project area. The proposed Project involves the redevelopment of a high school and would not fall within the objectionable odors land uses or generate odors different than what is already generated on-site. Emissions from construction equipment, such as diesel exhaust and volatile organic compounds (VOCs) from architectural coatings and paving activities may generate odors. However, these odors would be low in concentration, temporary, and would not affect a substantial number of people. Odor impacts would be less than significant. Therefore, other emissions such as those leading to odors would be less than significant, and no further analysis is required.

[43] California Air Resources Board. April 2005. Air Quality and Land Use Handbook. https://ww2.arb.ca.gov/our-work/programs/resource-center/strategy-development/land-use-resources

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

The analysis in this section is based in part on the *Arborists Tree Survey Report* prepared by LAUSD, dated August, 2023. A complete copy of this report is included as Appendix E to this IS.[44]

EXPLANATION:

LA Unified applies SCs for minimizing impacts to biological resources. Applicable SCs related to biological resources impacts associated with the proposed Project are provided below.

LAUSD Standard Conditions of Approval	
SC-BIO-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 1-mile radius beyond the project construction site and shall be performed by a qualified nesting bird Surveyor or Biologist with knowledge of local biological conditions as well as the use and interpretation of the data sources identified below. Where appropriate, in the opinion of the Biologist, the literature search shall be supplemented with a site visit and/or aerial photo analysis. Resources and information that shall be investigated for each site should include, but not be limited to: • U.S. Fish and Wildlife Service (USFWS)

[44] Arborists Tree Survey Report. Arborgate Consulting, Inc. prepared for the Sylmar Charter High School Preliminary Site Analysis and Program Development Report. August 2023.

- 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.

Biological Resources Report

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

- Information on regional setting that is critical to the assessment of rare or unique resources.
- A thorough, recent floristic-based assessment of special status 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 on-site and within the area of potential effect. CDFW's California Natural Diversity Data Base (CNDDB) should be contacted to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
- An inventory of rare, threatened, and endangered, and other sensitive species on-site and within the area of potential effect. Species to be addressed should include all those identified in CEQA Guidelines Section 15380, including sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at appropriate time of year and time of day when sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the CDFW and USFWS.
- A discussion of the potential adverse impacts from light, noise, human activity, exotic species, and drainage. Drainage analysis should address project-related changes on drainage patterns on and downstream from the site; the volume, velocity, and frequency of existing and post- project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site.

	• Discussions about direct and indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, wetland and riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a natural community conservation plan [NCCP]). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas. • Mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Measures should emphasize avoidance and reduction of biological impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be outlined. If on-site measures are not feasible or would not be biologically viable, 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: o Location of the mitigation site. o Plant species to be used, container sizes, and seeding rates. o Schematic depicting the mitigation area. o Planting schedule. o Irrigation method. o Measures to control exotic vegetation. o Specific success criteria. o Detailed monitoring program. o Contingency measures should the success criteria not be met. o 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[21]) should occur outside of nesting season to avoid take of birds, bats, or their eggs.[22] Bird Surveys - Construction Demolition or Vegetation Removal in or adjacent to Native Habitat • For construction projects occurring in or adjacent to native habitat, a qualified LAUSD nesting bird Surveyor or qualified Biologist (Surveyor/Biologist) may determine that additional surveys are required outside of the breeding and nesting season (February 1st through August 31st, beginning January 1st for raptors) to determine if protected birds occupy the area (e.g., project site is adjacent to areas with suitable habitat for Southwestern willow flycatcher). • If avoidance of the avian breeding season is not feasible, beginning 30 days prior to the initiation of the project activities, the Surveyor/Biologist with experience conducting nesting bird surveys shall conduct weekly bird surveys to detect

protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of project activities. In areas that contain suitable habitat for listed species, species-specific surveys shall be conducted by a qualified Biologist authorized by the regulatory agencies.

- If a protected bird is observed, additional protocol-level surveys may be required to determine if the sighting was a transient individual or if the site is used as nesting habitat for that species. Project activities shall be delayed until there is a final determination.
- If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests), or as determined by the Surveyor/Biologist shall be delayed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, and/or construction fencing shall be used to demarcate the boundary of the 300- or 500-foot buffer between the project activities and the nest or tree. Project personnel, including all Construction Contractors working on site, shall be instructed on the sensitivity of the area. Protective measures shall be documented to show compliance with applicable State and Federal laws pertaining to the protection of birds.
- If the Surveyor/Biologist determines that a narrower buffer between the project activities and active nests is warranted, a written explanation for the change shall be submitted to the LAUSD OEHS CEQA Project Manager. If approved, the Surveyor/Biologist can reduce the demarcated buffer.
- A Surveyor/Biologist shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain outside the demarcated buffer and that the flagging, stakes, and/or construction fencing are maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager during the grubbing and clearing of vegetation and shall notify LAUSD immediately if project activities damage avian nests.

Bird Surveys - Construction, Demolition, or Vegetation Removal at Existing Campuses

- If avoidance of the avian breeding season is not feasible, the Surveyor/Biologist with survey experience shall conduct a nesting bird surveys to determine if active nests are within or adjacent to the work area.
- The survey shall be conducted no more than 3 days prior to construction activities. A memo describing results of the survey shall be submitted to the OEHS CEQA Project Manager.
- If an active bird nest is observed, the Surveyor/Biologist shall determine the appropriate buffer around the nest. Buffers are determined on species-specific requirements and nest location.
- The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager.
- No construction activity shall occur within the buffer zone until nest is vacated, juveniles have fledged, and there is no evidence of a second attempt at nesting.

Bat Surveys

- Bat species inventories and habitat use studies shall be completed for demolition or new construction projects in native habitat as well as projects that require the removal of mature conifer, cottonwood, sycamore or oak trees or abandoned buildings.

	• Bat surveys must be conducted by a qualified bat Surveyor or Biologist (Surveyor/Biologist). The Surveyor/Biologist shall use the appropriate combination of structure inspection, sampling, exit counts, and acoustic monitors to survey an area that may be affected by the project. • If bats are found, the Surveyor/Biologist shall identify the species and evaluate the colony to determine potential impacts. • Mitigation measures shall be determined on a project-specific basis and may include: • Avoidance o Humane exclusion prior to demolition ▪ Bats should not be evicted from roost sites during the reproductive period (May-September), or during winter hibernating periods to avoid direct mortality ▪ Bats should be flushed from trees prior to felling or trimming. Off-site habitat improvements shall be conducted in coordination with the California Department of Fish and Wildlife.
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. o 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.

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	○ 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.

Would the proposed Project:

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

No Impact. Sensitive biological resources are habitats or species that have been recognized by federal, State, and/or local agencies as endangered, threatened, rare, or in decline throughout all or part of their historical distribution. The Project site is located on a high school campus and surrounded by urban land uses. Vegetation at the Campus is limited to ornamental school trees and shrubs. There is no native habitat and no suitable habitat for threatened, endangered, or rare species on or near the site.[45,46] Therefore, no impact would occur, and no 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, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

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

[45] CDFW. Lands Viewer. https://apps.wildlife.ca.gov/lands/
[46] USFWS. Critical Habitat Mapper. https://www.arcgis.com/apps/mapviewer/index.html?layers=794de45b9d774d21aed3bf9b5313ee24
[47] U.S. Fish and Wildlife Services (USFWS), 2024. National Wetlands Inventory. https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/
[48] Los Angeles County Department of Regional Planning, Significant Ecological Area GIS Map, 2024, https://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=9c9047fe1d2844f387f8ca1777f009fc
[49] California Department of Fish and Wildlife, 2024, https://gis.data.ca.gov/datasets/d0b55ff0c29a48b2b615852c40322d5b/explore?location=34.005978%2C-118.218320%2C13.23

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

No Impact. Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as swamps, marshes, and bogs. According to USFWS's NWI, there are no wetlands within the Project site. The nearest mapped wetland feature is a concrete-lined storm drain canal that runs north to south between Astoria Street and Dronfield Avenue just north of the Campus. This canal is mapped as 2.76 acres of riverine habitat.[47] The proposed Project would not impact any protected wetland areas. No impact would occur and no further analysis is required.

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

Less than Significant Impact. The Campus is surrounded by areas of fencing, and developed with buildings, asphalt, concrete surfaces, and landscaped areas. The Campus does not have any native habitat and is not available for overland animal movement as a wildlife corridor. However, according to the Arborists Tree Survey Report prepared as part of the Preliminary Site Analysis for the proposed Project, 286 trees of various species, sizes, and maturity are spread throughout the Campus,[50] which may provide nesting sites for resident or migratory birds. The proposed Project would require the removal of a maximum of approximately 21 trees in and around the footprint of the new MPB. Project construction near trees and structures may result in disturbances to birds during nesting season. Migratory nongame native bird species are protected by the California Fish and Game Code, Sections 3503, 3503.5, and 3513, which prohibits the take of all birds and their active nests, including raptors and other migratory nongame birds.

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

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

Less than Significant Impact. The Campus is within an entirely developed area surrounded by urban developments within the City of Los Angeles and there are no SEAs associated with the Campus. According to the Arborist Report, the Campus contains approximately 286 trees of which up to 21 would be removed. Due to presence of mature trees, presence of potentially sensitive bird species, including those protected by the Federal Migratory Bird Treaty Act (MTBA), may be present nesting onsite. SC-BIO-1 stipulates if the LAUSD-qualified nesting bird Surveyor or Biologist determines that a school construction project will affect an identified sensitive plant, animal, or habitat, a Biological Resources Report shall be prepared to determine extent of impact and necessary mitigation. SC-BIO-3 stipulates if any disturbance of trees occurs during nesting or

[50] Arborist Tree Survey Report, August 2023.

breeding season, a qualified biologist with survey experience would conduct nesting bird surveys no more than three days before disturbance activities to determine if active nests are within or adjacent to the work area. If an active nest or protected species is observed, the biologist shall establish an appropriate buffer zone around the area where no disturbance would be allowed, and conduct regular surveys until nest is vacated, juveniles have fledged, and there is no evidence of a second attempt at nesting. Implementation of SC-BIO-1 and SC-BIO-3 would ensure no significant impacts to sensitive or special-status bird species, their habitats, or species protected by the MBTA, would occur, and impacts would remain less than significant.

The Campus contains three western sycamore trees that are considered protected under the City of Los Angeles Municipal Code Section 46.02, Tree Preservation Ordinance No. 186873.[51] The three western sycamore trees would be avoided during construction and no impacts would occur. SC-BIO-4 requires adherence to the LAUSD OEHS Tree Trimming and Removal Policy which will require submittal of a Tree Removal Application to remove trees associated with the proposed Project. The application requires approval by the Directors of OEHS and Maintenance and Operations and would result in replacement equivalent to the City of LA Tree Preservation Ordinance requirements.

Although the proposed Project is exempt from local land use regulations, construction would require the implementation of SC-BIO-4. SC-BIO-4 requires that all tree trimming, and removal conducted on District property adhere to the procedures described in the LAUSD OEHS Tree Trimming and Removal Policy. This policy ensures the management of District trees while ensuring that District activities will not conflict with locally adopted tree preservation policies and ordinances.[52] Final design of the proposed Project would include a landscape plan that would identify the number, location, and type of replacement trees to be provided.

Therefore, the proposed Project would not conflict with local policies or ordinances protecting biological resources, and impacts would be less than significant. No mitigation or further study is required.

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

No Impact. The Project site is not within an adopted habitat conservation plan (HCP), natural community conservation plan (NCCP), or similar plan.[53] The closest area protected by an HCP or NCCP is the City of Rancho Palos Verdes NCCP/HCP, which is approximately 35.5 miles south of the Campus.[54] Therefore, no impact would occur and no further analysis is required.

[51] Protected Tree and Shrub Ordinance. https://planning.lacity.gov/odocument/c555340a-2f0a-481a-a2e8-da2937315bad/13-1339_ORD_186873_02-04-2021.pdf
[52] *Ibid*
[53] California Department of Fish and Wildlife (CDFW), 2024, https://wildlife.ca.gov/Conservation/Planning/NCCP/Plans
[54] CDFW, 2024, CCP Plan Summary – City of Rancho Palos Verdes NCCP/HCP, https://wildlife.ca.gov/Conservation/Planning/NCCP/Plans/Rancho-Palos-Verdes

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

The analysis in this section is based on the Historic Resource Evaluation Report (HRER) for "Sylmar Charter High School", prepared by Historic Resources Group, dated September 2022.[55] A complete copy of this report is included as Appendix A to this IS.

EXPLANATION:

LA Unified applies SCs for minimizing impacts to cultural resources. Applicable SCs related to cultural resources impacts associated with the proposed Project are provided below.

LAUSD Standard Conditions of Approval	
SC-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 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.

[55] Historic Resources Group, 2022, September. *Historic Resource Evaluation Report (HRER) for Sylmar Charter High School.*

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	• 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: • 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.

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	• **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 SCCUL-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 • 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: o Extent and duration of the monitoring based on the grading plans o At what soil depths monitoring of earthmoving activities shall be required o Location of areas to be monitored o Types of artifacts anticipated o 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 o 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.

Would the proposed Project:

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

Potentially Significant Impact. As described in the HRER (Appendix A), the Campus is eligible for federal, state, or local designation and is considered a historical resource for the purposes of CEQA.[56] A historic resources technical report will be prepared as part of the Draft EIR, which will evaluate the potential for implementation of the proposed Project to substantially change the significance of an identified historical resource and will include mitigation measures and/or alternatives to reduce impacts to historical resources, if necessary.

