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SYLMAR CHARTER HIGH SCHOOL

Major Modernization Project

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Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ACCM	asbestos-containing construction material
ACM	asbestos-containing material
ADA	Americans with Disabilities Act of 1990
ADT	average daily trips
Amsl	above mean sea level
APN	Assessor's Parcel Number
AQMD	Air Quality Management District
AQMP	air quality management plan
AVR	average vehicle ridership
BEP	Business Emergency Plan
Bgs	below ground surface
BMP	best management practice
B.P.	before present
BOE	Board of Education
CAA	Clean Air Act
CAFE	corporate average fuel economy
CandD	construction and demolition
CA FID UST	California Facility Inventory Database for Underground Storage Tanks
CA MUTCD	California Manual on Uniform Traffic Control Devices
Cal ARP	California Accidental Release Prevention Program
CalEEMod	California Emissions Estimator Model
Cal EPA	California Environmental Protection Agency
CalGEM	Geologic Energy Management Division
CALGreen	California Green Building Standards Code
Cal OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources Recycling and Recovery
CARB	California Air Resources Board
CalEMA	California Emergency Management Agency
Caltrans	California Department of Transportation
CBC	California Building Code
CCR	California Code of Regulations
CDE	California Department of Education
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CERS HAZ	California Environmental Reporting System Hazardous Waste Sites
CHP	California Highway Patrol
CFC	California Fire Code
CFR	Code of Federal Regulations
CHRIS	California Historic Resources Information System
CHMIRS	California Hazardous Material Incident Report System
CHPS	Collaborative for High Performance Schools

Abbreviations and Acronyms

CMP	Los Angeles County Congestion Management Program
CNEL	Community Noise Equivalent Level
COHb	arboxyhemoglobin
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CUPA	Certified Unified Program Agency
COPC	chemicals of potential concern
CSTMP	Construction Staging Traffic Management Plan
dB	decibel
dBA	A-weighted decibel
dBA L_{eq}	equivalent continuous sound level, in decibels
DOGGR	California Department of Conservation, Division of Oil, Gas, and Geothermal Resources
DOT	U.S. Department of Transportation
DPM	diesel particulate matter
DPW	Department of Public Works
DSA	Division of the State Architect (under the California Department of General Services)
DTSC	Department of Toxic Substances Control
ECHO	Enforcement and Compliance History Online
EDR	Environmental Data Resources, Inc.
EIR	Environmental Impact Report
EO	Executive Order
EOO	Emergency Operations Organization
EPCRA	Emergency Planning and Community Right-to-Know Act of 1986
ESA	Environmental Site Assessment
EV	Electric Vehicle
°F	Fahrenheit
FEMA	Federal Emergency Management Agency
FETU	Facilities Environmental Technical Unit
FINDS	Facility Index System
FRS	Facility Registry Service
FTA	Federal Transit Administration
GHG	greenhouse gas
HAZMAT LA CITY	Los Angeles County – City of Los Angeles Hazardous Materials Facilities
HAZNET	Hazardous Waste Manifest Data
H_2SO_4	sulfuric acid
HCM	Historical-Cultural Monument
HFC	hydrofluorocarbons
HIN	High Injury Network
HIST MANIFEST	Historical Hazardous Waste Manifest Data
HS	High School
HSC	Health and Safety Code

Abbreviations and Acronyms

HVAC	heating, ventilation and air conditioning
HRER	Historic Resources Evaluation Report
HNO2	nitric acid
HUD	Housing and Urban Development
Hz	hertz
I-	Interstate
IPCC	Intergovernmental Panel on Climate Change
IS	Initial Study
ISSP	Integrated Safe School Plan
kV	kilovolt
LADOT	Los Angeles Department of Transportation
LADPW	Los Angeles Department of Power and Water
LAFD	City of Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LASPD	Los Angeles School Police Department
LA Unified	Los Angeles Unified School District
LAUSD	Los Angeles Unified School District
LBP	lead based paint
Lbs	pounds
L_{dn} or DNL	Day-Night Noise Level
L_{eq}	Equivalent Continuous Noise Level
LCI	Governor's Office of Land Use and Climate Innovation
LCFS	low carbon fuel standards
LEPC	local emergency planning committee
LHMP	Local Hazard Mitigation Plan
LID	low-impact development
L_{max}	highest root-mean-square sound level measured over 1000 milliseconds in a slow response
LST	localized significance thresholds
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
MEP	Maximum Extent Practicable
Metro	Los Angeles County Metropolitan Transportation Authority
mg/L	milligrams per liter
MM	Mitigation Measure
MPB	Multipurpose Building
MPO	Metropolitan Planning Organization
MND	Mitigated Negative Declaration
MPH	mile per hour
MSAT	mobile source air toxic
MMTCO2e	million metric tons of CO_2e
$MTCO_2e$	metric ton of CO_2e
MW	Materials and Waste Management
N_2O	nitrous oxide

