

January 2026 | Response to Comments
State Clearinghouse No. 2025100439
Valley Oaks Center for Enriched Studies (VOCES)
Multi-Purpose Athletic Field Upgrades Project



Prepared for:

Los Angeles Unified School District

Office of Environmental Health and Safety

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OFFICE OF ENVIRONMENTAL HEALTH & SAFETY

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1. Introduction

1.1 VALLEY OAKS CENTER FOR ENRICHED STUDIES MULTI-PURPOSE ATHLETIC FIELD UPGRADES PROJECT

The Los Angeles Unified School District (LA Unified or District) proposes to complete upgrades to the existing multipurpose athletic field and associated facilities at Valley Oaks Center for Enriched Studies (VOCES) to provide safe, accessible, and modern athletic amenities that support student health, physical education, and extracurricular programs (proposed Project or Project). The proposed Project includes demolition and removal of existing football goal posts, handball courts, and associated asphalt pavement; grading and drainage improvements; replacement of the natural grass turf field with re-graded and re-seeded natural turf; repair and upgrade of the existing irrigation system; installation of four new LED sports lighting poles up to 80 feet in height, a scoreboard, goal posts, and a public address system; installation of new five-tier portable bleachers with ADA-accessible seating; restriping and minor re-paving of the adjacent visitor parking lot to improve accessibility and layout; and associated landscape, hardscape, pathway, fencing, and utility improvements. The proposed Project will not increase student enrollment or campus capacity.

1.2 INITIAL STUDY/NEGATIVE DECLARATION

An Initial Study/ Negative Declaration (IS/ND) was prepared for the Valley Oaks Center for Enriched Studies (VOCES) Multipurpose Athletic Field Upgrades Project and circulated for public and agency review from October 9, 2025, to November 10, 2025. The Draft IS/ND concluded that all potential environmental impacts would be reduced to less-than-significant levels with the incorporation of LAUSD's Standard Conditions of Approval and two project-specific mitigation measures identified in response to tribal consultation.

Under the California Environmental Quality Act (CEQA) (Public Resources Code §§ 21000 et seq.) and the CEQA Guidelines (14 CCR §§ 15000 et seq.), a lead agency is not required to prepare formal written responses to comments received on a draft IS/ND or draft Negative Declaration. However, the lead agency must have sufficient information in the record to demonstrate that the comments were considered and do not alter the conclusion that the project will not result in significant environmental effects.

In keeping with the District's commitment to transparency and public engagement, the District as Lead Agency has prepared written responses to all substantive comments received during the 30-day public review period. These responses, together with minor revisions and clarifications to the Draft IS/ND and the addition of project-specific mitigation measures for tribal cultural resources, are included in this Final IS/MND. None of the comments or revisions constitute significant new information that would require recirculation of the document pursuant to CEQA Guidelines Section 15088.5.

1.3 RESPONSE TO COMMENTS DOCUMENT FORMAT

This document is organized as follows:

Section 1, Introduction. This section describes CEQA requirements and the content of this document.

1. Introduction

Section 2, Response to Comments. This section provides a list of agencies and interested persons commenting on the IS/ND, copies of comments received during the public review period, and individual responses to written comments. To facilitate review of the responses, each comment has been reproduced and assigned an alphabetical letter. Individual comments have been provided, followed by responses from LAUSD with references to the corresponding comment number.

1.4 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(b) reminds commenters that the focus of review on an Initial Study/Negative Declaration or Initial Study/Mitigated Negative Declaration should be on the lead agency's proposed finding that the project will not have a significant effect on the environment. Commenters who believe the project may have a significant effect should: (1) identify the specific effect, (2) explain why they believe the effect would occur, and (3) explain why they believe the effect would be significant.

Comments are most helpful when they contain supporting data or references and when they suggest specific feasible alternatives or mitigation measures that would avoid or reduce significant environmental effects. Reviewers should be aware that the adequacy of an IS/MND is judged in terms of what is reasonably feasible (CEQA Guidelines § 15204(c)). An effect shall not be considered significant in the absence of substantial evidence (§ 15064).