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

Less than Significant Impact. Implementation of the proposed Project would cause less than significant impacts in relation to causing a substantial adverse change in the significance of an archaeological resource. As documented in the Subsequent PEIR and confirmed in the record search at the South Central Coastal Information Center (SCCIC), there are two resources identified within a one-mile radius of the proposed

[56] Historic Resources Group. 2022, September 30. *LAUSD Sylmar High School Historic Resources Evaluation Report (HRER)*

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Project site. Although it is unlikely that archaeological resources are present on the proposed Project site, it is possible that construction activity could unearth archaeological resources. If archaeological resources are discovered during construction, LA Unified shall implement standard conditions SC-CUL-4, SC-CUL-5, SC-CUL-6, SC-CUL-7, SC-CUL-8, SC-CUL-9, and SC-CUL-10 for evaluation and appropriate treating of archaeological resources. Therefore, the impacts would be less than significant. No mitigation or further study is required.

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

Less than Significant Impact. The proposed Project would result in less than significant impacts in relation to disturbing any human remains, including those interred outside of formal cemeteries. Based on a review of U.S. Geological Survey topographic maps, the records search at the SCCIC, and the known history of use of the site, there has not been a formal cemetery on the site and there is a low potential to encounter human remains in relation of the historic land uses of the site, including occupation of indigenous people. Although unlikely, it is possible that construction activity could unearth previously unknown human remains. If human remains are unearthed during construction, LA Unified shall implement the process specified by SC-CUL-10 and Section 7050.5 of the California Health and Safety Code. The Los Angeles County Coroner shall be notified, and no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition. Therefore, the impacts would be less than significant. No mitigation or further study is required.

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

EXPLANATION:

LA Unified applies SCs for minimizing impacts to energy resources. Applicable SCs related to energy impacts associated with the proposed Project are provided below:

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

Explanation:

The proposed Project would comply with CHPS green building criteria[57] and LA Unified policies.[58] The proposed Project is designed to meet CHPS criteria for energy performance and District sustainability guidelines, with implementation of an energy management system. The District is a current member of the CHPS and consistently applies sustainable construction principles as part of its development criteria. CHPS criteria were established 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 planned to be healthy, comfortable, energy efficient, material efficient, easy to maintain and operate, commissioned, environmentally responsive site, a building that teaches, safe and secure, community resource, stimulating architecture, and adaptable to changing needs.

Electrical Power. Electrical power in the City of Los Angeles, including the Project site, is supplied by the Los Angeles Department of Water and Power (LADWP). Electricity provided by the LADWP is generated from a diverse mix of power sources, including coal, natural gas, nuclear, and large hydropower, in addition to renewable sources such as wind, solar, small hydroelectric, biomass & bio-waste, and geothermal. The 2022 Strategic Long-Term Resource Plan, a 25-year roadmap, provides guidance for the LADWP's Power System to supply reliable and cost-effective electricity to attain 100 percent carbon-free energy system by 2035. Overhead

[57] Collaborative for High Performance Schools. N.d. CHPS Criteria. https://chps.net/chps-criteria
[58] Los Angeles Unified School District. June 8, 2015. Policy Bulletin: Energy and Resource Conservation Policy. http://learninggreen.laschools.org/uploads/8/0/0/0/8000811/bul-6513_energyconservationpolicy.pdf

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electrical distribution lines (66-220 kV) operated by Southern California Edison closest to the proposed Project are located approximately 0.4 miles west and 0.35 miles north in relation to the Campus.[59]

Power distribution for the Campus is provided by eight electrical substations on Campus. The main electrical distribution vault is an LADWP above-ground transformer located on Borden Avenue. This vault transforms utility power from overhead DPW utility lines located at the street on Borden Avenue, Raven Street, and Dronfield Avenue and runs power underground from the main switchboard to an underground 5kV electrical line. The majority of electrical distribution throughout the Campus was originally constructed in 1960 and is in poor condition.[60] The newer 5kV distribution was added in 1995 to support a HVAC upgrade. The Campus currently does not have a renewable energy system.

Water Consumption. Water supply in the City of Los Angeles, including the Project site, is supplied by LADWP. Substantial energy is required to pump and transport water into the Los Angeles basin. Source water extraction, treatment and local distribution also require significant amounts of energy. The Los Angeles Aqueduct, local groundwater, and supplemental water purchased from the Metropolitan Water District of Southern California (MWD) are the primary sources of water for the city. Because water supplies are declining due to environmental degradation, variable hydrology, and impacts from climate change, the LADWP is implementing recycled water programs, such as "operation NEXT water supply" to fill a larger portion of the city's water supply portfolio while reducing dependence on imported water. The Campus is served by an 8-inch LADWP mainline running along the service road, south of the gymnasium. This main line provides both fire and domestic water and is connected to the 12-inch public main line on Astoria Street. There is another water connection to the southwest of Campus along Borden Avenue.

The California Urban Water Management Planning Act (effective January 1, 1984) requires that every urban water supplier prepare and adopt an Urban Water Management Plan (UWMP) every 5 years. The LADWP's 2020 UWMP is the most recent plan available.[61] It is the City's master plan for water supply and resources management and is consistent with the City's goals and policy objectives. Total water demand varies from year to year and is influenced by population growth, weather, water conservation efforts, drought, and economic activity. From fiscal year (FY) 2012/13 through FY 2014/15, drought conditions triggered State and City mandatory conservation measures. This helped to reduce water use by 13 percent from FY 2013/14 to FY 2014/15, and average water demand between FY 2015/16 and FY 2019/20 was lower compared to 1970s recordings. The City is currently aiming for a 25 percent per capita reduction in potable water by 2035 and strives to maintain the same reduction rate through 2050, using FY 2013/14 as a baseline.

Natural Gas. As stated in the Subsequent PEIR, natural gas is provided to the City of Los Angeles including the Project site by the Southern California Gas Company (SoCalGas). SoCalGas obtains most of its natural gas supply from sources outside of California, primarily from basins in the southwestern United States and Canada, including the Rocky Mountains. According to the SoCalGas website, SoCalGas owned or operated high-pressure distribution lines are located approximately 0.25 to 0.33 miles to the east, south, and west of Campus,

[59] California Energy Commission. 2025. California Electric Infrastructure Map. Available at: https://cecgis-caenergy.opendata.arcgis.com/datasets/260b4513acdb4a3a8e4d64e69fc84fee_2/explore?location=34.307446%2C-118.446218%2C16.87
[60] LAUSD. 2023. Preliminary Site Analysis and Program Development Report. August 2023.
[61] LADWP. 2020. Urban Water Management Plan. Available at: https://www.ladwp.com/sites/default/files/documents/LADWP_2020_UWMP_Web.pdf

along Hubbard Street, Glenoaks Boulevard, and Polk Street.[62] Natural gas is fed to each building individually from a Campus gas connection. Natural gas is used in buildings for either water heating, space heating and/or teaching and science functions. Unless previously renovated, the existing natural gas systems are largely original.

Petroleum Based Fuel. California currently imports two-thirds of its petroleum from out-of-state, and accounts for about 10 percent of U.S. gasoline and diesel consumption. California has continued its shift away from fossil fuels to zero-emission and near-zero-emission vehicles powered by renewable sources to achieve its climate goals, with the governor's goals to setting new interim milestones of 90 percent clean energy by 2035 and 95 percent by 2040; further, the goal of achieving net-zero emissions by 2045 and establishing 85 percent reduction in emissions target as part of that goal.[63]

Would the proposed Project:

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

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

Short-Term Construction

Short-term construction activities associated with the proposed Project would consume energy, primarily in the form of diesel fuel (e.g., mobile construction equipment) and electricity (e.g., power tools). Construction activities would be subject to applicable regulations such as anti-idling measures, limits on duration of activities, and the use of alternative fuels, thereby reducing energy consumption. There are no aspects of the proposed Project that would foreseeably result in the inefficient, wasteful, or unnecessary consumption of energy during construction activities. For example, there are no unusual characteristics that would directly or indirectly cause construction activities to be any less efficient than would otherwise occur elsewhere (e.g., restrictions on equipment, labor, types of activities, etc.). The proposed major modernization would not result in the inefficient, wasteful, or unnecessary consumption of energy during construction activities.

Electrical Energy

Electricity use would vary during each phase of the proposed construction activities. Most of the initial phases would involve the use of heavy construction equipment, which would be diesel-powered. However, later phases would require the use of electric-powered equipment (e.g., power drills, table saws, lighting, etc.) for interior construction, finishing, and architectural coatings.

Electrical energy would be available for use during construction from existing connections and may require temporary use of generators during construction of the MPB/electrical main switchboard. However, any generator use would be temporary and would not result in wasteful or unnecessary electricity demands, and impacts would be less than significant and no further analysis is required.

[62] Southern California Gas Company. n.d. Natural Gas Pipeline Map. Available at:: https://socalgas.maps.arcgis.com/apps/webappviewer/index.html?id=c85ced1227af4c8aae9b19d677969335

[63] California Energy Commission. 2024. 2024 Integrated Energy Policy Report Update. Publication Number: CEC-100-2024-001-CMD. Available at: https://www.energy.ca.gov/publications/2024/2024-integrated-energy-policy-report-update

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Natural Gas Energy

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

Transportation Energy

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

The use of energy resources by vehicles and equipment would fluctuate according to the phase of construction and would be temporary. In addition, all construction equipment would cease operating upon completion of construction activities associated with the proposed Project. Thus, impacts related to transportation energy use during construction would be temporary and would not require expanded energy supplies or the construction of new infrastructure. Further, the construction equipment would be well maintained and meet the appropriate tier ratings per CALGreen or U.S. Environmental Protection Agency (USEPA) emissions standards so that adequate energy-efficiency level is achieved. Moreover, to limit wasteful and unnecessary energy consumption, the construction contractors are anticipated to minimize nonessential idling of construction equipment during construction, in accordance with Section 2449 of the CCR, Title 13, Article 4.8, Chapter 9. Construction trips would also not result in unnecessary use of energy since the Project site is centrally located and is served by numerous regional freeway systems (e.g., the I-210 and the I-5) that provide the most direct routes from various areas of the region. Thus, transportation energy use during construction of the proposed Project would not be considered inefficient, wasteful, or unnecessary. Impacts would be less than significant, and no further analysis is required.

Long-Term Operation

New exterior and interior LED lighting and lighting controls would be provided with new buildings to comply with LAUSD Design Guides and Title 24, Part 6, as well as new power distribution provided to each building. The proposed additional square footage added to the Campus would increase demand for electrical energy compared to existing conditions. A new 4160V, 3 phase, 3 wire, 800A electrical service from LADWP would be installed in a dedicated LADWP yard in the parking lot adjoining Borden Avenue. This yard would include an LADWP pole, LADWP transformer, and a 4160V, 3 phase, 3 wire, 800A service switchboard. This new service shall replace the existing 4160V, 3 phase, 3 wire, 200A service that is currently located to the south of the existing MPB. The new service shall be installed and operational before the demolition of the existing LADWP service. The equipment yard shall also include a 480-208/120V, 3 phase, 4 wire transformer and 208/120V, 3 phase, 4 wire switchboard, which will refeed the existing equipment that is currently supplied by the existing Substation located in the Multipurpose Building. This new equipment would also supply EV chargers and other new site loads as required.

Electrical power to the new MPB would be fed by a new 2500 kVA, 4160V-480/277V, 3 phase, 4 wire substation transformer and 3000amp, 480/277V, 3 phase, 4 wire service switchboard. In addition, the proposed Project would locate solar panels on roof tops of new buildings to ensure future expansion maintains District-desired electrical spare capacity of 20 percent with existing distribution and panel boards. Operationally, the

proposed major modernization at Sylmar Charter HS would be consistent with all appropriate design standards and sustainable building practices to reduce potential energy consumption and ensure electrical needs of the project are addressed consistent with the CALGreen Code, CHPS criteria, and the LAUSD's SCs included in this Initial Study. The CALGreen Code is a Statewide building standards code, which includes standards for reduced energy and water consumption and the reduction of GHG emissions from buildings.[64] The CHPS includes design criteria for energy and material efficiency. The proposed major modernization would replace or upgrade facilities on the Campus, but it would not increase the number of students or faculty at Sylmar Charter HS. As the original Campus was constructed in early 1960s, the proposed Project would overall improve energy efficiency with utilities upgrades and would not use large amounts of fuel or energy in an unnecessary, wasteful, or inefficient manner. The proposed major modernization would continue usage of local and regional energy supplies but would not constrain local or regional energy supplies, so the impacts would be less than significant. No mitigation or further study is required.

Because the proposed Project would not increase student enrollment or capacity and staffing would not increase or change after buildout of the three construction phases, implementation of the proposed Project would not result in additional trips or an increase in VMT and would not result in additional reliance on fossil fuel consumption. Electric vehicle charging stations would be provided in Lot No. 3, which could lessen reliance on fossil fuels. The proposed Project would result in less than significant impacts in relation to energy consumption. No further analysis is warranted.

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

No Impact. The proposed Project would result in no impact in relation to conflicts with or obstructions of a state or local plan for renewable energy or energy efficiency. The proposed Project is subject to the energy-efficient provisions of the current California Building Standards Code (CCR Title 24), CHPS criteria, and applicable CALGreen (CCR Title 24, Part 11) mandatory measures. Construction and operation of the proposed Project would remove existing permanent and temporary buildings, to provide CHPS-design facilities.

The State's electricity grid is transitioning to renewable energy under California's Renewable Energy Program. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. Electricity production from renewable sources is generally considered carbon neutral. On September 10, 2018, Governor Brown signed SB 100 and under SB 100, the renewable portfolios standard (RPS) for public-owned facilities and retail sellers consist of 60 percent by 2030.