Abbreviations and Acronyms

NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
ND	Negative Declaration
NOP	Notice of Preparation
NO_2	nitrogen dioxide
NPDES	National Pollutant Discharge Elimination System
O_3	ozone
O&M	operations and management
OEC	other environmental conditions
OEHHA	Office of Environmental Health Hazard Assessment
OES	Office of Emergency Services
OITC	outdoor-indoor transmission class
OPC	organochlorine pesticides
PAH	polycyclic aromatic hydrocarbons
PCB	polychlorinated Biphenyls
PCE	passenger car equivalency
PFC	perfluorocarbons
Pb	lead
pCi/L	picoCuries per liter
PDF	project design features
PE	Physical Education
PEA	Preliminary Environmental Assessment
PEA-E	Preliminary Environmental Assessment Equivalent
PEIR	Program Environmental Impact Report
PF	Public Facility
PM	particulate matter
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
PWA	Public Works Administration
PVC	polymer polyvinyl chloride
RCRA	Resource Conservation and Recovery Act
RCRA-LQG	Resource Conservation and Recovery Act - Large Quantity Generators
REC	recognized environmental condition
ROG	reactive organic gases
RPS	renewable portfolio standards
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SBHEM	Sylmar Biotech Health and Engineering Magnet
SC	Standard Condition
SCAB	South Coast Air Basin

Abbreviations and Acronyms

SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCS	Sustainable Communities Strategy
SERC	State Emergency Response Commission
SF	square feet
SFPD	School Facilities Planning Division
SIP	State Implementation Plan
SMP	Soil Management plan
SO_2	sulfur dioxide
SoCAB	South Coast Air Basin
SPCC	Spill Prevention Control and Countermeasure Plan
SR	State Route
SRA	Source Receptor Area
STC	sound transmission class
SUP	School Upgrade Program
Subsequent PEIR	Subsequent Program EIR
SUSMP	standard urban stormwater mitigation plan
SWEEPS	Statewide Environmental Evaluation and Planning System
SWPPP	stormwater pollution prevention plan
TAC	Toxic Air Contaminates
TPH	total petroleum hydrocarbons
TRI	toxic release inventory
ULSD	ultra-low sulfur diesel
Unified Program	Unified Hazardous Waste and Hazardous Materials Management Regulatory Program
USC	U.S. Code
U.S. EPA	U.S. Environmental Protection Agency
UST	underground storage tank
$\mu g/m^3$	micrograms per cubic meter
VdB	vibration decibel
VCP	vitrified clay pipe
VMT	vehicle miles traveled
VOC	volatile organic compounds
WDR	waste discharge requirement

Executive Summary

ES.1 INTRODUCTION

To comply with the California Environmental Quality Act (CEQA), the Los Angeles Unified School District (LA Unified or District) has prepared the Draft Environmental Impact Report (EIR) for the Sylmar Charter High School Major Modernization Project (proposed Project). The proposed Project would include renovations, modernizations, and new construction at Sylmar Charter High School (Sylmar Charter HS or Campus). LA Unified, as the Lead Agency, has prepared this Draft EIR to provide the public and local agencies with information about the potential effects on the local and regional environment associated with implementation of the proposed Project. This Draft EIR has been prepared in compliance with the CEQA of 1970 (as amended), codified at California Public Resources Code Sections 21000 et seq. and the CEQA Guidelines in the Code of Regulations, Title 14, Division 6, Chapter 3.

