

July 2025 | Response to Comments  
State Clearinghouse No. 2025050380  
**Fairfax High School**  
Major Modernization Project



*Prepared for:*

**Los Angeles Unified School District**  
Office of Environmental Health and Safety  
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**OEHS**  
OFFICE OF ENVIRONMENTAL HEALTH & SAFETY

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# 1. Introduction

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## 1.1 FAIRFAX HIGH SCHOOL MAJOR MODERNIZATION PROJECT

The Los Angeles Unified School District (LAUSD or District) proposes to complete a major modernization project at the Fairfax High School (HS) Campus to provide facilities that are safe, secure, and aligned with the instructional program (proposed Project or Project). The proposed Project includes demolition of the existing Shop Building, Gymnasium, Utility Building, Ticket Office, and Relocatable Sanitary Building, and the construction of a new gymnasium, specialty classrooms, outdoor physical education courts, maintenance and operations facilities, and an Art Gallery Building. The proposed Project also includes exterior painting of existing buildings; various landscape and hardscape improvements; parking improvements; infrastructure upgrades including, but not limited to, sanitary sewer, water, storm water, and electrical utilities; and accessibility upgrades as required.

## 1.2 INITIAL STUDY/NEGATIVE DECLARATION

An Initial Study (IS) was prepared for the proposed Project and concluded that there will be less-than-significant impacts on the environment with the incorporation of LAUSD's standard conditions of approval; therefore, a negative declaration (ND) was prepared for the proposed Project. Based on the information in the IS/ND, the proposed Project would not result in any potentially significant environmental impacts, and no mitigation measures would be required. This document includes the public comments received on the IS/ND as well as LAUSD's responses to those comments.

Under the California Environmental Quality Act (CEQA) (Public Resources Code, Division 13, Sections 21000 et seq.) and the CEQA Guidelines (California Code of Regulations [CCR] Section 15000 et seq.), a lead agency has no affirmative duty to prepare formal responses to comments on an IS/ND. The lead agency, however, should have adequate information on the record explaining why the comments do not affect the conclusion of the IS/ND. In the spirit of public disclosure and engagement, LAUSD – as the lead agency for the Project – has responded to all written comments submitted during the 30-day public review period.

## 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.

***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. Introduction

### 1.4 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(b) outlines parameters for submitting comments on NDs and reminds persons and public agencies that the focus of review and comment should be “on the proposed findings that the project will not have a significant effect on the environment.” If the commenter believes that the project may have a significant effect, they 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 suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an ND is determined in terms of what is reasonably feasible. CEQA Guidelines Section 15204(c) advises, “[re]viewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.”

CEQA Guidelines Section 15204(d) also states, “[e]ach responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” CEQA Guidelines Section 15204(e) states, “[t]his section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

Finally, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. Written responses to comments are not required; however, it is LAUSD’s policy to respond in writing to all comments. When responding to comments, lead agencies need only respond to potentially significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the environmental document.

### 1.5 PUBLIC ENGAGEMENT

**Notice of Intent to Adopt a Negative Declaration (ND).** Per CEQA Guidelines Section 15072 and 15073, LAUSD determined that an ND would be appropriate for the Project and circulated a Notice of Intent to Adopt a Negative Declaration (NOI) and the IS/ND. The public review period for this CEQA-compliant document was from May 7, 2025 to June 6, 2025. Public outreach included the following methods:

#### 1.5.1 Newspaper Publications

- NOI published in the legal announcement section of the Daily News (English) on May 10, 2025.
- NOI published in the legal announcement section of the La Opinión (Spanish) on May 5, 2025.

## 1. Introduction

### 1.5.2 Mailings

- NOI sent to eight State and local agencies, five elected officials, the Los Angeles Registrar-Recorder / County Clerk, and the State Clearinghouse.
- NOI sent to student / parent guardian addresses and all addresses within a 0.25-mile radius of the Project site – 6,500 mailings.

### 1.5.3 Document Availability

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

- Fairfax High School (Main Office) (7850 Melrose Avenue, Los Angeles, California 90046)
- LAUSD Office of Environmental Health and Safety, 333 South Beaudry Avenue, 21<sup>st</sup> Floor, Los Angeles, CA 90017 (by appointment)
- LAUSD Office of Environmental Health and Safety website (<https://www.lausd.org/ceqa>)
- California State Clearinghouse (<https://ceqanet.lci.ca.gov/>)

### 1.5.4 Community Outreach

A virtual public meeting was held via Zoom on May 22, 2025 at 6:00 PM. The meeting provided agencies and the public with an opportunity to comment on the Project and the IS/ND. The meeting included a presentation of the proposed Project, a summary of findings for CEQA and the Preliminary Environmental Assessment-Equivalent (PEA-E), and a question and answer (Q&A) session. During the Q&A session, commenters had inquiries on the following topics:

- Design (including questions regarding the architect selection process, classroom and support spaces, Americans with Disabilities Act of 1990 (ADA) improvements, parking, athletics facilities, landscaping etc.)
- Construction (including questions regarding schedule, safety precautions, traffic control, interim housing)
- Public engagement process

Those comments that were received (listed above) were addressed by LAUSD during the meeting. No other formal comments were received via letter or e-mail from community members. Additionally, none of the Zoom comments pertained to the adequacy of the environmental analyses contained in this IS/ND. As such, pursuant to CEQA Guidelines Section 15204(b), Zoom comments from the May 22, 2025 meeting are not included in this document and do not warrant additional written responses.

## 1. Introduction

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

Section 15073.5(a) of the CEQA Guidelines states that a lead agency is required to recirculate an IS/ND if the document must be substantially revised after public notice of its availability has previously been given pursuant to Section 15072, but prior to its adoption. Notice of recirculation must comply with Sections 15072 and 15073. A “substantial revision” of the IS/ND refers to when:

1. A new, avoidable significant effect is identified and mitigation measures or project revisions must be added to reduce the effect to less than significant.
2. The lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significant, and new measures or revisions are required.

Recirculation is not required under the following circumstances:

1. Mitigation measures are replaced with equal or more effective measures pursuant to CEQA Guidelines Section 15074.1.
2. New project revisions, which are not new avoidable significant effects, are added in response to written or verbal comments on the project effects identified in the negative declaration.
3. Measures or conditions of project approval are added after circulation of the negative declaration that are not required by CEQA, do not create new significant environmental effects, and are not necessary to mitigate an avoidable significant effect.
4. New information is added to the negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.

As a result of the comments received the District has determined that no revisions to the IS/ND are necessary and the requirements in CEQA Guidelines Section 15073.5 are not met and that recirculation of the IS/ND is not required. The analysis and conclusions in the IS/ND demonstrate substantial evidence in light of the whole record that the Project would not have a significant effect on the environment.

## 2. Response to Comments

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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
<b>Written Comment Letters</b>			
A	LA County Metropolitan Transportation Authority	May 27, 2025	5
B	Department of Toxic Substances Control	May 15, 2025	8

## 2. Response to Comments

COMMENT A – Justin Klaparda, LA County Metropolitan Transportation Authority (Metro) (2 pages)



Los Angeles County  
Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
metro.net

**Metro**

May 27, 2025

Christy Wong, CEQA Project Manager  
Los Angeles Unified School District  
Office of Environmental Health and Safety  
333 South Beaudry Avenue, 21st Floor  
Los Angeles, CA 90017  
Email: [CEQA-comments@lausd.net](mailto:CEQA-comments@lausd.net)

RE: Fairfax High School Major Modernization Project – 7850 Melrose Avenue Los Angeles, CA 90036  
Notice of Intent to Adopt a Negative Declaration and Notice of Public Comment Period for Preliminary Environmental Assessment

Dear Christy Wong:

The purpose of this letter is to outline recommendations from Metro concerning issues that are germane to our agency's statutory responsibility in relation to the Metro Bus facilities and services, which may be affected by the proposed Project. In addition to the specific comments outlined below, Metro would like to provide the Project Sponsor the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro bus stops and right-of-way (ROW). This document and additional resources are available at <https://www.metro.net/devreview>.

### Project Description

The proposed Project is designed to address the most critical physical concerns of the buildings and grounds at Fairfax HS through building replacement, renovation, and modernization to provide facilities that are safe, secure, and better aligned with the current instructional program.

The proposed Project includes demolition of the existing Shop Building, Gymnasium, Utility Building, Ticket Office, and Relocatable Sanitary Building, and the construction of a new gymnasium, specialty classrooms, outdoor physical education courts, maintenance and operations facilities, and an Art Gallery Building. The proposed Project also includes exterior painting of existing buildings; various landscape and hardscape improvements; parking improvements; infrastructure upgrades including, but not limited to, sanitary sewer, water, storm water, and electrical utilities; and accessibility upgrades as required.

### Metro Comments

1. Bus Services: Metro Bus Lines 10, 48, 217, and 218 operate on Fairfax Ave, adjacent to the Project. One Metro Bus stop is directly adjacent to the proposed Project at Fairfax and Melrose. Other transit operators may provide service in this area and should be consulted.