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

Also, in compliance with SC-GHG-5, the new buildings would not exceed the Building Energy Efficiency Standards and CALGreen Code and would be more energy efficient than the existing elementary school. The Project would be reviewed by the Division of the State Architect (DSA) for compliance with design and

[64] Building Standards Commission. 2018. CALGreen. https://www.dgs.ca.gov/BSC.

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construction and energy regulations, and by LA Unified for compliance with standard conditions. Since the proposed Project would result in improvements to energy use on the campus and address infrastructure vulnerabilities, the proposed Project would not result in conflicts with or obstructions of a state or local plan for renewable energy or energy efficiency, no impacts would occur. No further analysis is warranted.

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

The analysis in this section is based in part on the "Geotechnical and Geologic Investigation Report, Proposed Major Modernization and Seismic Retrofit for Sylmar Charter High School", prepared by TGR Geotechnical Inc., dated March 4, 2022. A complete copy of this report is included as Appendix B to this IS.

EXPLANATION:

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

LAUSD Standard Conditions of Approval	
SC-GEO-1	LAUSD shall prepare a Geohazard Assessment for the construction of any new school or applicable school addition.
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 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.

Would the proposed Project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazards of surface faulting and fault rupture on habitable buildings. Fault rupture generally occurs within 50 feet of an active fault line and is limited to the immediate area where the fault breaks along the surface. Active earthquake faults are faults where surface rupture has occurred within the last 11,000 years. The Project site is not within or immediately adjacent to (i.e., within a few hundred feet) of an Alquist-Priolo Earthquake Fault Zone (surface fault rupture only). A review of geologic literature indicates that there are no known active or potentially active faults located within or immediately adjacent to the Campus. The nearest fault to the Project site is the Sylmar fault mapped approximately 0.5 miles to the southeast.[65] Other nearby faults include the Sierra Madre fault mapped approximately 0.9 miles to the north of the Campus. Since no known faults are located within the site, surface fault rupture is not anticipated. The potential for tectonic fault rupture at the site is considered negligible.

The DSA approves designs for new school construction, and all projects must submit to DSA oversight and inspections during construction.[66] The DSA must then certify that each new school building meets State of California statutory safety requirements. Compliance with DSA and CBC requirements would ensure that potential impacts related to surface rupture from a known active fault would be less than significant. No mitigation or further study is required.

ii. Strong seismic ground shaking?

Less than Significant Impact. Southern California is a seismically-active region. Impacts from ground shaking could occur many miles from an earthquake epicenter. The potential severity of ground shaking depends on many factors, including the distance from the originating fault, the earthquake magnitude, and the

[65] TGR Geotechnical, Inc. (TGR). 2022, March 4. *Geotechnical and Geologic Investigation Report, Proposed Major Modernization and Seismic Retrofit for Sylmar Charter High School.*
[66] Department of General Services. Division of the State Architect Enforcement Responsibility. https://www.dgs.ca.gov/DSA/About.

nature of the earth materials beneath a given site. Moderate to strong ground shaking can be anticipated, as with current conditions. Because of the proximity to known faults and because the entire Southern California region is considered seismically active, there is a potential for people and structures to experience strong ground shaking in the future from local and regional faults. However, the site is not on or within 1,500 feet of a known active fault or geologically hazardous area.

In compliance with SC-GEO-1, LA Unified would prepare a Geohazard Assessment for the construction of the new structures on the Project site. The new buildings would be designed in compliance with the CBC guidelines for evaluating and mitigating seismic hazards in California and the California Geological Survey "Checklist for the Review of Geologic/Seismic Reports for California Schools, Hospitals, and Essential Services Buildings."[67] The proposed Project also requires review from the DSA for compliance with design and construction and accessibility standards and codes, including seismic requirements. LA Unified, with oversight from DSA, would comply with these requirements in the design and construction of the new school buildings. Therefore, seismic ground shaking impacts would be less than significant and no further analysis is required.

iii. Seismic-related ground failure, including liquefaction?

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

A review of the Seismic Hazards Zone Map of the Los Angeles quadrangle indicates that the Project site is not in a seismic hazard zone for soil liquefaction. Groundwater was not encountered in subsurface explorations to 51.5 feet below existing grade during the geotechnical investigation for the proposed Project. Based on review of available historical groundwater information, regional historic high groundwater has been recorded at approximately 120 to 150 feet below existing grade across the Project site. Thus, due to the lack of shallow groundwater and density of the subsurface soils, the Project site is excluded from a liquefaction hazard zone. The proposed Project would not expose people or the new school buildings to adverse effects from liquefaction. Therefore, there would be no impact and no further analysis is required.

iv. Landslides?

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

The relatively flat-lying topography at the school precludes both stability problems and the potential for lurching. There are no known landslides near the site, nor is the school in the path of any known or potential

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

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

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

Less than Significant Impact. Potential short-term construction-related and long-term operational impacts associated with soils erosion and/or loss of topsoil are discussed below.

Construction

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

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

Project-related construction activities would expose soil through excavation, grading, and trenching, and thus could cause erosion during heavy winds or rainstorms. Construction projects of one acre or more are regulated under the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) issued by the State Water Resources Control Board. LA Unified would obtain coverage by preparing and implementing a Stormwater Pollution Prevention Plan (SWPPP), estimating sediment risk from construction activities to receiving waters, and specifying best management practices (BMPs) that would be incorporated into the construction plan to minimize stormwater pollution. The proposed Project would occur on up to 2.9 acres of the 30.6-acre Campus; thus, construction would be subject to the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP. This is also required under SC-HWQ-2. Therefore, construction-phase soil erosion impacts would be less than significant and no further analysis is required.

Operation

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

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

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

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

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

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

Seismically Induced Settlement. Seismically-induced settlement occurs in dry sands, in contrast to liquefaction, which occurs in saturated sand or gravel, and is often caused by loose to medium-dense granular soils densified during ground shaking. A potential total dry seismic settlement (above the groundwater table) is estimated to range from 1.9 to 6.5 inches, with differential seismic settlement estimated to be 0.4 inches across a span of 30 feet. The majority of the dry seismic settlement was found to occur in the upper 20 to 40 feet. The resulting estimated total dry seismic settlements beneath new buildings would be between 0.5 and 1 inch (with differential settlements estimated to be less than 0.4 inch across a 30-foot span). Table 7 lists the following soil parameters may be used for the evaluation of the retaining wall with a maximum height of six feet:

Table 7. Soil Parameters

Condition	Parameter
Active (Level)	40 psf/ft
At Rest (Level)	60 psf/ft
Passive	300 psf/ft (maximum 3,000 psf)
Friction Coefficient	0.40

psf = pounds per square foot; ft = feet

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The above settlement estimates assume that the earthwork recommended in the Geotechnical Investigation would be performed, that the footings would be sized accordingly, and additional structural load information would be provided when it is available, to evaluate the settlement. Therefore, impacts would be less than significant, and no further analysis is required.

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

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

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

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

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

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

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

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

Los Angeles is rich in paleontological sites. Fossils have been found mostly in sedimentary rock that has been uplifted, eroded, or otherwise exposed. Since the Project site has been highly disturbed and is covered by fill soils, discovery of paleontological resources during shallow excavation activities is unlikely. In the event of a discovery, implementation of SC-GEO-2, which requires a Paleontological Monitor to oversee specific ground-disturbing activities, would reduce the potential impacts of potentially uncovered paleontological resources. Additionally, neither the school nor the surrounding area has been identified as having a high paleontological sensitivity.[68] Therefore, with incorporation of SC-GEO-2, impacts to unique paleontological resources and unique geologic features would be less than significant and no mitigation or further analysis is required.

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

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

EXPLANATION:

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

LAUSD Standard Conditions of Approval	
SC-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.
SC-USS-1	Implementation of SC-USS-1.

The primary source of anthropogenic (human-caused) GHG comes from burning fossil fuels for energy use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major sources of GHGs—water vapor, carbon dioxide (CO_2), methane (CH_4), and ozone (O_3)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHG identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.[69]

Information on manufacture of cement, steel, and other "life cycle" emissions that would occur as a result of the Project are not applicable and are not included in the analysis.[70] Black carbon emissions are not included in

[69] Water vapor (H_2O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.

[70] Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency,

the GHG analysis because CARB does not include this pollutant in the State's SB 32 and Assembly Bill (AB) 1279 inventory and treats this short-lived climate pollutant separately.[71]

Would the proposed Project:

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

Potentially Significant Impact. The proposed Project would generate GHG emissions during temporary construction activities and long-term operations. Construction would result in short-term GHG emissions produced by construction equipment exhaust as well as on-road truck and other vehicle trips. While the proposed Project would not increase the capacity of the Sylmar Charter HS, operation of the proposed Project would result in GHG emissions from energy consumption. Therefore, this impact is considered potentially significant and the EIR will evaluate the potential for the proposed Project to generate a substantial increase in GHG emissions.

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

Potentially Significant Impact. The proposed Project would potentially result in significant impacts in relation to conflicting with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. The primary plans and policies applicable to the proposed Project include the CARB's Scoping Plan[72], the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). CARB's latest Climate Change Scoping Plan (2022) outlines the State's strategies to reduce GHG emissions in accordance with the targets established under AB 32, SB 32, and AB 1279. The proposed Project would emit GHGs during temporary construction activities and long-term operations. Therefore, this impact is considered potentially significant and the potential for the proposed Project to conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions will be analyzed in the EIR.

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

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

72 California Air Resources Board. 2022, 2022 Scoping Plan for Achieving Carbon Neutrality, https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf, accessed April 16, 2024.

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

The analysis in this section is based in part on "*Phase I Environmental Site Assessment Sylmar Charter High School*," prepared by Geosyntec, dated March 9, 2022, and the "*Preliminary Environmental Assessment Equivalent Work Plan*" prepared by Geosyntec Consultants, dated March 2023. Copies these reports are included as Appendix C and D to this IS.

EXPLANATION:

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

LAUSD Standard Conditions of Approval	
SC-HAZ-1	LAUSD shall determine the proximity of electromagnetic field (EMF) generators to new classrooms or outdoor play areas to ensure the EMF generator does not pose a threat. **Criteria for School Siting in Proximity to High Voltage Power Lines or Cell Towers** Board of Education resolutions (Effects of Non-Ionizing Radiation-2000, Wireless Telecommunication Installations – 2009 and T-Mobile – Cell Tower Notification and Condemnation-2009) regarding electromagnetic field (EMF) and radio frequency exposures associated with cellular towers near schools whereby a prohibition exists regarding siting towers on school campuses.

	LAUSD's screening perimeter for new classroom construction or outdoor play area is 200 feet from cell towers and 500 feet from high voltage power lines.
SC-HAZ-2	LAUSD shall determine the proximity of new classrooms or outdoor play areas to ensure that these new facilities are placed outside of the established exclusion zone. **Pipeline Safety Hazard Analysis** This document outlines the process for evaluating safety hazards associated with underground and above-ground natural gas and hazardous liquid pipelines. The pipeline safety hazard assessment (PSHA) process determines whether potential releases of natural gas, petroleum product, and crude oil from pipelines located near a school site pose a safety risk to students and staff.
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).

The Project site is an existing high school. A Phase I ESA Report was prepared for the Project site in 2022 that found onsite listings consistent and typical of a school (see Appendix C). According to the Phase I ESA, the Project Site was listed in the following environmental databases: the Facility Registry Service/Facility Index (FINDS/FRS), Hazardous Waste Manifest Data (HAZNET), Historical Hazardous Waste Manifest Data (HIST MANIFEST), California Environmental Reporting System Hazardous Waste Sites (CERS HAZ), Los Angeles County – City of Los Angeles Hazardous Materials Facilities (HAZMAT LA CITY), Los Angeles County CUPA Program Records (CUPA LA COUNTY), Los Angeles County – City of Los Angeles Underground Storage Tank List (UST LA CITY), and Resource Conservation and Recovery Act Large Quantity Generator (RCRA-LQG). The Phase I ESA Report, California Department of Toxic Substances Control (DTSC) EnviroStor database, and California State Water Resources Control Board GeoTracker database show that the proposed Project site is not listed as a hazardous waste site.[73],[74] No violations were noted, and one offsite listing was considered an environmental concern to the Project site as detailed below.

Well 7A at 13180 Dronfield Avenue

The 13180 Dronfield Avenue property is located approximately 150 feet from the Project site toward the north-northwest, hydraulically cross gradient, and is a groundwater production facility for the City of San Fernando subject to Waste Discharge Requirements (WDRs) under the Regional Water Quality Control Board (RWQCB). The property includes a drinking water supply well identified as Well 7A. Given the proximity of the property

[73] California Department of Toxic Substances Control (DTSC). N.d. EnviroStor: 3010 Estara Ave, Los Angeles, CA 90065. Available at: https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=13050+Borden+Ave+Los+Angeles. Accessed December 3, 2024.
[74] California State Water Resources Control Board. N.d. GeoTracker: 13050 Borden Avenue, Los Angeles, CA. Available at: GeoTracker. Accessed December 3, 2024.

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to the Project site it can be reasonably assumed that groundwater conditions underlying the Project site are similar to those reported for Well 7A. The presence of low concentrations of perchlorate and nitrate and slightly elevated concentrations of sulfate in underlying groundwater are considered reflective of regional groundwater conditions and are not considered to present a specific threat to the Project site.

A recognized environmental condition (REC) is defined as the presence or likely presence of hazardous substances or petroleum products in, on, or at a property due to any release to the environment, under any conditions indicative of a release to the environment, or under conditions that pose a material threat of a future release to the environment. RECs identified by the 2022 Phase I ESA include:

Inactive UST: Geosyntec identified the potential presence of an underground storage tank (UST) on Campus and further information is pending from the Los Angeles County Fire Department. The referenced UST is considered to be a REC. The potential for UST to be present on the Campus would indicate the presence of underground pipes that may carry hazardous substances and/or petroleum products.