On December 7, 2021, the Board of Education approved project definitions for the due diligence, planning, and feasibility activities necessary to propose scope recommendations, budgets, and schedules for the Sylmar Charter HS major modernization project. The purpose of the proposed Project is to provide facilities that are safe, secure, and aligned with the instructional program. On November 15, 2022, the Board approved the definition of the proposed major modernization project at Sylmar Charter HS that will address the most critical physical conditions and essential safety issues. This approval authorizes the District's Facilities Services Division to proceed with Project design and the completion of related technical and regulatory processes including those required under CEQA.

The proposed Project is one of the major modernization projects under the District's School Upgrade Program (SUP). The SUP was initiated by the District in 2014 and updated in 2021 to integrate funding from Measure RR. Projects developed under the SUP framework focus on upgrading, modernizing, and replacing aging and deteriorating school facilities; updating technology; and addressing facility inequities.

ES.2 PROJECT OBJECTIVES

The primary objective of the proposed Project is to address the most critical physical conditions and essential safety of the Project site, which includes alleviating known seismic and structural risks on the Campus. Four objectives have been established for the SUP and will aid decision-makers in their review of the proposed Project and associated environmental impacts:

1. Repair aging schools and improve student safety.
2. Upgrade schools to modern technology and educational needs.
3. Create capacity to attract, retain, and graduate more students through a comprehensive portfolio of small, high-quality pre-K through adult schools.
4. Promote a healthier environment through green technology.

Further, the District has established six core principles/objectives for the scoping of major modernization projects:

1. Buildings meeting Assembly Bill (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 Division of the State Architect (DSA) requirements.
2. The buildings, grounds, and site infrastructure that have significant/severe physical conditions that already do or are highly likely in the near future to pose a health and safety risk, or negatively impact a school's ability to deliver the instructional program and/or operate may be addressed by repair or replacement.
3. The District's reliance on relocatable buildings, especially for K–12 instruction, should be reduced.
4. Necessary and prioritized upgrades must be made throughout the school site in order to comply with the program accessibility requirements of the Americans with Disabilities Act (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 around new buildings and/or areas impacted by construction to improve the visual appearance including landscape and hardscape.
6. Outdoor learning environments will be developed where the site layout and project planning provide the opportunity.

ES.3 PROJECT LOCATION

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

ES.4 PROJECT DESCRIPTION

The proposed Project involves building replacement and reconfiguration on the Sylmar Charter HS Campus as part of the update to the SUP. The scope consists of the modernization of the Campus to facilitate a safe and secure campus that is better aligned with the current instructional program and meets current DSA requirements and educational specifications. Structurally vulnerable buildings would be demolished and replaced by a new building that will improve educational quality and safety for students and staff. The proposed Project also includes the removal of barriers and other accessibility upgrades, and various landscape and hardscape improvements including outdoor learning areas, and parking reconfiguration to accommodate the new site design. The proposed Project would result in demolition and/or modifications to existing buildings, including historic buildings and resources. However, the proposed Project would be designed to preserve and/or enhance character-defining features associated with the Campus.

Additionally, the proposed Project would be designed and implemented in a manner that complies with the Los Angeles Unified School District (LA Unified or District) Design Guidelines and Treatment Approaches for Historic Schools. Upon completion of construction, the proposed Project would reduce the total number of standard classrooms on the Campus by two standard classrooms, while providing additional outdoor learning and gathering spaces for its students. The proposed Project would include the following changes to Campus buildings, described fully in Chapter 2, *Project Description*.

- 25,972 square feet (SF) of permanent building demolition, including the existing Multipurpose Building (MPB), Student Store, Music/Chorale, and Classroom Building #20
- 9,668 SF of portable building removal, including four portable DSA buildings along Astoria Street and two portable DSA buildings adjacent to the volleyball court
- Approximately 75,000 SF of new building construction
    - One MPB (approximately 53-foot high, and approximately 73,219 SF) that would house a 600-seat performing arts space, dining areas, kitchen, and four classrooms on the main floor, and a deck, a staff workroom, and six classrooms on the second floor.
    - One Student Store (Approximately 1,200 SF).

