January 2026| Initial Study / Negative Declaration

32nd St. / USC Magnet School
Major Modernization Project

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32ND ST. / USC MAGNET SCHOOL

Major Modernization Project

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Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ADA	Americans with Disabilities Act
APN	Assessor Parcel Number
AQMP	air quality management plan
ARMR	Archaeological Resource Management Reports
BAAQMD	Bay Area Air Quality Management District
BMP	best management practices
BOE	LAUSD Board of Education
BUG	Backlight-Uplight-Glare
C&D	construction and demolition
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Code
Cal-IPC	California Invasive Plant Council
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulation
CGS	California Geological Survey
CHPS	Collaborative for High Performance Schools
CMP	Los Angeles County Congestion Management Program
CNDDB	California Natural Diversity Data Base
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CNRA	California Natural Resources Agency
CO_2e	carbon dioxide equivalent
COPC	chemical of potential concern

CRHR	California Register of Historic Resources
dBA`	A-weighted decibel
LADWP	Department of Water and Power
DSA	Division of the State Architect (under the California Department of General Services)
EIR	Environmental Impact Report
EMF	electromagnetic field
ERP	Emergency Response Plan
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FETU	Facilities Environmental Technical Unit
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
GHG	greenhouse gas
HABS	Historic American Buildings Survey
HCM	Historic-Cultural Monument
HCP	habitat conservation plan
HRER	Historic Resource Evaluation Report
HVAC	heating, ventilation, and air conditioning
I-	Interstate
ICS	Incident Command System
IDA	International Dark-Sky Association
IES	Illuminating Engineering Society
in/sec PPV	inches per second peak particle velocity
IP	Internet Protocol
IPCC	Intergovernmental Panel on Climate Change
IS	Initial Study
LAA	Los Angeles Aqueduct
LACFCD	Los Angeles County Flood Control District
LACoFD	County of Los Angeles Fire Department
LADOT	City of Los Angeles Department of Transportation
LADWP	Los Angeles Department of Water and Power

Abbreviations and Acronyms

LAFD	Los Angeles Fire Department
LAPD	City of Los Angeles Police Department
LASPD	Los Angeles School Police Department
LAUSD	Los Angeles Unified School District
LBP	lead-based paint
LCM	lead-containing materials
L_{dn}	day-night average sound level
L_{eq}	equivalent continuous sound level
LEED	Leadership in Energy and Environmental Design
LID	Low-Impact Development
LRA	Local Responsibility Area
LST	localized significance threshold
LZ	lighting zone
MEP	maximum extent practicable
Metro	Los Angeles County Metropolitan Transportation Authority
mg/kg	milligrams per kilogram
MLD	Most Likely Descendant
MLO	Model Lighting Ordinance
MND	Mitigated Negative Declaration
mph	miles per hour
MRZ	mineral recovery zone
MT	metric ton
MWD	Metropolitan Water District of Southern California
MWELO	Model Water Efficient Landscape Ordinance
NAAQS	National Ambient Air Quality Standards
NCCP	natural community conservative plan
ND	Negative Declaration
NFHL	National Flood Hazard Layer
NIMS	National Incident Management System
NMFS	National Marine Fisheries Services
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places

Abbreviations and Acronyms

NWI	National Wetlands Inventory
O&M	Operations and Maintenance
OEHS	Office of Environmental Health and Safety
OHP	Office of Historic Preservation
OITC	outdoor-indoor transmission class
PCB	Polychlorinated Biphenyls
PDF	project design feature
PEA-E	Preliminary Environmental Assessment – Equivalent
ppm	parts per million
PRC	Public Resources Code
PSHA	pipeline safety hazard assessment
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RTP	Regional Transportation Plan
SC	Standard Condition of Approval
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCS	sustainable communities strategy
SEMS	Standardized Emergency Management System
SCAB	South Coast Air Basin
SR-	State Route
SRA	State Responsibility Area
SSO	school safety officers
STC	sound transmission class
SUP	School Upgrade Program
SWPPP	stormwater pollution prevention plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCR	tribal cultural resource
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
VMT	vehicle miles traveled

Abbreviations and Acronyms

VOC	volatile organic compound

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1. Introduction

1.1 OVERVIEW

The Los Angeles Unified School District (LAUSD/District) is proposing a major modernization of the 32nd Street/USC MaST K–12 School (Campus/Project site), including demolition of existing classroom buildings and restrooms, construction of new classroom buildings and restrooms, and upgrades of associated infrastructure (Proposed Project). The Proposed Project is intended to address the most critical physical needs of the Campus through building replacement, renovation, modernization, and reconfiguration. The proposed Project is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This Initial Study (IS) provides an evaluation of the potential environmental consequences associated with this Proposed Project.

1.2 BACKGROUND

In 1994, LAUSD, in partnership with the University of Southern California (USC) and the California National Guard, launched the Math, Science, and Technology (MaST) magnet program at the site. Initially intended as a temporary arrangement, the program has remained on the 32nd Street campus and continues to serve K–12 students with a curriculum emphasizing college preparation in the sciences, math, and technology. The Campus provides magnet programs in Visual and Performing Arts for elementary school students and Media Arts and Engineering for secondary students.

On August 24, 2021, the Board adopted an update to the School Upgrade Program (SUP) to integrate Measure RR funding and priorities into its operational framework and approved the Measure RR Implementation Plan (Implementation Plan) to help guide the identification of sites and development of project proposals. The Implementation Plan included, among other things, the development of seven major modernization projects, one in each Board District.

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

On October 12, 2021, the Board approved the project definition for the due diligence, planning, and feasibility activities necessary to propose scope recommendations, budget, and schedule for a major modernization project at 32nd St./USC. In the first quarter of 2022, staff commenced studying the site's physical conditions by gathering and analyzing significant data and information including, but not limited to, seismic and historic evaluations, site surveys and infrastructure analysis (including topographic, geological, and utility surveys), and educational programming.

32nd St./USC is located within the boundaries of Region South and Board District 1 and provides Kindergarten - 12th grade programs including the Visual and Performing Arts Magnet Program for elementary students and Media Arts and Engineering Magnet Programs for the secondary students. The site spans 3.67 acres and has 13 portable buildings, 1 storage building, and 3 permanent admin/classroom buildings. The buildings were constructed between 1949 and 2010. As of the 2022-2023 Electronic Capacity Assessment Review (E-CAR), the school served approximately 890 students.

The former Downtown Business Magnet (DBM) campus is located at 1081 West Temple Street, Los Angeles CA 90012, in Region East, and Board District 2. The campus was vacated by Downtown Business Magnet High School in the Summer of 2022 and currently serves as interim space for Rise Kohyang High School operated by Bright Star Schools. A portion of the site houses KLCS Education Foundation (KLCS), which will remain in place while 32nd St./USC temporarily occupies the site.

The Project, once completed, would help ensure that students attending 32nd St./USC are provided with safe and healthy environments that promote learning. The Proposed Project will remove relocatable buildings on site, providing 21st century general and specialty classrooms, upgrade site infrastructure, accessibility, landscaping, and hardscaping to improve the learning environment. The Project will also decrease the demand for repair and maintenance and alleviate the burden placed on school-site administration and custodial staff

1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by the CEQA[1] and the CEQA Guidelines.[2] 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). The District is the lead agency for this proposed Project and is therefore required to conduct an environmental review to analyze the potential environmental effects associated with the proposed Project.

California Public Resources Code (PRC) Section 21080(a) states that analysis of a project's environmental impact is required for any "discretionary projects proposed to be carried out or approved by public agencies…" In this case, the District 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.[3]

[1] California Public Resources Code, §21000 et seq (1970).
[2] California Code of Regulations, Title 14, Division 6, Chapter 3, §15000 et seq.
[3] California Code of Regulations, Title 14, Division 6, Chapter 3, §15063.

When an IS identifies the potential for significant environmental impacts, the lead agency must prepare an EIR,[4] 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.[5]

1.4 ENVIRONMENTAL PROCESS

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

1) An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100-65700.

2) An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.

3) An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies. (California Code of Regulations [CCR] §15378[a])

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

1.5 INITIAL STUDY

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

[4] California Code of Regulations, Title 14, Division 6, Chapter 3, §15064.
[5] California Code of Regulations, Title 14, Division 6, Chapter 3, §15070.

1.5.1 Negative Declaration or Mitigated Negative Declaration or Environmental Impact Report

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

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

1.5.2 Tiering

This type of project is one of many that were analyzed in the District's SUP SPEIR that was certified by the Board on December 23, 2023. The District's SUP SPEIR meets the criteria for a Program EIR under CEQA Guidelines Section 15168 (a)(4) as one "prepared on a series of actions that can be characterized as one large project and are related…[a]s individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

The SPEIR enables LAUSD to streamline future environmental compliance and reduces the need for repetitive environmental studies. The SPEIR serves as the framework and baseline for CEQA analyses of later projects through a process known as "tiering." Under CEQA Guidelines Sections 15152(a) and 15385, "Tiering" refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a program) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.[6]

The SPEIR is applicable to all projects implemented under the SUP. The SPEIR provides the framework for evaluating environmental impacts related to ongoing facility upgrade projects planned by the District.[7] Due to the extensive number of individual projects anticipated to occur under the SUP, projects were grouped into four categories based on project scope, type of construction and location of project. The four categories of projects are as follows:[8]

- Type 1 – New Construction on New Property

[6] California Code of Regulations Title 14, § 3 Article 1-15152(a).
[7] Ibid, at 4-8.
[8] Ibid, at 1-7.

- 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 3 – Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation, which includes modernization and infrastructure upgrades and 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. The evaluation of environmental impacts related to these project types, and the appropriate project design features and mitigation measures to incorporate, are provided in the SPEIR.

The proposed Project is considered a site-specific project under the SPEIR; therefore, this ND is tiered from the SPEIR. The SPEIR 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),[9] the District's Standard Conditions of Approval (SC), and the Leadership in Energy and Environmental Design (LEED) criteria.

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) emissions from buildings; promote environmentally responsible, cost-effective, healthier places to live and work; reduce energy and water consumption; and respond to the environmental directives of the Department of Housing and Community Development.

Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects. The SCs for District Construction, Upgrade, and Improvement Projects were adopted by the Board on December 12, 2023 (LAUSD 2015). 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

[9] California Green Building Standards Code, Title 24, Part 11.

1. Introduction

standard policies, practices and specifications (e.g., the LAUSD Design Guidelines and Design Standards, which are routinely updated and are referenced throughout the SCs).

Leadership in Energy and Environmental Design (LEED). The Collaborative for High Performance Schools (CHPS) was recently incorporated into the Center for Green Schools at the U.S. Green Building Council, which is shifting all new school projects toward LEED certification as the primary national framework for sustainable educational facilities. CHPS certification will remain available only for projects that were previously registered and will fully sunset in 2027, which means new projects are now directed to pursue LEED. In response to this transition, the Proposed Project will pursue LEED certification to document its sustainable design and construction practices. Many of the performance goals long associated with CHPS, including improved indoor environmental quality, reduced energy and water use, responsible materials selection, and environmentally sensitive site design, are now integrated into LEED criteria. As a result, the Project will continue to meet the intent of CHPS design while aligning with the current national standard for third party green building certification.

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, LEED prerequisite criteria, PDFs, and SCs, there are still significant environmental impacts, then feasible and project-specific mitigation measures are required to reduce impacts to less than significant levels. Mitigation under CEQA Guidelines Section 15370 includes:

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

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

Federal, State, regional, and local laws, regulations, plans, and guidelines, LEED criteria, PDFs, and SCs are considered part of the proposed 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 with the incorporation of mitigation. This report contains the following sections:

Chapter 1, *Introduction* identifies the purpose and scope of the ND and supporting 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 LEED 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 MND and supporting IS and technical studies and their areas of technical specialty.

Appendices have data supporting the analysis or contents of this IS:

A. Air Quality, Energy, and Greenhouse Gas Emissions Impact Analysis

1. Introduction

B. Tree Assessment Report

C. Final Historic Resource Evaluation Report

D. Preliminary Geotechnical Report

E. Phase I Environmental Site Assessment

F. Approved Phase 1 – Asbestos Engineering Assessment Report

G. Phase II Asbestos Abatement Plan

H. Noise Impact Analysis

I. Pedestrian Safety Study

2. Environmental Setting

2.1 PROJECT LOCATION

The Campus is located in the University Park neighborhood in the City of Los Angeles on a 3.67-acre site (Assessor Parcel Number [APN] 5123008905). The site is located at 822 West 32nd Street and is bounded by West 32nd Street to the north, Royal Street to the east, Jefferson Boulevard to the south, and University Avenue to the west. The Campus is also adjacent to the USC campus and the Shrine Auditorium.

2. Environmental Setting

Figure 1 Project Location and Vicinity

2.2 SURROUNDING LAND USES

The Project site is located in a developed urban area characterized by a mix of residential and commercial uses. To the north, zoning includes Residential Multiple Family (R3-1-O), with a General Plan land use designation of Medium Residential. To the east, the site is bordered by Commercial zoning (C2-1-O) with a Community Commercial land use designation. To the south, zoning is designated as Commercial (USC 1-A), with a General Plan designation of High Medium Residential. To the west, zoning includes Residential Multiple Family (R4-1-O) and Commercial (USC-3), with a General Plan designation of Community Commercial.
The adjoining properties and land uses include:

- Northeast: W. 32nd Street followed by residential properties.
- Southeast: Asphalt-paved parking lot followed by the Shrine Auditorium.
- Southwest: W. Jefferson Boulevard followed by the University of Southern California (USC).
- Northwest: University Avenue which is a walking mall, followed by a Catholic Church and Hillel USC, a Jewish Student Center.

The existing Project site has 13 portable buildings, 1 storage building, 3 permanent admin/classroom buildings, and 45 classrooms. These buildings were constructed between 1949 and 2010. At the time of the 2022-2023 Electronic Capacity Assessment Review (E-CAR), the school served approximately 890 students.

2.3 SENSITIVE RECEPTORS

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

The nearest sensitive receptors are the USC Catholic Center, Hoover Intergenerational Care (HIC) Daycare and USC Jewish Center that are as near as 65 feet west of the project site. There are also the USC dormitories that are as near as 85 feet north of the Project site.

2.4 CAMPUS HISTORY

The Campus has served as a K-12 educational institution in the community since its establishment in 1904 at the corner of 32nd Street and Hoover Street in Los Angeles. Originally housed in a two-story brick building, the Campus underwent multiple reconstructions due to seismic damage in the early 1970s and a subsequent fire that destroyed its primary wooden structure. Over time, the Campus evolved into a collection of bungalows and a main administration building.

2.5 EXISTING CONDITIONS

The Campus is a compact 3.67-acre K–12 campus made up of three permanent buildings and thirteen older portable classrooms, with structures ranging from 1949 through 2010. The school currently has 45 classrooms, limited playground and recreation space, and 18 on-site parking spaces. The main permanent buildings date from the 1970s and 2010, while many of the portable units are decades old. The Campus supports a Visual & Performing Arts Magnet for younger grades and a Media Arts & Engineering Magnet for upper grades. See Table 1 for a list of existing buildings on the Campus.

The Campus had 878 students in kindergarten through 12th grade enrolled in the 2023-2024 school year[10].

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[10] California Department of Education, *School Profile: Thirty-Second Street USC Performing Arts* (2024), https://www.cde.ca.gov/sdprofile/details.aspx?cds=19647336019475

2.6 GENERAL PLAN AND EXISTING ZONING

The Project site is zoned as Public Facilities (PF-1), has a General Plan land use designation as Public Facilities, and is within the South Los Angeles Community Plan Area.

2.7 NECESSARY APPROVALS

It is anticipated that approval required for the proposed Project would include those listed below.

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

State

- California Department of General Services, Division of State Architect
- California Department of Toxic Substances Control (DTSC)

Regional

- Los Angeles Regional Water Quality Control Board (LARWQCB)
- City of Los Angeles, Public Works Department
- City of Los Angeles, Fire Department
- City of Los Angeles, Department of Building and Safety

Local

- Urban Forestry Division

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

LAUSD sent Assembly Bill (AB) 52 consultation letters in December 2022 to tribes who have previously requested Project notification and tribes who are traditionally or culturally affiliated with the geographic area, as provided by the Native American Heritage Commission (NAHC). The letters informed the respective tribes that LAUSD was evaluating the potential environmental consequences associated with the Subsequent PEIR and requested consultation. Both tribes responded, and consultation continued throughout 2023. The outcome of the LAUSD and tribal consultation efforts include the following:

The Fernandeño Tataviam Band of Mission Indians, Cultural Resource Division requests formal consultation notification on future LAUSD projects within their ancestral territory that would involve the disturbance of either native soil or undocumented fill.

The Gabrieleno Band of Mission Indians - Kizh Nation also request formal consultation notification on future LAUSD projects.

2. Environmental Setting

In accordance with AB 52, the Project proponent shall conduct the requested formal consultation with the Fernandeño Tataviam Band of Mission Indians and Gabrieleno Band of Mission Indians - Kizh Nation.

3. Project Description

3.1 BACKGROUND

The 32nd St./USC Campus has been identified under the SUP as one of the schools most in need of critical upgrades and improvements. The goal of the SUP is to improve student health, safety, and education through the modernization of school facilities. The core principles of major modernization project scoping are as follows:

1. Buildings meeting AB 300 criteria for seismic evaluation may be addressed, to the extent feasible, with a focus on those determined to have a high seismic vulnerability, through retrofit, removal, or seismic modernization, which will be determined based on an assessment of the seismic vulnerability of the building(s), the historic context of the building/site, actual or potential impact to the learning environment, site layout, and the approach that best ensures compliance with DSA requirements.

2. The buildings, grounds and site infrastructure that have significant/severe physical conditions that already do or are highly likely in the near future to pose a health and safety risk, or negatively impact a school's ability to deliver the instructional program and/or operate may be addressed by repair or replacement.

3. The District's reliance on relocatable buildings, especially for kindergarten through 12th grade instruction, should be reduced.

4. Necessary and prioritized upgrades will be made throughout priority school sites in order to comply with the program accessibility requirements of the Americans with Disabilities Act of 1990 (ADA) Title II Regulations, and the District's Self-Evaluation and Transition Plan under Title II of the ADA.

5. The exterior conditions of the school site will be enhanced including landscape and hardscape improvements around new buildings and/or areas impacted by construction and the painting of building exteriors throughout the school site.

6. Outdoor learning environments will be developed where the site layout and project planning provide the opportunity.

3.2 PROPOSED PROJECT

LAUSD is proposing a major modernization of the Campus, including demolition of existing classroom buildings and restrooms, construction of new classroom buildings and restrooms, and upgrades of associated infrastructure (Project/Proposed Project).

On November 14, 2023, the Board approved the major modernization of the 32nd St./USC Magnet. The Project will be implemented in two phases that include, but are not limited to:

3. Project Description

PHASE 1

- Temporarily relocate 32nd St./USC to the former DBM campus during construction.

PHASE 2

- Construction of approximately (23) general and specialty classrooms and support spaces.
- Demolish (23) classrooms and restrooms in (13) relocatable buildings and (1) storage building.
- Minor modernization of existing administration classroom building, single story classroom building, 2-story classroom buildings, and the lunch shelter
  - Accessibility upgrades
  - Utility infrastructure upgrades,
  - Exterior painting
- Addition of greening landscape, hardscape, and infrastructure upgrades including, but not limited to, sanitary sewer, water, storm water, and electrical utilities.
- Improvements that comply with the Americans with Disabilities Act (ADA), the Division of the State Architect (DSA), the California Environmental Quality Act (CEQA), the Department of Toxic Substances Control (DTSC), and local, state, and federal requirements.
- Improvements to ensure compliance with the Americans with Disabilities Act (ADA), Division of the State Architect (DSA), California Environmental Quality Act (CEQA), Department of Toxic Substances Control (DTSC), local, state, and federal requirements.

The Project would not increase the current student or staff capacity of the Campus. Table 1 below summarizes the existing building footprint and proposed demolition. Table 2 below summarizes the proposed new building footprint.

Table 1 Existing Buildings and Proposed Demolitions

Building Type	SF Existing	SF Proposed Demolished
Admin and Classroom Building - CAFM 23107	13,786	
Classroom Building - CAFM 17273	8,147	
2 Story Classroom Building - CAFM 35282	9,252	
2 Story Classroom Building - CAFM 35283	7,682	
Portable Classroom Building - CAFM 27016	1,440	1,440
Portable Classroom Building - CAFM 24157	1,792	1,792
Storage Building - CAFM 24003	441	441
Portable Classroom Building - CAFM 24033	1,792	1,792
Portable Classroom Building - CAFM 24492	1,792	1,792
Portable Classroom Building - CAFM 16641	1,792	1,792
Portable Classroom Building - CAFM 24293	1,792	1,792

3. Project Description

Building Type	SF Existing	SF Proposed Demolished
Portable Classroom Building - CAFM 23331	960	960
Portable Classroom Building - CAFM 23738	864	864
Portable Classroom Building - CAFM 24366	1,920	1,920
Portable Classroom Building - CAFM 24365	1,920	1,920
Portable Classroom Building - CAFM 23532	1,920	1,920
Portable Classroom Building - CAFM 24364	1,920	1,920
Portable Classroom Building - CAFM 24401	1,920	1,920
Total Existing	**61,132**	**-**
Total Demolished	**-**	**22,265**

Notes: All numbers are provided in square feet (sf). All new square footages are approximate and subject to change during final site and architectural planning and design phases. These square footage changes would not significantly change the environmental analysis or findings in this IS. Square footage totals may not add up exactly due to rounding and the way usable space is calculated. All numbers are based on the 32nd St/USC – Design Criteria.

Table 2 Proposed Buildings

Building Type	Units	Total SF
General Classrooms	17	16,320
Science Laboratories	2	1,680
Visual Arts	-	-
Specialized Classrooms	7	6,420
Special Education	6	2,600
Support Facilities	34	6,145
Performing Arts	4	2,390
Auditorium	-	-
Physical Education / Athletics Facilities	-	-
Parent Center		960
Administration	-	-
Maintenance and Operations	-	-
Circulation, Mechanical, and Electrical		9,866
Total Proposed		**46,380**

Notes: All numbers are provided in square feet (sf). All new square footages are approximate and subject to change during final site and architectural planning and design phases. These square footage changes would not significantly change the environmental analysis or findings in this IS. Square footage totals may not add up exactly due to rounding and the way usable space is calculated. All numbers are based on the 32nd St/USC – Design Criteria.