A-1



## 2. Response to Comments

Fairfax High School Major Modernization Project – 7850 Melrose Avenue Los Angeles, CA 90036  
Notice of Intent to Adopt a Negative Declaration and Notice of Public Comment Period for Preliminary  
Environmental Assessment– Metro Comments  
May 27, 2025

- |  |     |
|--|-----|
| 2. <b>Final Bus Stop Condition:</b> The existing Metro bus stop must be maintained as part of the final Project. During construction, the stop must be maintained or relocated consistent with the needs of Metro Bus operations. Final design of the bus stop and surrounding sidewalk area must be ADA-compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.  | A-2 |
| 3. <b>Bus Stop Access &amp; Enhancements:</b> Metro encourages the installation of bus shelters with benches, wayfinding signage, enhanced crosswalks and ramps compliant with the Americans with Disabilities Act (ADA), as well as pedestrian lighting and shade trees in paths of travel to access bus stops and other amenities that improve safety and comfort for transit riders. The City should consider requesting the installation of such amenities as part of the development of the site. | A-3 |
| 4. <b>Driveways:</b> Driveways accessing parking and loading at the Project site should be located away from transit stops, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.  | A-4 |
| 5. <b>Bus Operations Contacts:</b> Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 with any questions and at least 30 days in advance of initiating construction activities. Other municipal buses may also be impacted and should be included in construction outreach efforts.   | A-5 |

If you have any questions regarding this response, please contact me by phone at 213.418.3484, by email at DevReview@metro.net or by mail at the following address:

Metro Development Review  
One Gateway Plaza, MS 99-22-2  
Los Angeles, CA 90012-2952

Sincerely,



Justin Klaparda, AICP  
Senior Transportation Planner  
Transit Oriented Communities

Attachment and link:

- Adjacent Development Handbook: <https://www.metro.net/devreview>

## 2. Response to Comments

### A. Response to Comments from Justin Klaparda, Metro, dated May 27, 2025

- A-1 The proposed Project does not involve modifications to the public right-of-way, including Fairfax Avenue or Melrose Avenue, and no permanent or temporary relocation of bus stops is proposed (refer to Section 3.2.2, *Site Access, Circulation, and Parking*). Construction activities would occur within the school property and would be phased to maintain safe and efficient campus operations. LAUSD will coordinate with the City of Los Angeles and relevant transportation agencies regarding construction-related traffic control and will notify Metro and other transit operators in advance of any activities that could affect transit service or access. The IS/ND concludes that no significant impacts to public transit are anticipated as a result of the proposed Project.
- A-2 The proposed Project would not modify the public right-of-way, including the sidewalk or bus stop area at Fairfax Avenue and Melrose Avenue. As defined in the project description and analysis of the IS/ND no changes to pedestrian circulation, public transit infrastructure, or off-site improvements are included as part of the proposed Project (refer to Section 3.2.2, *Site Access, Circulation, and Parking*). During construction, LAUSD will coordinate with the City of Los Angeles Department of Transportation (LADOT) and Metro to ensure that the existing bus stop adjacent to the Project Site is either maintained in its current location or temporarily relocated in a manner that maintains safe and functional transit operations. Any temporary relocation or construction-related access changes will comply with all applicable regulations, including Americans with Disabilities Act (ADA) requirements, to ensure a clear and accessible path of travel for all transit riders, including individuals with disabilities.
- A-3 The Project would not require the permanent relocation or rebuilding of any bus stops and therefore would not make any improvements to or install any amenities to existing bus stops. LAUSD will coordinate with LADOT and Metro during final design and construction planning to ensure safe and accessible pedestrian connections to the campus and adjacent transit stops.
- A-4 The proposed Project would not modify existing vehicular access points or alter driveway locations along Melrose Avenue or Fairfax Avenue. The Project would be required to comply with SC-T-2, which states that vehicular access and parking shall comply with Vehicular Access and Parking guidelines of the School Design Guide. One of the elements of the School Design Guide deals with vehicular access and pedestrian safety. Additionally, development of the proposed Project is confined to improvements within the existing campus and maintains the current circulation layout (refer to Section 3.2.2, *Site Access, Circulation, and Parking*).
- A-5 The proposed Project would be constructed entirely within the existing school campus and is not expected to directly impact transit stops or routes. However, LAUSD will coordinate with LADOT and Metro during the planning and construction phases to ensure that Metro and other affected transit operators are notified in advance of any activities that could potentially impact transit access, operations, or infrastructure.