The proposed Project also provides for ADA upgrades impacted by the Project scope. Interim Housing would be provided to ensure the school is fully operational throughout construction. The City of Angels Independent Study School which currently occupies Building #40 would be relocated to a different place on Campus prior to the demolition/removal of portable buildings #40, #41, #42, and #43. The proposed Project would not result in an increase in enrollment at Sylmar Charter HS; it would- modernize the existing school for the safety of existing students.

Classrooms 131 and 132 in portable buildings #38 and #39 respectively, would be demolished. Prior to demolition, the Beyond the Bell program in Classroom 132 would be relocated to another classroom on Campus.

The proposed Project would reconfigure existing parking lots to accommodate new building construction. One new driveway would be constructed to provide access to an expanded parking area along the east side of Astoria Street, just north of the existing Campus Service Road. The proposed Project would not result in any reconfiguration or relocation of three of the main points of entry. One point of entry at the southeast parking lot along Borden Avenue would be relocated eastward from its present location. The existing Basketball Courts would be used as a temporary staff parking area during construction before portable buildings #40, #41, #42 and #43 along Astoria street are removed for a resurfaced parking lot. Following the completion of construction activities, the proposed Project would result in a total of approximately 258 parking spaces on Campus.

ES.5 SUMMARY OF IMPACTS

Table ES-1, *Summary of Impacts and Mitigation Measures for the Sylmar Charter High School Major Modernization Project*, presents a summary of the impacts and mitigation measures identified in the Draft EIR. The detailed impact

statements and mitigation measures are presented in Chapter 3, *Environmental Analysis*. The level of significance for each impact was determined using significance criteria (thresholds) developed for each category of impacts; these criteria are presented in the appropriate sections of Chapter 3.

Significant impacts are those adverse environmental impacts that meet, or exceed, the significance thresholds; less than significant impacts would not exceed the thresholds. Table ES-1 provides a summary of the impacts, mitigation measures, and residual impacts from the implementation of the proposed Project.

Potential significant impacts to cultural resources and hazards and hazardous materials have been identified. Mitigation measures have been incorporated into this Draft EIR to avoid or minimize impacts associated with these resources. However, even with implementation of mitigation measures, impacts would be significant and unavoidable for cultural resources (see Table ES-1).

Table ES-1
Summary or Impacts and Mitigation Measures for the Sylmar Charter High School Major Modernization Project

Impacts	Significance before Mitigation	Mitigation Measures	Significance After Mitigation
3.1 Air Quality			
Project Impacts			
Impact 3.1-1: The proposed Project would not conflict with, or obstruct, implementation of the applicable air quality plan.	Less than Significant	No mitigation measures are required.	Less than Significant
Impact 3.1-1: The proposed Project would not 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	No mitigation measures are required.	Less than Significant
Impact 3.2-3: The proposed Project would not expose sensitive receptors to substantial pollutant concentrations.	Less than Significant	No mitigation measures are required.	Less than Significant
Cumulative Impacts			
The proposed Project would not result in a cumulatively considerable impact in relation to conflict with, or obstruct, implementation of the applicable air quality plan.	Less than Significant	No mitigation measures are required.	Less than Significant
The proposed Project would not result in a cumulatively considerable impact in relation to a 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	No mitigation measures are required.	Less than Significant
The proposed Project would not result in a cumulatively considerable impact in relation to exposing sensitive receptors to substantial pollutant concentrations.	Less than Significant	No mitigation measures are required.	Less than Significant
3.2 Cultural Resources			
Project Impacts			
Impact 3.2-1: The proposed Project would not result in a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.	Significant	**MM-CUL-1.** To communicate information on the historic development and character of Sylmar Charter HS, including the Multipurpose Building, an Interpretative Program shall be developed and implemented. This Interpretive Program shall be accessible to the general public and include information on the history and architecture of the Campus (both exterior and interior), from the founding of the City (1781, incorporated 1850) until 1961, when the contributing buildings were completed. A historian or architectural historian who meets the Secretary of the Interior's professional qualifications shall be engaged to research and write the information to be provided in the Interpretive Program. The Interpretive Program shall be initiated within 1 year of the approval of the proposed Project and shall be completed by substantial completion of construction. Potential elements of such an Interpretive Program could include: • Physical exhibit located on the Campus. Potential location of an exhibit could be in the new construction building that will replace the demolished Multipurpose Building, or potentially an Interpretive Garden or landscape/hardscape feature that is placed in the location of the demolished Multipurpose Building. Historical salvage materials may be incorporated or displayed as part of the exhibit. • Creation of a brochure or website that includes both text and historical images of the Sylmar Charter HS Campus, including the Multipurpose Building.	Significant and Unavoidable
Cumulative Impacts			
The proposed Project would not result in a cumulatively considerable impact in relation to a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.	Less than Significant	No mitigation measures are required.	Less than Significant
3.3 Greenhouse Gas Emissions			