Figure 2 Proposed Project Site Plan

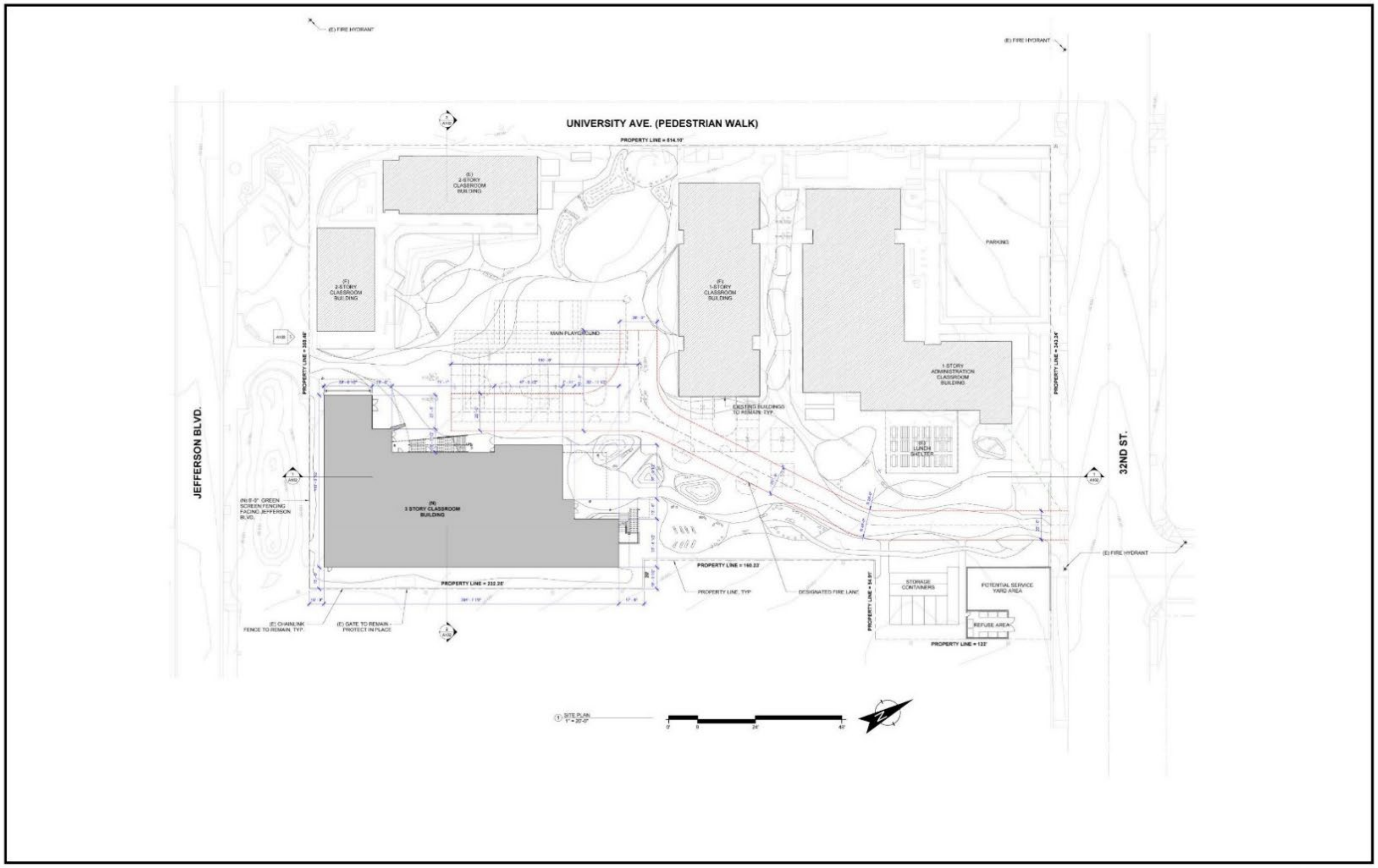

Figure 2
32nd St USC Magnets Modernization
Site Plan

Name: 21480 32nd St USC Magnets Modernization.Mxd
Print Date: 8/7/2025 9:36 AM Author: pcarlos

3.2.1 Utilities

The existing catch basin flowing to the south on the Campus is to be replaced. An 18" storm drain pipe is also to be replaced as it may be in the area needed during the excavation for the building foundations. The site stormwater is proposed to overflow to the 18" pipe and discharge to the public storm drain pipe along Jefferson Blvd. Only work within LAUSD property is proposed. The existing 18" lateral which connects to the public main will be protected and connected to on-site.

3.2.2 Site Access, Circulation, and Parking

The Proposed Project would include an access road from W. 32nd St. to the central western portion of the site, where the existing basketball courts are located.

During construction and operations, site access would be provided via existing driveways off of W. 32nd St and W Jefferson Boulevard.

All existing parking, including the parking lot at the northern and eastern portions of the site, would remain unchanged.

The school has two entrances, one off of Jefferson Boulevard primarily used as a student drop-off area and another off of 32nd St. that leads to an asphalt parking lot.

3.2.3 Landscaping

The Proposed Project would include removal and replacement of existing landscaping and hardscape areas within the footprint of the Campus. All landscaping and irrigation systems would comply with LAUSD School Design Guidelines and Leadership in Energy and Environmental Design (LEED) criteria would be implemented where appropriate. Plant material would comply with the LAUSD approved plant list. New canopy and accent trees would be installed to increase canopy coverage and provide shade while complimenting the aesthetics of hardscape areas throughout the Campus. Native and climate-appropriate planting would be paired with high-efficiency irrigation to minimize water usage. No landscaping modifications would be made at the DBM campus.

3.2.4 Construction Phasing and Equipment

Construction of the Proposed Project would include the following activities

- Demolition and Site Preparation
- Grading and Excavation
- Utility Installation
- Building Construction
- Site Improvements

It is estimated that an average of 50 workers would be present at the construction site daily (Monday through Friday). In addition, approximately 45 truck trips per day are estimated to be required for site clearing and demolition, excavation, grading and hauling activities and for the delivery of concrete during construction. Approximately 1000 cubic yards of soil would be imported and 1500 cubic yards would be exported.

.Equipment

Equipment to be used during construction may include the following items:

- Excavators
- Skip Loader
- Bulldozer
- Backhoe(s)
- Cement Trucks
- Dump Trucks
- Utility Pick-Up Trucks
- Concrete Finishing Equipment and Tools
- Graders and rollers
- Earth Compactor
- Cranes
- Forklifts

Construction Schedule

Construction is planned to start in Summer 2026 and be completed by Fall 2028. Construction will occur between the hours of 7:00 a.m. and 9:00 p.m., per Section 41.40 of the City's Municipal Code.

Campus Relocation

During construction, Campus operations would be temporarily relocated to the DBM campus located at 1081 West Temple Street, Los Angeles CA 90012, approximately 3.25 miles northeast of the Project site. This site is zoned as Central City West Specific Plan (CW), has a General Plan designation as PF, and is within the Silver Lake - Echo Park - Elysian Valley Community Planning Area.

3.2.5 Operation and Maintenance

Upon Project completion, the Campus would return to the same operations as current conditions. This consists of providing Kindergarten - 12th grade programs, including the Visual and Performing Arts Magnet Program for elementary students and Media Arts and Engineering Magnet Programs for the secondary students. There would be no increase in staff or student enrollment as a result of the Proposed Project. Implementation of the Proposed Project would also decrease the demand for repair and maintenance and alleviate the burden placed on school-site administration and custodial staff.

3.2.6 LAUSD Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects

The LAUSD Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects (Standard Conditions; SCs) are uniformly applied development standards. The SCs were 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 LAUSD California Environmental Quality Act (CEQA) environmental topics (Appendix G of the CEQA Guidelines plus Pedestrian Safety). For each SC, compliance is triggered by factors such as the project type, existing conditions, and type of environmental impact. Compliance with every condition is not required.

The SCs have been updated since the original Board-adopted Standard Conditions of Approval in 2015 and in 2018. This 2023 update incorporates new and revised laws, regulations, guidelines, and Los Angeles Unified School District's standard policies, practices, and specifications.

Additionally, the LAUSD School Design Guidelines and Design Standards referenced in the SCs are routinely updated. If the Design Guidelines and Design Standards conflict with the current SCs, the Design Guidelines and Design Standards shall be followed.

In instances where the District is the Lead Agency but not the project proponent or implementing party (e.g., non-profit, charter school, etc.), the project proponent or implementing party will act as the District's agency (or designee) to implement the applicable SCs.

3.2.7 Documents Incorporated by Reference

The Draft Subsequent Environmental Impact Report (SPEIR) for the LAUSD School Upgrade Program is incorporated by reference into this Initial Study[11].

[11] Los Angeles Unified School District, *School Upgrade Program Draft Subsequent Environmental Impact Report* (2023), https://files.ceqanet.lci.ca.gov/284141-2/attachment/0CRpktr1bFw7EGk4wzmRRM-8GGQv8GBEtSfSTad2rMJBck4k2dV1arXvtBmbvtcwK3qbd7l1HeDDJdyz0.

4. Environmental Checklist and Analysis

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would potentially be affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklists on the following pages. For each of the potentially affected factors, mitigation measures are recommended that would reduce the impacts to less than significant levels.

☐ *Aesthetics*	☐ *Agriculture and Forestry Resources*	☐ *Air Quality*
☐ *Biological Resources*	☐ *Cultural Resources*	☐ *Energy*
☐ *Geology / Soils*	☐ *Greenhouse Gas Emissions*	☐ *Hazards & Hazardous Materials*
☐ *Hydrology / Water Quality*	☐ *Land Use / Planning*	☐ *Mineral Resources*
☐ *Noise*	☐ *Population / Housing*	☐ *Public Services*
☐ *Recreation*	☐ *Transportation*	☐ *Tribal Cultural Resources*
☐ *Utilities / Service Systems*	☐ *Wildfire*	☐ *Mandatory Findings of Significance*

DETERMINATION

On the basis of this initial evaluation:

☒ I find that the 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 in 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 the 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.

01/12/2026

Signature | Date

Carlos Torres | 01/12/2026

Name | Title

4. Environmental Checklist and Analysis

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, SPEIR, 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. 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 (where aesthetic impacts shall not be considered significant for qualifying residential, mixed-use residential, and employment centers), 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 non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage 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?	☐	☐	☒	☐

(AE) Explanation:

The SPEIR evaluated the potential for implementation of the SUP-related projects to impact aesthetic and visual resources. Projects implemented under the SUP were identified as having less than significant impacts on scenic vistas, scenic resources within designated scenic highways, existing visual character, and day or nighttime views in the LAUSD region.

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

LAUSD 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**[12] 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.

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

LAUSD Standard Conditions of Approval	
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.

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

No Impact. Vistas provide visual access or panoramic views to a large geographic area. The Project site and surrounding areas are flat and located within in densely developed urban area. The field of view from a vista location 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 might include an urban skyline, valley, mountain range, the ocean, or other water bodies.

4. Environmental Checklist and Analysis

Views from the Project site are limited to buildings along the developed corridors along West Jefferson Boulevard, South Hoover St., W. 32nd St., and Royal St. Due to the flat topography, only the adjacent urban development is visible from the Project site.

Based on Figure 4-1 of the South Los Angles Community Plan, the Project site is not adjacent to, nor visible from any designated scenic avenues within the area[13]. Additionally, the District is required to incorporate the LAUSD School Design Guide and **SC-AE-3** into the site-specific design and construction for the protection of unique scenic features and designated scenic vistas. Given the lack of scenic vistas within the immediate Project vicinity, and limited viewshed from the Project site, no impact would occur at the Campus. No mitigation or further analysis is required.

Given that no exterior building modifications are proposed at the DBM campus, where students would be temporarily relocated, and that exterior site changes would be limited to minor reconfiguration of existing parking and signage, no adverse aesthetic impacts would occur at this site. No mitigation or further analysis is required.

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

No Impact. According to the Caltrans State Scenic Highway Map, there are no scenic highways within the vicinity of the Project site[14]. The closest designated state scenic highways are a portion of State Route (SR) 27, located 17 miles northwest, and SR 2, located 15 miles northeast from the Project site. Therefore, no impact regarding scenic resources within a state scenic highway would occur. No mitigation or further analysis is required.

Given that no exterior building modifications are proposed at the existing DBM campus, where students would be temporarily relocated, and that exterior site changes would be limited to minor reconfiguration of existing parking and signage, no adverse aesthetic impacts would occur at this site. No mitigation or further analysis is required.

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

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

The Project site is located in an urbanized area and would not conflict with any zoning and other regulations governing scenic quality. The Project site and surrounding area are flat and developed with urban land uses.

[13] City of Los Angeles, *South Los Angeles Community Plan* (2017), https://planning.lacity.gov/odocument/b909e749-754e-4caa-af7f-14c82adaa2b7/South_Los_Angeles_Community_Plan.pdf

[14] California Department of Transportation, *State Scenic Highway Map* (2025), https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa.

The existing street-facing structures on the Project do not contain visual quality. They're standard structures that do not represent any particular style, design, time period, etc. The proposed modernization and site improvements of the Campus would be designed to complement the visual character of the surrounding USC and residential development.

LAUSD would implement SC-AE-1 and SC-AE-2 to ensure that methods outlined in the current School Design Guide are incorporated throughout the planning, design, construction, and operation of the Project with consideration given to architectural appearance, consistency, and other aesthetic factors in relation to the campus and surrounding community. Additionally, the SPEIR states that compliance with SC-AE-3 would minimize the likelihood of degraded visual character or quality through appropriate design changes and elimination of significant adverse aesthetic impacts from building or site design[15]. LAUSD would also implement SC-AE-5 to ensure that shade and shadow impacts are analyzed and mitigated through a shadow analysis. School upgrade/modernization projects, such as the Proposed Project, may enhance the view amenities and aesthetic properties of a given neighborhood, especially where structures do not meet building codes and/or are dilapidated. Therefore, impacts to the visual character or quality of the Project site and its surroundings would be less than significant. No mitigation or further analysis is required.

Given that no exterior building modifications are proposed at the DBM campus, where students would be temporarily relocated, and that exterior site changes would be limited to minor reconfiguration of existing parking and signage, no adverse aesthetic impacts would occur at this site. No mitigation or further analysis is required.

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

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

The Project site is in an urban setting and is fully developed. The current uses generate nighttime light from security and parking lot lights and exterior building lights. Surrounding land uses also generate significant light and glare from streetlights, vehicle lights, parking lot lights, and exterior building security lights.

Exterior building lighting and security lighting would be incorporated in all newly constructed building areas and spaces, in accordance with existing applicable regulations and guidelines for school operations.

As discussed in the SPEIR, LAUSD SC-AE-4 includes requirements that are intended to minimize adverse light and glare impacts on nearby properties. The SC-AE-4 Marquee Signs Bulletin BUL 5004.1 includes detailed criteria for the design, approval, placement, and operation and maintenance of electronic light boards (i.e. marquees) proposed for any LAUSD school site. The LAUSD **SC-AE-5** and **SC-AE-6** provides measures such

[15] Los Angeles Unified School District, *School Upgrade Program Draft Subsequent Environmental Impact Report* (2023), accessed [month day, year], https://files.ceqanet.lci.ca.gov/284141-2/attachment/0CRpktr1bFw7EGk4wzmRRM-8GGQv8GBEtSfSTad2rMJBck4k2dV1arXvtBmbvtcwK3qbd7l1HeDDJdyz0

as eliminate direct-beam projection off-site or glare off buildings into adjoining residential areas, install lighting to minimize glare for pedestrians and drivers, and to avoid light spilling onto adjacent properties.

SC-AE-5 references quantitative performance standards for light and glare impacts from the School Design Guide, which limits light and glare impacts to no more than two foot-candles, as measured at the property line of an affected nearby residence. The use of light hoods, filtering louvers, glare shields, and/or landscaping is discussed, as is painting of lamp enclosures and poles to reduce reflection. SC-AE-6 includes site lighting. standards that would have minimal impact off-site and minimal contribution to sky glow, glare, and light trespass.

The California Building Code also contains standards for outdoor lighting that are intended to reduce light pollution and glare by regulating light power and brightness, shielding, and sensor controls.

With implementation of **SC-AE-4, SC-AE-5 and SC-AE-6,** impacts from substantial light and glare would be less than significant. No mitigation or further analysis is required.

Given that no exterior building modifications are proposed at the DBM campus, where students would be temporarily relocated, and that exterior site changes would be limited to minor reconfiguration of existing parking and signage, no adverse aesthetic impacts would occur at this site. No mitigation or further analysis is required.

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, as updated) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	☒
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?	☐	☐	☐	☒

(AG) Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact agriculture and forestry resources. The District spans an urban area with small areas of scattered important farmland, no land protected under Williamson Act contract, and no forest land or timberland. According to the SPEIR, projects implemented under the SUP are anticipated to have less than significant impacts related to the conversion of farmland to nonagricultural use and no impacts on land protected under a Williamson Act contract, forest land and timberland uses in the District. Therefore, there are no SCs for minimizing impacts to agriculture and forestry resources in areas where future Projects would be implemented under the SUP.

Project specific analysis provided below concludes that implementation of the proposed Project would have no impacts on agriculture and forestry resources.

4. Environmental Checklist and Analysis

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 existing Project site, DBM campus, and surrounding areas are highly disturbed and developed. All development under the Proposed Project would occur solely within the existing Campus boundaries. According to the California Department of Conservation's (DOC) California Important Farmland Finder, the Project site and DBM campus are designated as "Urban and Built-up Land"[16]. No Farmland exists within or surrounding the Project site or DBM campus. Therefore, no impacts to farmland or agricultural resources would occur. No mitigation or further analysis is required.

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

No Impact. The existing Project site and DBM campus are highly disturbed, developed, and zoned as Public Facilities in the South Los Angeles Community Plan and the Silver Lake - Echo Park Community Plan, respectively. No development outside of the existing Campus and DBM campus boundaries are proposed. The Project site is not zoned for agricultural production and is not classified as farmland. The Project site and DBM campus are designated as "Urban and Built-Up Land" and is not designated as a Williamson Act Land[17]. Therefore, no impact would occur. No mitigation or further analysis is required.

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

No Impact. The Project site and DBM campus are zoned as Public Facilities and are designated as "Urban and Build-up Land" by the DOC. The Project site and DBM campus are not zoned as forestland or timberland, and there is no timberland production at the Project site. No impact would occur regarding forest land or timberland. No mitigation or further analysis is required.

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

No Impact. The Project site and DBM campus are zoned as Public Facilities and is designated as "Urban and Build-up Land" by the DOC. The Project site and DBM campus are not zoned as forestland and would not convert forest land to non-forest use. No impact would occur regarding forest land. No mitigation or further analysis is required.

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

No Impact. The Project site does not contain agricultural or forest uses. Existing land uses surrounding the Project site are residential and commercial. There are no areas zoned for agricultural or forest uses within the

[16] California Department of Conservation, *California Important Farmland Finder* (2018), https://maps.conservation.ca.gov/DLRP/CIFF/
[17] California Department of Conservation, *California Important Farmland Finder* (2018), https://maps.conservation.ca.gov/DLRP/CIFF/

Project area. The Project site and surrounding area is designated as "Urban and Built-Up Land" (DOC). No impacts regarding conversion of agricultural or forest land would occur. No mitigation or further analysis is required.

4. Environmental Checklist and Analysis

	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 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?	☐	☐	☒	☐

(AQ) Explanation:

On December 11, 2025, an Air Quality, Greenhouse Gas, and Energy Emissions Impact Analysis (Air Report) was prepared by Vista Environmental in support of the Proposed Project. The Air Report is included in Appendix A.

The SPEIR evaluated the potential for implementation of the SUP-related site-specific projects to result in adverse air quality impacts, including impacts to students and faculty at the upgraded school sites. According to the SPEIR, some impacts, even with implementation of regulatory requirements and SCs would be potentially significant. This air quality impact analysis is based upon the Air Quality Technical Study prepared for the proposed Project (see Appendix A).

LAUSD recently updated SCs that are applied to LAUSD construction, upgrade, and improvement projects during the environmental review process by the OEHS CEQA team to offset potential environmental impacts. Applicable SCs related to air quality impacts associated with the Project are provided below.

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

LAUSD Standard Conditions of Approval	
	• 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 Air Quality Management District's (SCAQMD's) regional and localized significance thresholds. Construction bid contracts shall include protocols that reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. The Construction Contractor shall be responsible for documenting compliance with the identified protocols. Specific air emission reduction protocols include, but are not limited to, the following. Exhaust Emissions • Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM). • Consolidate truck deliveries and limit the number of haul trips per day. • Route construction trucks off congested streets, as permitted by local jurisdiction haul routes. • Employ high pressure fuel injection systems or engine timing retardation. • Use ultra-low sulfur diesel fuel, containing 15 parts per million (ppm) sulfur or less in all diesel construction equipment. • Use construction equipment rated by the U.S. Environmental Protection Agency (USEPA) 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).

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LAUSD Standard Conditions of Approval	
	• 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 percent or greater silt content. • Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 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. <u>General Construction</u> • Use ultra-low volatile organic compounds (VOCs) 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.
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 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 (SCAB), which is managed by the SCAQMD, is designated nonattainment for O_3, and $PM_{2.5}$ under the National Ambient Air Quality Standards

(NAAQS) and California AAQS, nonattainment for PM_{10} under the California AAQS, and nonattainment for lead (Los Angeles County only) under the NAAQS.

Further, the SCAQMD has identified regional thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including VOC, CO, NO_x, SO_X, PM_{10}, and $PM_{2.5}$. Development projects below the regional significance thresholds are not expected to generate sufficient criteria pollutant emissions to violate any air quality standard or contribute substantially to an existing or projected air quality violation. Where available, the significance criteria established by the SCAQMD may be relied upon to make the following determinations.

Table 3 Federal and State Attainment Status

Pollutants	Federal Classification	State Classification
Ozone (O_3)	1- and 8-Hour Nonattainment (Extreme)	1- and 8-Hour Nonattainment
Particulate Matter (PM_{10})	Attainment (Maintenance)	Nonattainment
Fine Particulate Matter ($PM_{2.5}$)	Nonattainment (Serious)	Nonattainment
Carbon Monoxide (CO)	Attainment (Maintenance)	Attainment
Nitrogen Dioxide (NO_2)	Attainment (Maintenance)	Attainment
Sulfur Dioxide (SO_2)	Attainment	Attainment

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

Less than Significant Impact. As discussed in Appendix A, the South Coast Air Quality Management District (SCAQMD) CEQA Handbook states that "New or amended GP Elements (including land use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP." Strict consistency with all aspects of the plan is usually not required. A Proposed Project should be considered to be consistent with the Air Quality Management Plan (AQMP) if it furthers one or more policies and does not obstruct other policies. The SCAQMD CEQA Handbook identifies two key indicators of consistency:

(1) Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

(2) Whether the project will exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

Both of these criteria are evaluated in Appendix A and summarized in the following sections.

<u>Criterion 1 - Increase in the Frequency or Severity of Violations?</u>

Based on the air quality modeling analysis contained in Appendix A, short-term regional construction air emissions would not result in significant impacts based on SCAQMD regional thresholds of significance (see Section 9.1 of the Air Report) or local thresholds of significance (see Section 9.2 of the Air Report). The ongoing operation of the Proposed Project would generate air pollutant emissions that are inconsequential on a regional basis and would not result in significant impacts based on SCAQMD thresholds of significance. The analysis for long-term local air quality impacts (see Section b) below) showed that local pollutant concentrations would

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not be projected to exceed the air quality standards. In addition, the Project would comply with **SC AQ-4**, which requires the implementation of all feasible measure to reduce air emissions below the SCAQMD regional and localized significance thresholds. Therefore, a less than significant long-term impact would occur and no mitigation would be required.

Therefore, based on the information provided above, the Proposed Project would be consistent with the first criterion.

Criterion 2 - Exceed Assumptions in the AQMP?

Consistency with the AQMP assumptions is determined by performing an analysis of the Proposed Project with the assumptions in the 2022 AQMP. The emphasis of this criterion is to ensure that the analyses conducted for the Proposed Project are based on the same forecasts as the AQMP. The 2022 AQMP was developed through use of the planning forecasts provided in the Connect SoCal and 2019 Federal Transportation Improvement Program (FTIP). The Connect SoCal is a major planning document for the regional transportation and land use network within Southern California. The Connect SoCal is a long-range plan that is required by federal and state requirements placed on the Southern California Association of Governments (SCAG) and is updated every four years. The 2019 FTIP provides long-range planning for future transportation improvement projects that are constructed with state and/or federal funds within Southern California. Local governments are required to use these plans as the basis of their plans for the purpose of consistency with applicable regional plans under CEQA. For this Project, the South Los Angeles Community Plan defines the assumptions that are represented in AQMP.

The Proposed Project site is currently designated as Public Facilities in the South Los Angeles Community Plan. The Proposed Project consists of the modernization of an existing school. The Proposed Project is an allowed use within the current land use designation. As such, the Proposed Project is not anticipated to exceed the AQMP assumptions for the Proposed Project site and is found to be consistent with the AQMP for the second criterion.

Based on the above, the Proposed Project will not result in an inconsistency with the SCAQMD AQMP. Therefore, a less than significant impact will occur in relation to implementation of the AQMP. No mitigation or further analysis is required.

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

Less than Significant Impact. The Proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Proposed Project region is non-attainment under an applicable Federal or State ambient air quality standard. The SCAQMD has published a report on how to address cumulative impacts from air pollution (see Appendix A). In this report the AQMD clearly states (Page D-3):

> "…*the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or Environmental Impact Report (EIR). The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for TAC emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility- wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts. Projects that exceed the project-specific significance thresholds are*

considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."