Responsible and trustee agencies are encouraged to focus their comments on environmental information relevant to their statutory responsibilities (§ 15204(d)). These guidelines are not intended to restrict the ability of any person or agency to comment on the general adequacy of the document, nor do they limit the lead agency's discretion to consider or reject comments that are not focused on potential significant environmental effects (§ 15204(e)). CEQA does not require a lead agency to conduct every recommended test or perform all research demanded by commenters. Written responses to comments on an IS/MND are not required by CEQA; however, as a matter of policy and in the interest of transparency and public engagement, LAUSD provides written responses to all substantive comments received during the public review period. When responding, the District addresses potentially significant environmental issues raised by the comments and is not required to provide all information requested by reviewers, provided a good-faith effort at full disclosure has been made in the IS/MND.

1.5 PUBLIC ENGAGEMENT

In accordance with CEQA Guidelines §§ 15072, 15073, and 15105, the District prepared a Draft Initial Study/Negative Declaration for the Valley Oaks Center for Enriched Studies (VOCES) Multipurpose Athletic Field Upgrades Project and circulated a Notice of Intent to Adopt the Negative Declaration (NOI) along with the Draft IS/ND for a 30-day public and agency review period from October 9, 2025, to November 10, 2025.

Public outreach included the following methods:

1.5.1 Newspaper Publications

- NOI was published in the legal announcement section of the Daily News (English) on October 9, 2025.
- NOI was published in the legal announcement section of the La Opinión (Spanish) on October 9, 2025.

1.5.2 Mailings

- NOI was sent to responsible and trustee agencies, elected officials, the Los Angeles County Clerk, and the State Clearinghouse. NOI was mailed to all student/parent/guardian addresses and all property owners and occupants within a 500-foot radius of the campus (approximately 2,800 postcards).

1.5.3 Document Availability

The NOI and IS/ND were available for review at the following locations:

- Valley Oaks Center for Enriched Studies (Main Office), 9171 Telfair Avenue, Sun Valley, CA 91352
- LA Unified School District Office of Environmental Health and Safety (OEHS), 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017 (by appointment)
- OEHS CEQA website: <https://www.lausd.org/ceqa>
- State Clearinghouse CEQAnet website: <https://ceqanet.lci.ca.gov>

1.5.4 Community Outreach

An online public meeting was held on October 23, 2025, at 6:00 p.m. via Zoom. The meeting provided an overview of the proposed athletic field upgrades, a summary of the Draft IS/ND findings, and an opportunity for public questions and comments. No oral comments raised concerns regarding the adequacy or accuracy of the environmental analysis in the Draft IS/ND. There were no questions asked by the public during the public meeting.

No formal written comments were received from members of the public during or after the community meeting. Three written comment letters were received during the public review period (from the California Department of Transportation, the Fernandeno Tataviam Band of Mission Indians, and one individual). Responses to those letters are provided in Section 3 of this document. Because none of the questions or comments at the October 23, 2025 meeting pertained to potential significant environmental effects, they do not warrant written responses pursuant to CEQA Guidelines § 15204.

1 Introduction

1.6 NEED FOR RECIRCULATION OF AN IS/ND PRIOR TO ADOPTION

CEQA Guidelines § 15073.5(a) requires recirculation of an Initial Study/Negative Declaration or Initial Study/Mitigated Negative Declaration only when the document must be substantially revised after public notice of its availability, but prior to adoption. A “substantial revision” occurs when:

1. A new, avoidable significant effect is identified that would require major revisions to the document and the addition of mitigation measures or project changes to avoid or reduce the effect to a less-than-significant level; or
2. The lead agency determines that proposed mitigation measures or project revisions would not reduce a significant effect to less than significant, requiring new or different measures.

Recirculation is not required when:

1. Mitigation measures are replaced with equal or more effective measures (§ 15074.1);
2. New project revisions are added in response to comments that do not identify new avoidable significant effects;
3. New conditions of approval or measures are added that are not required by CEQA, do not create new significant effects, and are not needed to mitigate an avoidable significant effect; or
4. New information is added that merely clarifies, amplifies, or makes insignificant modifications to the document.

After consideration of the three comment letters received during the public review period and the minor revisions and clarifications made to the Draft IS/ND (see Section 2), the District has determined that no substantial revision of the Draft IS/ND has occurred. The two project-specific mitigation measures added for tribal cultural resources (TCR-MM-1 and TCR-MM-2) supplement — and are fully consistent with — LAUSD’s Standard Conditions of Approval and do not reflect a new significant impact. No other changes constitute significant new information or identify new or substantially increased significant effects.

Therefore, recirculation of the Draft IS/ND is not required under CEQA Guidelines § 15073.5 and the Final IS/MND is ready for consideration and adoption by the Los Angeles Unified School District.