Impacts	Significance before Mitigation	Mitigation Measures	Significance After Mitigation
Impact 3.3.1: The proposed Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	Less than Significant	No mitigation measures are required.	Less than Significant
Impact 3.3.2: The proposed Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	No Impact	No mitigation measures are required.	No Impact
Cumulative Impacts			
The proposed Project would not result in a cumulatively considerable impact in relation to generating greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	Less than Significant	No mitigation measures are required.	Less than Significant
The proposed Project would not result in a cumulatively considerable impact in relation to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	No Impact	No mitigation measures are required.	No Impact
3.4 Hazards and Hazardous Materials			
Project Impacts			
Impact 3.4-1: The proposed Project would have the potential to create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials.	Significant	**MM-HAZ-1:** Soil Management Plan. A soil management plan shall be required for all earth-moving construction activities conducted at the site. The purpose of the soil management plan is to provide guidance for identifying impacted soil and the proper handling, onsite management, transport, and disposal of impacted soil that may be encountered during construction activities. The soil management plan shall be prepared by a licensed State of California Civil Engineer or Professional Geologist. The plan shall outline specific areas where impacted soils must be removed and describe specific measures to ensure that transport of any contaminated soils will be conducted by a U.S. EPA and U.S. Department of Transportation (DOT) qualified transporter as outlined in Title 40 of the Code of Federal Regulations Part 263.[1]The soil management plan shall include the following sections at a minimum. • Introduction • Background • Potential Contaminants of Concern • Contaminated Soil Management • Health and Safety • Excavation/Grading Contractor • Identification of Contaminated Soil • Excavation and Handling of Contaminated Soil • Soil Staging • Dust Mitigation and Track-Out Controls • Stormwater Management • Waste Characterization and Profiling • Transportation Requirements and Procedures • Requirements for Haulers • Truck Loading Operations • Transportation Route • Traffic Control Procedures • Shipment Documentation • Contingency Plan • Soil Sampling and Analysis Protocol • Confirmation Soil Sampling • Screening Levels • Actions Based on Soil Results	Less than Significant

[1] U.S. Environmental Protection Agency. May 21, 2023. Hazardous Waste Transportation. https://www.epa.gov/hw/hazardous-waste-transportation