## 2. Response to Comments

### COMMENT B – Tamara Purvis, Department of Toxic Substances (DTSC) (3 pages)



**Yana Garcia**  
Secretary for  
Environmental Protection



**Department of Toxic Substances Control**

Katherine M. Butler, MPH, Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200  
[dtsc.ca.gov](http://dtsc.ca.gov)



**Gavin Newsom**  
Governor

**SENT VIA ELECTRONIC MAIL**

May 15, 2025

Christy Wong  
CEQA Project Manager  
Los Angeles Unified School District  
333 S Beaudry Avenue, 21<sup>st</sup> Floor  
Los Angeles, CA 90017  
[cp-christy.wong@lausd.net](mailto:cp-christy.wong@lausd.net)

RE: NEGATIVE DECLARATION FOR THE FAIRFAX HIGH SCHOOL MAJOR  
MODERNIZATION PROJECT DATED MAY 8, 2025, STATE CLEARINGHOUSE  
NUMBER [2025050380](#)

Dear Christy Wong,

The Department of Toxic Substances Control (DTSC) reviewed the Negative Declaration (ND) for Fairfax High School Major Modernization Project (Project). The proposed Project includes demolition of the existing Shop Building, Gymnasium, Utility Building, Ticket Office, and Relocatable Sanitary Building, and the construction of a new gymnasium, specialty classrooms, outdoor physical education courts, maintenance and operations facilities, and an Art Gallery Building. The proposed Project also includes exterior painting of existing buildings; various landscape and hardscape improvements; parking improvements; infrastructure upgrades including, but not limited to, sanitary sewer, water, storm water, and electrical utilities; and accessibility upgrades as required. DTSC recommends and requests consideration of the following comments:

1. If the district plans to use California Department of Education (CDE) State funds for the project, then the district shall comply with the requirements of Education Code (EDC), [§17210](#), [§17213.1](#), and [§17213.2](#), unless otherwise

B-1

## 2. Response to Comments

Christy Wong  
May 15, 2025  
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specifically exempted under section [§17268](#). If the district is not using CDE State funds for the project, or is otherwise specifically exempt under section [§17268](#), DTSC recommends the district continue to investigate, clean up the Site under the oversight of Los Angeles County and in concurrence with all applicable DTSC guidance documents, if necessary. For more information on the CDE State funding, please visit the [Office of Public-School Construction](#) webpage.

B-1  
Cont.

A local education agency may also voluntarily request the CDE site/plan approval for locally funded site acquisitions and new construction projects. In these cases, CDE will require DTSC to review and approve prior to its final approval, except when exempt under section 17268.

2. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's PEA Guidance Manual](#). Additionally, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

B-2

DTSC appreciates the opportunity to comment on the Neg Dec for Fairfax High School Major Modernization Project. If you would like to proceed with DTSC's school environmental review process, please visit [DTSC's Evaluating & Clean-up School 3-Step Process to begin a Phase I Environmental Site Assessment](#). If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via our [CEQA Review email](#) for additional guidance.

## 2. Response to Comments

Christy Wong  
May 15, 2025  
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Sincerely,

*Tamara Purvis*

Tamara Purvis  
Associate Environmental Planner  
HWMP - Permitting Division – CEQA Unit  
Department of Toxic Substances Control  
[Tamara.Purvis@dtsc.ca.gov](mailto:Tamara.Purvis@dtsc.ca.gov)

cc: (via email)

Governor's Office of Land Use and Climate Innovation  
State Clearinghouse  
[State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

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**B. Response to Comments from Tamara Purvis, DTSC, dated May 15, 2025**

- B-1 Education Code Sections 17210, 17213.1, and 17213.2 require a district to perform a Phase I Environmental Site Assessment for project work receiving state funds and details other, similar responsibilities. LAUSD has completed environmental investigations consistent with applicable requirements for school construction and modernization projects. As described in Section 4.9: *Hazards and Hazardous Materials*, in the IS/ND, the Phase I Environmental Site Assessment (Appendix F) and Preliminary Environmental Assessment – Equivalent (PEA-E, Appendix J) was prepared for this Project. the IS/ND acknowledges the potential presence of contaminants in the soil related to historical use of the site. The proposed Project includes Standard Conditions of Approval (SCs), specifically, SC-HAZ-4, as stated in Section 4.9 *Hazards and Hazardous Materials*, which require soil testing and remediation procedures in the event that previously unidentified contamination is encountered during construction. Contaminated soils, if identified during ground-disturbing activities, would be removed and properly managed in accordance with applicable federal, state, and local regulations, including oversight by appropriate regulatory agencies.
- B-2 Any soil that is imported or exported will be tested in accordance with the specific written procedures in LAUSD Specifications, Section 01 4524, Environmental Import/Export Materials Testing. This specification has the requirements for the sampling, testing, transporting, and certifying of imported fill materials or exported fill materials from school sites.