1. Response to Comments

2. Response to Comments

This section provides all written comments received on the IS/ND and LAUSD's response to each comment.

Table 1
Summary of Comments Received

Reference	Commenting Person / Agency	Date of Comment	Page Number
Written Comment Letters			
A	Ms. Miya Edmonson/California Department of Transportation	November 06, 2025	6
B	Ms. Carol Furutani	November 03, 2025	11
C	Ms. Sarah Brunzell/Fernandeño Tataviam Band of Mission Indians	October 16, 2025	9

2 Response to Comments

COMMENT A – Miya Edmonson, California Department of Transportation (Caltrans) (2 pages)

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 407-6607
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



November 06, 2025

Bryan Ramos Fernandez
Los Angeles Unified School District
333 S. Beaudry Avenue, 21st Floor
Los Angeles, CA 90017

RE: Valley Oaks Center for Enriched
Studies (VOGES) Multipurpose
Athletic Field Upgrades Project
SCH# 2025100439
GTS# 07-LA-2025-04926

Dear Bryan Ramos Fernandez,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. The Los Angeles Unified School District is proposing the modernization and enhancement of the existing multipurpose athletic field at VOES. The proposed Project will demolish the existing asphalt pavement and handball courts and in its place, the proposed Project will construct a new natural grass turf multipurpose athletic field, field lights, goal posts, scoreboard, and five-tier portable bleachers. The proposed Project will also include restriping of an existing parking lot and minor upgrades to existing buildings and grounds consistent with the requirements Americans with Disabilities Act (ADA).

The nearest State facility is SR-170 and I-5. After reviewing the Negative Declaration (ND), Caltrans has the following comments:

Caltrans encourages the Lead Agency to incorporate multi-modal infrastructure along and project boundaries to meet community placemaking and safe urban design objectives. This infrastructure, encompassing ADA-compliant design, adequate sidewalks, high-visibility crosswalks, Class IV bike lanes, and bike parking, is crucial for

A-1

"Provide a safe and reliable transportation network that serves all people and respects the environment".

1. Response to Comments

Bryan Ramos Fernandez
November 06, 2025
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establishing a fully accessible Complete Street that supports pedestrians, bicyclists, and transit riders

Caltrans recommends limiting large truck travel and construction traffic to off-peak commute hours. A permit for any heavy construction equipment and or materials that require the use of oversized transport vehicles on State highways. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing potential impacts for Caltrans review.

A-2

Should you have any questions, please feel free to contact Nestor Lemus, the project coordinator, at Nestor.Lemus@dot.ca.gov and refer to GTS # 07-LA-2025-04926.

Sincerely,

Miya Edmonson

MIYA EDMONSON
LDR/CEQA Branch Chief

cc: State Clearinghouse

"Provide a safe and reliable transportation network that serves all people and respects the environment"

2. Response to Comments

A. Response to Comments from Miya Edmonson, Caltrans, dated November 06, 2025

The Los Angeles Unified School District appreciates Caltrans' review of the Draft Initial Study/ Negative Declaration (IS/ND) and its comments regarding multi-modal infrastructure and construction traffic management. The District notes that the nearest State facilities are Interstate 5 (I-5, approximately 0.25 miles west) and State Route 170 (SR-170, approximately 0.6 miles east), and the project will not directly impact these facilities. The comments do not identify any new or potentially significant environmental effects not already analyzed in the Draft IS/ND, and no revisions to the document are required. Specific responses to each comment are provided below.