Therefore, this analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which the South Coast Air Basin is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual Project-related construction and operational emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable. The following section calculates the potential air emissions associated with the construction and operations of the Proposed Project and compares the emissions to the SCAQMD standards.

Short-Term Construction Emissions

The construction activities for the Proposed Project are anticipated to include the demolition of 23 classrooms and restrooms in 13 relocatable buildings and a storage building and associated pavement, grading of approximately 2.75 acres of the Project site, installation of new underground utilities, building construction that would include the minor modernization of approximately 40,127 square feet of building space and new construction of a 3-story classroom building that would total 46,380 square feet, paving associated with the outside improvements that would include landscape and hardscape upgrades, and application of architectural coatings. The CalEEMod model has been utilized to calculate the construction-related emissions from the Proposed Project and the input parameters utilized in the analysis are detailed in Section 8.1 of the Air Report. The maximum daily regional construction-related criteria pollutant emissions from the Proposed Project, as calculated in the Air Report, are shown in the table below.

Table 4 Construction-Related Criteria Pollutant Emissions

Season and Year of Construction	Pollutant Emissions (pounds/day)					
	VOC	ROG	VOC	CO	VOC	PM_{10}
Daily Summer Maximum						
2026	1.49	14.9	16.0	0.03	3.02	1.60
2027	1.27	10.3	14.1	0.03	0.92	0.44
2028	1.21	9.80	13.9	0.03	0.88	0.41
Daily Winter Maximum						
2026	1.49	14.9	15.4	0.03	3.02	1.60
2027	1.27	10.3	13.8	0.03	0.92	0.44
2028	37.6	9.83	13.6	0.03	0.88	0.41
Maximum Daily Emissions		3.1	2.7	31.3	0.3	1.2
SCAQMD Significance Thresholds		*75*	*100*	*550*	*55*	*150*
Maximum Daily Construction Emissions	**37.6**	**14.9**	**16.0**	**0.03**	**3.02**	**1.60**
SCAQMD Regional Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
SCAQMD Local Thresholds[1]	**--**	**121**	**1,251**	**--**	**10**	**6**
Exceeds Thresholds?		No	No	No	No	No

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Notes:

[1] The nearest off-site sensitive receptors are the Catholic Center, Daycare and Jewish Center to the west that are located as near as 65 feet (20 meters) from the Project site. According to SCAQMD methodology, all receptors closer than 25 meters are based on the 25-meter threshold. Calculated from SCAQMD's Mass Rate Look-up Tables for 2.75 acres interpolated from two and five acres in Air Monitoring Area 1, Central Los Angeles.

Source: CalEEMod Version 2022.1

NO_x: Nitrous Oxides; CO: Carbon Monoxide; SO_2: Sulfur Dioxide; PM: Particulate Matter.

The table above shows that none of the criteria pollutants analyzed would exceed the regional emissions thresholds during construction of the Proposed Project. It also shows that the Proposed Project's regional construction-related criteria pollutant emissions that consist of both on-site and off-site emissions sources would not exceed the local thresholds, which provides for a worst-case analysis, since the local thresholds are for analyzing only the emissions created on-site.

In addition, the Project would implement **SC-AQ-2**, **SC-AQ-3**, and **SC-AQ-4**. **SC-AQ-2** would obligate construction contractors to have off-road equipment properly tuned and maintained in accordance with the manufacturer's specifications. **SC-AQ-3** would implement methods for reducing onsite dust emissions during soil removal. These methods would include maintaining slow speeds for vehicles, applying water/mist to dirt as it is loaded engine idling times to no more than five consecutive minutes, utilizing ultra-low sulfur diesel and unloaded, minimizing soil drop heights, covering haul truck loads, and using polyethylene sheeting to cover excavated areas and dirt stockpiles. **SC-AQ-4** is intended to reduce construction exhaust and fugitive dust emissions with a number of features, including, but not limited to, restricting diesel fuel, utilizing off-road construction equipment that is compliant with Tier 3 engine standards at a minimum, applying soil stabilizers, replacing ground cover as soon as possible, and installing wheel washers.

The temporary relocation of campus operations to the DBM campus would not result in any air quality impacts, as no new construction or a net increase in vehicle trips would occur. Activities at the temporary DBM campus would consist of typical school functions within existing facilities, and no long-term or intensive construction activities generating emissions are proposed at this site.

Therefore, a less than significant regional or local air quality impact would occur from construction of the Proposed Project

Long-Term Operational Emissions

The on-going operation of the Proposed Project would result in a long-term increase in air quality emissions. This increase would be due to emissions from on-site area sources and energy usage emissions created from the on-going use of the Proposed Project. The operations-related regional criteria air quality impacts created by the Proposed Project have been analyzed through use of the CalEEMod model and the input parameters utilized in this analysis have been detailed in Section 8.1 of the Air Report. The worst-case summer or winter VOC, NOx, CO, SO2, PM10, and PM2.5 daily emissions created from the Proposed Project's long-term operations have been calculated and are summarized in the table below in and the CalEEMod emissions printouts are shown in Appendix A of the Air Report.

Table 5 Operational Criteria Pollutant Emissions

Activity	Pollutant Emissions (pounds/day)					
	VOC	ROG	VOC	CO	VOC	PM_{10}
Area Sources[1]	2.70	0.03	3.76	<0.01	0.01	0.01
Energy Usage[2]	0.03	0.46	0.39	<0.01	0.04	0.04
Total Emissions	2.73	0.49	4.15	<0.01	0.05	0.05
SCAQMD Regional Thresholds	55	55	550	150	150	55
SCAQMD Local Thresholds	--	121	1,251	--	4	2
Exceeds Thresholds?	No	No	No	No	No	No

Notes:
[1] Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.
[2] Energy usage consist of emissions from natural gas usage.
Source: CalEEMod Version 2022.1
NO_x: Nitrous Oxides; CO: Carbon Monoxide; SO_2: Sulfur Dioxide; PM: Particulate Matter.

The data provided in the table above shows that none of the analyzed criteria pollutants would exceed either the regional or local emissions thresholds during operation of the Proposed Project. Therefore, less than significant regional and local air quality impacts would occur from operation of the Proposed Project.

Local CO Hotspot Impacts from Project-Generated Vehicular Trips

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future without and with project CO levels to the State and Federal CO standards of 20 ppm over one hour or 9 ppm over eight hours.

At the time of the 1993 Handbook, the Air Basin was designated nonattainment under the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) for CO. With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations in the Air Basin and in the state have steadily declined. In 2007, the Air Basin was designated in attainment for CO under both the CAAQS and NAAQS. SCAQMD conducted a CO hot spot analysis for attainment at the busiest intersections in Los Angeles during the peak morning and afternoon periods and did not predict a violation of CO standards. Since the nearby intersections to the Proposed Project are much smaller with less traffic than what was analyzed by the SCAQMD, no local CO Hotspot are anticipated to be created from the Proposed Project and no CO Hotspot modeling was performed. Therefore, a less than significant long-term air quality impact is anticipated to local air quality with the on-going use of the Proposed Project. No mitigation or further analysis is required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. Sensitive receptors in the Project area are defined as residences, schools, and places of worship adjacent to the proposed Project. The Proposed Project would not expose sensitive

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receptors to substantial pollutant concentrations. The local concentrations of criteria pollutant emissions produced in the nearby vicinity of the Proposed Project, which may expose sensitive receptors to substantial concentrations have been calculated above in Section b) for both construction and operations, which are discussed separately below. The discussion below also includes an analysis of the potential impacts from toxic air contaminant emissions. The nearest sensitive receptors are the USC Catholic Center, HIC Daycare and USC Jewish Center that are as near as 65 feet west of the Project site. There are also the USC dormitories that are as near as 85 feet north of the Project site.

CONSTRUCTION-RELATED SENSITIVE RECEPTOR IMPACTS

The construction activities for the Proposed Project are anticipated to include demolition of 23 classrooms and restrooms in 13 relocatable buildings and a storage building and associated pavement, grading of approximately 2.75 acres of the Project site, installation of new underground utilities, building construction that would include the minor modernization of approximately 40,127 square feet of building space and new construction of a 3-story classroom building that would total 46,380 square feet, paving associated with the outside improvements that would include landscape and hardscape upgrades, and application of architectural coatings. Construction activities may expose sensitive receptors to substantial pollutant concentrations of localized criteria pollutant concentrations and from toxic air contaminant emissions created from on-site construction equipment, which are described below.

Local Criteria Pollutant Impacts from Construction

The local air quality impacts from construction of the Proposed Project have been analyzed above in Section b) and found that the construction of the Proposed Project would not exceed the local NOx, CO, PM10 and PM2.5 thresholds of significance discussed in Section 9.2 of the Air Report. Therefore, construction of the Proposed Project would create a less than significant construction-related impact to local air quality and no mitigation would be required.

Toxic Air Contaminants Impacts from Construction

Construction activities are anticipated to generate Toxic Air Contaminant (TAC) emissions from diesel particulate matter (DPM) associated with the operation of trucks and off-road equipment and from possible asbestos in the structures to be remodeled and demolished.

Diesel Particulate Matter Emissions

The greatest potential for toxic air contaminant emissions would be related to diesel particulate matter (DPM) emissions associated with heavy equipment operations during construction of the Proposed Project. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of "Individual Cancer Risk." "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. It should be noted that the most current cancer risk assessment methodology recommends analyzing a 30-year exposure period for the nearby sensitive receptors (Appendix A).

Given the relatively limited number of heavy-duty construction equipment, the varying distances that construction equipment would operate to the nearby sensitive receptors, and the short-term construction schedule, the Proposed Project would not result in a long-term (i.e., 30 or 70 years) substantial source of toxic air contaminant emissions and corresponding individual cancer risk. In addition, California Code of Regulations Title 13, Article 4.8, Chapter 9, Section 2449 regulates emissions from off-road diesel equipment in California. This regulation limits idling of equipment to no more than five minutes, requires equipment operators to label each piece of equipment and provide annual reports to CARB of their fleet's usage and emissions. This regulation also requires systematic upgrading of the emission Tier level of each fleet, and currently no commercial operator is allowed to purchase Tier 0, Tier 1 or Tier 2 equipment. In addition to the purchase restrictions, equipment operators need to meet fleet average emissions targets that become more stringent each year between years 2014 and 2023. By January 2026, 75 percent or more of all contractors' equipment fleets must be Tier 2 or higher and by January 2029, 100 percent of all equipment fleets must be Tier 2 or higher. Furthermore, the Project shall comply with SC-AQ-4, which requires that construction bid contracts 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. Specific air emission reduction protocols include measures include, but are not limited to, using cleaner, modern engines and fuels, limiting idling, consolidating truck trips, controlling dust with watering and coverings, and managing traffic to minimize congestion. Therefore, no significant short-term DPM impacts would occur during construction of the Proposed Project.

Asbestos Emissions

It is possible that the existing on-site structures to be remodeled and demolished contain asbestos. According to SCAQMD Rule 1403 requirements, prior to the start of demolition activities, the existing structures located on-site shall be thoroughly surveyed for the presence of asbestos by a person that is certified by Cal/OSHA for asbestos surveys. Rule 1403 requires that the SCAQMD be notified a minimum of 10 days before any demolition activities begin with specific details of all asbestos to be removed, start and completion dates of demolition, work practices and engineering controls to be used to contain the asbestos emissions, estimates on the amount of asbestos to be removed, the name of the waste disposal site where the asbestos will be taken, and names and addresses of all contractors and transporters that will be involved in the asbestos removal process. Furthermore, the Project shall comply with SC-HAZ-4 which requires the construction contractor to follow environmental site assessment practices, including testing and handling of imported/exported materials, implementing removal or remedial workplans, adhering to CARB Rule 1466, addressing PCBs in older building materials, and following lead and asbestos abatement requirements identified in Phase I/II reports or abatement plans. Therefore, through adherence to the asbestos removal requirements, detailed in SCAQMD Rule 1403, and SC-HAZ-4, a less than significant asbestos impact would occur during construction of the Proposed Project

Therefore, construction of the Proposed Project would result in a less than significant exposure of sensitive receptors to substantial pollutant concentrations.

OPERATIONS-RELATED SENSITIVE RECEPTOR IMPACTS

The on-going operations of the Proposed Project may expose sensitive receptors to substantial pollutant concentrations of local CO emission impacts from the Project-generated vehicular trips and from the

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potential local air quality impacts from on-site operations. The following analyzes the vehicular CO emissions. Local criteria pollutant impacts from on-site operations, and toxic air contaminant impacts.

Local CO Hotspot Impacts from Project-Generated Vehicle Trips

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential impacts to sensitive receptors. The analysis provided above in Section b) shows that no local CO Hotspots are anticipated to be created at any nearby intersections from the vehicle traffic generated by the Proposed Project. Therefore, operation of the Proposed Project would result in a less than significant exposure of off-site sensitive receptors to substantial pollutant concentrations.

Local Criteria Pollutant Impacts from On-site Operations

The local air quality impacts from the operation of the Proposed Project would occur from on-site sources such as architectural coatings and landscaping equipment. The analysis provided above in Section b) found that the operation of the Proposed Project would not exceed the local NOx, CO, PM10 and PM2.5 thresholds of significance discussed in Section 9.2 of the Air Report. Therefore, the on-going operations of the Proposed Project would create a less than significant operations-related impact to local air quality due to on-site emissions and no mitigation would be required.

Operations-Related Toxic Air Contaminant Impacts

Particulate matter (PM) from diesel exhaust is the predominant TAC in most areas and according to *The California Almanac of Emissions and Air Quality 2013 Edition*, prepared by CARB, about 80 percent of the outdoor TAC cancer risk is from diesel exhaust (Appendix A). Some chemicals in diesel exhaust, such as benzene and formaldehyde have been listed as carcinogens by State Proposition 65 and the Federal Hazardous Air Pollutants program. Due to the nominal number of diesel truck trips that are anticipated to be generated by the on-going operation of the Proposed Project, a less than significant TAC impact would be created from the on-going operations of the Proposed Project and no mitigation would be required.

Therefore, impacts towards sensitive receptors would be less than significant. No mitigation or further analysis is required.

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

Less than Significant Impact. Sensory perception has four major components: detectability, intensity, character, and hedonic tone. The detection (or threshold) of an odor is based on a panel of responses to the odor. There are two types of thresholds: the odor detection threshold and the recognition threshold. The detection threshold is the lowest concentration of an odor that will elicit a response in a percentage of the people that live and work in the immediate vicinity of the Project site and is typically presented as the mean (or 50 percent of the population). The recognition threshold is the minimum concentration that is recognized as having a characteristic odor quality, this is typically represented by recognition by 50 percent of the population. The intensity refers to the perceived strength of the odor. The odor character is what the substance smells like.

The hedonic tone is a judgment of the pleasantness or unpleasantness of the odor. The hedonic tone varies in subjective experience, frequency, odor character, odor intensity, and duration. Potential odor impacts have been analyzed separately for construction and operations below.

Construction-Related Odor Impacts

Potential sources that may emit odors during construction activities include the application of coatings such as asphalt pavement, paints and solvents and emissions from diesel equipment. Standard construction requirements that limit the time of day when construction may occur, as well as SCAQMD Rule 1108 that limits VOC content in asphalt and Rule 1113 that limits the VOC content in paints and solvents would minimize odor impacts from construction. As such, the objectionable odors that may be produced during the construction process would be temporary and would not likely be noticeable for extended periods of time beyond the Project site's boundaries.

Further, with the implementation of SC-AQ-2 and SC-AQ-4, the contractors would be required to keep the equipment properly tuned, which would reduce harmful emissions and odors. Implementation of SC-AQ-4 would keep exhaust emissions and fugitive dust levels low.

Through compliance with the applicable regulations and SCs that reduce odors and due to the transitory nature of construction odors, a less than significant odor impact would occur and no mitigation would be required.

Operations-Related Odor Impacts

The Proposed Project would consist of a major modernization of an existing school. No new sources of odor would be introduced upon Project completion. Potential sources that may emit odors during the on-going operations of the Proposed Project would primarily occur from the trash storage areas. Pursuant to City regulations, permanent trash enclosures that protect trash bins from rain as well as limit air circulation would be required for the trash storage areas. Due to the distance of the nearest receptors from the Project site and through compliance with SCAQMD's Rule 402, City trash storage regulations, a less than significant impact related to odors would occur during the on-going operations of the Proposed Project. No mitigation or further analysis is required.

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	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, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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?	☐	☐	☐	☒

(BIO) Explanation:

On June 30, 2022, a Tree Assessment Report was prepared by Arborgate Consulting in support of the Proposed Project and is included in Appendix B.

The SPEIR evaluated the potential for implementation of the SUP-related projects to impact biological resources. According to the SPEIR, upon implementation of regulatory requirements and LAUSD SCs for SUP-related projects, impacts associated with nesting birds, wildlife movement, and native trees would be less than significant.

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

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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

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	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) • 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. <u>Biological Resources Report</u> 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

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	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[18]) should occur outside of nesting season to avoid take of birds, bats, or their eggs.[19]

[18] Substrate is the surface on which a plant or animal lives.
[19] Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs and/or young resulting from disturbances that cause abandonment of active nests.

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	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.

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	• 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:
	  o 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

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	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. o 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. o Monitoring period for woodlands shall be at least 10 years with a minimum of 7 years without supplemental irrigation. This allows the trees to go through one typical drought cycle. This should also be the minimal time needed to see signs of stress and disease and determine the need for replacement plantings. LAUSD shall request CDFW review and comment on any translocation plans, habitat preservation, habitat creation and/or restoration plans. **Removal of Protected Trees on Existing Campuses** LAUSD shall comply with the LAUSD OEHS Tree Trimming and Removal Policy. This policy ensures the management of District trees while ensuring that District activities will not conflict with locally adopted tree preservation policies and ordinances.

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

No Impact. The Project site and surrounding area are fully developed and contain no native vegetation capable of supporting any special status plant or wildlife species. No known threatened, endangered, or rare species or their habitats, locally designated species, locally designated natural communities, riparian, or wetland habitats exist on the Project site. The Project site is not designated as a critical habitat for threatened or endangered species. The Project site and its surrounding area are not located within a Significant Ecological Area (SEA)[20]. No impact would occur. No mitigation or further analysis is required.

The temporary DBM campus is within an existing developed school site that is fully paved and landscaped, with no natural habitat or sensitive biological resources present. No biological impacts at this site would occur. No mitigation or further analysis is required.

[20] County of Los Angeles, *Significant Ecological Areas and Coastal Resource Areas Policy Map* (2019), https://planning.lacounty.gov/wp-content/uploads/2022/11/9.1_Chapter9_Figures.pdf

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

No Impact. The Project site does not contain any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations by the CDFW[21] or USFWS[22]. The Project site is entirely developed and does not contain any natural drainage or water courses, which would potentially support riparian habitat, or natural undeveloped areas that may contain any other sensitive natural community. No impact would occur. No mitigation or further analysis is required.

The temporary DBM campus is within an existing developed school site that is fully paved and landscaped, with no natural habitat or sensitive biological resources present. No biological impacts at this site would occur. No mitigation or further analysis is required.

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

No Impact. The Project site and DBM campus are entirely developed and do not contain any waterways or undeveloped land capable of supporting federally protected wetlands[23]. Therefore, no impact to wetlands would occur through direct removal, filling, hydrological interruption, or other means. No mitigation or further analysis is required.

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

Less than Significant Impact. The Project site does not contain any native vegetation or undeveloped land capable of supporting fish or the movement of wildlife. However, tree removal and building demolition have the potential to disrupt birds that are nesting in the trees or buildings during the avian breeding season (February 1 through August 31). Construction-related noise and vibration also have the potential to disrupt birds during avian breeding season. Thus, construction activities have the potential to impact nesting birds. The Proposed Project would implement **SC-BIO-3**, which would establish buffer zones and monitoring procedures in the event construction occurs during nesting bird season. Following the completion of a pre-construction clearance survey, the implementation of measures provided in **SC-BIO-3** would reduce impacts to less than significant. These measures include completing tree removal and demolition activities outside of avian nesting season, if feasible. Additionally, the Project would also adhere to the requirements outlined in **SC-BIO-1**, **SC-BIO-2**, and **SC-BIO-4**. Therefore, impacts would be less than significant. No mitigation or further analysis is required.

[21] County of Los Angeles, *Significant Ecological Areas and Coastal Resource Areas Policy Map* (2019), https://planning.lacounty.gov/wp-content/uploads/2022/11/9.1_Chapter9_Figures.pdf

[22] U.S. Fish and Wildlife Service, *National Wetlands Inventory* (2025), https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/

[23] U.S. Fish and Wildlife Service, *National Wetlands Inventory* (2025), https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/

No major noise-producing construction activities or tree removal are proposed at the DBM campus, thus no impacts regarding the movement of species would occur. No mitigation or further analysis is required.

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

Less than Significant Impact. The Project site is located in a fully developed area, and the surrounding development is not mapped within a SEA[24].

According to the Tree Assessment Report, there are 43 trees within the Project site that are generally in fair to poor condition due to being confined in urban hardscape. At least five trees are recommended for removal due to being in poor condition. There are no Los Angeles City- or Los Angeles County-protected trees on the Project site; they are all non-native to the region.

There are 6 trees along the edge of the Project site that are under City of Los Angeles jurisdiction, and permits from the Urban Forestry Division are required before pruning or removing them. Half of these street trees are in good health and half of them are in poor health.

Tree removal would be necessary under the Proposed Project, as there are existing trees scattered within the eastern portion of the Project site, where the majority of building development and access road development would occur. The Proposed Project would include a landscape plan to offset the loss of trees on the Project site.

Recommendations from the Tree Assessment Report include specific actions (e.g. remove or protect in place) for each tree within the Project site, soil improvements for maintaining the health of landscaped plants, and optimizing tree planting and tree replanting locations, All recommendations contained in the Project-specific Tree Assessment Report, prepared by an LAUSD Tree Maintenance Personnel Certified Arborist, would be incorporated into the Proposed Project during construction activities.

In compliance with SC BIO-4, the Project would comply with LAUSD's Office of Environmental Health and Safety (OEHS) Tree Trimming and Removal Procedure for trees on the Campus and would complete the City's tree removal permit process if any street trees are removed[25]. The LAUSD Tree Trimming and Removal Procedure[26] encompasses all requirements of the City and would not conflict with any local policy or ordinances. No major construction activities or tree removals are proposed at the temporary DBM campus. Therefore, the Project would result in less than significant impacts. No mitigation or further analysis is required.

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[24] County of Los Angeles, *Significant Ecological Areas and Coastal Resource Areas Policy Map* (2019), https://planning.lacounty.gov/wp-content/uploads/2022/11/9.1_Chapter9_Figures.pdf

[25] Los Angeles Unified School District, *Tree Trimming and Removal Application* (2024), https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/135/ceqa/LAUSD_TreeTrimmingRemovalProcedure_20240607.pdf

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

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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 and DBM campus are not located within a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan[27]. The Project site and DBM campus are also not located on or near any SEA, Land Trust, or Conservation Plan[28]. Thus, no impact would occur. No mitigation or further analysis is required.

[27] California Department of Fish and Wildlife, *California Natural Community Conservation Plans* (2023), https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline

[28] County of Los Angeles, *Significant Ecological Areas and Coastal Resource Areas Policy Map* (2019), https://planning.lacounty.gov/wp-content/uploads/2022/11/9.1_Chapter9_Figures.pdf

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

(CUL) Explanation:

In April 2022, a Final Historic Resource Evaluation Report (HRER) was prepared by ASM Affiliates in support of the Proposed Project. The HRER is included in Appendix C.