Inactive Clarifier: The presence of a clarifier on the Campus since circa 1963 would indicate the presence of associated underground drains that may have discharged hazardous substances and/or petroleum products through the clarifier.

Lead Based Paint (LBP) and Asbestos Containing Material (ACM): Based on the age of the buildings, there is the potential for LBP residue to be present in shallow soils around existing and former buildings on Campus. In addition, ACM labels on pipes indicate the presence of ACM on Campus.

Polychlorinated Biphenyls (PCBs): Based on the age of the buildings on Campus, the presence of in-ground hydraulic lifts within the Industrial Arts (Building #23/Automotive Shop), and the presence of transformers, there is the potential for PCB-containing materials to have been used at the Campus and therefore for PCBs to be present in shallow soils.

Potential Pesticide/Herbicide Application: Based on the Campus' historical use for agricultural and the potential associated application of pesticides and herbicides, and the potential for application throughout the Campus' use as a school, there is the potential for arsenic and pesticides to be present in shallow soils around existing and former buildings and in areas of former agriculture on the Campus.

The 2022 Phase I ESA also identified the following *de minimis* conditions:

Historical Agricultural Land Use: Aerial photographs indicated that portions of the Campus were used from at least 1928 through to approximately 1960 for what appeared to be orchards and/or pastures. Based on the timeframe of the observed agricultural use, it is possible that hazardous pesticides or herbicides were used on the Campus; however, no evidence of pesticide/herbicide usage was found during the Phase I ESA. Therefore, this finding is not a REC but rather a de minimis condition.

Former Residential Septic System(s): According to information provided to Geosyntec, septic systems were historically present at the Campus associated with Former residential dwellings. Septic system leach fields may contain pathogens that pose a risk to human health if improperly managed. It is likely that the septic systems

were removed during the development of the Campus for its current use. Therefore, this finding is considered de minimis condition.

The Campus is also located in "Zone 2" for radon, which has average indoor basement radon levels between 2 and 4 picoCuries per liter (pCi/L).[75] The USEPA's continuous exposure limit applicable to residential properties, which is also the limit at which further testing or remedial action is suggested, is 4.0 pCi/L.

The LA Unified OEHS prepared a Preliminary Environmental Assessment Equivalent (PEA-E) Work Plan (Appendix D) in 2023 for the proposed Project outlining recommendations for follow up soil sampling investigation and analysis to identify any chemicals of potential concern (COPC) located in proposed excavation areas within the Project site.[76] The PEA-E Work Plan recommends that prior to any demolition, remodeling, and/or renovation activities at the Project site, untested suspect ACMs, LBP and other LCMs, and potential PCB-containing building material that may be disturbed should be sampled and analyzed in accordance with applicable regulations[77]. This follow-up soil sampling investigation has not been completed.

Upon review of the City of Los Angeles 2024-2029 Local Hazard Mitigation Plan (LHMP), the proposed Project would have no impact to the LHMP outlined in the report.[78] The Project site is an active high school campus with an existing Safe School Plan that follows the LAUSD Integrated Safe School Plan.[79]

The Project site is not located within 500 feet of existing high voltage lines or cell towers.[80] Overhead electrical transmission lines (66 kilovolt) operated by Southern California Edison are located approximately 2,000 feet west of the Project site, along Glenoaks Boulevard and approximately 1,900 feet northeast of the Project site (220 kilovolt), along the I-210.[81] According to SoCalGas's gas Transmission Pipeline Interactive Map, SoCalGas owned or operated transmission lines are located approximately 1,400 feet northwest of the Project site, along Polk Street, approximately 1,300 feet west along Glenoaks Boulevard, and approximately 1,700 feet southeast of the Project site along Hubbard Street.[82] According to the urban/wildland interface fire maps within the City of Los Angeles 2024-2029 Local Hazard Mitigation Plan, the Project site is not located within a wildfire hazard zone; however, it does border an area of very high wildfire severity zone due to its proximity to the vegetated areas within the San Gabriel Mountains.[83]

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75 Geosyntec Consultants Inc. March 2022. *Phase I Environmental Site Assessment for Sylmar Charter High Schoo*l.
76 Geosyntec Consultants. 2023. Preliminary Environmental Assessment Equivalent Workplan for Sylmar High School. March 2023.
77 Geosyntec Consultants Inc. March 2022. *Phase I Environmental Site Assessment for Sylmar Charter High Schoo*l.
78 City of Los Angeles. 2024-2029 Local Hazard Mitigation Plan. June 2024. Tetra Tech. https://emergency.lacity.gov/Local-Hazard-Plan
79 LAUSD. 2001. Integrated Safe School Plan 2024-2025 Highlights. Available at: https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/318/Final%20ISSP%20Highlights%202024-25%20081224.pdf
80 City of Los Angeles. January 16, 2025. Los Angeles County Substructure Utility Lines. Available at: https://geohub.lacity.org/datasets/4d53d2df747e4aa784773370dc2375a3_0/explore?location=34.261665%2C-118.384041%2C11.57
81 California Energy Commission. June 6, 2024. California Electric Transmission Lines. Available at: https://cecgis-caenergy.opendata.arcgis.com/datasets/260b4513acdb4a3a8e4d64e69fc84fee_2/explore?location=34.308548%2C-118.444515%2C16.68
82 Southern California Gas Company, a subsidiary of Sempra Energy. N.d. Natural Gas Pipeline Map. Available at: https://socalgas.maps.arcgis.com/apps/webappviewer/index.html?id=c85ced1227af4c8aae9b19d677969335
83 City of Los Angeles. 2024-2029 Local Hazard Mitigation Plan. June 2024. Tetra Tech. https://emergency.lacity.gov/Local-Hazard-Plan

4. Environmental Checklist and Analysis

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

Potentially Significant Impact. The proposed Project would have the potential to result in significant impacts in regard to the routine transport, use, or disposal of hazardous materials during construction activities.

According to the Phase I ESA, there is the potential for LBP and PCB to be present in shallow soils around existing and former buildings on Campus. There is also potential for arsenic and pesticides to be present in shallow soils around existing and former buildings and in areas of former agriculture on the Campus due to past pesticide/herbicide use. There is also potential for the presence of ACMs and a UST onsite.

The PEA-E Work Plan outlines recommendations for a soil sampling and analysis plan to be conducted prior to construction to evaluate shallow (up to 3 three feet below ground disturbance [bgs]) soil for the presence of COPCs associated with the Site's historical agricultural/residential use, including metals and organochlorine pesticides (OCPs). Limited screening should also occur for PCBs, ACMs, VOCs, polycyclic aromatic hydrocarbons (PAHs), and total petroleum hydrocarbons (TPHs) to evaluate the soil in accordance with SCAQMD Rule 1466 requirements. This follow up study has not been completed and therefore the extent of potential impacts from hazardous materials is unknown. As such, there is the potential for hazardous materials to result in significant impacts with regard to the routine transport, use, or disposal of hazardous materials during construction activities, which requires the consideration of mitigation measures and alternatives in the EIR.

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

Potentially Significant Impact. The proposed Project would result in potentially significant impacts in regard to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. According to the Phase I ESA, the Project site was listed in the following environmental databases: the Facility Registry Service/Facility Index (FINDS/FRS), HAZNET, Historical Hazardous Waste Manifest Data (HIST MANIFEST), California Environmental Reporting System Hazardous Waste Sites (CERS HAZ), Los Angeles County – City of Los Angeles Hazardous Materials Facilities (HAZMAT LA CITY), Los Angeles County CUPA Program Records (CUPA LA COUNTY), Los Angeles County – City of Los Angeles Underground Storage Tank List (UST LA CITY), and Resource Conservation and Recovery Act Large Quantity Generator (RCRA-LQG). Violations regarding failures to maintain Hazardous Waste Manifests, active generator permit, and improper labeling were reported from 2017 to 2020. The Project site was listed in HAZNET for as a facility that has submitted hazardous waste manifests to the DTSC; including unspecified aqueous solution, asbestos containing waste, other inorganic solid waste, waste oil and mixed oil, unspecified oil-containing waste, PCBs, and material containing PCBs, off-specification aged or surplus organics, other organic solids, laboratory waste chemicals, and liquids with cadmium concentrations greater than 100 milligrams per liter (mg/L). All listings relate to tracking; and therefore, none of these listings represent an obvious environmental concern. However, based on the Phase I ESA and PEA-E Work Plan, there is potential for COPCs at the Project Site and an inactive UST that require further investigation. As such, there is the potential for hazardous materials to result in significant impacts through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment. The potential for significant impact requires the consideration of mitigation measures and alternatives in the EIR.

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

Potentially Significant Impact. The proposed Project would result in potentially significant impacts regarding the emission of hazards or handle hazardous or acutely hazardous materials, substances, or waste within one quarter mile of an existing or proposed school. During the construction phase, it is possible children could come in contact with hazardous materials associated with asbestos, lead pesticides, herbicides, and arsenic in shallow soils (see Appendix C and D). However, SC-HAZ-04 would ensure that the following guidelines are followed: District Specification Section 01 4524, Environmental Import / Export Materials Testing; Removal Action Workplan; CARB Rule 1466 Guidelines and Procedures to Address 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 FETU in the Phase I/Phase II; or abatement plan(s). It should be noted that the school is located within "Zone 2" for radon, which is considered 'moderate' and has average indoor basement radon levels between 2 and 4 picoCuries per liter (pCi/L).[84] As stated in the LAUSD Reference Guide REF-5314.2, Procedures for Environmental Review of Proposed Projects: "building design and construction Measures – Should a building or similar structure be constructed or renovated for student and/or staff occupancy and is located in a "high" radon zone, USEPA guidance entitled "radon Prevention in the Design and Construction of Schools and Other Large Buildings, EPA/625/R-92/016, June 1994" (or latest published version) shall be reviewed and all relevant and appropriate measures incorporated in its design and construction to prevent radon gas infiltration. As such, there is the potential for hazardous materials to result in significant impacts with regards to emitting or releasing potentially hazardous materials that could impact students at Sylmar Charter HS during construction activities, which requires the consideration of mitigation measures and alternatives in the EIR.

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?

Potentially Significant Impact. The proposed Project would result in potentially significant impacts in regard to creating a significant hazard to the public or the environment due to location on a listed hazardous materials site. There is potential for elevated concentrations of asbestos, lead, pesticides, herbicides, and arsenic in shallow soils.

As discussed, the PEA-E Work Plan prepared for the proposed Project outlines recommendations for a soil sampling and analysis plan to be conducted prior to construction to evaluate presence of potential hazardous materials onsite. This follow up study has not been completed, and therefore the extent of potential impacts from hazardous materials remains unknown. These findings represent a potentially significant impact which requires the consideration of mitigation measures and alternatives in the EIR.

[84] Geosyntec Consultants Inc. March 2022. *Phase I Environmental Site Assessment for Sylmar Charter High Schoo*l.

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

No Impact. The nearest public airports to the school site are Whiteman Airport, approximately 3.8 miles southeast, Van Nuys Airport, approximately seven miles southwest, and Hollywood Burbank Airport, approximately 9.15 miles southeast of the Project site. The Project site is not within the airport influence areas or the airport land use planning areas of these airports.[85] Development of the proposed Project would not result in a new use that would interfere with air traffic patterns or increase traffic levels or change traffic patterns. New buildings would have similar height to the existing buildings on the Campus and would not create a safety hazard or excessive noise. Therefore, no impact would occur and no further analysis is required.

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

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

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

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

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

[85] Airnav.com. 2024, April 14. https://airnav.com/cgi-bin/airport-search

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

No Impact. The Project site is located in an urban and built-up area, which does not contain any wildlands in the immediate vicinity of the Campus. The Project site is generally flat without significant topography, and there are no steep slopes where high winds can exacerbate wildfire risks. Furthermore, CAL FIRE does not classify the Project site as being within a very high fire hazard safety zone (VHFHSZ).[86] The nearest VHFHSZ is located in the Lopez Canyon area, located approximately 1.25 miles east of the Project site. Project development would not place people or structures at risk from wildfire. Therefore, no impact would occur and no further analysis is required.

[86] California Department of Forestry and Fire Protection (CAL FIRE). 20243. https://calfire-forestry.maps.arcgis.com/apps/webappviewer

4. Environmental Checklist and Analysis

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

The analysis in this section is based in part on "*Geotechnical and Geologic Investigation Report, Proposed Major Modernization and Seismic Retrofit, Sylmar Charter High School,"* prepared by TGR Geotechnical Inc., dated March 4, 2022. A complete copy of this report is included as Appendix B to this Initial Study.

EXPLANATION:

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

LAUSD Standard Conditions of Approval	
SC-HWQ-1	LAUSD shall design and construct the project to meet or exceed the current and applicable stormwater guidelines. **Stormwater Technical Manual** This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). These guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) and the mandated post-construction element of the NPDES program requirements.