- A-1 The Draft IS/ND already addresses these elements in alignment with Caltrans' objectives for safe urban design and community placemaking. As described in Section 3.2.3 (Site Access, Circulation, and Parking) and Section XVIII (Transportation), the project includes restriping of the existing parking lot to improve accessibility, including ADA-compliant spaces, pathways, and layout enhancements. No changes to off-site sidewalks, crosswalks, or roadways are proposed, as the project is limited to on-campus improvements and will not increase student enrollment, vehicle trips, or pedestrian demand (see Appendix D, Traffic and Pedestrian Safety Study). The project complies with LAUSD Standard Condition SC-T-3 (Pedestrian Safety), which requires ADA-compliant design for all on-site pathways and access points, and SC-T-4 (Construction Worksite Traffic Control Plan), which ensures safe pedestrian and bicycle routing during construction. Existing pedestrian facilities around the campus (e.g., sidewalks along Telfair Avenue, Sheldon Street, Haddon Avenue, and Allegheny Street) already include yellow crosswalks at key intersections, and bicycle racks are provided on campus. The project is consistent with the Los Angeles Mobility Plan 2035 and Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, as it promotes active transportation without generating new trips. No bike lanes or additional off-site improvements are warranted, as the Traffic and Pedestrian Safety Study confirms less-than-significant impacts to multi-modal facilities. This comment does not alter the Draft IS/ND's conclusion that transportation impacts would be less than significant.
- A-2 The Draft IS/ND fully incorporates these measures, consistent with Caltrans requirements. As noted in Section 2.8 (Agency Reviews and Approvals), the project anticipates requiring Caltrans approval for any oversized vehicles on State highways, and all such permits will be obtained prior to construction (anticipated to begin in Q2 2027). Section 3.2.5 (Construction Phasing and Equipment) specifies that construction will occur in a single phase, with worker arrivals before 7:00 AM and departures before 4:00 PM to avoid peak commute hours, and haul trucks (estimated at fewer than 10 daily trips for debris removal and materials delivery) restricted to off-peak times. No roadway closures, lane detours, or significant impacts to I-5 or SR-170 are anticipated, as staging and parking will be on-site. LAUSD Standard Condition SC-T-4 requires preparation of a Construction Worksite Traffic Control Plan (CTP), which will detail haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. This plan will be submitted to OEHS and relevant agencies, including Caltrans District 7, for review and approval at least 30 days prior to construction start if any State facilities could be affected. The Traffic and Pedestrian Safety Study (Appendix D) confirms that construction traffic would be temporary, intermittent, and below thresholds for significant impacts. This comment does not identify any new significant effects and reinforces the Draft IS/ND's finding of less-than-significant transportation impacts with implementation of existing SCs.

1. Response to Comments

COMMENT B – Carol Furutani, Community member (1 page)

From: Carol Furutani <rad.mariposa@gmail.com>
Sent: Monday, November 3, 2025 4:41 PM
To: Rodriguez, Marcos Alan <cp-m.rodriguez39@lausd.net>
Subject: Fwd: Oct 16 VOCES Community Meeting



CAUTION: EXTERNAL EMAIL

To Alan Rodriguez,

I would like a copy of the presentation. I joined via a phone link so could not see the charts.] B-1

I am concerned about the impact of the upgrades to the neighborhood. I've experienced athletic field upgrades at other schools, and find the impact on neighboring homes are not considered. For example bright lights that shine into homes and yards, loud noise levels that disturb neighbors considering its a residential area and not a commercial zone. I've found that depending on the size of the bleachers sound bounces and resonates into the neighborhood much louder than on the playing field. In addition speakers that blare into the neighborhood.] B-2
] B-3

I have a few questions about the construction process itself. Will construction cause dirt and noise into the neighborhood? Will trucks avoid the narrow streets near the Allegheny and Telfair intersection? How much truck traffic will be added during construction?] B-4

I want the neighborhood to not have to deal with additional disturbances causing stressful living conditions. I support school improvements but not at the cost of degrading living conditions to the residents. It would ease my concerns to know that disturbance to residents living near the school are considered.] B-5