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

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

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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

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	Treatment Approaches for Historic Schools. The Historic Architect shall work with the Design Team and LAUSD throughout the design process to develop project options that facilitate compliance with the applicable historic preservation standards. • For new construction, the Historic Architect shall work with the Design Team and LAUSD to identify options and opportunities for: (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors, and (2) ensuring that new construction is designed and sited in such a way that reinforces and strengthens, as much as feasible, character-defining site plan features, landscaping, and circulation corridors throughout campus. • For modernization and upgrade projects involving contributing (significant) buildings or features, the Historic Architect shall work with the Design Team and LAUSD to ensure that specifications for design and implementation of projects comply with the applicable historic preservation standards. • The Historic Architect shall participate in Design Team meetings during all phases of the project through 100 percent construction drawings, pre-construction, and construction phases, as applicable. • The Historic Architect shall prepare a memo at the 50 percent and at the 100 percent 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.

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	• 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 Historic American Buildings Survey (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

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	specifying the name of researcher, date of research, and sources/archives visited, as well as a bibliography. Within the written history, statements shall be footnoted as to their sources, where appropriate. • **Historic Documentation Package Submittal:** Upon completion of the descriptive and historic narrative, all materials will be compiled in electronic format and presented to LAUSD for review and comment. Upon approval, one electronic copy and one hard copy shall be submitted to LAUSD OEHS. Photographs will be individually labeled and provided to LAUSD in electronic format.
SC-CUL-5	LAUSD shall comply with Design Specification 01 3591, Historic Treatment Procedures, as applicable. This Specification requires the Construction Contractor to submit a Historic Treatment Plan to the District for the protection, repair, and replacement of historic materials and features.
SC-CUL-6	LAUSD shall retain a qualified Archaeologist to be available on-call. The Archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology. To reduce impacts to previously undiscovered buried archaeological resources, following completion of the final grading plan and prior to any ground disturbance, a qualified archaeologist shall prepare an Archaeological Monitoring Program as described under SC-CUL-7.
SC-CUL-7	The Construction Contractor shall halt construction activities within a 30-foot radius of the find and shall notify the LAUSD. • LAUSD shall retain an Archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology. • 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.

LAUSD Standard Conditions of Approval	
	○ Procedures for temporary stop and redirection of work to permit sampling, including anticipated radius of suspension of ground disturbances around discoveries and duration of evaluation of discovery to determine whether they are classified as unique or historical resources. ○ Procedures for maintenance of monitoring logs, recovery, analysis, treatment, and curation of significant resources. ○ Procedures for archaeological resources sensitivity training for all construction workers involved in moving soil or working near soil disturbance, including types of archaeological resources that might be found, along with laws for the protection of resources. The sensitivity training program shall also be included in a worker's environmental awareness program that is prepared by LAUSD with input from the Archaeologist, as needed. ○ Accommodation and procedures for Native American monitors, if required. ○ Procedures for discovery of Native American cultural resources. • The construction manager shall adhere to the stipulations of the Archaeological Monitoring Plan.
SC-CUL-8	Cultural resources sensitivity training shall be conducted for all construction workers involved in ground-disturbing activities. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources and shall be included in a worker's environmental awareness program that is prepared by LAUSD with input from a qualified Archaeologist, as needed.
SC-CUL-9	LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. If feasible, the Archaeologist shall prepare a Phase III Data Recovery/Mitigation Program to outline procedures to recover a statistically valid sample of the archaeological remains and to document the site and reduce impacts to be less than significant. All documentation shall be prepared in the standard format of the Archaeological Resource Management Reports (ARMR) Guidelines, as prepared by the Office of Historic Preservation (OHP). Once a Phase III Data Recovery/Mitigation Program is completed, an Archaeological Monitor shall be present to oversee the ground-disturbing activities to ensure that construction proceeds in accordance with the Program.
SC-CUL-10	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified Archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.

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

No Impact. As described in the HRER (Appendix C), two of the four permanent buildings on the Campus were constructed in 2010, and thus do not meet the age requirement of 45 years for consideration as historically significant resources/properties. The other two buildings, the administration building (Building #1) and the classroom building (Building #2), were constructed in 1975, are more than 45 years old, and are therefore evaluated in the HRER.

4. Environmental Checklist and Analysis

In preparation of the HRER, ASM conducted archival research on the Campus using various sources, including historic newspapers, assessor's maps, Zoning Information and Map Access System (ZIMAS), Sanborn maps, the Los Angeles Public Library, and historic aerials. They reviewed as-built drawings and construction documents from LAUSD and consulted academic and professional sources to assess the architects' significance. They were unable to access the LAUSD collection at UCLA due to temporary closure for construction. On February 24, 2022, ASM conducted an on-site survey of the Campus to document it with detailed field notes and photographs of the exteriors and interiors (where available) of the two buildings that were constructed more than 45 years ago.

ASM considered the Campus and the four permanent buildings for significance under LAUSD's Historic Context Statement standards, City of Los Angeles Historic-Cultural Monument designation standards, and the criteria for listing in the California Register of Historic Resources (CRHR) and the National Register of Historic Places (NRHP). The respective criterion for these designations are described under the Evaluation Framework section in Appendix C. The Campus was evaluated as a potential historic district, and the two permanent buildings were evaluated for individual significance (Building No. 1 and Building No. 2).

Historic District Eligibility

Building #1 and Building #2 were evaluated as a potential historic district and found ineligible for listing in the NRHP/CRHR. The buildings fall outside the LAUSD Historic Context Statement's period of significance for postwar schools, lack a unified design, and do not reflect postwar school architecture. While they embody later trends in energy-efficient design, this campus type is not yet defined for historic evaluation. Architect Roy A. Sealey is not considered a master, and the buildings lack architectural distinction. With only half the campus buildings potentially contributing to the historic designation, the site does not meet the criteria for a historic district.

Individual Building Eligibility

Building No. 1 (Administration and Classrooms) and Building No. 2 (Classrooms) of the Campus were evaluated for historical significance under NRHP/CRHR Criteria A/1, B/2, C/3, and D/4:

- Criterion A/1 (Historical Significance): Neither building meets eligibility standards or exhibits the character-defining features of postwar modern functionalist school design outlined in the LAUSD Historic Context Statement. Therefore, both are recommended ineligible under this criterion.
- Criterion B/2 (Association with Significant Persons): No evidence was found linking either building to any historically significant individuals. Both are recommended ineligible under this criterion.
- Criterion C/3 (Architectural Significance): Although designed by noted architect Roy A. Sealey, he is not considered a master architect, and neither building exhibits outstanding design, high artistic value, or represents a significant construction method or period. As such, both are recommended ineligible under this criterion.
- Criterion D/4 (Information Potential): This archaeological criterion was not considered, as previous studies found no evidence suggesting the site contains important prehistoric or historic information.

City of Los Angeles Eligibility

The Campus, as well as the two 1975 individual buildings, cannot be considered potentially eligible for designation as a City of Los Angeles Historic-Cultural Monument. This is because they do not meet any of the four eligibility criteria established by the City, which closely parallel the criteria used for determining significance under the NRHP/CRHR. These include associations with significant historical events or persons, distinctive architectural characteristics, or the work of a master architect - none of which apply in this case. Therefore, the Project would result in no impact regarding changes in the significance of a historical resource pursuant to CEQA §15064.5. No mitigation or further analysis is required.

During the temporary relocation of students at DBM campus, no permanent alterations to existing buildings or structures with potential historic significance are proposed. All activities would occur within existing, previously developed facilities. No impact would occur at this site. No mitigation or further analysis is required.

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

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

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

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

The temporary school relocation at the DBM campus would not involve ground disturbance or excavation. All temporary improvements would occur on previously developed and paved areas of the existing campus. No impact would occur at this site. No mitigation or further analysis is required.

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

Less than Significant Impact. . During previous construction of the Campus, extensive earthwork (excavation and grading) occurred; therefore, human remains are not anticipated. In the unlikely event that human remains are uncovered during Project demolition, grading, or excavation, Government Code Sections 27460 et seq. mandate that there shall be no further excavation or soil disturbance until the Los Angeles County Coroner has determined that the remains are not subject to the provisions of Section 27491 of the Government

4. Environmental Checklist and Analysis

Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of death, and the required recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in PRC Section 5097.98.

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

(ENG) Explanation:

All SUP projects are required to meet CCR Title 24 energy-efficiency standards. Therefore, site specific projects would be consistent with applicable goals of SCAG's 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS) (Connect SoCal), such as encouraging energy efficiency. LAUSD also applies SCs for minimizing impacts to GHG emissions and energy consumption. Applicable SCs related to energy impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval	
SC-AQ-1	LAUSD shall complete a Health Risk Assessment for new campus locations that would place classrooms or play areas within close proximity (less than 0.25 mile) of existing sources of adverse emissions. LAUSD shall identify all permitted and non-permitted stationary sources, freeways and other busy traffic corridors, railyards, and large agricultural operations within 0.25 mile of the project. Once identified, make a determination about the need for qualitative evaluation, screening level evaluation in accordance with air district specific guidance and tools, or a refined evaluation with air dispersion modeling, to determine the if risks constitute an actual or potential endangerment of public health to persons who would attend or be employed at the school. For freeways and other busy traffic corridors within 500 feet, air dispersion modeling must be used to make the health risk determination (no screening, no qualitative discussion, etc.). The Health Risk Assessment shall comply with 'Air Toxics Health Risk Assessment (HRA).' This document includes guidance on HRA protocols for permitted, non-permitted, and mobile sources that might reasonably be anticipated to emit hazardous air emissions and result in potential long-term and short-term health impacts to student and staff at the school site. The HRA must find that health risks are below criteria thresholds. If health risks which exceed air district criteria thresholds are identified, the school campus shall be redesigned or relocated to a site farther from the emissions generator
SC-AQ-2	Construction Contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.
SC-GHG-1	During operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
SC-GHG-2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.
SC-GHG-3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.
SC-GHG-4	LAUSD shall develop a water budget for landscape (both nonrecreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources

4. Environmental Checklist and Analysis

SC-GHG-5	LAUSD shall ensure that the designed time dependent valued energy shall be at least 10 percent, with a goal of 20 percent less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the Division of the State Architect.
SC-USS-1	Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities: **School Design Guide**. Establishes a minimum nonhazardous construction and demolition (C&D) debris recycling requirements of 75 percent by weight. Construction and demolition waste shall be recycled to the maximum extent feasible. **Construction & Demolition Waste Management**. This document outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of nonhazardous waste materials generated during demolition and/or new construction to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling, salvaging and/or reusing a minimum of 75 percent of the C&D waste generated by weight
SC-USS-2	LAUSD shall coordinate with the City Department of Water and Power or other appropriate jurisdictions and departments prior to relocating or upgrading any water facilities to reduce the potential for disruptions in service
SC-USS-3	LAUSD shall provide an easily accessible area that services the entire school and is dedicated to the collection and storage of materials for recycling, including (at a minimum) paper, cardboard, glass, plastics, metals, and landscaping waste. There shall be at least one centralized collection point (loading dock), and the capacity for separation of recyclables where waste is disposed of for classrooms and common areas such as cafeterias, gyms, or multipurpose rooms.

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

Less than Significant Impact. The temporary relocation of campus operations to the DBM campus would not result in a net increase in energy consumption. While energy use may temporarily shift to the DBM site during the relocation period, this use would offset the reduction in energy demand at the primary campus, resulting in no overall increase in total energy usage.

The following sections summarize the energy impacts associated with constriction and operations of the Proposed Project at the Campus, as discussed in Appendix A.

Construction Energy

The Proposed Project would consume energy resources during construction in three general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment on the Project site, construction worker travel to and from the Project site, as well as delivery and haul truck trips (e.g. hauling of demolition material to off-site reuse and disposal facilities);
2. Electricity associated with the conveyance of water that would be used during Project construction for dust control (supply and conveyance) and electricity to power any necessary lighting during construction, electronic equipment, or other construction activities necessitating electrical power; and,
3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Electrical Energy

During construction the Proposed Project would consume electricity to modernize the campus. Electricity would be supplied to the Project site by the Los Angeles Department of Water and Power (LADWP) and would be obtained from the existing electrical lines in the vicinity of the Project site. The use of electricity from existing power lines rather than temporary diesel or gasoline powered generators would minimize impacts on fuel consumption. Electricity consumed during Project construction would vary throughout the construction period based on the construction activities being performed. Various construction activities include electricity associated with the conveyance of water that would be used during project construction for dust control (supply and conveyance) and electricity to power any necessary lighting during construction, electronic equipment, or other construction activities necessitating electrical power. Such electricity demand would be temporary, nominal, and would cease upon the completion of construction. Overall, construction activities associated with the Proposed Project would require limited electricity consumption that would not be expected to have an adverse impact on available electricity supplies and infrastructure. Therefore, the use of electricity during project construction would not be wasteful, inefficient, or unnecessary.

Since there are currently power lines in the vicinity of the Project site, it is anticipated that only nominal improvements would be required to LADWP distribution lines and equipment with development of the Proposed Project. Compliance with City's guidelines and requirements would ensure that the Proposed Project fulfills its responsibilities relative to infrastructure installation, coordinates any electrical infrastructure removals or relocations, and limits any impacts associated with construction of the Project. Construction of the Project's electrical infrastructure is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity.

Petroleum Energy

Petroleum-based fuel usage represents the highest amount of transportation energy potentially consumed during construction, which would be utilized by both off-road equipment operating on the Project site and on-road automobiles transporting workers to and from the Project site and on-road trucks transporting equipment and supplies to the Project site.

The off-road construction equipment fuel usage was calculated through use of the off-road equipment assumptions and fuel use assumptions shown in Section 8.2 of the Air Report (Appendix A), which found that construction of the Proposed Project would consume 15,487 gallons of gasoline and 69,168 gallons of diesel fuel. This equates to 0.0005 percent of the gasoline and 0.024 percent of the diesel used annually in Los Angeles County. As such, the construction-related petroleum use would be nominal, when compared to current county-wide petroleum usage rates.

Construction activities associated with the Proposed Project would be required to adhere to all State and SCAQMD regulations for off-road equipment and on-road trucks, which provide minimum fuel efficiency standards. As such, construction activities for the Proposed Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Impacts regarding transportation energy would be less than significant. Development of the Project would not result in the need to manufacture construction materials or create new building material facilities specifically to supply the Proposed Project. It is difficult to measure the energy used in the production of construction materials such as asphalt, steel, and concrete. It is reasonable to assume that the production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business.

Construction of the proposed Project would include demolition, grading, building construction, landscaping, utility installation, and building upgrades in different phases. Petroleum would be the primary fuel source used during construction to power heavy-duty equipment, operate haul trucks and delivery trucks, and operate temporary power for lighting and electronic equipment. The use of petroleum fuel during construction would comply with **SC-AQ-1** and **SC-AQ-2**, which would reduce the amount of petroleum products used through more up to date and efficient equipment that are properly maintained. With the implementation of **SC-AQ-1**, **SC-AQ-2** and compliance with local, State, and Federal requirements, the impacts of unnecessary or wasteful petroleum use is expected to be less than significant. No mitigation or further analysis is required.

Long-Term Operation

The on-going operation of the Proposed Project would require the use of energy resources for multiple purposes including, but not limited to, heating/ventilating/air conditioning (HVAC), refrigeration, lighting, appliances, and electronics. Energy would also be consumed during operations related to water usage, solid waste disposal, and landscape equipment.

Operations-Related Electricity

Operation of the Proposed Project would result in consumption of electricity at the Project site. As detailed in Section 8.2 of the Air Report, the Proposed Project would consume 578,416 kilowatt-hours per year of electricity, which does not account for existing electricity use on the Project site. This equates to 0.0009 percent of the electricity consumed annually in Los Angeles County. As such, the operation-related electricity use would be nominal, when compared to current electricity usage rates in the County

It should be noted that the Proposed Project would comply with all Federal, State, and City requirements related to the consumption of electricity, which includes CCR Title 24, Part 6 Building Energy Efficiency Standards and CCR Title 24, Part 11: California Green Building Standards. The CCR Title 24, Part 6 and Part 11 standards require numerous energy efficiency measures to be incorporated into the proposed structures, including enhanced insulation, use of energy efficient lighting and appliances, water and space heating systems, as well as requiring a variety of other energy-efficiency measures to be incorporated into the Proposed Project. Therefore, it is anticipated the Proposed Project will be designed and built to minimize electricity use and that existing and planned electricity capacity and electricity supplies would be sufficient to support the Proposed Project's electricity demand. Thus, the Project would not result in the wasteful or inefficient use of electricity and no mitigation measures would be required.

Operations-Related Natural Gas

Operation of the Proposed Project would result in increased consumption of natural gas at the Project site. As detailed in Section 8.3 of the Air Report, the Proposed Project would consume 1,724 MBTU per year of natural gas, which does not account for existing natural gas use on the Project site. This equates to 0.0006 percent of the natural gas consumed annually in Los Angeles County. As such, the operations-related natural gas use would be nominal, when compared to current natural gas usage rates in the County.

It should be noted that the Proposed Project would comply with all Federal, State, and City requirements related to the consumption of natural gas, that includes CCR Title 24, Part 6 Building Energy Efficiency Standards and CCR Title 24, Part 11: California Green Building Standards. The CCR Title 24, Part 6 and Part 11 standards require numerous energy efficiency measures to be incorporated into the Proposed Project, including enhanced insulation as well as use of efficient natural gas appliances and HVAC units. Therefore, it is anticipated the Proposed Project will be designed and built to minimize natural gas use and that existing and planned natural gas capacity and natural gas supplies would be sufficient to support the Proposed Project's natural gas demand. Thus, impacts with regard to natural gas supply and infrastructure capacity would be less than significant and no mitigation measures would be required.

In conclusion, the proposed Project would comply with the Title 24 standards, CALGreen, L.A.'s Green New Deal, LAUSDLEED, LAUSD sustainability guidelines, LAUSD Resolution 018-19/20, and existing energy standards and regulations. Furthermore, the proposed Project would implement the energy efficiency measures outlined in **SC-AQ-2**; **SC-GHG-1** through **SC-GHG-5**; and **SC-USS-1** through **SC-USS-3**. Therefore, there would be less than significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation[29]. No mitigation or further study is required.

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

No Impact. As discussed in Appendix A, the Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The applicable energy plans for the Proposed Project include Green LA, adopted May 2007; Climate LA, approved 2008; City pLAn, revised in 2019; and LADWP's 2017 Power Strategic Long-Term Resource Plan (SLTRP). All of these plans have city-wide strategies that promote energy conservation in new development projects. The Proposed Project would be required to adhere to all of the applicable energy conservation regulations that have been implemented as a result of the above plans.

Major objectives for enhancing energy efficiency and expanding the supply of renewable energy resources to LADWP customers that are identified in the SLTRP include:

- 33 percent renewable portfolio standard (RPS) by 2020, 50 percent RPS by 2025, 55 percent RPS by 2030, and 65 percent RPS by 2036;
- 900 megawatts (MW) local solar by 2025 and 1,500 MW local solar by 2035;
- Doubling of energy efficiency from 2017 through 2027;
- Early replacement of electricity derived through coal-powered plants;
- 404 MW of energy storage by 2025;
- Fuel switching/electrification of the transportation sector;
- Replace aging infrastructure components.

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

4. Environmental Checklist and Analysis

Climate LA targets an increase in the use of renewable energy to 35 percent by 2020, reduction in the use of coal-fired power plants and present a comprehensive set of green building policies to guide and support private sector development. These measures include use of LED lighting, increased use of renewable energy, and increased solid waste diversion.

LA's Green New Deal, the City's first update to the City pLAn, was adopted in 2019. It is a program of actions meant to create sustainability-based performance targets through 2050 that are designed to advance economic, environmental, and equity objectives. One of the key aspects to LA's Green New Deal is climate mitigation, which has co-benefits with respect to energy conservation and expanded use of clean and renewable energy sources, as follows:

- Reduce GHG emissions through near-term outcomes;
- Reduce potable water use by 22.5 percent by 2025, 25 percent by 2035, and maintain or further reduce 2035 per capita water use through 2050;
- Reduce building energy use per square feet for all building types by 22 percent by 2025, 34 percent by 2035, and 44 percent by 2050;
- All new buildings will be net zero carbon by 2030 and 100 percent of all buildings will be net zero carbon by 2050;
- Increase landfill diversion rate to 90 percent by 2025, 95 percent by 2035, and 100 percent by 2050;
- Reduce municipal solid waste generation per capita by at least 15 percent by 2030;
- Eliminate organic waste going to landfill by 2028.

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

The proposed Project would comply with the Title 24 standards, CALGreen, City' Green New Deal, LEED, LAUSD sustainability guidelines, LAUSD Resolution 018-19/20, and existing energy standards and regulations. Furthermore, the proposed Project would implement the energy efficiency measures outlined in **SC-AQ-2; SC-GHG-1** through **SC-GHG-5**; and **SC-USS-1** through **SC-USS-3**. Therefore, impacts during construction and operation of the Proposed Project would be less than significant. The Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. No mitigation or further study is required.

	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 California Geological Survey 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 potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
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?	☐	☐	☒	☐

(GEO) Explanation:

On January 28, 2022, a Preliminary Geotechnical Report was prepared by Group Delta in support of the Proposed Project. The Geotechnical Report is included in Appendix D. The scope of work conducted included the following:

- Review available published geologic and geotechnical reports, and geologic publications and maps pertaining to the site and surrounding area.
- Permitting
- Conduct a geotechnical field investigation to investigate the subsurface conditions at the site, which consisted of drilling four (4) hollow stem auger (HSA) borings to a depth of 30 to 50 feet, and advancing five (5) Cone Penetration Test (CPT) soundings a depth of 60 feet, or refusal.

4. Environmental Checklist and Analysis

- Perform laboratory tests on selected soil samples from the geotechnical field investigation to define the subsurface profile and to evaluate the physical properties and engineering characteristics of the soils encountered.
- Corrosion testing, and preparation of a corrosion protection report, by HDR, Corrosion Engineers.
- A geologic-seismic hazards evaluation to satisfy the requirements of Title 24 of the California Code of Regulations and guidelines outlined by the California Geological Survey.
- Perform site-specific response spectra in accordance with the requirement for American Society of Civil Engineers (ASCE) 41-17 for voluntary seismic retrofit of the existing structures, and with the requirement for ASCE 7-16 for seismic design for new structures.
- Use the geotechnical data to develop preliminary geotechnical design recommendations.
- Prepare a preliminary geotechnical report presenting the data collected, our findings, and preliminary design recommendations including design of multiple new foundations (spread footings, mat foundations, piles, pole foundations, etc.), preliminary recommendations for evaluating the existing foundations, including ultimate bearing capacities and preliminary estimated foundation stiffness, preliminary recommendations for the design of retaining walls, pavement, floor slab support, and hardscapes, preliminary recommendations for shoring, utility trenching and backfilling, and a discussion on the feasibility of infiltration within the campus based on soil characteristics.

The SPEIR evaluated the potential for implementation of the SUP-related projects to impact geological and soil resources. It was determined in the SPEIR that, upon implementation of regulatory requirements and SCs for SUP-related projects, the impacts associated with seismic hazards, underlying soil characteristics, slope stability, and erosion would be less than significant.

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

<table>
<tr><th colspan="2">LAUSD Standard Conditions of Approval</th></tr>
<tr><td>SC-GEO-1</td><td>LAUSD shall prepare a Geohazard Assessment for the construction of any new school or applicable school addition.</td></tr>
<tr><td>SC-GEO-2</td><td>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.</td></tr>
</table>

4. Environmental Checklist and Analysis

LAUSD Standard Conditions of Approval	
	• Significant resources found shall be curated as determined necessary by the Paleontologist.
SC-HWQ-1	LAUSD shall design and construct the project to meet or exceed the current and applicable stormwater guidelines. **Stormwater Technical Manual** This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). These guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) and the mandated post-construction element of the NPDES program requirements.
SC-HWQ-2	LAUSD shall implement the applicable stormwater requirements during construction activities **Compliance Checklist for Storm Water Requirements at Construction Sites** This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.
SC-HWQ-3	LAUSD shall implement the following programs and procedures, as applicable: • Environmental Training Curriculum – a qualified environmental Monitor shall provide a worker's environmental awareness program that is prepared by LAUSD for the project. • Hazardous Waste Management Program (Environmental Compliance/Hazardous Waste). • Medical Waste Management Program. • Environmental Compliance Inspections. • Safe School Inspection Program. • Integrated Pest Management Program. • Fats Oil and Grease Management Program. • Solid Waste Management Program. • Other related programs overseen by OEHS

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

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)

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).