SC-HWQ-2	LAUSD shall implement the applicable stormwater requirements during construction activities. **Compliance Checklist for Storm Water Requirements at Construction Sites** This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.
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.
SC-HWQ-4	LAUSD shall analyze potential flood hazards for new projects. The analysis for new projects shall include evaluation of all possible flood hazards as determined by: (1) review of FEMA flood maps; (2) review of flood information provided by local City or County floodplain managers; (3) review of California Department of Water Resources dam safety information; and (4) local drainage analysis by a civil engineer. The flood hazard determination shall include consideration of tsunamis and debris flow. New projects should be located outside of these hazard areas, if practical. Where placing the project outside the floodplain is impractical, the school or project structure shall be protected from flooding by containment and control of flood flows (e.g., elevating lowest floors at least one foot above the expected 100-year flood level).
SC-HWQ-6	LAUSD shall consult with the Los Angeles County Department of Public Works, and/or local city officials, as appropriate, regarding the debris flow potential near the mouth of or in natural canyons and feasible mitigation measures shall be developed to reduce any potential risk. Potential debris flow hazards shall be reduced by one or more of the following: • Adequate building setbacks from natural slopes. • Construction of debris control facilities in upstream areas. • Monitoring and maintaining potential debris flow areas and basins. In addition, potential loss shall be minimized by establishing an evacuation plan, and elevated awareness and early warning of pending events.

Would the proposed Project:

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

Less than Significant Impact. A significant impact would occur if the proposed Project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into

4. Environmental Checklist and Analysis

stormwater drainage systems. A significant impact would also occur if the proposed Project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB).

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

The proposed Project would be constructed in an area that is already developed and already produces nonpoint-source pollutants. There is a storm drain maintained by the City of Los Angeles located just outside of the northern corner of the Campus at Astoria Avenue and Dronfield Avenue.[87] There are two concrete-lined channels maintained by the LA County Flood Control District along Dronfield Avenue, and one running north from the corner of Astoria Avenue and Dronfield Avenue.

Construction

Construction projects of one acre or more are regulated under the NPDES Construction General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order WQ No. 2022-0057-DWQ) issued by the SWRCB. Project applicants obtain coverage by developing and implementing a SWPPP, estimating pollutants from construction activities to receiving waters, and specifying BMPs that would be incorporated into the construction plan to minimize stormwater pollution. Prior to redevelopment, all applicable agencies would be contacted for requirements related to storm water run-off (including the SWRCB) and other development- and construction-related environmental requirements would be implemented (such as dust suppression). This would include the preparation and implementation of a SWPPP. This is also required under SC-HWQ-2. Therefore, construction phase soil erosion and sedimentation would not degrade or violate water quality standards and impacts would be less than significant.

Operation

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

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

[87] Los Angeles County Public Works Department. 2024. Los Angeles County Storm Drain System. https://pw.lacounty.gov/fcd/StormDrain/index.cfm

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 in the Sylmar Subbasin of the San Fernando Valley Groundwater Basin. DWP supplies water to the Project site and the surrounding community. DWP water supplies consist of about 12 percent local groundwater, most of which is from the San Fernando Valley Groundwater Basin; 86 percent imported water from northern California via the State Water Project, from the eastern Sierra Nevada via the Los Angeles Aqueduct, and from the Colorado River via the Colorado River Aqueduct; and two percent recycled water. Groundwater was not encountered in subsurface explorations to 51.5 feet below existing grade during the geotechnical investigation of the site. Historical data provided by the California Geologic Survey (CGS) indicates historical high groundwater depths of approximately 120 to 150 feet below existing grade across the Campus. Construction and operation of the school improvements would not lower the groundwater table or deplete groundwater supplies. The Project site does not provide intentional groundwater recharge. The proposed Project would not interfere with groundwater recharge. Therefore, impacts would be less than significant and no further analysis is required.

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

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

Less than Significant Impact. There are no streams or rivers on the Project site. The school is a fully-developed Campus and the new buildings would not increase impermeable surfaces on Project site. There is an open, concrete-lined storm drain canal (known as Wilson Canyon Channel) maintained by the Los Angeles County Flood Control Division, located one block north of the Campus at the Astoria Street/Dronfield Avenue intersection.[88]

Construction

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

Operation

A new stormwater inlet would be installed at a low point west of Building #15 (Library) to alleviate issues with ponding, as well as installation of new piping to connect the inlet to the existing system. The proposed Project

[88] Los Angeles County Public Works Department. 2024. Los Angeles County Storm Drain System. https://pw.lacounty.gov/fcd/StormDrain/index.cfm

would also replace the existing storm drain piping north of Building #16 (Administration) where clogging is occurring. Upon completion of the proposed Project, drainage from the Project site would continue to be captured on-site or conveyed via the same storm drains as with existing conditions. The entire Project site would discharge less stormwater because of LID requirements. The County of Los Angeles has prepared the 2014 LID Standards Manual to comply with the requirements of the NPDES Municipal Separate Storm Sewer System (MS4) Permit for stormwater and non-stormwater discharges from the MS4 within the coastal watersheds of Los Angeles County (CAS004001, Order No. R4-2012-0175). LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treats stormwater as a resource rather than a waste product. There are many practices that have been used to adhere to these principles, such as bioretention facilities, rain gardens, vegetated rooftops, rain barrels, and permeable pavements. By implementing LID principles and practices, water can be managed in a way that reduces the impact of built areas and would not result in substantial erosion or siltation on- or off-site. Therefore, impacts would be less than significant and no further analysis is required.

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

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

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

No Impact. Project development would not result in runoff exceeding the capacity of the municipal storm drain system. As stated above, the proposed on-site drainage system would result in a net decrease in runoff to municipal storm drains, pursuant to LID standards and the State MWELO for landscaped areas. Runoff would not exceed the existing capacity of the stormwater drainage systems. Therefore, no impact would occur and no further analysis is required.

iv. Impede or redirect flood flows?

No Impact. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) depicting the Site parcel, Panel No. 06037C1075G, the Project site is located in Zone X, (unshaded) and is outside of the 100-year and 500-year flood zones mapped by FEMA.[89] However, as stated above, the Project would incorporate SC-HWQ-1, which requires implementation of cost-effective and LID methods like those provided in the LID Standards Manual issued by the County. The proposed on-site drainage system would result in a net decrease in runoff to municipal storm drains, pursuant to LID standards and the State MWELO for landscaped areas. Therefore, no impact would occur and no further analysis is required.

[89] Federal Emergency Management Agency (FEMA). 2021. December. Accessed 2024, August. FEMA's National Flood Hazard Layer (NFHL) Viewer. https://msc.fema.gov/portal/search?AddressQuery=750%20E%2049th%20St%2C%20Los%20Angeles%2C%20CA%2090011

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

No Impact. The Project site is outside of 100-year and 500-year flood zones mapped by FEMA.[89] A seiche is an oscillating surface wave in a restricted or enclosed body of water, generated by ground motion, usually during an earthquake. Seiches are of concern for water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. There are no adjacent body of water that would pose a flood hazard to the site due to a seiche. The school is not at risk of inundation by seiche.

Tsunamis are a type of earthquake-induced flooding produced by large-scale sudden disturbances of the sea floor. Tsunami waves interact with the shallow sea floor when approaching a landmass, resulting in an increase in wave height and a destructive wave surge into low-lying coastal areas. The Project site is at an elevation of approximately 1,260 to 1,295 feet above sea level**Error! Bookmark not defined.** and is approximately 19.5 miles inland from the Pacific Ocean.

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

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

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

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

EXPLANATION:

There are no land use and planning LAUSD SCs.

Would the proposed Project:

a) Physically divide an established community?

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

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

No Impact. The Campus and surrounding developments are within the Sylmar Community Plan, which is one of the 35 community plans that comprises the Land Use Element of the General Plan of the City of Los Angeles. The Project site is zoned PF-1VL (Public Facility, Height District 1VL) and designated PF (Public Facilities) in the Sylmar Community Plan. The PF-1 zone permits the use and development of publicly-owned land, including public high schools and the Public Facilities designation encourages the development of educational facilities. The City of Los Angeles General Plan Land Use designation for the school property is 'Public Facilities', which allows public schools. New construction on the Project site would not represent a change in land use and would not conflict with existing plans, policies, or regulations adopted for the purpose of avoiding or mitigating environmental effects. On February 19, 2019, the BOE Adopted a Resolution to exempt all LA Unified school sites from local land use regulations under Government Code Section 53094. LA Unified 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 (Bd. Of Ed Rprt No. 256-18/19). Therefore, no impact would occur and no further analysis is required.

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

EXPLANATION:

There are no mineral resource LAUSD SCs.

Would the proposed Project:

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

No Impact. The Project site is mapped Mineral Resource Zone 3 (MRZ-3) by the California Department of Conservation,[90] indicating that it is in an "area containing known or inferred Portland cement concrete aggregate resource or undetermined mineral resource significance." No active mines are in the local vicinity.[91] The closest mine to Project site is the Hansen Dam Mine, located approximately three miles southeast[92]. Neither the Project site nor the surrounding community is available for mining. The nearest active oil well is located approximately two miles to the southeast; and the nearest oil/gas field is the Pacoima Oil and Gas Field located approximately three miles south of the Project site.[93] Development of the proposed Project would not cause a loss of availability of a known mineral resource valuable to the region and the State. Therefore, no impact would occur and no further analysis is required.

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

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

[90] California Department of Conservation. 2024. CGS Information Warehouse: Mineral Land Classification. https://www.conservation.ca.gov/cgs/Documents/Publications/Special-Reports/SR_254-MLC-SanFernandoValleySaugusNewhallPCR-2021-Plate01-MRZs-a11y.pdf
[91] California Department of Conservation. Division of Mine Reclamation. https://maps.conservation.ca.gov/mol/index.html
[92] Ibid
[93] California Department of Conservation. Well Finder. https://maps.conservation.ca.gov/doggr/wellfinder/

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

EXPLANATION:

The Subsequent PEIR evaluated the potential for implementation of the SUP-related site-specific projects to result in adverse noise impacts to students and faculty at the upgraded school sites and to surrounding areas. LA Unified has SCs for minimizing impacts to noise. Applicable SCs related to noise impacts associated with the Project are provided below.

LAUSD Standard Conditions of Approval	
SC-N-1	LAUSD shall design new buildings and other noise-generating sources to include features such as sound walls, building configuration, and other design features that attenuate exterior noise levels on a school campus to less than 67 dBA L_{eq}.[23]
SC-N-2	LAUSD shall analyze the acoustical environment of the site (such as traffic) and the characteristics of planned building components (such as Heating, Ventilation, and Air Conditioning [HVAC]), and designs shall achieve interior classroom noise levels of less than 45 dBA L_{eq} with a target of 40 dBA L_{eq} (unoccupied), and a reverberation time of 0.6 seconds. Noise reduction methods shall include, but are not limited to, sound walls, building and/or classroom insulation, HVAC modifications, double-paned windows, and other design features. • New construction should achieve classroom acoustical quality consistent with the current School Design Guide and CHPS (California High Performance Schools) standard of 45 dBA L_{eq}. • New HVAC installations should be designed to achieve the lowest possible noise level consistent with the current School Design Guide. HVAC systems shall be designed so that noise from the system does not cause the ambient noise in a classroom to exceed the current School Design Guide and CHPS standard of 45 dBA L_{eq} • Modernization of existing facilities and/or HVAC replacement projects should improve the sound performance of the HVAC system over the existing system. • The District's purchase of new units should give preference to HVAC manufacturers that sell the lowest noise level units at the lowest cost. • Existing HVAC units operating in excess of 45 dBA Leq inside classrooms should be modified

SC-N-3	LAUSD shall incorporate long-term permanent noise attenuation measures between new playgrounds, stadiums, and other noise-generating facilities and adjacent noise-sensitive land uses, to reduce noise levels to meet jurisdictional standards or an increase of 3 dB or less over ambient. Operational noise attenuation measures include, but are not limited to: • Buffer zones; • Berms; • Sound barriers; • Buildings; • Masonry walls; • Enclosed bleacher foot wells; and/or • Other site-specific project design features
SC-N-4	LAUSD or its Construction Contractor shall consult and coordinate with the school principal or site administrator, and other nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. Coordination between the school, nearby land uses and the Construction Contractor shall continue on an as-needed basis throughout the construction phase of the project to reduce school and other noise sensitive land use disruptions.
SC-N-5	LAUSD shall require the Construction Contractor to minimize blasting for all demolition and construction activities, where feasible.
SC-N-6	For projects where pile driving activities are required within 150 feet of a structure, a detailed vibration assessment shall be provided by an acoustical engineer to analyze potential impacts related to vibration to nearby structures and to determine feasible mitigation measures to eliminate potential risk of architectural damage.
SC-N-7	LAUSD shall meet with the Construction Contractor to discuss alternative methods of demolition and construction for activities within 25 feet of a historic building to reduce vibration impacts. During the preconstruction meeting, the Construction Contractor shall identify demolition methods not involving vibration-intensive construction equipment or activities. For example: sawing into sections that can be loaded onto trucks results in lower vibration levels than demolition by hydraulic hammers. • Prior to construction activities, the Construction Contractor shall inspect and report on the current foundation and structural condition of the historic building. • The Construction Contractor shall implement alternative methods identified in the preconstruction meeting during demolition, excavation, and construction, such as mechanical methods using hydraulic crushers or deconstruction techniques. • The Construction Contractor shall avoid use of vibratory rollers and packers adjacent to the building. • During demolition, the Construction Contractor shall not phase any ground-impacting operations near the building to occur at the same time as any ground impacting operation associated with demolition and construction. During demolition and construction, if any vibration levels cause cosmetic or structural damage to the building or structure, a “stop-work” order shall be issued to the Construction Contractor immediately to prevent further damage. Work shall not restart until the building is stabilized and/or preventive measures to relieve further damage to the building are implemented.
SC-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.