-Carol Furutani

2. Response to Comments

B. Response to Comments from Ms. Carol Furutani, Community Member, dated November 3, 2025

- B-1 A copy of the presentation from the public scoping meeting was emailed to Ms. Carol Furutani on November 4, 2025. The presentation also remains available on the CEQA project website and upon request from the OEHS CEQA Project Manager, Bryan Fernandez (213-241-4210 or bryan.fernandez@lausd.net).
- B-2 Response addresses light spill, glare, and general neighborhood impact concerns. The proposed athletic field lighting system consists of 42 LED fixtures on four 80-foot poles with factory-aimed optics, visors, and full shielding designed to focus light onto the field and minimize off-site spill and glare. As documented in Section IV (Aesthetics) of the IS/ND, calculated light trespass at the nearest residential property lines is 0.0025–0.0158 foot-candles, well below the 1.0 foot-candle threshold typically considered intrusive. The system complies with LAUSD Standard Conditions of Approval SC-AE-2, SC-AE-5, and SC-AE-6, which require directional shielding, inward angling, and use of the Control-Link system for automatic dimming or shut-off when the field is not in use. These measures ensure that light impacts on adjacent residences remain less than significant.
- B-3 Response addresses operational noise, crowd noise from bleachers, PA system, and speakers. Operational noise is analyzed in Section XII (Noise) of the IS/ND. The upgraded field will host approximately the same number of events (approximately 42 regular-season and playoff games per year) as the existing field, with no increase in teams or events proposed. The new PA system is mounted on the light poles and is intended primarily for emergency announcements; its use for game commentary will be limited and will comply with LAUSD Standard Condition SC-NOI-1, which restricts amplified sound at the property line to no more than 5 dBA above ambient. Crowd noise from the proposed five-tier portable bleachers (370 total seats, maximum height approximately 10 feet 7½ inches) will be directed primarily north-south along the field's long axis rather than toward the closest residences. Athletic events remain governed by the District's Orange Book (BUL-6429.0 Athletic Rules and Regulations) and CIF-LA City Section regulations (Gold Book) that prohibit artificial noisemakers and limit overall event noise. With these controls and SC-NOI-1, operational noise impacts, including crowd noise and PA use, remain less than significant.
- B-4 Response addresses construction dust, noise, truck traffic, and routing. Construction dust and noise are addressed in Sections III (Air Quality) and XII (Noise). LAUSD Standard Conditions SC-AQ-1 through SC-AQ-4 require watering of exposed surfaces at least twice daily, covering of haul trucks, speed limits of 15 mph on unpaved surfaces, and full compliance with SCAQMD Rule 403. Construction noise will be controlled through SC-N-1 through SC-N-5, which restrict work hours to 7:00 a.m.–7:00 p.m. weekdays and 8:00 a.m.–6:00 p.m. Saturdays (no Sunday/holiday work without prior approval) and require properly muffled equipment. Haul routes and truck traffic will be detailed in the Construction Worksite Traffic Control Plan required by SC-T-4; the District and its contractor will select routes that avoid narrow residential streets to the maximum extent feasible and will schedule haul trips outside peak school drop-off/pick-up and commuter hours. Construction worker vehicles will park on campus. These measures reduce construction-related dust, noise, and traffic impacts to less than significant levels.
- B-5 The District appreciates the commenter's support for school improvements and shares the goal of minimizing effects on neighboring residents. The project incorporates the lighting, noise, dust, and traffic controls described above, along with ongoing coordination with the community through

1. Response to Comments

the school administration and OEHS, to ensure that disturbances remain less than significant and that resident quality of life is protected. No changes to the environmental conclusions or additional mitigation measures are required.

COMMENT C – Sarah Brunzell, Fernandño Tataviam Band of Mission Indians (1 page), Confidential Tribal Consultation Letter pursuant to Public Resources Code Section 21082.3

2. Response to Comments

C. Response to Comments from Ms. Sarah Brunzell, dated October 16, 2025,

- C-1 The District acknowledges that the project area is within the Tribe's ancestral territory. The District recognizes the potential for Native American resources the project's inclusion of excavation activities that could lead to inadvertent discoveries. This information has been considered in the ongoing AB 52 consultation process, as initiated following the Tribe's request on September 23, 2025. As documented in Section 2.9 (Tribal Consultation) and Section XVIII (Tribal Cultural Resources) of the IS/ND, the District has adopted Standard Conditions of Approval SC-TCR-1 and SC-TCR-2 to address potential unanticipated discoveries of tribal cultural resources (TCRs), including requirements for halting work, notifying the Tribe, and implementing appropriate treatment protocols in consultation with the Tribe.
- C-2 Response addresses request for specific mitigation measures incorporated into the Final IS/MND. The District appreciates the Tribe's recommendation of Mitigation Measures 300-2.4.1, 300-2.4.2, and 300-2.5.2. The District is committed to meaningful government-to-government consultation under AB 52 and will schedule a follow-up meeting if needed to discuss these measures and reach mutual agreement on any project-specific mitigation to avoid or minimize potential impacts to TCRs. These or equivalent measures will be incorporated into the Final IS/MND as enforceable mitigation, supplementing the existing SC-TCR-1 and SC-TCR-2. Consultation remains ongoing, and no significant impacts to TCRs are anticipated with the implementation of these protective measures.
- C-3 Response to general acknowledgment of confidentiality and consultation process. The District respects the confidential nature of this government-to-government consultation pursuant to AB 52 and Public Resources Code Section 21080.3.1. All information provided will be treated as confidential and used solely for the purposes of environmental review and project planning. The District thanks the Fernandño Tataviam Band of Mission Indians for its participation and looks forward to continued collaboration to ensure the protection of tribal cultural resources. No changes to the environmental conclusions are required at this time, pending completion of consultation.