4. Environmental Checklist and Analysis

According to the Preliminary Geotechnical Report, ground surface rupture potential at the Project site was evaluated with review of current California Geologic Survey (CGS) Fault Activity Map of California, United States Geological Survey (USGS) online Fault and Fold database, and Alquist-Priolo (AP) Earthquake Fault Zone Maps in the area. The closest seismic source to the site is the Lower Elysian Park Thrust Fault, located about 0.7 miles to the northeast of the site. Puente Hills Blind Thrust Fault is also located about 1.2 miles to the southwest of the Project site. The closest Alquist-Priolo Earthquake Fault Zone is 4.3 miles west of the Project site[30]. No known active faults are mapped crossing the Project site or projecting towards the Project site. Therefore, as determined in the Preliminary Geotechnical Report, the possibility of ground surface fault rupture at the site is considered low.

The DSA approves designs for school construction, and all projects must be submitted to DSA oversight and inspections during construction[31]. 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 regarding the rupture of a known earthquake fault are less than significant. No mitigation or further analysis is required.

The DBM campus is an existing developed school site designed and constructed in compliance with applicable state and local seismic safety standards. No new buildings or ground-disturbing activities are proposed at this site; therefore, the temporary campus relocation would not result in significant impacts regarding the rupture of a known fault. No mitigation or further analysis 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 nature of the earth materials beneath a given site. As discussed in Threshold a), there are no known active faults mapped across the Project site or projecting towards the Project site.

It is probable that the Project Site would experience moderate to strong ground motion due to earthquakes. To reduce impacts regarding strong seismic ground shaking, the Proposed Project will be required to be designed and constructed in accordance with the California Building Code (CBC) and Division of the State Architect (DSA) standards, as well as incorporate any recommendations contained in the Geotechnical Report prepared pursuant to SC-GEO-1. The CBC incorporates design provisions based on the latest seismic safety standards, including structural engineering criteria intended to resist earthquake forces (Title 24, Part 2, California Code of Regulations). The DSA reviews and certifies design plans for public school facilities and other state-owned structures to ensure these seismic design provisions are met. This process ensures that project buildings are designed and constructed to withstand the maximum credible seismic forces expected for the site, thereby substantially reducing the risk of structural failure or damage and protecting public safety during an earthquake. Therefore,

[30] U.S. Geological Survey, *Earthquake Zones of Required Investigation* (2025), https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/
[31] California Division of the State Architect, *About Us* (2025), https://www.dgs.ca.gov/DSA/About

impacts regarding seismic ground shaking would be less than significant. No mitigation or further analysis is required.

The DBM campus is an existing developed school site designed and constructed in compliance with applicable state and local seismic safety standards. No new buildings or ground-disturbing activities are proposed at this site; therefore, the temporary campus relocation would not result in significant impacts related to strong seismic ground shaking. No mitigation or further analysis is required.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant 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.

As discussed in the Preliminary Geotechnical Report, the Project site is not located within the State Earthquake Induced Liquefaction Seismic Hazard Zone for the Hollywood Quadrangle, (shown in **Figure 6 of Appendix D**). The field explorations did not encounter ground water to the maximum depth of 51.5 feet explored. The historical high groundwater level at the site is deeper than 50 feet below ground surface. Therefore, the potential of liquefaction-induced seismic settlement is low. The Proposed Project would not expose people or the new school building to adverse effects from liquefaction. Therefore, impacts would be less than significant and no mitigation or further analysis is required.

The DBM campus is an existing developed school site designed and constructed in compliance with applicable state and local seismic safety standards. No new buildings or ground-disturbing activities are proposed at this site; therefore, the temporary campus relocation would not result in significant impacts related to liquefaction. No mitigation or further analysis is required.

iv. Landslides?

Less than Significant Impact. Landslide is a type of erosion in which masses of earth and rock move down slope as a single unit. Susceptibility of slopes to landslides and other forms of slope failure depend on several factors, which are usually present in combination and include steep slopes, condition of rock and soil materials, the presence of water, formational contacts, geologic shear zones, and seismic activity.

As discussed in the Preliminary Geotechnical Report, the Project site is situated within a broad alluvial plain and the surrounding lots are relatively level. There are no significant slopes that can present a landslide hazard at or near the site. Elevations within the Project site range about a foot across the site. Therefore, the potential hazard for landslides and slope instability is not an issue at the Campus. The proposed Project would not expose people or the new, consolidated three-story building to adverse effects from landslides. Impacts would be less than significant and no mitigation or further analysis is required.

4. Environmental Checklist and Analysis

The DBM campus is an existing developed school site designed and constructed in compliance with applicable state and local seismic safety standards. No new buildings or ground-disturbing activities are proposed at this site; therefore, the temporary campus relocation would not result in significant impacts related to landslides. No mitigation or 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 native topsoil was removed and/or compacted during development of the Campus; therefore, the proposed 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 1 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 (SWRCB). LAUSD would obtain coverage by preparing and implementing a Stormwater Pollution Prevention Plan (SWPPP), estimating sediment risk from construction activities to receiving waters, and specifying BMPs that would be incorporated into the construction plan to minimize stormwater pollution. As discussed in the Hydrology and Water Quality section, grading and excavation activities during construction may expose soils to rainfall or runoff that would create on- or off-site erosion or siltation. However, the Proposed Project would implement a SWPPP, BMPs, and monitoring for stormwater discharge to ensure that sedimentation of the downstream waters remain within regulatory limits per SC-HWQ-2.

In addition, the Proposed Project would also comply with all applicable regulations from Federal, State, and local levels, and **SC-HWQ-1** through **SC-HQ-3**. The programs to be implemented and compliance with the existing regulations would reduce the impacts of on- and off-site erosion or siltation to less than significant impact, and no mitigation or 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 the County of Los Angeles Department of Public Works (LADPW) 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. LAUSD would comply with existing regulations. Therefore, soil erosion impacts would be less than significant, and no mitigation or further analysis is required.

The temporary DBM campus relocation would also not result in substantial soil erosion or the loss of topsoil, as all proposed activities at the DBM campus would occur within existing paved and landscaped areas with no grading or earthwork required. No mitigation or further analysis is required.

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

Less than Significant Impact. As discussed in Threshold a) iii and a) iv), liquefaction and landslide potential on the Project site is considered low.

As discussed in the Preliminary Geotechnical Report, the Project site is situated within a relatively level alluvial plain. The closest significant body of water is the Los Angeles River, located about 3 miles east of the site. The closest river segment is directed through a concrete lined channel. The groundwater level at the site is generally below the channel floor, and the channel slopes are unsaturated. The potential hazard for lateral spreading at the site is considered low. Thus, impacts related to lateral spreading are considered less than significant.

As discussed in the SPEIR, unmonitored extraction of oil and groundwater can result in ground subsidence[32]. To prevent overdraft of underlying groundwater resources, groundwater basins within LAUSD are actively monitored and managed to maintain sustainable pumping levels. Groundwater management responsibilities are shared between the Water Replenishment District of Southern California (WRD), which oversees most areas south of downtown Los Angeles, and the Los Angeles Department of Water and Power (LADWP), which manages the majority of the remaining portions of the District. The SPEIR concluded that substantial ground subsidence associated with groundwater withdrawal is not anticipated to occur within the District. Therefore, impacts regarding subsidence or collapse at the Project site would be less than significant. No mitigation or further analysis is required.

[32] Los Angeles Unified School District, *School Upgrade Program Draft Subsequent Environmental Impact Report* (2023), https://files.ceqanet.lci.ca.gov/284141-2/attachment/0CRpktr1bFw7EGk4wzmRRM-8GGQv8GBEtSfSTad2rMJBck4k2dV1arXvtBmbvtcwK3qbd7l1HeDDJdyz0

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Given the DBM campus relocation would not include any new foundations or soil disturbance, no impacts related to unstable geologic units would occur. No mitigation or further analysis is required.

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

Less than Significant Impact. Expansive soils 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.

As discussed in the Geotechnical Report, boring and Cone Penetration Test (CPT) data indicate that Project site soils are not susceptible to collapse potential. Laboratory analysis conducted on a sample, collected at a depth of 0.5 to 5 feet, yielded an Expansion Index (EI) of 28, which corresponds to a low expansion potential. Therefore, impacts regarding expansive soils would be less than significant, and no mitigation or further analysis is required.

Given the DBM campus relocation would not include any new foundations or soil disturbance, no impacts related to expansive soils would occur. No mitigation or further analysis is required.

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

No Impact. The Proposed Project does not involve installation of septic tanks or alternative wastewater disposal systems. The Project would connect to the existing sanitary sewer system for wastewater disposal. Therefore, no impact would occur, and no mitigation or further study is required.

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

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

As discussed above, the Project site has been previously disturbed, and therefore, it is unlikely that undisturbed paleontological resources exist on the Project site. Any surficial paleontological resources, which may have existed at one time, have likely been unearthed or disturbed to accommodate building foundations, and shallow excavation, or surface grading, is unlikely to uncover any paleontological resources. However, earth moving and grading activities at the Project site could potentially exceed the depth of prior grading activities and therefore, unanticipated discovery of unique paleontological resources is possible. As part of the Project implementation, SC-GEO-2 requires that a paleontological monitoring program be prepared and implemented for earthwork activities. In the unlikely event that paleontological resources are uncovered, construction within a 30-foot radius would stop and LAUSD would be notified. Thus, impacts to paleontological resources would be less than significant and no mitigation or further analysis is required.

No earthwork or grading would occur at the DBM campus that would destroy a paleontological resource. No mitigation or further analysis is required.

4. Environmental Checklist and Analysis

	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?	☐	☐	☒	☐

(GHG) Explanation:

The SPEIR evaluated the potential for implementation of the SUP-related site-specific projects to contribute to GHG emission impacts. Because individually no one project is large enough to single-handedly result in a significant increase in global concentrations of GHG compounds, Project-related climate change impacts are inherently cumulative. This GHG emissions impact analysis is based upon the GHG modeling provided Appendix A.

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

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

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

Less than Significant Impact. Global climate change is not confined to a particular area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very

4. Environmental Checklist and Analysis

large one, does not generate enough greenhouse gas emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

Project-related construction-phase GHG emissions are shown in the table below. As discussed in Appendix A, the Proposed Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. The Proposed Project would consist of a major modernization of an existing school. The Proposed Project is anticipated to generate GHG emissions from area sources, energy usage, waste disposal, water usage, and construction equipment. Since the Proposed Project would not result in an increase in staff or student enrollment, it is not anticipated to generate any new vehicle trips to the Campus and no new mobile source emissions would be created from the Proposed Project.

The Project's GHG emissions have been calculated with the CalEEMod model based on the construction and operational parameters detailed in Section 8.1 of Appendix A. A summary of the results is shown in the table below and the CalEEMod model run is provided in Appendix A of the Air Report.

Table 6 Project Related Greenhouse Gas Emissions

Category	GHG Emissions ($MTCO_2e$)			
	CO2	CH4	N2O	CO2e
Area Sources[1]	1.75	<0.01	<0.01	1.76
Energy Usage[2]	273	0.02	<0.01	274
Water and Wastewater[3]	7.89	0.09	<0.01	10.9
Solid Waste[4]	10.0	1.00	0.00	35.1
Refrigeration[5]	--	--	--	0.06
Construction[6]	8.67	<0.01	<0.01	8.77
Total GHG Emissions	301	1.11	<0.01	331
SCAQMD Screening Threshold				3,000
Exceed Thresholds?				No

Notes:
[1] Area sources consist of GHG emissions from consumer products, architectural coatings, and landscaping equipment.
[2] Energy usage consists of GHG emissions from electricity and natural gas usage.
[3] Water includes GHG emissions from electricity used for transport of water and processing of wastewater.
[4] Waste includes the CO_2 and CH_4 emissions created from the solid waste placed in landfills.
[5] Refrigeration includes GHG emissions from refrigerants in air conditioning units.
[6] Construction emissions amortized over 30 years as recommended in the SCAQMD GHG Working Group on November 19, 2009
Source: CalEEMod Version 2022.1.

The data provided in the table above shows that the Proposed Project would create 331 MTCO2e per year, which would be well below the SCAQMD's screening threshold of 3,000 MTCO2e per year. Therefore, a less than significant generation of greenhouse gas emissions would occur from development of the Proposed Project. Additionally, SC-GHG-1 through -6 and SC-USS-1 would minimize operational GHG emissions through efficient irrigation, energy consumption, and waste generation. Therefore, the cumulative contribution of the proposed Project to GHG emissions would be less than significant and no mitigation or further analysis is required.

The temporary relocation of students and staff to the DBM campus would not result in a net increase in greenhouse gas emissions. Although energy use and school-related activities would occur at the DBM campus during the relocation period, these activities would shift from the 32nd St./USC Campus rather than add new or expanded sources of emissions. Because there would be no increase in the number of students, staff, or overall operational intensity, the temporary campus relocation would not generate additional vehicle trips or energy demand and therefore would not result in a net increase in GHG emissions. No mitigation or further analysis is required.

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

Less than Significant Impact. As discussed in Appendix A, the Proposed Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions. In 2008, the City released an implementation program for the LA Green Plan referred to as ClimateLA, which provides detailed information about each action item discussed in the LA Green Plan framework. Action items range from harnessing wind power for electricity production and energy efficiency retrofits in City buildings, to converting the City's fleet vehicles to cleaner and more efficient models, and reducing water consumption.

The City of Los Angeles's Green New Deal Sustainable City pLAn (pLAn), prepared in 2015 and updated in 2019, requires both short-term and long-term aspirations through the year 2035 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. Specific targets related to GHG reduction include reducing vehicle miles traveled per capita by 5 percent by 2035 and increasing trips made by walking, biking or transit by at least 35 percent by 2025. In addition, building energy use per square foot for all building types will be reduced by 22 percent by 2025, 34 percent by 2035 and 44 percent by 2050.

In 2019, the first four-year update was released. Although not a formally adopted plan or policy, but rather a mayoral initiative, the updated document expands upon the City's vision for a sustainable future and provides accelerated targets and new goals. The goal of the 2019 update established targets such as 100-percent renewable energy by 2045 diversion of 100 percent of waste by 2050, and recycling 100 percent of wastewater by 2035. Achieving progress toward these targets would help reduce the City's overall GHG footprint, over time.

The Proposed Project would be designed to meet the most current State of California Title 24 building energy efficiency standards. In addition, as detailed in Section a) above, the Proposed Project is anticipated to create 331 MTCO2e per year, which is well below the SCAQMD draft threshold of significance of 3,000 MTCO2e per year. The SCAQMD developed this threshold through a Working Group, which also developed detailed methodology for evaluating significance under CEQA. At the September 28, 2010 Working Group meeting, the SCAQMD released its most current version of the draft GHG emissions thresholds, which recommends a tiered approach that provides a quantitative annual threshold of 3,000 MTCO2e for all land use type projects, which was based on substantial evidence supporting the use of the recommended thresholds. Therefore, the Proposed Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

The temporary relocation of students and staff to the DBM campus would not conflict with any applicable GHG reduction plan, policy, or regulation. Because the relocation does not result in a net increase in student population, staffing levels, or operational activities, it would not create additional vehicle trips, energy use, or other emission-generating activities that could undermine state, regional, or local GHG-reduction strategies.

4. Environmental Checklist and Analysis

The relocation does not introduce new emissions sources, expand facility capacity, or intensify use relative to existing conditions. Instead, it merely shifts existing activities from one campus to another without increasing total district-wide GHG emissions. Therefore, impacts would be less than significant. No mitigation or further analysis is required.

4. Environmental Checklist and Analysis

	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/or accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
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?	☐	☐	☐	☒

(HAZ) Explanation:

On April 8, 2022, a Phase I Environmental Site Assessment (ESA) was prepared by Eco & Associates in support of the Proposed Project. The Phase I ESA is included in Appendix E.

On August 19, 2024, an Approved Phase I - Asbestos Engineering Assessment Report (Asbestos Report) was prepared by Vista Environmental Consulting in support of the Proposed Project. The Asbestos Report is included in Appendix F.

On August 27, 2024, the Facilities Environmental Technician Unit (FETU) reviewed and approved the Phase II Asbestos Abatement Plan on the Project site. The Phase II Asbestos Abatement Plan is included in Appendix G.

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

4. Environmental Checklist and Analysis

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

LAUSD Standard Conditions of Approval	
SC-HAZ-4	The Construction Contractor shall comply with the following OEHS Site Assessment practices and requirements (as applicable): • District Specification Section 01 4524, Environmental Import / Export Materials Testing. • Removal Action Workplan or Remedial Activities Workplan. • South Coast Air Quality Management District Rule 1466. • Guidelines and Procedures to Address Polychlorinated Biphenyls (PCBs) in Building Materials – particularly applicable to buildings that were constructed or remodeled between 1959 and 1979. • Lead and asbestos abatement requirements identified by the Facilities Environmental Technical Unit (FETU) in the Phase I / Phase II, or abatement plan(s).
SC-T-4	LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.

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

Less than Significant Impact. Construction of the Proposed Project may involve the transport, storage, use, or disposal of limited quantities of hazardous materials, such as fuels, lubricants, solvents and degreasers, and paints. Examples of such activities include fueling and servicing construction equipment, application of paints and other coatings, and demolition of buildings that contain asbestos or lead-based paint. At any construction site, activity would be short-term or one-time in nature and would be governed by existing regulations of several agencies, including the Environmental Protection Agency (EPA), Department of Transportation (DOT), California Division of Occupational Safety and Health (Cal/OSHA), DTSC, and the City fire department. If previously unidentified hazardous materials or contaminated soils are encountered during construction or grading activities, work in the affected area would be temporarily suspended and the materials would be evaluated, handled, and disposed of in accordance with applicable federal, state, and local regulations, under the oversight of the appropriate regulatory agencies. A Soil Management Plan would be prepared, as necessary, in accordance with applicable Department of Toxic Substances Control (DTSC) guidelines, and its implementation would ensure compliance with regulatory requirements and would avoid or reduce potential impacts to human health and the environment to a less-than-significant level.

During Project operations, hazardous materials that might be handled, used, transported, or disposed of include standard cleaning products, pesticides, herbicides, paints, fuels, and lubricants used in association with standard campus janitorial, maintenance, and landscaping. In addition, certain curricula, such as chemistry and industrial arts, could involve the use of small quantities of chemicals, fuels and other petroleum products, solvents, and paints. Small volumes of hazardous wastes, such as waste paint, batteries, fluorescent lamps, mercury-containing equipment, or unused maintenance products would be generated to maintain the school facilities, which would require management in accordance with standard District policies and practices. Most hazardous materials stored on school campuses present little risk of upset, since they are generally stored in small containers (30 gallons or less) in designated areas. The amounts of hazardous materials that are handled at any one time are likewise small, reducing the potential consequences of an accident during transport, storage, or handling. In general, the amounts of hazardous materials handled at a given campus would remain relatively small and would be subject to federal, state, and local health and safety requirements. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

During the temporary DBM campus relocation, while minor amounts of hazardous materials, such as paint, may be used for interior and exterior improvements, these would be handled, stored, and disposed of in accordance with standard safety procedures and applicable local, state, and federal regulations. Existing protocols for handling, storage, and disposal of any minor hazardous materials (e.g., cleaning supplies, laboratory chemicals) at the DBM campus would remain in place, ensuring that no substantial risk to students, staff, or the surrounding environment would occur. Impacts would be less than significant at the DBM campus. No mitigation or further analysis is required.

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

Less than Significant Impact. The Phase I ESA identified the following potential concerns regarding the release of hazards material resulting from the Project:

- Based on historical LAUSD figures for the Project site, it is possible an abandoned Underground Storage Tank (UST) is present in the northwest corner of the Project site. Historical figure notations indicate an oil tank and oil gauge were present in this area. It is unknown if the tank was aboveground or belowground. Any future construction work in this area of the Project site should plan for the possible discovery of an abandoned UST.
- Asbestos-Containing Building Materials (ACBMs) and Lead-based Paint (LBP) may be present in site buildings.
- There is a potential for impacted shallow soil from historical application of herbicides and pesticides.
- The Project is located within a methane zone.
- A former 1,500-gallon UST (specific contents unknown) was discovered in the southwest corner of the Project site during excavation activities for new construction in 2008. Soil sampling conducted under the oversight of the Los Angeles Fire Department (LAFD) identified contaminants of concern, total petroleum hydrocarbons (TPH), above regulatory screening criteria. Affected soil was excavated and removed from the Project site, and confirmation soil sampling indicated all contaminated soil above regulatory screening criteria had been removed. The LAFD issued a no further action letter to the Site in January 2009.

UNDERGROUND STORAGE TANKS (USTS)

Based on the issuance of the No Further Action letter from the LAFD in January 2009, which confirmed that all contaminated soil exceeding regulatory screening criteria had been removed, no further mitigation related to the former UST at the southwestern corner of the Project site is required.

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As discussed above, it is possible that an abandoned UST is present in the northwest corner of the Site. However, no ground-disturbing activities are proposed in the northwest portion of the Project. All proposed grading, excavation, and construction activities would be confined to the southern and eastern portions of the Project site, which avoids potential disturbance of the area where the UST may be located.

Accordingly, because the known contamination has been remediated and Project activities would not disturb the portion of the site where a potential UST may remain, impacts related to USTs would be less than significant.

ASBESTOS

The federal Clean Air Act regulates asbestos as a hazardous air pollutant, which subjects it to regulation by the SCAQMD under its Rule 1403. OSHA also regulates asbestos as a potential worker safety hazard. The Asbestos-Containing Materials in Schools rule (CFR Title 40, Part 763, Subpart E), promulgated under the federal Asbestos Hazard Emergency Response Act (AHERA), requires local education agencies to inspect their school buildings for asbestos-containing building material, prepare asbestos management plans, and perform asbestos response actions to prevent or reduce asbestos hazards. AHERA also tasked EPA with developing a model accreditation plan for states to certify individuals who conduct asbestos inspections and corrective actions in schools.

Compliance with asbestos regulations and requirements is the responsibility of the District's Facilities Environmental Technical Unit (FETU). FETU is responsible for hazardous material abatement and management and for state and federal AHERA regulatory compliance as follows:

- Execute abatement projects with FETU force account labor;
- Perform assessments, prepare abatement designs as well as review assessment reports, abatement designs, and close out reports following abatement contracts submitted by environmental consultants for all District contracted projects;
- Develop specifications and procedures for safe handling of asbestos, lead, and mold, in concert with the OEHS; and
- Review and approve qualifications of abatement contractors and environmental consultants and manage master service contracts for such services.

Per District requirements, prior to disturbance, materials that are suspected of containing asbestos are tested for asbestos content using accredited laboratories. All ACM must be removed by licensed asbestos abatement contractors or by trained and certified FETU personnel using work practices and engineering controls that have been designed to reduce the potential for asbestos fiber release. Specific handling procedures in place for handling ACM are the following, which the FETU will abide by as and when needed.

- Asbestos is to be handled only by qualified and certified contractors. Asbestos contractors/subcontractors must be approved in accordance with applicable federal, state, and local regulations and must be approved by the District to perform abatement and disposal of ACM and asbestos-containing construction materials (ACCM), as defined.
- It is the contractor's responsibility to review the Asbestos Assessment Report (Phase 1) and the Abatement Design (Phase 2) prepared for a site prior to the commencement of work and take the

necessary steps to ensure the safety of students, faculty, contractor employees, and the general public through compliance with regulatory and District specification requirements.

- Contractors must verify the presence or absence of asbestos content in building materials prior to impacting these materials during construction remodeling or demolition work.