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	The Construction Contractor shall implement project specific noise reduction measures identified by OEHS. Noise reduction measures may include, but are not limited to, the following: <u>Source Controls</u> • Time Constraints – prohibiting work during sensitive nighttime hours. • Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential: only between 7:00 AM and 7:00 PM). • Equipment Restrictions – restricting the type of equipment used. • Substitute Methods – using quieter methods and/or equipment. • Exhaust Mufflers – ensuring equipment has quality mufflers installed. • Lubrication and Maintenance – well maintained equipment is quieter. • Reduced Power Operation – use only necessary size and power. • Limit Equipment On-Site – only have necessary equipment on-site. • Noise Compliance Monitoring – technician on site to ensure compliance. • Quieter Backup Alarms – manually-adjustable or ambient sensitive types. <u>Path Controls</u> • Noise Barriers – semi-permanent or portable wooden or concrete barriers. • Noise Curtains – flexible intervening curtain systems hung from supports. • Enclosures – encasing localized and stationary noise sources. • Increased Distance – perform noisy activities farther away from receptors, including operation of portable equipment, storage and maintenance of equipment. <u>Receptor Controls</u> • Window Treatments – reinforcing the building's noise reduction ability. • Community Participation – open dialog to involve affected residents. • Noise Complaint Process – ability to log and respond to noise complaints. • Advance notice of the start of construction shall be delivered to all noise sensitive receptors adjacent to the project area. The notice shall state specifically where and when construction activities will occur and provide contact information for filing noise complaints with the Construction Contractor and the District. In the event of noise complaints noise shall be monitored from the construction activity to ensure that construction noise is not obtrusive.
SC-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.[94] Noise control measures may include, but are not limited to: <u>Path Controls</u> • Noise Attenuation Barriers[95] – Temporary noise attenuation barriers installed blocking the line of sight between the noise source and the receiver. Intervening

[94] 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 District campus.

[95] 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).

	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 and 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.

Would the proposed Project:

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

Potentially Significant Impact. Construction and operational activities associated with the proposed Project have the potential to create noise impacts that may adversely affect surrounding residential, educational, religious, and recreational uses. Noise levels from mobile and stationary sources may increase where construction of new buildings and other facilities are proposed. Therefore, relevant noise standards and temporary and periodic noise levels associated with Project construction will be further evaluated within the Draft EIR.

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

Potentially Significant Impact. Groundborne vibration and groundborne noise would occur during the construction phase of the proposed Project. Therefore, relevant vibration standards and temporary and vibration levels which could occur during construction and operation of the proposed Project will be further evaluated within the Draft EIR.

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

No Impact. There are no private airstrips within 10 miles of the Project site. There is one private heliport and several public airports within 10 miles of the Project site; the closest are:[96]

- Olive View Medical Center Heliport 1.25 miles north
- Whiteman Airport 3.6 miles southeast
- Van Nuys Airport 7.09 miles southwest
- Hollywood Burbank Airport 8.9 miles southeast

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

The nearest airport to the school is Whiteman Airport in the City of Los Angeles, a public airport approximately 3.6 miles southeast. The site is not within the airport influence area or the airport land use planning area.[97] The site is outside the 65 dBA CNEL noise exposure contours of the airport. Thus, the proposed Project would not expose people working on-site to excessive airport noise levels. No impacts would occur and no further analysis is required.

[96] Airnav.com. 2024, April 17. Airport Information. http://www.airnav.com/airports
[97] Los Angeles County Department of Public Works. 2017, August. Los Angeles County Airports. http://dpw.lacounty.gov/avi/airports/map.aspx?extent=-13182592.650342794,4063015.015811797,-13180758.161663902,4064543.7563775414.

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

EXPLANATION:

LA Unified applies SCs for minimizing impacts to pedestrian safety. Applicable SCs related to pedestrian safety impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-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. 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

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	request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.
SC-PED5	LAUSD shall design new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide. **School Design Guide.** The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.
SC-T-2	Implementation of SC-T-2.
SC-T-3	Implementation of SC-T-3.
SC-T-4	Implementation of SC-T-4.

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

- Astoria Street at Borden Avenue: 4-way stop – Installed Continental Crosswalk[98],[99] at three legs
- Borden Avenue at Raven Street: 4-way stop – Installed Continental Crosswalk at two legs
- Dronfield Avenue at Astoria Street: 4-way stop – Installed Continental Crosswalk at two legs

There are four entrances to the Campus. Student pick up and drop off occurs at the two main entrances on Borden Avenue. There are five parking areas within the Campus:

- Parking Area No. 1, located in the northern corner of Campus on Astoria Street: 44 regular stalls, four ADA stalls (48 total stalls).
- Parking Area No. 2, located at the main SCHS Campus entrance along Borden Ave: 38 regular stalls, four ADA stalls (42 total stalls).
- Parking Area No. 3, located at the main SBHEM Campus entrance along Borden Ave: 70 regular stalls, four ADA stalls (74 total stalls).
- Parking Area No. 4, separated in two locations among industrial arts buildings: 15 regular stalls, seven restricted stalls (22 total stalls).

[98] Los Angeles Department of Transportation. (LADOT). 2024. https://ladotlivablestreets.org/overall-map/maps
[99] Continental crosswalks are high-visibility crosswalks use patterns (i.e., bar pairs, continental, ladder) that are visible to both the driver and pedestrian from farther away compared to traditional transverse line crosswalks.

- Parking Area No. 5, located adjacent to portable classroom buildings: 19 regular stalls, nine unmarked spaces (28 total stalls).

Primary visitor parking is in Parking Areas No. 2 and No. 3 along Borden Avenue. Additional parking for teachers and staff is provided the parking lot located off Astoria Street (Parking Area No. 1).

Would the proposed Project:

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

Potentially Significant Impact. The proposed Project would result in potentially significant impacts in relation to vehicular and/or pedestrian safety hazards. LAUSD SCs require that performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at District schools are taken into consideration in the design of sidewalks, new student drop-off, pick-up, bus loading areas, and parking areas. The proposed Project is a modernization of the school to alleviate the most critical physical and safety risks associated with the Campus and facilities. The Project site would still function as a school, and the school would remain operational throughout construction activity. This Project plans to demolish existing buildings, construct new buildings, and reconfigure parking and access to the Campus that may impact parking areas, vehicular access, student pick-up/drop-off zones, and pedestrian routes. The proposed Project may interfere with public right-of-way (ROW) traffic during construction for proposed utility upgrades. Construction vehicles entering and existing the site from the ROW would occur, as well as a temporary increase in construction related traffic.

Therefore, vehicle and pedestrian safety hazards, including traffic impacts during construction will be further evaluated within the Draft EIR, along with the *Traffic and Pedestrian Safety Technical Study* being prepared by Linscott, Law & Greenspan, Engineers (LLG).

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

Potentially Significant Impact. The proposed Project would result in potentially significant impacts in relation to unsafe routes for students walking from local neighborhoods.

The proposed Project has the potential to affect existing vehicular areas and pedestrian access and therefore, may result in changes to the internal site circulation and site access by students walking from the neighborhood (refer to Figure 8 *Pedestrian and Vehicle Access Existing Conditions*). Potential risks to safety for students walking to the campus associated with public sidewalks mentioned above will be evaluated in LLG's *Traffic and Pedestrian Safety Technical Study*. The proposed Project will require construction vehicles to enter and exit the campus, so traffic control measures will need to be evaluated for traffic and pedestrian safety. As there is potential for Project-related pedestrian safety impacts during construction, vehicular/and or pedestrian safety will be analyzed further in the in LLG's *Traffic and Pedestrian Safety Technical Study* carried into the Draft EIR.

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

Less than Significant Impact. The Project site is approximately 0.5 mile west of the I-210 and 2.5 miles north and east of the I-118. The nearest four-lane arterial roadway to the Project site is Foothill Boulevard, approximately 0.25 miles to the north and east, classified as a Major Highway in the Los Angeles County Highway Plan.[100] The proposed Project site is not adjacent to or near a major arterial roadway or freeway that may pose a safety hazard. No impacts would occur and no further analysis is required.

[100] Los Angeles County Public Work Department. 2016. Los Angeles County Highway Plan. https://planning.lacounty.gov/wp-content/uploads/2022/10/map_t04-hwy-plan-north-existing.pdf

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

EXPLANATION:

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

Would the proposed Project:

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

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

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

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

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

EXPLANATION:

LA Unified applies SCs for minimizing impacts to public services. Applicable SCs related to public services impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-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.

Would the proposed Project:

a) Result in adverse impacts related to fire protection?

Less than Significant Impact. The City of Los Angeles Fire Department (LAFD) currently provides fire protection and emergency medical services to the Project site. The nearest LAFD fire station to the site is Fire Station 91 at 14430 Polk Street, approximately 0.27 miles east of the Project site.[101] The proposed Project would not accommodate an increase above student enrollment or capacity; therefore, it would not require the need for additional fire protection services or require construction of new or expanded fire stations. As shown in Table 8, *LAFD Response Metrics for 2023*, on average, response times from Station 91 are faster than the average City-Wide response times in 2023.[102] All LA Unified school projects are required to comply with Fire Department and Department of Building and Safety regulations for water availability and fire hydrant pressure, and accessibility for firefighting equipment to minimize any threat of fire. Additionally, all projects are required to comply with standard design requirements in accordance with the CBC, California Fire Code (CFC), and

[101] City of Los Angeles Fire Department (LAFD). 2024. Find Your Station. https://www.lafd.org/fire-stations/station-results
[102] City of Los Angeles Fire Department (LAFD). 2024. Response Metrics for 2023. https://www.lafd.org/fsla/stations-map?station=21andaddress=750%20E%2049th%20Streetandyear=2023

Fire Department requirements, which include fire sprinklers, fire alarm devices, emergency access, and evacuation procedures.

Table 8. LAFD Response Metrics for 2023

	Station 91 (Minutes: Seconds)	City-Wide (Minutes: Seconds)
Operational Response Time for EMS	07:16	07:21
Operational Response Time for Non-EMS	06:58	07:08
Operation Response Time for Critical ALS	06:14	06:15
Operation Response Time for Structural Fire	05:25	05:31

Source: LAFD 2024

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

b) Result in adverse impacts related to police protection?

Less than Significant Impact. The Los Angeles Police Department's (LAPD) Mission Community Police Station at 11121 N. Sepulveda Boulevard in Mission Hills, approximately 2.7 miles southwest of the Campus,[103] provides police service to the Campus and surrounding neighborhood.[104]

LA Unified' s Los Angeles School Police Department (LASPD) is responsible for Campus safety and creating safe school passages for students, staff, and the school community.[105] The Campus is served by LASPD's North Division, Northeast Substation located at 12540 Pierce Avenue in Pacoima. LASPD is a recognized independent school police department, with 211 sworn police officers, 25 non-sworn school safety officers (SSO), and 32 civilian support staff dedicated to serving the District. LASPD officers are assigned to support school traffic safety, parking enforcement and facility protection.[106]

The proposed Project would not accommodate an increase in student enrollment or capacity; therefore, it would not require the need for additional police protection services or require construction of new or expanded police stations. Any increase in police demands due to construction activities would be temporary and would not require construction of new or expanded police facilities. Thus, implementation of the proposed Project would not substantially increase demands for police services in the area, and the high school upgrades would not require construction of new or expanded police stations. Therefore, impacts would be less than significant and no further analysis is required.

[103] Los Angeles Police Department (LAPD). 2023. Mission Community Police Station. https://www.lapdonline.org/lapd-contact/valley-bureau/mission-community-police-station/
[104] LAPD. 2024. Mission Community Police Station Service Area. https://lapdonlinestrgeacc.blob.core.usgovcloudapi.net/lapdonlinemedia/2021/03/MISN11x17.pdf
[105] Los Angeles School Police Department. 2024. https://ca01000043.schoolwires.net/Page/12393
[106] LA School Police Department (LASPD). https://www.lausd.org/Page/15609

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c) Result in adverse impacts related to schools?

No Impact. The proposed Project would not increase student enrollment or capacity nor create a substantial number of new jobs that could result in increased demand for school services as part of long-term operations. Therefore, no impact on the provision of schools would occur and no mitigation or further study is required.

d) Result in adverse impacts related to parks?

Less Than Significant Impact. During construction, use of interim housing may disrupt softball and volleyball playing areas. Neighboring LA Unified facilities and/or the City-owned Sylmar Park may be used to provide temporary recreational accommodation for the students (e.g., student athletes) during construction. However, the use of neighboring facilities would be temporary and LA Unified does not anticipate the need to make improvements to the local parks or facilities located outside of its jurisdiction. The proposed Project would not induce growth in the community and would not require the construction of new parks. Thus, the proposed Project would not result in the need for new or expanded park facilities. Therefore, impacts would be less than significant, and no further analysis is required.

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

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

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

EXPLANATION:
There are no Recreation LA Unified adopted SCs.

Would the proposed Project:

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

Less than Significant Impact. Demands for park and recreational facilities are typically generated by an increase in population in the park's service area. The proposed major modernization at Sylmar Charter HS would not increase student enrollment, long-term employment, or population in the area as it consists of replacement and repair of buildings and other infrastructure on the Campus. In addition, as previously described, any use of neighboring parks or LA Unified facilities would be temporary during construction and therefore would not cause physical deterioration of or cause accelerated physical deterioration of parks or other recreational facilities. Further, for long-term operations, Sylmar Charter HS has its own athletic playfields and recreational facilities for use by its students, which would remain unchanged with implementation of the Project. Therefore, impacts to recreation would be less than significant and no mitigation or further analysis is required.

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

Less than Significant Impact. The proposed major modernization would not require development of recreational facilities outside of District-owned properties.[107] Sylmar Charter HS has existing athletic and recreational facilities such as a football field, a baseball and softball field, volleyball court, and tennis courts (refer to Section 2.4, *Existing Conditions*). Under the proposed Project, upgrades including new exterior paint, removal of barriers and other accessibility upgrades, hardscape areas, landscape areas, and replacement of staff parking area with electric vehicle charging stations would be included in the proposed Project. During construction, neighboring District facilities may be used to provide temporary recreational accommodation for the students (e.g., student athletes). However, LA Unified does not anticipate the need to make improvements to the local parks or facilities located outside of its jurisdiction.