- Upon discovery of any ACM or ACCM or presumed asbestos-containing materials (PACM) not identified in the Phase 1 report, the contractor will stop work in such areas and notify the LAUSD Construction Inspector. The material will be inspected and tested, if necessary, by the District's ATU or by a District-assigned environmental consultant

- The contractor shall ensure employees are trained in asbestos awareness to identify ACM, ACCM, and PACM. Training will be in compliance with the requirements of the District's Standard Specification Section 13280, "Asbestos Abatement and Asbestos Related Disturbance", and be documented. Proof of such training is required to be submitted to a District-authorized representative prior to commencement of work.

- All asbestos abatement/removal work must follow all regulations of the EPA and/or applicable state agency, OSHA, and the SCAQMD.

- LAUSD Maintenance and Operations personnel working in areas with ACM or PACM must have appropriate asbestos training, which may include minor abatement and compliance with negative exposure assessment protocols. OEHS is responsible to ensure all asbestos surveys have been completed and information and training disseminated to effected employees and contractors per the applicable asbestos standards and District protocols.

In addition, the following standard District procedures apply to asbestos abatement action which the District will implement as and when needed:

- LAUSD Section 13280: Asbestos Abatement and Asbestos Related Disturbance (November 21, 2003). Construction contractors are required to comply with the requirements of this LAUSD standard specification during any project where ACM may be disturbed. Included among the specific requirements are procedures for worker training, permitting, air monitoring, personnel protection, development of emergency plans, waste management, and reporting. Specific procedures are outlined for the performance of asbestos abatement, including maintenance of regulated areas through polyethylene sheeting and air filtration equipment, wet cleaning, and vacuum cleaning of exposed surfaces, and posting of signs.

Per SC-HAZ-4, a Phase I Asbestos Report and Phase II Asbestos Abatement Plan were reviewed and approved by the District's FECU. As documented, asbestos-handling activities will be carried out in full compliance with the Clean Air Act, SCAQMD Rule 1403, OSHA worker safety requirements, AHERA, and LAUSD Standard Specification Section 13280. Therefore, compliance with standards and regulations would result in less than significant impacts relating to asbestos.

LEAD

Per CFR and District requirements, all projects at existing school and office sites must be reviewed by the Asbestos and Toxic Material Unit (ATU) for impact to lead-based paint prior to the project being started. All coated surfaces (paint, varnish, or glazed) are assumed to contain lead, and work that impacts coated

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surfaces must be performed by properly trained individuals. Specific handling procedures for handling building materials that may contain lead are the following, with which the ATU will ensure compliance as and when needed.

- Lead abatement, as defined, is to be performed by contractors or subcontractors whose workers are certified by the California Department of Public Health. Lead-related construction work may be performed by contractors' or subcontractors' workers who have been trained in lead awareness, as described in the District's Standard Specification Section 13282, "Lead Abatement and Lead Related Construction Work." Evidence of certification and/or training is required to be provided to the District's environmental representative prior to the commencement of work.

- It is the contractor's responsibility to review the assessment report addressing the impact to lead-based materials, lead-containing materials or coatings, and materials assumed to contain lead prior to commencement of work and take the necessary steps to ensure the safety of students, faculty, contractor employees, and the general public.

- Contractor must identify any lead-based paint or coatings and assumed lead-containing coatings in or on the materials to be impacted within the proposed scope of work prior to any construction, remodeling, maintenance, repair, or demolition activities.

- No lead abatement will proceed until the District's environment representative has given written approval of the lead abatement contractor's written abatement work plan.

- No work by contractors other than the lead abatement contractor will be permitted to work in regulated areas until clearance is provided by the District's environmental representative.

- The lead abatement contractor or general contractor performing monitoring of lead-related construction work will be responsible for characterizing the waste stream (e.g., paint chips, components) and disposing of waste according to the characterization. Hazardous waste will be transported under a Uniform Hazardous Waste Manifest in accordance with District Standard Specification Section 13282.

In addition, the following standard District procedures apply to lead abatement projects, which the District will also implement as appropriate:

- LAUSD Section 13282: Lead Abatement and Lead Related Construction Work (March 15, 2007). Construction contractors are required to comply with the requirements of this LAUSD standard specification during any project where lead-containing materials may be disturbed. Included among the specific requirements are procedures for worker training, permitting, air monitoring, personnel protection and medical monitoring, development of emergency plans, and waste management. Procedures specific to waste disposal are testing requirements for determining the hazardous properties of the lead-containing materials using prescribed federal and state testing procedures. 382 Specific procedures are outlined for the abatement of lead-based paint, including its removal by sanding, chemical agents, or water jets, or its isolation by encapsulation.

As documented in the approved Phase I Asbestos Report and the Phase II Asbestos Abatement Plan, removal of assumed Lead-Based painted / coated surfaces shall be performed in accordance with LAUSD Specification, Section 02 8333 (Lead Abatement and Lead Related Construction Work) and must be removed by a Renovation, Repair and Painting (RRP) Firm and RRP trained personnel qualified in the techniques of lead-related construction, handling, disposal of lead containing materials, and in accordance with Environmental Protection Agency (EPA) and Renovation, Repair and Painting (RRP) under the supervision of FETU or a District approved Environmental Consultant. Furthermore, the Abatement Contractor shall also submit, for review and approval, a lead-related work plan. The lead related work plan shall detail the means and methods that will be used for controlling and containing dust released during the removal/disturbance of lead containing materials, in accordance with the project specifications. The plan shall include, but not be limited to, a drawing that adequately depicts the location of lead-related control areas, change areas and any special features and engineering controls to be implemented for demarcating and containing lead-related work areas. Therefore, Project compliance with District and CFR requirements would result in less than significant impacts regarding lead.

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

Less than Significant Impact. The Proposed Project is located in a mixed-use neighborhood with both commercial and residential development. Schools within one-quarter mile include USC to the immediate south and west. The Proposed Project site is a school as well and impacts may occur if hazardous waste materials were to be released on campus.

As previously discussed in Threshold a) and b) any impact regarding the disposal, use, handling, and release of hazardous materials would be less than significant with compliance with existing regulations and District requirements. Therefore, emission impacts within one-quarter mile of existing or proposed schools would be less than significant.

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

Less than Significant Impact. The Phase I ESA report included a review of California Regional Water Quality Control Board (RWQCB), Department of Toxic Substances Control (DTSC), Los Angeles Fire Department (LAFD), Los Angeles Department of Public Works (LADPW), California Geologic Energy Management Division (CalGEM), City Bureau of Engineering Department of Public Works, and National Pipeline Mapping System (NPMS). Based on this review, a former 1,500-gallon UST (specific contents unknown) was discovered in the southwest corner of the Project during excavation activities for new construction in 2008. Soil sampling conducted under the oversight of the LAFD identified contaminants of concern, total petroleum hydrocarbons (TPH), above regulatory screening criteria. Affected soil was excavated and removed from the Project site, and confirmation soil sampling indicated all contaminated soil above regulatory screening criteria had been removed. The LAFD issued a no further action letter to the Site in January 2009. Based on the issuance of the No Further Action letter from the LAFD, which confirmed that all contaminated soil exceeding regulatory screening criteria had been removed, no further mitigation related to the former UST at the southwestern corner of the Project site is required.

As discussed in Section b), it is possible that an abandoned UST is present in the northwest corner of the Project site; however, all proposed construction activity would occur outside of this area. Therefore, impacts related to hazardous materials sites would be less than significant.

There are no hazardous materials sites at the DBM campus, where students would temporarily be relocated[33] [34]. Thus, no impact would occur at this site.

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

No Impact. . The Proposed Project is not located within an airport land use plan or within two miles of a public airport. The nearest airport is the Los Angeles International Airport, located approximately eight miles southwest of the Project site. The Hollywood Burbank Airport is approximately 10 miles northwest of the DBM campus. No safety hazards or excessive noise impacts would occur due to the proximity of an airport. Thus, no impact would occur.

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

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

In addition, contractors on the site would also develop an emergency response plan in the event of an unforeseen emergency. During an emergency during construction, all applicable protocols would be followed. The function and operation of the Proposed Project site will remain unchanged. LAUSD has developed an Emergency Operation Plan (EOP) that provides protocols and assigned personnel in response to recovery efforts in the event of an emergency. The EOP functions in coordination with the local ordinances and would not interfere with locally adopted emergency response plans and emergency evacuation plans. Therefore, the operation of the Proposed Project is not expected to interfere with an adopted emergency response plan and emergency evacuation plan. Impacts would be less than significant.

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

No Impact. According to California Department of Forestry and Fire Prevention (CAL FIRE) Fire Hazard Severity Zone Viewer, the Project site and DBM campus are not within a Fire Hazard Severity Zone of Local,

[33] California Department of Toxic Substances Control, *EnviroStor* (2025), https://www.envirostor.dtsc.ca.gov/public/
[34] State Water Resources Control Board, *GeoTracker* (2025), https://geotracker.waterboards.ca.gov/map/?global_id=T0607100280

State or Federal responsibility[35]. Furthermore, the Project area is fully developed and does not contain any undeveloped land that could contribute to a significant fuel load. No impact would occur.

[35] California Department of Forestry and Fire Protection, *Fire Hazard Severity Zone Viewer* (2025), https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0

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	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. 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?	☐	☐	☒	☐

(HWQ) Explanation:

The SPEIR evaluated the potential for implementation of the SUP-related projects to have impacts associated with hydrology and water quality. Upon implementation of regulatory requirements and SCs, the impacts associated with hydrology and water quality would be less than significant.

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

LAUSD Standard Conditions of Approval	
	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-5	LAUSD shall evaluate tsunami hazards to determine if the project site is within a tsunami inundation zone as delineated by California Emergency Management Agency or National Oceanic and Atmospheric Administration. If the project site is within a tsunami hazard zone LAUSD shall prepare a Tsunami Awareness and Evacuation Plan in compliance with the LAUSD Emergency Operations Plan.
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.

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LAUSD Standard Conditions of Approval	
	• 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.

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

Less than Significant Impact. Given the Project would disturb more than one-acre, potential construction impacts would be mitigated by complying with the State Water Resources Control Board (SWRCB) Construction General Permit, which includes the following steps:

- Assess the Project site and its potential pollutants
- Develop a Stormwater Pollution Prevention Plan (SWPPP)
- Enroll in the Construction General Permit by Filing a Notice of Intent with the SWRCB.
- Implement erosion, sediment, material, and waste management and good housekeeping BMPs described in the SWPPP.
- Install post-construction BMPs, per the LAUSD's Stormwater Technical Manual
- Comply with the Construction General Permit final stabilization requirements and file a Notice of Termination
- Operate and/or implement and maintain post-construction BMPs long-term

The LAUSD's Compliance Checklist, as described in SC-HWQ-2, would be used by LAUSD to verify compliance with the Construction General Permit. Post-construction stormwater runoff impacts will be mitigated by the implementation of LAUSD's Stormwater Technical Manual, CalGreen and LEED standards (**SC-HWQ-1**), and LAUSD's Stormwater BMP Maintenance and Operations Manual (**SC-HWQ-3**). By complying with the Construction General Permit, implementing LAUSD's Stormwater Technical Manual, CalGreen, and LEED standards, and the LAUSD Stormwater BMP Maintenance and Operations Manual, construction and post-construction impacts will be mitigated.

The Proposed Project would be designed to maintain the existing and historic patterns and storm water discharge locations within and along the perimeter of the Project site. Construction of new structures would generally occur within the footprint of demolished structures, and implementation of the Proposed Project would not increase impervious surfaces on the Campus. The existing drainage system is designed to accommodate existing runoff from the Project site, and the design of the Proposed Project would intercept and capture stormwater runoff within the Project site to the extent feasible. Irrigation systems and other water delivering features would be selected in accordance with the LAUSD standards to maintain water efficiency on the Campus and reduce discharge. The expected volume of discharge during operation is anticipated to be comparable to the existing discharge volume at the site. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

During the DBM campus relocation, no grading, excavation, or other construction-related ground disturbance is proposed, and all activities would occur on existing paved and landscaped areas. Stormwater drainage and runoff patterns would remain unchanged at the DBM campus, and no new impervious surfaces or drainage modifications would occur. Additionally, the relocation would not introduce substantial quantities of pollutants or hazardous materials into the stormwater system beyond those associated with normal school operations, which are already managed in accordance with applicable local and state water quality regulations. As a result, the DBM campus relocation would not substantially alter hydrology, impact groundwater quality or recharge, increase flooding, or degrade water quality at the site; no impact would occur. No mitigation or further analysis is required.

LID stormwater management would be incorporated into the Project design. LAUSD 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.

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 Central Subbasin of the Coastal Plain of Los Angeles Groundwater Basin (LA Basin) underlies the Project site[36]. As referred to within Section a), the Project site is currently developed with little existing permeable surface area. The Proposed Project would not increase impermeable surface to the Project site compared to existing conditions and would, therefore, not significantly interfere with existing groundwater recharge. The Proposed Project would also not increase student capacity at the Campus or significantly increase its water usage. Additionally, the Project site is not designated as part of the Sole Source Aquifer Program or designated as an area for groundwater recharge activities[37].

Project design features would include Low Impact Development (LID) measures and green infrastructure installed per LAUSD's Stormwater Technical Manual, and CalGreen and LEED standards to control runoff from the newly impervious areas and promote on-site percolation, such as permeable pavement, infiltration trenches, bioswales, etc. Per the Stormwater Technical Manual, projects are required to retain the full stormwater quality design volume (SWQDv) on-site through infiltration, evapotranspiration, or a combination thereof, unless it is demonstrated that it is technically infeasible to do so[38]. If alternative compliance measures, such as biofiltration, are used, they must be designed to capture and treat 1.5 times the portion of the SWQDv not retained on-site. Therefore, the Proposed Project's groundwater impacts would be less than significant, and no mitigation or further analysis is required.

As discussed in Section a), the DBM campus relocation would not substantially alter hydrology, impact groundwater quality or recharge, increase flooding, or degrade water quality at the site; no impact would occur at this site. No mitigation or further analysis is required.

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[36] California Department of Water Resources, *SGMA Basin Prioritization Dashboard* (2020), https://gis.water.ca.gov/app/bp-dashboard/final/#

[37] U.S. Environmental Protection Agency, *Sole Source Aquifers* (2025), https://experience.arcgis.com/experience/1bfab371d71e4b868fc9ae7df62a16fe

[38] Geosyntec, *LAUSD Stormwater Technical Manual* (2019).

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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. Construction of the Proposed Project would involve grading and excavating of the Project site. The loose soil from construction, when exposed to rainfall or runoff could create on- or off-site erosion or siltation. However, as mentioned in Section a), the Proposed Project would implement a SWPPP, BMPs, and monitoring for stormwater discharge to ensure that sedimentation of the downstream waters remain within regulatory limits per **SC-HWQ-2**. Minimum BMPs implemented under the SWPPP would include, as applicable:

- Minimize disturbed areas of the site;
- Preserve existing vegetation to the maximum extent practicable;
- Re-vegetate exposed areas as quickly as possible, with a maximum of 14 days of inactivity;
- Implement erosion and sediment control practices;
- Implement dust control measures, such as silt fences and regular watering of areas;
- Stabilize construction entrances/exits and construction roads;
- Install storm drain inlet protection measures; and
- Install linear sediment control measures, such as silt fences and fiber rolls, around the perimeter and on slopes.

In addition, the Proposed Project would also comply with all applicable regulations from Federal, State, and local levels, and **SC-HWQ-1 through SC-HQ-3**. The programs to be implemented and compliance with the existing regulations would reduce the impacts of on- and off-site erosion or siltation to less than significant levels.

As discussed in Section a), the DBM campus relocation would not substantially alter hydrology, impact groundwater quality or recharge, increase flooding, or degrade water quality at the site; no impact would occur at this site.

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. Construction of the Proposed Project would produce surface runoff from water used for dust control and other construction activities. However, the amount of runoff would be minimal. During operation, as mentioned within Section a), the Proposed Project would be designed to maintain the existing and historic patterns and storm water discharge locations of the Project site. Drainage structures and piping systems shall be designed based upon the 25-year storm event as defined by LA County Hydrology Manual[39]. Runoff from the site would be designed to be intercepted and captured within the Project site to the extent feasible. Irrigation systems and other water delivering features would be

[39] County of Los Angeles, *Hydrology Manual* (2006), https://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf

selected in accordance with the LAUSD standards to maintain water efficiency on campus and reduce discharge. The expected volume of discharge generated by operation of the Project site will be comparable to the existing discharge volume at the site. The Project would not substantially increase the rate or amount of surface runoff from the Project site and would not result in flooding on- or off-site. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

As discussed in Section a), the DBM campus relocation would not substantially alter hydrology, impact groundwater quality or recharge, increase flooding, or degrade water quality at the site; no impact would occur at this site. No mitigation or 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

Less than Significant Impact. The Proposed Project would produce runoff during construction through dust control measures and other construction related activities. However, the amount of runoff created would be minimal. The LAUSD **SC-HWQ-1** requires collecting surface runoff in a stormwater collection system designed for 25-year peak runoff rates. During Project operations, as mentioned within Section a), the Proposed Project would be designed to intercept and capture runoff within the Project site to the extent feasible and minimize polluted runoff from the Project site. In addition, the operation of the Proposed Project is expected to produce similar runoff volume as the existing operation of the Project site. Therefore, the impact of the Proposed Project would be less than significant, and no mitigation or further analysis is required.

As discussed in Section a), the DBM campus relocation would not substantially alter hydrology, impact groundwater quality or recharge, increase flooding, or degrade water quality at the site; no impact would occur at this site. No mitigation or further analysis is required.

iv) Impede or redirect flood flows?

No Impact. The Project site is designated as Flood Zone X, indicating an area of minimal flood hazard (outside the 100 year floodplain and within the 500 year flood zone)[40]. The Project is also not located within a Tsunami Inundation Zone[41]. Therefore, no impacts regarding flood flows would occur. No mitigation or further analysis is required.

As discussed in Section a), the DBM campus relocation would not substantially alter hydrology, impact groundwater quality or recharge, increase flooding, or degrade water quality at the site; no impact would occur at this site. No mitigation or further analysis is required.

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

No Impact. As previously discussed, the Project site and DBM campus are not within a flood hazard area or Tsunami Inundation Zone[42]. There are also no large bodies of water near the Project site or DBM campus and

[40] City of Los Angeles, *Zone Information and Map Access System (ZIMAS)* (2025), https://zimas.lacity.org/
[41] City of Los Angeles, *Zone Information and Map Access System (ZIMAS)* (2025), https://zimas.lacity.org/
[42] City of Los Angeles, *Zone Information and Map Access System (ZIMAS)* (2025), https://zimas.lacity.org/

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the surrounding areas are flat and highly developed. Therefore, no impact would occur, and no mitigation or further analysis is required.

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

Less than Significant Impact. The Central Subbasin of the Coastal Plain of Los Angeles Groundwater Basin (LA Basin) underlies the Project site[43]. The LA Basin is designated as a "Very Low Priority" per the Sustainable Groundwater Management Act (SGMA), which means that the basin is not required to form a Groundwater Sustainability Agency (GSA) or adopt a Groundwater Sustainability Plan (GSP). Therefore, the Project would not conflict with a sustainable groundwater management plan.

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

As discussed in Section a), the DBM campus relocation would not substantially alter hydrology, impact groundwater quality or recharge, increase flooding, or degrade water quality at the site; no impact would occur at this site. No mitigation or further analysis is required.

[43] California Department of Water Resources, *SGMA Basin Prioritization Dashboard* (2020), https://gis.water.ca.gov/app/bp-dashboard/final/#

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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?	☐	☐	☐	☒

(LU) Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact existing land uses in the LAUSD service area and to conflict with applicable land use plans, policies and regulations, including habitat for wildlife conservation plans. To avoid impacts on existing land uses in areas where future projects would be implemented under the SUP, the SPEIR requires site specific projects to be consistent with applicable state regulations.

According to the SPEIR, projects implemented under the SUP that include new construction and modernization on existing school campuses would not conflict with applicable land use and conservation plans and regulations, would not physically divide an established community, and would have no impacts on existing land uses in the LAUSD region. Similarly, project-specific analysis provided below concludes that implementation of the Project would have no impacts related to land use and planning.

a) Physically divide an established community?

No Impact. The physical division of an established community generally refers to the construction of a feature such as an interstate highway or railroad tracks, or removal of an access point, such as a local road or bridge that would impact mobility or access to or between an existing community. The Campus and the surrounding area is fully developed with urban land uses, including residential, recreational, and institutional uses. The existing Project site and DBM campus currently serve as school facilities, which is an allowed use under the Public Facilities zoning designation. The Proposed Project would not change the existing school uses. No components of the Project would physically divide the residential uses to the northeast or divide the USC campus to the south and west. No impact would occur. No mitigation or further analysis is required.

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

No Impact. The Proposed Project would continue to operate as a public school, which is consistent with the site's zoning and General Plan land use designation as Public Facilities. The proposed modernization of the Campus would not change the land use of the Project site and, thus, would not conflict with existing plans, policies, or regulation adopted for the purpose of avoiding or mitigating environmental effects.

On February 19, 2019, the LAUSD Board of Education adopted a resolution to exempt all LAUSD school sites from local land use regulations under Government Code Section 53094. LAUSD school sites are exempt from all local ordinances, such as those pertaining to building height, parking, preservation and replacement of

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trees, construction permits (except those in the public right-of-way), recordation of parcel maps, signage, site plan review, and inspection. Therefore, no impact would occur, and no mitigation or further analysis is required.

XII. MINERAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

The SPEIR evaluated the potential for implementation of SUP-related projects to impact mineral resources. The State geologist-classified Mineral Resource Zone-2 (MRZ-2) sites are located in two regions within the LAUSD area: one in central Los Angeles, and the other in the east-central San Fernando Valley.[44] According to the SPEIR, projects implemented under the SUP are anticipated to have no impacts on mineral resources in the LAUSD region. The analysis provided below concludes that implementation of the proposed Project would have no impacts on mineral resources in the Project area. There are no Mineral Resources LAUSD SCs that apply to this Project.

(MR) Explanation:

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 SPEIR states that no schools within LAUSD are designated as MRZ-2, nor are there any school sites proximal to regions designated MRZ-2 and aggregate quarries (District 2023). Furthermore, school campuses are not available for mineral resource extraction. Therefore, no impact would occur, and no mitigation or further analysis is required.

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

No Impact. The SPEIR states that no schools within LAUSD are designated as MRZ-2, nor are there any school sites proximal to regions designated MRZ-2 and aggregate quarries (District 2023). Furthermore, school campuses are not available for mineral resource extraction. Therefore, no impact would occur, and no mitigation or further analysis is required.

[44] According to SMARA, MRZ-1 are areas of no significant mineral resource deposits, MRZ-2 are areas that contain identified mineral resources, MRZ-3 are areas of undetermined mineral resource significance, and MRZ-4 are areas of unknown resource potential.

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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 a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
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?	☐	☐	☒	☐

(NOI) Explanation:

On November 21, 2025 a Noise Impact Analysis was prepared by Vista Environmental in support of the Proposed Project and is included in Appendix H.

The SPEIR 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. LAUSD 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 A-weighted decibels (dBA) equivalent continuous sound level (L_{eq}).[45]
SC-N-2	LAUSD shall analyze the acoustical environment of the site (such as traffic) and the characteristics of planned building components (such as 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 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.

[45] L10 value represents the noise level that is exceeded 10 percent of the time or 6 minutes in an hour.

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LAUSD Standard Conditions of Approval	
	• 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 L_{eq} 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.

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

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	the school environment, through implementation of noise control measures, as necessary.[46] Noise control measures may include, but are not limited to: <u>Path Controls</u> • Noise Attenuation Barriers[47] – Temporary noise attenuation barriers installed blocking the line of sight between the noise source and the receiver. Intervening barriers already present, such as berms or buildings, may provide sufficient noise attenuation, eliminating the need for installing noise attenuation barriers. <u>Source Controls</u> • Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential areas: only between 7:00 AM and 7:00 PM). • Substitute Methods – using quieter methods and/or equipment. • Exhaust Mufflers – ensuring equipment has quality mufflers installed. • Lubrication & Maintenance – well maintained equipment is quieter. • Reduced Power Operation – use only necessary size and power. • Limit Equipment On-Site – only have necessary equipment on-site. • Quieter Backup Alarms – manually-adjustable or ambient sensitive types. If OEHS determines that the above noise reduction measures will not reduce construction noise to below the levels permitted by LAUSD's noise standards LAUSD shall mandate that construction bid contracts include the following receptor controls: <u>Receptor Controls</u> • 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.

Noise is defined as unwanted sound and is known to have potential adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known adverse effects of noise, the federal government, State of California, County of Los Angeles, and LAUSD have established criteria to protect public health and safety and to prevent the disruption of certain human activities, such as classroom instruction.

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

[47] 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).

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

Less than Significant Impact. The Proposed Project would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The following section describes the potential noise emissions associated with the temporary construction activities and long-term operations of the Proposed Project, as discussed in Appendix H.

Construction-Related Noise

The construction activities for the Proposed Project are anticipated to include demolition of 23 classrooms and restrooms in 13 relocatable buildings and a storage building and associated pavement, grading of approximately 2.75 acres of the Project site, installation of new underground utilities, building construction that would include the minor modernization of approximately 40,127 square feet of building space and new construction of a 3-story classroom building that would total 46,380 square feet, paving associated with the outside improvements that would include landscape and hardscape upgrades, and application of architectural coatings. Noise impacts from construction activities associated with the Proposed Project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities.

Section 41.40(a) of the City of Los Angeles Municipal Code exempts construction activities from the City's noise standards provided construction activities do not take place between the hours of 9:00 p.m. and 7:00 a.m. For construction activities that occur during the allowed hours, Section 112.05(a) of the Municipal Code limits the noise from construction equipment to 75 dBA at the nearby residential dormitory uses. Since the Municipal Code does not provide any construction noise limits at the adjacent commercial uses, the Federal Transit Administration (FTA) construction noise level standard of 85 dBA at the nearby religious centers and daycare facility, USC Campus and Shrine Auditorium have been utilized in this analysis.

The construction noise levels to the nearby sensitive receptors, as calculated in the Noise Impact Analysis, are shown in the table below.

Table 7 Construction Noise Levels at the Nearby Sensitive Receptors

Construction Phase	Construction Noise Level (dBA Leq) at:			
	Religious & Daycare to West[1]	Dormitories to North[2]	USC Campus[3]	Shrine Auditorium to East[4]
Demolition	74	69	68	70
Grading	73	68	67	69
Underground Utilities	71	66	65	67
Building Construction	74	69	68	69
Paving	72	67	65	67
Painting	62	57	56	57

Construction Phase	Construction Noise Level (dBA Leq) at:			
	Religious & Daycare to West[1]	Dormitories to North[2]	USC Campus[3]	Shrine Auditorium to East[4]
Construction Noise Thresholds[5]	85	75	85	85
Exceed Thresholds?	No	No	No	No

Notes:

1 The USC Catholic Center, HIC Daycare and USC Jewish Center to the west are located as near as 200 feet from the center of the School.

2 The USC Dormitories to the north are located as near as 350 feet from center of the School.

3 The USC Campus to the south is located as near as 400 feet from the center of the School.

4 The Shrine Auditorium to the east is located as near as 330 feet from the center of the School.

5 The Construction noise thresholds are from Section 112.05(a) of the Municipal Code for the dormitories to the north and from the FTA daytime commercial noise
threshold (see Table A of Appendix H) for the religious and daycare facilities to the west and USC campus to the south.

Source: Appendix H

The table above shows that the greatest noise impacts would occur during the demolition and building construction phases, with noise levels as high as 74 dBA Leq at the religious centers and daycare to the west, 69 dBA Leq at the dormitories to the north, 68 dBA Leq at the USC Campus to the south, and 70 dBA Leq at the Shrine Auditorium to the east. The calculated construction noise levels shown in the table above are within the residential noise standard of 75 dBA from Section 112.05(a) of the Municipal Code at the dormitories to the north and the daytime commercial noise standard of 85 dBA from the FTA at the religious and daycare centers to the west, USC Campus to the south, and Shrine Auditorium to the east. Therefore, through adherence to allowable construction times provided in Section 41.40(a) of the Municipal Code, the construction activities for the Proposed Project would not create a substantial temporary increase in ambient noise levels that are in excess of applicable noise standards. Impacts would be less than significant.

Operations-Related Noise

The Proposed Project consists of the operation of the modernized school structures that would not result in an increase in student enrollment nor would it result in a new use on campus. As such, no off-site roadway noise impacts are anticipated to be created from operation of the Proposed Project.

The Proposed Project would include outdoor improvements that include modernization of the existing lunch shelter, landscape, hardscape and infrastructure upgrades. No new noise generating sources such as outdoor play equipment or play courts would be added as part of the Proposed Project.

The Proposed Project would also include construction of an on-site access road that would start at the location of the existing basketball courts adjacent to 32nd Street and would extend to the southwest portion of the Campus. The new access road is being provided for fire department access to the school buildings and would also be utilized occasionally by maintenance vehicles. Since daily trips would not regularly occur on the access road, the access road would not be considered an operational noise source. As such, potential new on-site sources that may be created from operation of the Proposed Project are limited to new HVAC units on the modernized structures and new structures. Section 112.02 of the Municipal Code limits noise from mechanical equipment, including include the proposed rooftop mechanical equipment, to the ambient noise plus 5 dB.

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Section 111.03 of the Municipal Code defines the minimum ambient noise level as 60 dBA during the daytime and 55 dBA during the nighttime at the nearby commercial uses and 50 dBA during the daytime and 40 dBA during the nighttime at the nearby residential uses.

In order to determine the noise impacts from the operation of the HVAC units, a reference noise measurement was taken of a HVAC unit at a school, which was utilized to calculate the noise levels at the nearby sensitive receptors based on the standard geometric spreading of noise, which provides an attenuation rate of 6 dB per doubling the distance between source and receptor. The table below shows the calculated HVAC unit noise levels at the nearby homes.

Table 8 Operational On-site Noise Levels at the Nearby Sensitive Receptors

Noise Source	Calculated Noise Levels (dBA Leq) at[1]:			
	Religious & Daycare to West[2]	Dormitories to North[3]	USC Campus[4]	Shrine Auditorium to East[5]
HVAC Equipment[6]	34	31	29	27
City Noise Standards (Day/Night)[7]	60/55	50/40	60/55	60/55
Exceed City Noise Standards (Day/Night)?	No/No	No/No	No/No	No/No

Notes:
1 Noise levels calculated through standard geometric spreading of noise, which results in a 6 dB drop in noise when distance is doubled.
2 The USC Catholic Center, HIC Daycare and USC Jewish Center to the west are located as near as 100 feet from potential HVAC unit locations.
3 The Dormitories to the north are located as near as 130 feet from potential HVAC unit locations.
4 The USC Campus to the south is located as near as 170 feet from potential HVAC unit locations.
5 The Shrine Auditorium to the east is located as near as 210 feet from potential HVAC unit locations.
6 The HVAC reference noise measurement captured a noise level of 53.5 dBA at 10 feet (see Appendix D of the Noise Impact Analysis).
7 The City Noise Standards were obtained from Section 111.03 of the Municipal Code.

The table above shows that the operation of new HVAC equipment on the Project site would create a noise level as high as 31 dBA at the nearest dormitories to the north, which would be within the City's residential noise standards of 50 dBA during the daytime and 40 dBA during the nighttime and would create a noise level as high as 34 dBA at the nearest commercial use (religious and daycare to west), which would be within the City's commercial noise standards of 60 dBA during the daytime and 55 during the nighttime. Therefore, the operational activities for the Proposed Project would not create a substantial long-term increase in ambient noise levels that are in excess of applicable noise standards. Impacts would be less than significant.

Temporary DBM Campus Noise

Phase 1 of the Proposed Project would consist of temporarily relocating the Campus to the former DBM campus that is currently vacant and located at 1081 West Temple Street, Los Angeles. Phase 1 may require the reconfiguration of the demountable partitions. As discussed in Appendix H, construction-related noise created from Phase 1 would be nominal. In addition, the DBM is located approximately 3.2 miles north of the Project site, which would result in only a nominal change in bus routes and worker commutes during the temporary relocation of the Campus.

Therefore, all construction and operational noise impacts resulting from the Proposed Project would be less than significant.

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

Less than Significant Impact. The Proposed Project would result in generation of excessive groundborne vibration or groundborne noise levels. The following section analyzes the potential vibration impacts associated with the construction and operations of the Proposed Project, as discussed in the Noise Impact Analysis.

Construction-Related Vibration Impacts

The construction activities for the Proposed Project are anticipated to include demolition of 23 classrooms and restrooms in 13 relocatable buildings and a storage building and associated pavement, grading of approximately 2.75 acres of the Project site, installation of new underground utilities, building construction that would include the minor modernization of approximately 40,127 square feet of building space and new construction of a 3-story classroom building that would total 46,380 square feet, paving associated with the outside improvements that would include landscape and hardscape upgrades, and application of architectural coatings. The nearest off-site sensitive receptor to these proposed improvements are the USC Catholic Center, HIC Daycare and USC Jewish Center that are as near as 65 feet west of the Project site.

Because neither the City of Los Angeles General Plan nor the Municipal Code establish vibration standards for construction activities, the project relies on Caltrans guidance, as detailed in Section 4.2 of the Noise Impact Analysis. This guidance identifies a threshold of human perception for transient vibration sources at 0.25 inches per second peak particle velocity (PPV).

The primary source of vibration during construction would be from the operation of a vibratory roller. A vibratory roller would create a vibration level of 0.003 inch per second PPV at 25 feet (Appendix H). Based on typical propagation rates, the vibration level at the structures to the west (65 feet away) would be 0.073 inch per second PPV. The vibration level at the nearest off-site structures would be below the 0.25 inch per second PPV threshold detailed above. Impacts would be less than significant, and no mitigation or further analysis is required.

Operation-Related Vibration Impacts

The Proposed Project would consist of the on-going operation of the new and modernized school structures. The on-going operation of the Proposed Project would not include the operation of any known vibration sources. Therefore, a less than significant vibration impact is anticipated from the operation of the Proposed Project. No mitigation or further analysis is required.

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

Less than Significant Impact. As discussed in Appendix H, the Proposed Project would not expose people residing or working in the Project area to excessive noise levels from aircraft. The nearest airports include

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Hawthorne Municipal Airport that is located as near as 7.3 miles south of the Project site and Los Angeles International Airport that is located as near as 8 miles southwest of the Project site. The Project site is located outside of the 60 dBA CNEL noise contours of both of these airports. A less than significant impact would occur from aircraft noise. Therefore, no mitigation or further analysis is required.

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	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?	☐	☐	☒	☐

(PED) Explanation:

On October 28, 2025, a Pedestrian Safety Study was prepared by General Technologies and Solutions in support of the Proposed Project. The Pedestrian Safety Study is included in Appendix I.

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

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

LAUSD Standard Conditions of Approval	
SC-PED-1	LAUSD shall participate in the Safe Routes to School (SR2S) program. **California Department of Transportation (Caltrans) SR2S Program** LAUSD is a participant in the SR2S program administered by Caltrans, local law enforcement, and transportation agencies. OEHS provides pedestrian safety evaluations as a component of traffic studies conducted for new school projects. This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25-mile radius of a proposed school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic.
SC-PED-2	LAUSD shall implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program. **OEHS Traffic and Pedestrian Safety Program** LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for: student drop-off areas, vehicle access, and pedestrian routes to school. School traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.

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LAUSD Standard Conditions of Approval	
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 request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.
SC-PED-5	LAUSD shall design new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide. **School Design Guide** The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.
SC-T-2	Implementation of SC-T-2 (see XVIII. TRANSPORTATION AND CIRCULATION)
SC-T-3	Implementation of SC-T-3 (see XVIII. TRANSPORTATION AND CIRCULATION)
SC-T-4	Implementation of SC-T-4 (see XVIII. TRANSPORTATION AND CIRCULATION)

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

Less than Significant Impact. During construction, the Proposed Project would temporarily require construction equipment to move in and out of the Project site at the 32nd St. Campus. Per **SC-T-2**, LAUSD shall follow the vehicular access and pedestrian safety design standards in the School Design Guide, which would minimize potential traffic safety hazards through appropriate site access design, internal circulation, and parking layout. In accordance with **SC-T-3**, LAUSD shall coordinate with local jurisdictions to evaluate and implement improvements to pick-up and drop-off zones, traffic control devices, and pedestrian safety measures. The construction contractor is required to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction which would present the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies, per **SC-T-4**. In the event that road closure and/or large equipment maneuvering is required, the construction contractor would provide traffic control personnel to ensure the safety of all surrounding transportation users. Additionally, the Proposed Project would comply with all Federal, State, and local ordinances.

During operation, the improvements associated with the Proposed Project would be contained within the existing Campus. The Proposed Project would include an access road from W. 32nd St. to the central western portion of the site, where the existing basketball courts are located. The modified access road would be designed in accordance with all applicable LAFD, Los Angeles Department of Transportation (LADOT) and/or LAUSD geometric design standards (e.g., lane width, turning radii, sight distance, signage). Compliance with these standards ensures that the roadway geometry would not create sharp curves, blind spots, or other features that could increase collision risk. Thus, impacts would be less than significant at the 32nd St. Campus.

Given the DBM campus is a temporary site that has been historically used as a school site, it is not anticipated to substantially increase the vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses. The temporary site features standard driveway widths and turning radii and provision of adequate line of sight to avoid design elements that could result in hazards. As discussed in the Pedestrian Safety Study, under the School Design Guide, Section 2.3 (Vehicular Access and Parking) LAUSD will:

- Ensure adequate and safe access for students, staff and visitors walking, entering and circulating on the campus. Vehicle traffic patterns shall not interfere with major pedestrian traffic patterns. Foot traffic shall not pass through entrance driveways.
- Provide safe and clearly indicated student drop-off and pick-up provisions by car and bus.
- Delivery and utility vehicles shall have direct access from the street without crossing playgrounds or fields.

In addition, the site is required to accommodate ingress and egress of emergency vehicles as required by the City of Los Angeles Fire Department or other affected emergency service vehicles. All access features are subject to and must satisfy fire department code in each affected jurisdiction.

LAUSD has several policies (SC-PED-1 through SC-PED-5) to coordinate with local traffic engineering departments and to provide adequate access, parking, and circulation in the vicinity of a school site. Such policies shall apply to the Proposed Project.

Additionally, pursuant to California Vehicle Code Sections 21272 and 21273, local jurisdictions must install traffic control devices required to mitigate hazards for students traveling to and from school. Local jurisdictions may request the District to reimburse the City up to 50 percent of the cost of installing such devices.

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Further, although the southern parking lot—repurposed as a one-way drop-off area—does not provide a continuous pedestrian path, students walking or arriving by bus would access the campus via the North Beaudry Avenue entrance, which provides a direct and continuous pedestrian pathway from the public sidewalk to the school entrance. This design would separate pedestrian activity from vehicular circulation along Temple St., minimizing potential conflicts between vehicles and pedestrians and ensuring safe and efficient access to the campus. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

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

Less than Significant Impact. As discussed in the Pedestrian Safety Study, the DBM site is a temporary site. The Project would temporarily increase student capacity or attendance and would include installation of any necessary signs and roadway markings pursuant to Part 7, School Area Traffic Controls, of the California MUTCD (Appendix I). Compliance with existing regulations would result in less than significant impacts at the DBM campus. No mitigation or further analysis is required.

During operations at the 32nd St. Campus, there would be no change in the location of pedestrian access points to the school compared to existing conditions. Thus, there would be no change in the routes utilized by students walking from local neighborhoods. Therefore, no impact would occur, and no mitigation or further analysis is required.

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

Less than Significant Impact. Though the DBM campus is in the vicinity of a freeway, it is grade separated and no direct access is available between the freeway and the site's immediate vicinity. The DBM campus is accessible via a collector street, not on major highways. The California Air Resources Board's Air Quality and Land Use Handbook recommends that sensitive land uses, including schools, be 500 feet or more from freeways or from urban roads carrying traffic volumes of 100,000 or more vehicles per day (Appendix I). This temporary site was built prior to the freeways and/or regulations for siting schools, so LAUSD has some schools near high-traffic roads. Students already walk and bike to the DBM, and safety devices—such as crosswalks, traffic lights, and signage—are already in place. Therefore, additional students on a temporary basis would not exacerbate any current conditions. Impacts would be less than significant at this site.

The 32nd St. Campus is already located adjacent to two major roadways, W. Jefferson Blvd. and S. Hoover St., and currently accommodates pedestrian and vehicle activity safely under existing conditions. Because the Project would not modify pedestrian access points or vehicle drop-off and pick-up locations, circulation patterns would remain unchanged. As such, the Project would not introduce new design features or alterations that could exacerbate existing safety conditions. Therefore, impacts at this site 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
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?	☐	☐	☐	☒

(PH) Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact population growth in the LAUSD service area and cause displacement of people and housing. According to the SPEIR, new construction, renovation and modernization projects implemented under the SUP on existing LAUSD campuses are anticipated to have less than significant impacts related to indirect population growth and no impacts related to displacement of housing and people in the LAUSD region. Similarly, the project-specific analysis below concludes that implementation of the Project would also have less than significant impacts related to indirect population growth and no impacts related to displacement of housing and people in the Project area.

LAUSD has an SC addressing potential impacts to population and housing; however, the proposed Project would not displace any residences or businesses. Therefore, the implementation of LAUSD's Relocation Assistance Advisory Program would not be applicable to the proposed 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)?

No Impact. The scope of the Proposed Project includes demolition of 23 classrooms and restrooms, construction of approximately 23 general and specialty classrooms and support spaces, landscaping, and minor improvements. The Proposed Project aims to modernize the aging infrastructure of the Campus, without increasing student enrollment or capacity. Additionally, the Proposed Project does not include features such as new homes, businesses, road extensions, or other infrastructure that may induce population growth. The SPEIR determined that modernization projects would generate short-term construction employment to be absorbed from the regional labor force rather than attracting new workers into the region (District 2023). Therefore, no impact would occur, and no mitigation or further analysis is required.

The temporary relocation of students under the Proposed Project would occur within the existing DBM campus located at 1081 West Temple Street, Los Angeles CA 920012. Given this school is within a reasonable proximity from the Campus, it is anticipated there would be no population growth or new housing demand. Therefore, no impact would occur, and no mitigation or further analysis is required.

4. Environmental Checklist and Analysis

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

No Impact. The existing Project site operates as an educational facility and does not contain any housing. The Proposed Project would not change the existing educational uses. Although the Project would temporarily relocate students to the DBM campus for the duration of construction, the DBM is currently vacant. There are no existing schools and programs operating at the DBM campus and the temporary relocation would not disrupt current operations at DBM. Therefore, no impact would occur relating to displacement of people or housing. No mitigation or further analysis is required.

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

(PS) Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact public services in the LAUSD region. Proposed new construction projects under the SUP could lead to an expansion of existing school campuses, an increase in total building area, or changes in access, circulation and site plans, thereby generating increased demands for fire and police protection services. LAUSD has SCs for minimizing impacts to public services. Applicable SCs related to public services impacts associated with the proposed Project are provided below:

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

a) Result in adverse impacts related to fire protection?

Less than Significant Impact. The Los Angeles County Fire Department (LACFD) currently provides fire protection and emergency medical services to the Project site. The Project site is served by Los Angeles Fire Department Station #15, located 0.15 miles north of the Project site.

The Proposed Project would include an access road from W. 32nd Street to the central western portion of the site, where the existing basketball courts are located. This improved circulation would enhance fire department access by providing a more direct and unobstructed route to the interior portions of the site.

The Proposed Project would be required to comply with LACFD and Department of Building and Safety regulations for water availability and fire hydrant pressure, and accessibility for firefighting equipment to minimize any threat of a fire. The Project would comply with standard design requirements in accordance with the California Building Code (CBC), California Fire Code (CFC), and local fire department requirements, which include fire sprinklers, fire alarm devices, emergency access, and evacuation procedures. The proposed modernization of the Campus would include installation of new and upgraded fire alarms, safety and technology upgrades, and life safety and seismic safety upgrades.

Per the SPEIR, LAUSD is required to coordinate with LACFD regarding fire equipment access during construction and specifications for the new emergency access road in compliance with SC-PS-1 (District 2023). Additionally, LAUSD has several emergency procedures in place to ensure the safety of people on and around schools, as outlined in SC-PS-2.

In addition, because the Project would not increase student enrollment or campus capacity, it would not result in any increase in site usage that could otherwise affect emergency access or response times. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

The temporary DBM campus relocation would not result in a net increase in the number of students or staff served within LAUSD, and all activities would occur within an existing developed facility, so no new fire protection facilities or services would be required. The existing vehicular circulation at the DBM campus would be improved to provide adequate emergency access to the site. A less than significant impact would occur. No mitigation or further analysis is required.

b) Result in adverse impacts related to police protection?

Less than Significant Impact. The Project site is currently served by City of Los Angeles Police Department (LAPD). The Southwest Community Police Station is located 1.57 miles southwest of the Project site. In addition the Los Angeles School Police Department (LASPD) is a recognized independent school police department, with over 258 sworn police officers, 61 non-sworn school safety officers (SSO), and 40 civilian support staff dedicated to serving LAUSD[48]. A sufficient number of officers are available to respond to the remaining schools in the LAUSD. In the event of an emergency that would require additional officers, a back-up LASPD patrol force is also available. LASPD's headquarters are in central Los Angeles near the District headquarters. LASPD operates out of four additional division offices: Valley West, in the Community of Van Nuys in the City of Los Angeles; Valley East, in the Community of Pacoima in the City of Los Angeles; West, in the Community of Venice in the City of Los Angeles; and South, in the Community of Willowbrook in unincorporated Los Angeles County.

Demands for police protection are generated more by the number of people in a service area than by numbers of building or total building area. Given the Proposed Project would not increase student enrollment or capacity, there would not be an increase demand for police services.

As discussed in the SPEIR, individual school projects would include both design features and provisions for LASPD police officers in order to ensure a high level of safety and security at future school projects and in the immediately surrounding area. The entries and boundaries of school campuses are fenced, secured, and carefully controlled by the LAUSD staff and the LASPD. Marked LASPD police vehicles patrol schools on a regular basis. LAUSD maintains a cooperative working relationship between the LASPD and affected local and

[48] Los Angeles School Police Department, Mission Statement (2025), https://laspd.lausd.org/

regional law enforcement agencies who act as backup. Prior to Project approval, site plans would be reviewed by local police departments to ensure safety and access as outlined in SC-PS-1. Additionally, LAUSD has several emergency procedures in place to ensure the safety of people on and around schools as outlined in SC-PS-2. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

Any impacts on police services as a result of the DBM campus relocation would be temporary, limited to the duration of construction at the Project site; thus, impacts would less than significant. No mitigation or further analysis is required.

c) Result in adverse impacts related to schools?

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

d) Result in adverse impacts related to parks?

Less than Significant Impact. Demands for parks facilities are generated by the population in the parks' service areas. Given the Proposed Project would not increase student enrollment or capacity, there would not be an increased demand for parks. Upon Project completion, there would be sufficient indoor and outdoor recreational space for student use. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

The temporary DBM campus relocation would not increase population that would result in increased recreation demand. Impacts would be less than significant. No mitigation or further analysis is required.

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

Less than Significant Impact. The Project would not induce growth in the community, increase the student or staff population, or increase demand for other public facilities. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. RECREATION. Would the 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?	☐	☐	☒	☐
b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☒	☐

(REC) Explanation:

The SPEIR evaluated the potential for implementation of SUP-related projects to impact existing recreation facilities and parks in the LAUSD region, due to increased demand or adverse effect on the environment from the provision of new and/or expanded recreational facilities. According to the SPEIR, projects implemented under the SUP are anticipated to have no impacts on parks and recreation facilities in the LAUSD region. Therefore, the analysis provided below concludes that implementation of the Project would have less than significant impacts on existing park and recreation facilities in the Project area and no impact on the provision of new and/or expanded facilities.