[107] LAUSD. 2015. Program EIR for the School Upgrade Program. Report. https://www.lausd.org/Page/2799

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The proposed modernization of Sylmar Charter HS would not result in any unique impacts to recreational resources in the Sylmar community and use of neighboring facilities would be temporary. Pursuant to the requirements of the Civic Center Act, school facilities such as gyms, playing fields, stadiums, auditoriums, multipurpose rooms, cafeterias, and classrooms may be permitted by LA Unified for public use within designated times outside school hours (California Education Code Sections 38130-38139). Therefore, impacts to recreation would be less than significant and no mitigation or further analysis is required.

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

EXPLANATION:

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

LAUSD Standard Conditions of Approval	
SC-T-2	LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process. **School Design Guide** Vehicular access and parking shall comply with the Vehicular Access and Parking guidelines of the School Design Guide. The Design Guide contains the following regulations related to traffic: • Parking Space Requirements • General Parking Guidelines • Vehicular Access and Pedestrian Safety • Parking Structure Security
SC-T-3	LAUSD shall coordinate with the local City or County jurisdiction and agree on the following: • Compliance with the local jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project. • Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds. • Implementation of SR2S, traffic control and pedestrian safety devices. • Fair share contribution and/or other mitigation measures for potential traffic impacts. • Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events. • Traffic study will use the latest version of Institute of Transportation Engineer's (ITE) Trip Generation manual (or comparable guidelines) to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility and the specific school type (e.g., Magnet, Charter, etc.), unless otherwise required by local jurisdiction. • Loading zones will be analyzed to determine the adequacy as pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction

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	for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.
SC-T-4	LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.
SC-T-5	Prior to project approval of large-scale new construction (10,000 square feet or more) on new property or existing campus, LAUSD shall prepare a VMT assessment that documents the project trip generation, whether the project is expected to serve the immediate community or a broader area, and the expected net effect on VMT for the region. If necessary, the VMT assessment shall identify transportation demand management (TDM) measures to reduce VMT impacts.

Would the proposed Project:

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

Potentially Significant Impact. The proposed Project would result in potentially significant impacts in relation to conflicts with a program, plan, ordinance, or policy addressing the circulation system. The proposed Project would result in temporary impacts to the circulation system during construction activities and slightly increase the potential of pedestrian safety risks. Construction would feature the upgrade and expansion of parking lots which could have an impact on access to the Campus. The proposed Project would also be required to include ADA compliant upgrades to features that are impacted by the Project scope. Interim Housing would be provided as mitigation to ensure the school remains fully operational through construction. The Project therefore can shift traffic or change vehicle turning movements in key intersections during construction. As there is potential for Project-related impacts, transportation will be analyzed further in the *Traffic and Pedestrian Safety Technical Study* being prepared by LLG and carried into the EIR.

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

Less Than Significant Impact. According to the CEQA Guidelines Section 15064.3(b), generally, VMT is the most appropriate measure of transportation impacts. For the purposes of this section, VMT refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. The section establishes that a land use project's effect on automobile delay shall not constitute a significant environmental impact.

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

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

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

Potentially Significant Impact. The proposed Project would have the potential to result in significant impacts in relation to a substantial increase in hazards due to a geometric design feature or incompatible uses. The Project would be constructed within the boundary of the Campus, however utility upgrades may require temporary work within the ROW surrounding the Campus. The Project would alter parking lot driveways, which would need to be studied for impacts relating to geometric design and hazards. LA Unified will coordinate with LLG to prepare the *Traffic and Pedestrian Safety Technical Study* and has specifications for transportation as well as the school provision of adequate access, parking, and circulation in the vicinity of a school site.[108] While it is anticipated that the proposed Project would result in less than significant impacts in relation to an increase in hazards due geometric design feature or incompatible uses, pedestrian routes would potentially be impacted, so transportation will be analyzed further in the Traffic and Pedestrian Safety Technical Study being prepared by LLG in coordination with LADOT and carried into the EIR.

d) Result in inadequate emergency access?

Potentially Significant Impact. The proposed Project would have the potential to result in significant impacts in relation to inadequate emergency access during construction and implementation of the new design. Such Projects are required to accommodate ingress and egress of emergency vehicles, as required by the affected jurisdiction where the individual Project would be implemented.[109] As this Project must conform to local ordinances to ensure emergency access, before and after the Project is constructed and implemented, there would be no anticipated access issues for the campus in operation or during construction. Construction phasing would feature the upgrade of parking lots, which could temporarily impact emergency access to specific areas of the campus during construction. However, access features must accommodate and satisfy the local fire department for the Project site. There would be less than significant impacts in relation to inadequate emergency access during operation of the school. As there is potential for temporary Project-related impacts during construction, transportation will be analyzed further in the Traffic and Pedestrian Safety Technical Study being prepared by LLG and carried into the EIR.

[108] LAUSD OEHS CEQA Specification Manual. December 2005, revised June 2007. Appendix C, Traffic and Pedestrian Safety Requirements for New Schools.
[109] Los Angeles Unified School District. 2015. School Upgrade Program Final Environmental Impact Report, http://achieve.lausd.net/ceqa. Adopted by the Board of Education on November 10, 2015.

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

XIX. TRIBAL CULTURAL RESOURCES.

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

☐ Yes ☒ No

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

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	☒
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☐	☒	☐

EXPLANATION:

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

LAUSD Standard Conditions of Approval	
SC-TCR-1	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been assessed by a qualified Archaeologist. Based on this initial assessment the affiliated Native American Tribal representative has contacted and consulted to provide as-needed monitoring or to assist in the accurate assessment, recordation, and if appropriate, recovery of the resources, as required by the District.
SC-TCR-2	If Tribal cultural resources are identified, the Archaeologist will retain a Native American Monitor to begin monitoring ground disturbance activities. The Native American Monitor shall be approved by the District and must have at least one or more of the following qualifications: • At least one year of experience providing Native American monitoring support during similar construction activities. • Be designated by the Tribe as capable of providing Native American monitoring support. • Have a combination of education and experience with Tribal cultural resources. Prior to reinitiating construction, the construction crew(s) will be provided with a brief summary of the sensitivity of Tribal cultural resources, the rationale behind the need for protection of resources, and information on the initial identification of Tribal cultural resources. This information shall be included in a worker's environmental awareness program that is prepared by LAUSD for the project (as applicable). Subsequently, the Monitor shall remain on-site for the duration of the ground-disturbing activities to ensure the protection of any other potential resources.

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

Native American Consultation

Assembly Bill 52 (AB 52) requires meaningful consultation with California Native American tribes on potential impacts to tribal cultural resources (TCRs). As part of the AB 52 process, California Native American tribes must submit a written request to LA Unified (Lead Agency) to be notified of projects within their traditionally and culturally affiliated area. LA Unified must provide written notification to those tribes upon deciding to undertake a project. The Native American tribe must respond to LA Unified if they want to engage in consultation on the project, and LA Unified must begin the consultation process within 30 days of receiving the tribe's request. Consultation concludes when either: 1) the parties agree to mitigation measures to avoid a significant effect on a TCR; or 2) a party, acting in good faith and **after** reasonable effort, concludes mutual agreement cannot be reached.

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

No Impact. The Project site is not in any list of historical resources. According to the Historic Resources Evaluation Report (HRER), the Sylmar High School campus is eligible for historic listing in the National Register of Historic Places under Criterion A, and the California Register of Historical Resources under Criterion 1, and for local designation as a Los Angeles Historic-Cultural Monument under Criterion 1, for its association with postwar school development in Los Angeles.[110,111] The Campus is eligible for historic listing on the NRHP and the California Register of Historic as a potential historic district; however, this eligibility is not based on the presence of any known tribal cultural resources. To date, one response has been received from the Coastal Band of the Chumash Nation who deferred to more local tribes for any consultation. LA Unified has adopted Standard Conditions of Approval (SC-TCR-1 and SC-TCR-2) to protect potential unanticipated discoveries associated with Tribal Cultural Resources. With implementation of SC-TCR-1 and SC-TCR-2, the impacts of the Project pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1 would be less than significant and no further analysis is required.

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

Less than Significant Impact. AB 52 requires meaningful consultation with California Native American tribes on potential impacts to tribal cultural resources, as defined in PRC Section 21074. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native

[110] An Historic-Cultural Monument (HCM) may be a building, site, structure, or resource — including, trees and plant life — recognized for its historic significance; an HCM can identify with important events; notable figures of national, State, or local importance; and/or distinctive architectural styles. https://planning.lacity.gov/preservation-design/historic-landmark-programs

[111] Historic Landmarks – Sylmar. https://planning.lacity.gov/preservation-design/historic-landmarks/detail?cpa=sylmar

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American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources.[112]

As part of the AB 52 process, Native American tribes must have submitted a written request to LA Unified (lead agency) to be notified of projects within their traditionally and culturally affiliated area. LA Unified must provide written, formal notification to those tribes within 14 days of deciding to undertake a project. The tribe must respond to LA Unified within 30 days of receiving this notification if they want to engage in consultation on the proposed Project, and LA Unified must begin the consultation process within 30 days of receiving the tribe's request. Consultation concludes when either 1) the parties agree to mitigation measures to avoid a significant effect on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached.

The LA Unified OEHS sent Project notification on August 25, 2023, to all tribes affiliated within the area as provided by the NAHC. No tribes responded to the District's request for consultation at the close of the 30-day period. On January 23, 2024, ASM sent a project-specific follow-up request to the NAHC for the SLF to determine whether it contained any information relating to the presence of Native American cultural resources within the Project site. Response from the NAHC was received on February 16, 2024, indicating that the result of the SLF search was positive. Query letters were sent to each of the contacts on the list on February 20, 2024. To date, one response has been received from the Coastal Band of the Chumash Nation who deferred to more local tribes for any consultation. LA Unified has adopted Standard Conditions of Approval (SC-TCR-1 and SC-TCR-2) to protect potential unanticipated discoveries associated with Tribal Cultural Resources. With implementation of SC-TCR-1 and SC-TCR-2, the impacts of the Project pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1 would be less than significant and no further analysis is required.

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

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

EXPLANATION:

LA Unified applies SCs for minimizing impacts to utilities and service systems. Applicable SCs related to utilities and service systems impacts associated with the proposed Project are provided below.

LAUSD Standard Conditions of Approval	
SC-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 and Demolition Waste Management.** This document outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of non-hazardous waste materials generated during demolition and/or new construction to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling, salvaging and/or reusing a minimum of 75% of the C&D waste generated by weight.
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.

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

Would the proposed Project:

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

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

Generally, underground utilities would be repaired or replaced within the footprint of the new MPB. Utilities adjacent, but outside of the MPB footprint would be protected in place and kept in use during construction. The Campus-wide utility upgrades (e.g., stormwater and electrical) would not significantly change the existing conditions of the Project site. Electrical service to the Project site would be upgraded to new 4160V, 3 phase, 3 wire, 800A service from LADWP located at the southeast corner of the site in a dedicated LADWP yard in the parking lot adjoining Borden Ave (this includes new pole and transformer). A new transformer and switchboard would also be installed to supply the electrical needs of the new MPB. This new equipment would also support new EV chargers and other new site loads as required.

Proposed sanitary sewer connections associated with the new MPB construction development are anticipated to connect via gravity flow to a new connection to LADWP sewer facilities in Borden Avenue.

Proposed domestic water service associated with the new construction development is anticipated to connect to a LADWP watermain in Borden Avenue. The proposed water service will include a new water meter and backflow prevention device sized for the new construction. Storm water runoff from the proposed new MPB construction would be intercepted by sheet flow to drain inlets, and below grade roof drain connections. Stormwater would then be conveyed eastwardly to a stormwater detention and infiltration system in the parking lot south of the new MPB. Stormwater more than the water quality storm event will overflow to Borden Avenue through a proposed parkway outlet. The new construction project is anticipated to be subject to District standards and the City of Los Angeles Low Impact Development (LID) requirements for stormwater management as new impervious area will be greater than the 5,000 SF threshold. Proposed utility upgrades would require off-site work such as curb-cuts and/or utility connections at or in the street ROW. Work

proposed in the public ROW includes parkway drains, a sanitary sewer connection, and public water connections for fire, and domestic water service.

Due to the age of the existing structures, the proposed new buildings and upgrading of existing facilities would be more resource efficient when compared to the existing structures and facilities. With the implementation of SC-USS-2 and SC-GHG-1 to SC-GHG-3, the Campus' resource consumption and stormwater production are expected to reduce with the implementation of the proposed Project. Therefore, impacts would be less than significant and no further analysis is required.

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

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

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

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

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

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

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Construction

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

Section 5.408 (Construction Waste Reduction, Disposal, and Recycling) of the CALGreen Building Standards Code (Title 24, CCR, Part 11, Section 5.408.1.1) requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. During construction, the proposed Project would generate demolition and construction related solid waste. However, the amount of solid waste would be minimized per SC-USS-1 requirements. SC-USS-1 requires the minimum recycling of 75 percent of the nonhazardous construction debris by weight. In addition, the proposed Project would comply with all waste recycling/reuse requirements in the California Green Building Code and the LAUSD School Design Guide and Specification 01340, Construction and Demolition Waste Management which requires the collection and separation of all construction and demolition waste materials on-site and that they be reused or recycled to the extent feasible. Thus, the proposed Project improvements would not adversely impact such landfills. Therefore, impacts would be less than significant and no further analysis is required.