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. Upon completion of the Proposed Project, the Campus would contain recreational facilities, including a playground and physical education spaces, that would be available for student use only. The Proposed Project would not increase student capacity or enrollment, thus it would not induce population growth typically associated with increased demand for parks and recreational facilities. Impacts to parks and recreational facilities would be less than significant. No mitigation or further analysis is required.

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

Less than Significant Impact. The Proposed Project does not involve the addition of recreational spaces outside of the Campus. Upon completion of the Proposed Project, the Campus would contain recreational facilities, including a playground and physical education spaces, that would be available for student use only. The Proposed Project would not require the construction or expansion of recreational facilities outside of LAUSD-owned property. Therefore, environmental impacts related to community recreational facilities would be less than significant, and no mitigation or further analysis is required.

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	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?	☐	☐	☐	☒

(T) Explanation:

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

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

LAUSD Standard Conditions of Approval	
SC-T-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.

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LAUSD Standard Conditions of Approval	
	• 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 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.

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

Less than Significant Impact. The Project site is bounded by W. 32nd St. to the north, S. Hoover St. and University Ave. pedestrian walk to the west, Jefferson Boulevard to the south, and Royal Street to the east. The Project site is accessed regionally by I-110 to the east and Interstate 10 to the north. LA Metro Bus Lines 35 and 38 runs east and west from the Project site and Line 2 runs north and east from the Project site. The Jefferson & Hoover and Hoover & 32nd St. bus stops are adjacent to the Campus. On weekdays, Line 2 has a peak-hour frequency of eight minutes and daytime frequency of 10 minutes; Line 35 has a peak-hour frequency and daytime frequency of 15 minutes; and Line 38 has a peak-hour frequency of 30-40 minutes and daytime frequency of 30 minutes[49] .

Construction

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

[49] Los Angeles County Metropolitan Transportation Authority, *Central LA/Westside Bus & Rail Service* (2025), https://cdn.beta.metro.net/wp-content/uploads/2025/06/06110820/25-2152_web_MSysMap_CenLAWestside_35x17_DCR.pdf

public and to ensure the safety of student and staff. LAUSD would also encourage that the contractor limit construction-related truck traffic to off-peak commute periods as much as is feasible.

At the existing W. 32nd St. Campus, approximately 660 students travel to and from school via car, 210 students via bus, and 20 to 30 students walk to school (Appendix I). The DBM campus would include a clearly defined one-way circulation route within the southern parking lot, with vehicular ingress from the southern Temple St. driveway and egress at the northern Temple St. driveway, providing an efficient drop-off and pick-up system for students. The DBM campus is well-served by Metro bus lines 10, 48, and 92, with Terminal 25 located immediately adjacent to the site. There are 10-foot-wide sidewalks along both Temple Street and North Beaudry Avenue for safe pedestrian access. Because the relocation would temporarily shift existing students and staff to a developed site with adequate proposed circulation infrastructure and multiple transportation options, no significant adverse impacts to roadway, transit, bicycle, or pedestrian facilities would occur. No mitigation or further analysis is required.

Operation

The operation of the Proposed Project would remain the same as the existing operation conditions at the Campus, without any increase in student capacity. As development of the Proposed Project would be confined to areas on Campus, the transportation operations of the surrounding area are expected to remain the same.

Per SC-T-2, LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process to ensure compliance with the School Design Guide. These measures would maintain consistency with local circulation policies by providing adequate parking, safe vehicular access, and pedestrian safety features. In addition, per SC-T-3, LAUSD shall coordinate with the City to ensure compliance with local design guidelines for access, parking, and circulation in the vicinity of the Project. This coordination would prevent potential conflicts with adopted transportation plans.

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

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

Less than Significant Impact. The Proposed Project would involve construction equipment and additional vehicles for construction workers to reach the Project site. Construction equipment would primarily remain on-site for the duration of the construction with the exception of haul trucks. An estimated 147 daily trips are expected during construction of the Proposed Project (calculated from Table I of Appendix A). LAUSD encourages carpooling for construction contractors getting to and from the Project site and will work with the contractor to minimize vehicle trips to the extent feasible. Construction equipment and contractor trips to the Project site would be temporary in nature, ceasing at the completion of the Proposed Project.

The temporary relocation of students may increase vehicle miles travelled (VMT) within the DBM campus area. However, impacts, if any, would be temporary and limited to the duration of construction. Further, there would

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be no increase in the net number of trips resulting from the temporary campus relocation given there would be no increase in students or staff.

During operation, the Proposed Project would not include any student or staff capacity increase, and the nature of operations would remain the same; no additional trips would result compared to pre-Project conditions. A less than significant impact regarding VMT would occur, and no mitigation or further analysis is required.

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

Less than Significant Impact. During construction, the Proposed Project would temporarily require construction equipment to move in and out of the Project site. Per SC-T-2, LAUSD shall follow the vehicular access and pedestrian safety design standards in the School Design Guide, which would minimize potential traffic safety hazards through appropriate site access design, internal circulation, and parking layout. In accordance with SC-T-3, LAUSD shall coordinate with local jurisdictions to evaluate and implement improvements to pick-up and drop-off zones, traffic control devices, and pedestrian safety measures. The construction contractor is required to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction which would present the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies, per SC-T-4. In the event that road closure and/or large equipment maneuvering is required, the construction contractor would provide traffic control personnel to ensure the safety of all surrounding transportation users. Additionally, the Proposed Project would comply with all Federal, State, and local ordinances.

The proposed circulation modifications at the DBM campus would not substantially increase hazards due to a geometric design feature. The one-way vehicular drop-off route within the southern parking lot would improve traffic flow and reduce potential conflicts by providing clearly defined ingress at the southern Temple St. driveway and egress at the northern Temple St. driveway. The reconfiguration of the parking layout and striping would further enhance circulation efficiency and visibility within the lot. Although the southern parking lot—repurposed as a one-way drop-off area—does not provide a continuous pedestrian path, students walking or arriving by bus would access the campus via the North Beaudry Avenue entrance, which provides a direst and continuous pedestrian pathway from the public sidewalk to the school entrance. This design would separate pedestrian activity from vehicular circulation along Temple St, minimizing potential conflicts between vehicles and pedestrians and ensuring safe and efficient access to the campus. No sharp curves, restricted sight distances, or other hazardous geometric conditions would be introduced, and the design would comply with applicable safety and access standards.

During operation, the improvements associated with the Proposed Project would be contained within the existing campus. The Proposed Project would include an access road from W. 32nd St. to the central western portion of the site, where the existing basketball courts are located. The modified access road would be designed in accordance with all applicable LAFD, Los Angeles Department of Transportation (LADOT) and/or LAUSD geometric design standards (e.g., lane width, turning radii, sight distance, signage). Compliance with these standards ensures that the roadway geometry would not create sharp curves, blind spots, or other features that could increase collision risk. Thus, impacts would be less than significant, and no mitigation or further analysis is required.

d) Result in inadequate emergency access?

No Impact. As previously discussed, the Proposed Project would include the addition of an access road extending from W. 32nd St to the central western portion of the Project site. Compared to existing conditions, this would enhance emergency access to the central portion of the Project site. All existing ingress and egress points for emergency access would remain unchanged. Therefore, emergency access to the Campus would improve with implementation of the Proposed Project. No impact would occur and no mitigation or further analysis is required.

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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)?	☐	☐	☒	☐
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?	☐	☐	☒	☐

(TCR) Explanation:

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

LAUSD Standard Conditions of Approval	
SC-TCR-1	All work shall stop within a 30 foot radius of the discovery. Work shall not continue until the discovery has 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	In the event that Tribal Cultural Resources (TCRs) 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).

LAUSD Standard Conditions of Approval	
	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

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 LAUSD (Lead Agency) to be notified of projects within their traditionally and culturally affiliated area. LAUSD must provide written notification to those tribes upon deciding to undertake a project. The Native American tribe must respond to LAUSD if they want to engage in consultation on the project, and LAUSD 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)?**

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?**

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

As previously discussed in the Cultural Resources section, no features within the Project are eligible for listing in the CRHR, NRHP, or local registers. In the unlikely event that construction-related ground disturbance results in the discovery of potential TCRs, compliance with SC-TCR-1 and SC-TCR-2 would ensure that potential impacts to TCRs are avoided.

Under LAUSD's SC-TCR-l, if evidence of Native American resources is uncovered, all work shall stop within a 30-foot radius of the discovery. In the unlikely event that Tribal Cultural Resources are identified, the Archaeologist will retain a Native American Monitor to begin monitoring ground disturbance activities. If Tribal Cultural Resources are discovered during construction, LAUSD shall implement SC-TCR-2 for evaluating and appropriately treating such resources.

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Furthermore, as part of SPEIR process, the LAUSD sent AB52 consultation letters in December 2022 to tribes who have previously requested Project notification and tribes who are traditionally or culturally affiliated with the geographic area, as provided by the Native American Heritage Commission (NAHC). The letters informed the respective tribes that LAUSD was evaluating the potential environmental consequences associated with the Subsequent PEIR and requested consultation. Both tribes responded, and consultation continued throughout 2023. The outcome of the LAUSD and tribal consultation efforts include the following:

The Fernandeño Tataviam Band of Mission Indians, Cultural Resource Division requests formal consultation notification on future LAUSD projects within their ancestral territory that would involve the disturbance of either native soil or undocumented fill.

The Gabrieleno Band of Mission Indians - Kizh Nation also request formal consultation notification on future LAUSD projects.

In accordance with AB 52, the Project proponent shall conduct the requested formal consultation with the Fernandeño Tataviam Band of Mission Indians and Gabrieleno Band of Mission Indians - Kizh Nation.

Compliance with SC TRC-1, SC TRC-2, and AB 52 would result in a less than significant impact regarding tribal cultural resources.

	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 construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

(USS) Explanation:

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

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

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

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LAUSD Standard Conditions of Approval	
	construction to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling, salvaging and/or reusing a minimum of 75 percent of the C&D waste generated by weight.
SC-USS-2	LAUSD shall coordinate with the City of Los Angeles Department of Water and Power or other appropriate jurisdictions and departments prior to relocating or upgrading any water facilities to reduce the potential for disruptions in service.
SC-USS-3	LAUSD shall provide an easily accessible area that services the entire school and is dedicated to the collection and storage of materials for recycling, including (at a minimum) paper, cardboard, glass, plastics, metals, and landscaping waste. There shall be at least one centralized collection point (loading dock), and the capacity for separation of recyclables where waste is disposed of for classrooms and common areas such as cafeterias, gyms, or multi-purpose rooms.
SC-GHG-1	Implementation of SC-GHG-1 (see VIII. GREENHOUSE GAS EMISSIONS)
SC-GHG-2	Implementation of SC-GHG-2 (see VIII. GREENHOUSE GAS EMISSIONS)
SC-GHG-3	Implementation of SC-GHG-3 (see VIII. GREENHOUSE GAS EMISSIONS)
SC-GHG-4	Implementation of SC-GHG-4 (see VIII. GREENHOUSE GAS EMISSIONS)
2003 LAUSD Waste Reduction Resolution	The Board of Education of the City of Los Angeles directs the Office of Environmental Health and Safety and the Business Services Division to work with District schools and offices to increase recycling participation rates among these District facilities, and identify additional waste reduction and recycling opportunities in consultation with vendors, product manufacturers, and appropriate State and local agencies, and specifically attempt to reestablish a recycling program for Styrofoam
2005 Adoption of New Waste Reduction and Recycling Goal	That the Board of Education of the City of Los Angeles adopt a new goal to reduce the amount of waste the District disposed in landfills by 70% during the period 1990 to 2020, increasing from the current 50% goal adopted in 1989, making our goal consistent with that established by the City of Los Angeles; and be it Resolved further, That the Board direct the Office of Environmental Health and Safety and the Business Services Division to work collaboratively with State and local agencies, including the City of Los Angeles to identify additional waste reduction and recycling opportunities, increase recycling participation rates among District facilities, and specifically make recycling programs consistent whether implemented at home or in school.

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

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

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

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

Although the temporary relocation of students at the DBM campus would shift utility usage (e.g., water, wastewater, electricity, natural gas, and solid waste generation) from the Project site to the DBM campus, there would be no net increase in overall demand for utilities or services because the same number of students and staff would continue to be served by existing LAUSD facilities.

Therefore, impacts on utilities would be less than significant, and no mitigation or further analysis is required.

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

Less than Significant Impact. The Los Angeles Department of Water and Power (LADWP) provides water to the existing Project site[50]. The City obtains its water supply primarily from four major sources: the Los Angeles Aqueduct, groundwater wells, purchases from the Metropolitan Water District (MWD), and wastewater that is treated and recycled for reuse in industrial facilities and for irrigation purposes.

The California Urban Water Management Planning Act requires water suppliers to prepare and adopt water management plans every five years to identify short-term and long-term water resources management measures for meeting growing water demands. The LADWP 2020 Urban Water Management Plan (UWMP) is designed to meet the current requirements of the Act, and also serves as the City's master plan for water supply and resources management. This plan provides an assessment of current water system conditions (source of supply, treatment, transmission, storage and distribution) for capacity to meet projected demands to 2035. A primary objective of this plan is to pursue cost-effective water conservation and recycling projects to increase supply reliability and offset increases in water demand due to growth and environmental enhancements. According to the LADWP 2020 UWMP, the City anticipates all demands would be met by available supplies under all hydrologic scenarios up to the projected water demand in 2045[51].

[50] City of Los Angeles, *South Los Angeles Community Plan* (2017), https://planning.lacity.gov/odocument/b909e749-754e-4caa-af7f-14c82adaa2b7/South_Los_Angeles_Community_Plan.pdf

[51] Los Angeles Department of Water and Power, *Urban Water Management Plan* (2020), https://www.ladwp.com/sites/default/files/documents/LADWP_2020_UWMP_Web.pdf

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Water use on the Project site would be expected to temporarily increase during the construction of the Proposed Project due to dust suppression measures and related construction activities. However, the water usage during construction would be minimal and, thus, would not impact the availability of the existing water supply. During operation, the Proposed Project would not increase the existing capacity at the Campus or change the nature of its operation to require additional water usage. The Proposed Project is expected to result in a reduction in water demand as new structures and facility upgrades would be more water efficient than the existing conditions on Campus. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

During the temporary relocation of students and staff at the DBM campus, the same population currently served at the 32nd St. Campus would be temporarily accommodated at the existing DBM campus with comparable water needs. As no new students or staff would be added and no new facilities requiring additional water supply are proposed, the Project would not increase overall water consumption or require new or expanded water infrastructure. Impacts at the DBM campus would be less than significant, and no mitigation or further analysis is required.

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

Less than Significant Impact. The City of Los Angeles Department of Public Works Bureau of Sanitation (BOS) provides sewer conveyance infrastructure and wastewater treatment services to the City of Los Angeles. The primary responsibility of the BOS is to collect, clean, and recycle solid and liquid waste generated by residential, commercial, and industrial users. The Project site conveys wastewater to the Hyperion Treatment Plant, which has a capacity of 450 million gallons per day (mgd) and currently treats approximately 275 mgd[52], thus leaving adequate available capacity.

The Proposed Project would not increase student enrollment or capacity that would potentially increase demand for wastewater treatment services. In addition, the Project would be required to comply with LEED design criteria, which would incorporate water-efficient fixtures, irrigation systems, and other conservation strategies that would reduce both potable water use and resulting wastewater generation. The temporary relocation of students and staff to the DBM campus would not result in a net increase in wastewater generation, as the same student and staff population would be served at an existing facility with adequate treatment capacity and no new infrastructure required. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

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

Less than Significant Impact. During construction, the Proposed Project would generate demolition and construction related solid waste. However, the amount of solid waste would be minimized per SC-USS-1, which 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

[52] City of Los Angeles, *Hyperion Water Reclamation Plant Treatment Process* (2025), https://sanitation.lacity.gov/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp

Building Code and the LAUSD School Design Guide & Specification 01340, Construction & Demolition Waste Management, which requires the collection and separation of all construction and demolition waste materials on-site and that they be reused or recycled to the extent feasible. Along with the implementation of the SCs and compliance with all Federal, State, and local regulations and programs, the solid waste generated by the Proposed Project would be less than significant. No mitigation or further analysis is required.

As previously discussed, although the temporary relocation of students would shift utility usage (e.g., water, wastewater, electricity, natural gas, and solid waste generation) from the Project site to the DBM campus, there would be no net increase in overall demand for utilities or services because the same number of students and staff would continue to be served by existing LAUSD facilities.

During operation, the Proposed Project would not expand on existing uses or increase enrollment capacity to serve additional students. The Proposed Project would also implement SC-USS-3, which would implement recycling programs on Campus to reduce solid waste production. With the unchanged student capacity and the implementation of SC-USS-3, the Proposed Project is expected have a less than significant impact during operation on solid waste production. Impacts would be less than significant. No mitigation or further analysis is required.

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

Less than Significant Impact. The Proposed Project would comply with all federal, State, and local management and reduction statutes and regulations related to solid waste. As referred to in Section d), the Proposed Project during construction would incorporate SC-USS-1 to recycle at least 75 percent of the construction and demolition solid waste. Operationally, SC-USS-3 would reduce the solid waste generated on site by incorporating an on-site recycling program. In addition, the Project's operational waste production would be the same as existing conditions given there would be no increase in students or staff. Therefore, the Proposed Project would have a less than significant impact on federal, State, and local management and reduction statutes and regulations related to solid waste. No mitigation or further analysis is required.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE.				
Is the project located in or near state responsibility areas or lands classified as high fire hazard severity zones?				
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project: ☐ Yes ☒ No				
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?	☐	☐	☐	☒

(WF) Explanation:

Wildland fire protection in California is the responsibility of either the State, local government, or the federal government. State Responsibility Areas (SRAs) 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 California Department of Forestry and Fire Protection (CAL FIRE) provides a basic level of wildland fire prevention and protection services (CAL FIRE 2023).

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. 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 within the Project area.

Fire Hazard Severity Zones (FHSZ) are identified by Moderate, High and Very High in an SRA, and Very High in an LRA. The Project site is not located in or near state responsibility areas or lands classified as high fire hazard severity.

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

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

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

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

No Impact. According to CALFIRE Fire Hazard Severity Zone Viewer, the Project site and the DBM campus are not within a Fire Hazard Severity Zone of Local, State or Federal responsibility[53]. Furthermore, the Project area is fully developed and does not contain any undeveloped land that could contribute to a significant fuel load. During the temporary DBM campus relocation, portions of existing planters and concrete curbs within the southern parking lot would be removed to accommodate the one-way drop-off route, which would also function as an emergency access road. This path of circulation would be modified to meet required specifications for emergency access routes, thus enhancing emergency access at the DBM campus site compared to existing conditions.

The Project would comply with **SC-PS-1**, which requires that the local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval. As previously discussed in the Hazards and Hazardous Materials section, since public schools are designed as critical community facilities, the campuses are often used as evacuation centers during disasters. Construction for the Proposed Project will be conducted in phases to allow partial use of campus facilities as emergency resources. In addition, LAUSD schools are required to comply with the California Education Code Sections 32281-32289 dealing with the preparation of "Safe School Plans," as described in **SC-PS-2**. The Safe School Plans develop emergency response protocols during an emergency on a District site during renovation, modification, and contracted work. The Safe School Plans are updated annually to capture the most up to date policy advances and protocol improvements.

[53] California Department of Forestry and Fire Protection, *Fire Hazard Severity Zone Viewer* (2025), https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0

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In addition, contractors on-site would also develop an emergency response plan in the event of an unforeseen emergency. During an emergency during construction, all applicable protocols would be followed. The function and operation of the Proposed Project site will remain unchanged. LAUSD has developed an EOP that provides protocols and assigned personnel in response to recovery efforts in the event of an emergency. The EOP functions in coordination with the local ordinances and would not interfere with locally adopted emergency response plan and emergency evacuation plans. Therefore, the operation of the Proposed Project is not expected to interfere with an adopted emergency response plan and emergency evacuation plan. No Impact would occur, and no mitigation or further analysis is required.

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

No Impact. According to CALFIRE Fire Hazard Severity Zone Viewer, the Project site and DBM campus are not within a Fire Hazard Severity Zone of Local, State or Federal responsibility[54] . Furthermore, the Project area is fully developed and does not contain any undeveloped land that could contribute to a significant fuel load. The Proposed Project would not expose occupants to pollutant concentrations from a wildfire or to the uncontrolled spread of a wildfire. No impact would occur, and no mitigation or further analysis is required.

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

No Impact. According to CALFIRE Fire Hazard Severity Zone Viewer, the Project site and DBM campus are not within a Fire Hazard Severity Zone of Local, State or Federal responsibility[55]. Furthermore, the Project is in a highly developed area with existing utility services including water, wastewater treatment and stormwater drainage, electric power, natural gas, and telecommunication facilities. Fire hydrants exist along the north, west, and eastern boundaries of the site. The installation of any utility connections would be designed in accordance with the facility requirements of the LA Bureau of Engineering, Department of Public Works, Bureau of Sanitation and Storm Water, and the County of Los Angeles, and would not exacerbate fire risk or result in temporary ongoing impacts to the environment. No Impact would occur, and no mitigation or further analysis is required.

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

No Impact. According to CALFIRE Fire Hazard Severity Zone Viewer, the Project site and DBM campus are not within a Fire Hazard Severity Zone of Local, State or Federal responsibility[56]. Furthermore, the Project site is in an urbanized area that has relatively flat topography and no vegetated slopes. Development of the Proposed Project would not lead to the exposure of people or structures to significant risks including

[54] California Department of Forestry and Fire Protection, *Fire Hazard Severity Zone Viewer* (2025), https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0

[55] California Department of Forestry and Fire Protection, *Fire Hazard Severity Zone Viewer* (2025), https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0

[56] California Department of Forestry and Fire Protection, *Fire Hazard Severity Zone Viewer* (2025), https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0

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

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

(MFS) Explanation:

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

Less than Significant Impact. The Proposed Project is located in a highly developed area and not located near or on any designated habitat that could support a fish, wildlife, or plant community. As discussed in the Biological Resources section, the Proposed Project would also incorporate SCs to comply with the Migratory Bird Treaty Act for any trees being removed. The Project would comply with applicable Federal and State regulations, in addition to LAUSD's Tree Trimming and Removal Procedure. Therefore, impacts related to degrading the quality of the biological environment would be less than significant. No mitigation or further analysis is required.

As discussed in the Cultural Resources section, the Campus and its four permanent buildings were determined ineligible for listing or designation under LAUSD's Historic Context Statement standards, City of Los Angeles Historic-Cultural Monument standards, the CRHR, and the NRHP. As discussed under the Geology and Soils section, the potential for discovering paleontological resources on the Project site is considered low. SC-GEO-2 also requires that a paleontological monitoring program be prepared and implemented for earthwork activities. In the unlikely event that paleontological resources are uncovered, construction within a 30-foot radius would stop and LAUSD would be notified. Thus, impacts to important examples of California history or prehistory would be less than significant. No mitigation or further analysis is required.

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

Less than Significant Impact. Given the Proposed Project would not create any significant impacts, it would not contribute to cumulatively considerable impacts through compliance with existing regulations, policies, and programs, and the incorporations of SCs. Furthermore, the Proposed Project is expected to reduce existing resource usage through replacement of aging infrastructure with efficient facilities. Therefore, the Project would not be contributing to an adverse cumulative impact, and no mitigation or further analysis is required.

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

Less than Significant Impact. Environmental effects that may cause substantial adverse effects on humans typically result from impacts related to air quality and GHGs; noise; hazardous materials; ground shaking; hazardous design features with respect to transportation and roadway designs; and wildfire. The analysis contained in this document indicates that impacts would be less than significant to the environmental areas mentioned above and, therefore, would not cause substantial adverse impacts to human beings. LAUSD's stringent standard conditions of approval are designed to offset any potential environmental impacts resulting from school projects within the District. Impacts would be less than significant. No mitigation or further analysis is required.

5. List of Preparers

1.1 LEAD AGENCY

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1.2 CEQA CONSULTANT

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