Operation

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

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

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

XXI. WILDFIRE.

Is the project located in or near state responsibility areas or lands classified as high fire hazard severity zones?

☐ Yes ☒ No

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

EXPLANATION:

There are no Wildfire SCs applicable to the Project.

Wildland fire protection in California is the responsibility of either the State, local government, or the federal government. State Responsibility Areas (SRA) are the areas in the State where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. The SRA forms one large area over 31 million acres to which the State Department of Forestry and Fire Protection (CAL FIRE) provides a basic level of wildland fire prevention and protection services.[113]

Local responsibility areas (LRA) include incorporated cities, cultivated agriculture lands, and portions of the desert. LRA fire protection is typically provided by city fire departments, fire protection districts, counties, and by CAL FIRE under contract to local government.[114] CAL FIRE uses an extension of the State responsibility area Fire Hazard Severity Zone model as the basis for evaluating fire hazard in local responsibility area. The local responsibility area hazard rating reflects flame and ember intrusion from adjacent wildlands and from flammable vegetation in the urban area. The City of Los Angeles Fire Department (LAFD) provides fire protection and emergency medical services to the City, including to the Campus.

Fire Hazard Severity Zones (FHSZ) are identified by Moderate, High and Very High in an SRA, and Very High in the LRA. The nearest SRA is designated Very High Fire Hazard Severity Zone (VHFHSZ) about 1.5 miles

[113] California Department of Forestry and Fire Protection (CAL FIRE). 2024. https://www.fire.ca.gov/what-we-do/fire-protection
[114] California Department of Forestry and Fire Prevention (CAL FIRE). https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildfire-preparedness/fire-hazard-severity-zones/fire-hazard-severity-zones-map/

4. Environmental Checklist and Analysis

east in Lopez Canyon in the community of Sylmar. The nearest VHFHSZ in the LRA is approximately 1.25 miles east near the Lopez Reservoir and Dam.[115] While the Campus is within two miles of lands classified as high fire hazard severity, it is not located directly in or near State responsibility areas.

Would the proposed Project:

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

No Impact. Emergency preparedness and response planning would be coordinated through LA Unified's Office of Emergency Services (refer to Section X(f)). The existing school currently has an emergency school evacuation plan in compliance with District's "Integrated Safe School Plan".[116] The proposed Project would not interfere with any other existing emergency response plans or emergency evacuation plans. Therefore, no impact would occur and no further analysis is required.

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

No Impact. The Campus is located in an urban and built-up area, which does not contain any wildlands in the immediate vicinity. The Campus is generally flat without significant topography, and there are no steep slopes where high winds can exacerbate wildfire risks. The nearest SRA VHFHSZ is approximately 1.5 miles east of the Campus; however, this area is physically separated from the Campus by the I-210 freeway. Project development would not place people or structures at risk from wildfire and would remain consistent with existing structures on Campus. Therefore, no impact would occur and no further analysis is required.

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

Less Than Significant Impact. The proposed Project includes installation of new electrical infrastructure (transformer and poles) to upgrade Campus infrastructure and provide the service needs for the new MPB. The project Site is already served by electrical infrastructure. The Project site is a developed high school Campus within an urbanized area in the Los Angeles basin and would continue to be an active high school with implementation of the proposed Project. The proposed Project would be required to comply with the local fire code, which includes portions of the California Fire Code (Title 32), the California Building Standards Code (Title 24), and Title 5 relating to Education regulations.[117,118,119] Therefore, the proposed Project would not exacerbate fire risk. No further analysis is required.

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[115] California Department of Forestry and Fire Prevention (CAL FIRE). https://egis.fire.ca.gov/FHSZ/
[116] LAUSD. 2020. Integrated Safe School Plan. https://www.lausd.org/Page/16314#:~:text=LAUSD%20schools%20are%20required%20to,traffic%20safety%20and%20crisis%20intervention.
[117] Los Angeles County elaws.us. N.d. Tile 32 – Fire Code. Accessed on 8/25/23. Available at: http://lacountyca.elaws.us/code/coor_title32
[118] California Department of Education. Title 5, California Code of Regulations (CCR), Section 14010[p].
[119] Department of General Services for the State of California. N.d. Building Standards Commission Codes: Title 24. Accessed on 2/5/25. Available at: https://www.dgs.ca.gov/BSC/Codes

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

Less Than Significant Impact. The Campus is within two miles of lands classified as high fire hazard severity; however, the Campus is generally flat without significant topography, and there are no steep slopes where high winds can exacerbate wildfire risks. There are no vegetated slopes susceptible to wildfire in the surrounding area.

As stated in the *Hydrology and Water Quality* section, the proposed Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. The geotechnical study for the proposed Project (Appendix B) found that there would be no potential for landslide hazards on the proposed site-based topography of the site and the surrounding area and grading at the site would not substantially alter the grades that would constitute a potential for landslides at the Project site. Furthermore, the proposed Project would be required to comply with the local fire code which includes portions of the California Fire Code (Title 32), California Building Standards Code (Title 24), and Title 5 relating to Education regulations. Thus, implementation of the proposed Project would not result in result of runoff, post-fire slope instability, or drainage changes. No further analysis is required.

4. Environmental Checklist and Analysis

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

EXPLANATION

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

Potentially Significant Impact. The proposed Project would result in potentially significant impacts that need to be evaluated in an EIR because although the Project site is an existing K–12 school campus located in an urbanized environmental with minimal habitat, it is eligible for historic significance (see Appendix A). The proposed Project does not have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal *(see Section IV, Biological Resources*).

Operation of the proposed Project would improve the quality of the educational environment by building replacement and reconfiguration on the Campus as part of the update to the SUP. The modernization of the campus would facilitate a safe and secure campus that is better aligned with the current instructional program and meets current DSA educational specifications. Structurally unsound and/or inadequate buildings would be demolished and replaced by a new building that would improve educational quality and safety for students and staff. The Project also includes parking upgrades, the removal of barriers and other accessibility upgrades, and various landscape and hardscape improvements.

Although the proposed Project would have the potential to cause a substantial adverse change in the significance of a historical resource, it would not eliminate important examples of the major periods of California history or prehistory because it is not the only example of a post-World War II LA Unified high school campus in the City of Los Angeles.

As documented in the HRER, the subject property is eligible for federal, state, or local, designation, and the Campus is considered a historical resource for the purpose of CEQA. The Sylmar High School campus contains a cohesive concentration of contributing buildings and features that date from the period of significance for the potential historic district. The boundary for the potential historic district comprises the full extent of the campus property, except the Evergreen Continuation High School site in the northernmost corner of the block.

The Sylmar High School campus meets the eligibility standards for the "LAUSD, Educating the Baby Boom: The Postwar Modern Functionalist School Plant, 1945-1969" theme, as outlined in the LAUSD Historic Context Statement. Specifically, the campus displays elements of the condensed finger-plan and cluster-plan typologies which were typical of LAUSD campus development in the 1960s. As such, The Sylmar High School campus is eligible for historic listing in the National Register of Historic Places under Criterion A, and the California Register of Historical Resources under Criterion 1, and for local designation as a Los Angeles Historic-Cultural Monument under Criterion 1, for its association with postwar school development in Los Angeles.

The proposed Project includes demolition of four buildings that are considered contributors to the historic district. None of the buildings are considered individually eligible.

- Multipurpose Building & Lunch Pavillion (Building 17)
- Student Store (Building 18)
- Music/Choral Building (Building 19)
- Drafting Building/Classroom (Building 20)

The findings of the SUP EIR were reviewed during the preparation of this document. The assumptions and data that were used to make the determination in the SUP EIR do not remain valid as Sylmar High School was not evaluated as a campus with potential eligibility for listing on either National Register and/or the California Register. Further, no site-specific projects were evaluated under the SUP EIR; and therefore, the nature and magnitude of any historical resource impacts, if any, could not be determined. Therefore, the proposed Project has the potential to result in adverse effects to historical resources, requiring the consideration of mitigation measures and alternatives in an EIR.

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.)

Potentially Significant Impact. The proposed Project is one of several school modernization projects evaluated in the SUP EIR. The SUP EIR identified potentially significant impacts regarding air quality, cultural

resources (historical resources), hazards/hazardous materials, noise, pedestrian safety, and transportation that will be evaluated in further detail in the EIR. As stated in in Section 4, the proposed Project would result in less than significant impacts in relation to environmental issue areas including aesthetics, agriculture/forestry resources, biological resources, energy, geology/soils, hydrology/water quality, land use/planning, mineral resources, population/housing, public services, recreation, tribal cultural resources, utilities/service systems, and wildfire.

As the related school projects are dispersed throughout Los Angeles County, air quality/GHG and noise impacts from the proposed Project in relation to other projects would not be cumulatively considerable. As with the SUP EIR, there is a potential for significant impacts to historical resources that will be evaluated further in the EIR from demolition of four contributing buildings of the historic resource. There is a potential for the proposed Project to result in temporary significant impacts during construction activities to air quality/GHG, hazards/hazardous materials, noise, pedestrian safety, and transportation that will be evaluated further in the EIR. Therefore, there is potential for contribution to cumulatively considerable significant impacts, and further analysis is required.

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

Potentially Significant Impact. The proposed Project would result in potentially significant impacts regarding temporary construction impacts from air quality/GHG emissions, hazards/hazardous materials, and noise/vibration to the nearest sensitive receptors: students on Campus near the construction activities. Construction of the proposed Project would expose sensitive receptors to air pollutant concentrations (see Section 4.4, Air Quality) and result in generation of a substantial temporary 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 (see Section 4.4, Noise).

The proposed Project would result in potentially significant impacts in regard to the routine transport, use, or disposal of hazardous materials during construction activities due to the unknown conditions of contaminants in the soil and presence of asbestos and lead based paints in the structures. The PEA-E Work Plan outlines recommendation for a soil sampling and analysis plan to be conducted prior to construction to evaluate shallow (up to 3 three feet bgs) soil for the presence of COPCs associated with the Site's historical agricultural/residential use, including metals and OCPs. Screening should also occur for PCBs, ACMs, VOCs, PAHs, and TPHs to evaluate the soil.

The construction contractor must comply with Remedial Activities Workplan (RAW), specifically the Los Angeles Unified School District Reference Guide REF-4149.2 Disposal Procedures for Hazardous Waste and Universal Waste.[120] Furthermore, these types of materials are not acutely hazardous, and all storage, handling, and disposal of these materials is regulated by the DTSC, the EPA, the OSHA, and the LAFD. Although the Project would adhere to the aforementioned regulations, until these items have been fully investigated, there is

[120] Los Angeles Unified School District Reference Guide. REF-4149.2. Disposal Procedures for Hazardous Waste and Universal Waste. June 12 , 2020. https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/REF-4149.2%20Hazardous%20Waste%20.pdf

a potentially significant impact in regard to transport and disposal of hazardous materials into the environment requiring the consideration of mitigation measures and alternatives in the EIR.

The proposed Project would result in potentially significant impacts in regard to the emission of hazards or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; impacts are expected to be less than significant after mitigation. During the construction phase, it is possible children could come in contact with PCBs, asbestos, paints, or petroleum products (see Appendix C). However, SC-HAZ-04 would ensure that the following guidelines are followed: District Specification Section 01 4524, Environmental Import / Export Materials Testing; Removal Action Workplan; California Air Resources Board Rule 1466; Guidelines and Procedures to Address 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 FETU in the Phase I/Phase II; or abatement plan(s).

It should be noted that the school is located within a moderate radon zone with levels between 2 and 4 pCi/L. The high radon zone is defined as having a high potential for radon levels to be above 4 pCi/L. As stated in the LAUSD Reference Guide REF-5314.2, Procedures for Environmental Review of Proposed Projects: "building design and construction Measures – Should a building or similar structure be constructed or renovated for student and/or staff occupancy and is located in a "high" radon zone, U.S. EPA guidance entitled "Radon Prevention in the Design and Construction of Schools and Other Large Buildings, EPA/625/R-92/016, June 1994" (or latest published version) shall be reviewed and all relevant and appropriate measures incorporated in its design and construction to prevent radon gas infiltration. Although the Project would adhere to the aforementioned regulations, the Phase I ESA determined that there is a potential for elevated concentrations of arsenic and pesticides, ACM, LBP, and PCBs to be present in shallow soil at the site. Therefore, there is a potentially significant impact in regard to hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, requiring further evaluation and study recommended in the PEA-E Work Plan and consideration of mitigation and alternatives in the EIR.

Therefore, there would be temporary substantial adverse effects on human beings, either directly or indirectly, during construction activities, requiring the consideration of mitigation measures and alternatives in the EIR.

5. List of Preparers

5.1 LEAD AGENCY

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

Bryan Ramos Fernandez, AICP, CEQA Project Manager

Ed Paek, AICP, Senior CEQA Project Manager

Gwenn Godek, CEQA Advisor

Christian Taylor, Historic Preservation Specialist and Coordinator

Connor Moore, Site Assessment Program Administrator

Anthony Espinoza, Environmental Health Manager/Environmental Program

Carlos Torres, Director

Jay Golida, Associate General Counsel

5.2 CEQA CONSULTANT

WSP USA, Inc. (WSP)

ASM Affiliates, Inc. (ASM)

Linscott, Law and Greenspan, Engineers (LLG)

Appendices are on USB Drive

A. Historic Resources Evaluation Report, Historic Resources Group

B. Geotechnical and Geologic Investigation Report, Proposed Major Modernization and Seismic Retrofit, Sylmar Charter High School, TGR

C. Phase 1 Environmental Site Assessment, Geosyntec Consultants

D. Preliminary Environmental Assessment Equivalent Work Plan, Geosyntec Consultants

E. Arborist Tree Survey Report, Arborgate Consulting Inc.