Impacts	Significance before Mitigation	Mitigation Measures	Significance After Mitigation
		• Reporting • References Before excavation or other soil-disturbing activities begin, a preparatory inspection must be conducted by the Contractor to ensure the proper soil management provisions, including initiation of the DigAlert notification(s) and stormwater Best Management Practices (BMPs) are evaluated.	
		MM-HAZ-2: Dust Control Plan – A dust control plan shall be required for all construction activities conducted on the site. The primary dust control requirement is for no visible dust to exit the site during construction activities. Dust control measures will be required daily during earth-moving activities to limit emissions of fugitive dust generated by their activities. The contractor is responsible for meeting requirements specified in Rule 403 and implementing reasonable Best Available Control Measures (BACMs) to minimize dust emissions. The following dust control measures shall be implemented to stabilize exposed surfaces and minimize suspended or tracked dust particles: • Apply water to excavation areas to minimize dust generated by vehicles, trucks, and heavy equipment. • Apply water to the staged soil piles before and during loading of trucks, and after completion of loading for the day. • Adequately tarp truck trailers, and clean truck tires as necessary prior to leaving the Site. Place shaker plates on the ingress and egress routes to the Site. • Cover and secure staged soil piles at the end of each day. Wind speed and wind direction shall be monitored at 15-minute intervals using a tripod-mounted weather station with data logging capabilities. Airborne particulate monitoring shall be conducted with aerosol monitors near the property boundary at locations upwind (one) and downwind (one) of excavation activities with an aggregate particle diameter of 10 microns or less (PM10). The monitors shall provide real-time concentration and median particle size information and shall log the data at one-minute intervals for the duration of the monitoring period. The dust monitors shall be zeroed daily and an action level of 25 micrograms per cubic meter (µg/m3) (per Rule 1466) shall be established and measured as the difference between upwind and downwind monitors.	
		MM-HAZ-3: Compliance Inspections – Site compliance inspections of the working areas shall be conducted by the Environmental Consultant or designated site manager to determine if any failed compliance has occurred. Stop-work orders shall be promptly issued if any failed compliance has occurred and corrective actions shall be immediately implemented to address the noncompliant issue.	
Impact 3.4-2: The proposed Project would have the potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment.	Significant	Mitigation Measures MM-HAZ-1 through MM-HAZ-3, listed above, would reduce pre-construction and construction hazard impacts.	Less than Significant
Impact 3.3-3: The proposed Project would have the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	Significant	Mitigation Measures MM-HAZ-1 through MM-HAZ-3 would reduce pre-construction and construction hazard impacts.	Less than Significant
Impact 3.3-4: The proposed Project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment.	Less than Significant	No mitigation measures are required.	Less than Significant

Impacts	Significance before Mitigation	Mitigation Measures	Significance After Mitigation
Cumulative Impacts			
The proposed Project would not result in a cumulatively considerable impact in relation to creating a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials.	Less than Significant	No mitigation measures are required.	Less than Significant
The proposed Project would not result in a cumulatively considerable impact in relation to reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment.	Less than Significant	No mitigation measures are required.	Less than Significant
The proposed Project would not result in a cumulatively considerable impact in relation to emitting 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	No mitigation measures are required.	Less than Significant
The proposed Project would not create a cumulatively considerable impact in relation to being located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment.	No Impact	No mitigation measures are required.	No Impact
3.5 Noise			
Project Impacts			
Impact 3.5-1: The Project would not result in 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	No mitigation measures are required.	Less than Significant
Impact 3.5-2: The Project would not result in generation of excessive groundborne vibration or groundborne noise levels.	Less than Significant	No mitigation measures are required.	Less than Significant
Cumulative Impacts			
The proposed Project would not result in a cumulatively considerable impact in relation to 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	No mitigation measures are required.	Less than Significant
The proposed Project would not result in a cumulatively considerable impact in relation to generation of excessive groundborne vibration or groundborne noise levels.	Less than Significant	No mitigation measures are required.	Less than Significant
3.6 Pedestrian Safety			
Project Impacts			
Impact 3.6-1: The Project would not substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses.	Less than Significant	No mitigation measures are required.	Less than Significant
Impact 3.6-2: The Project would not create unsafe routes to schools for students walking from local neighborhoods.	Less than Significant	No mitigation measures are required.	Less than Significant
Impact 3.6-3: The Project would not 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	No mitigation measures are required.	Less than Significant
Cumulative Impacts			
The proposed Project would not result in a cumulatively considerable impact in relation to substantially increasing vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses.	Less than Significant	No mitigation measures are required.	Less than Significant
The proposed Project would not result in a cumulatively considerable impact in relation to creating unsafe routes to schools for students walking from local neighborhoods.	Less than Significant	No mitigation measures are required.	Less than Significant
The proposed Project would not result in a cumulatively considerable impact in relation to being 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	No mitigation measures are required.	Less than Significant
3.7 Transportation & Traffic			
Project Impacts			

Impacts	Significance before Mitigation	Mitigation Measures	Significance After Mitigation
Impact 3.7-1: The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	Less than Significant	No mitigation measures are required.	Less than Significant
Impact 3.7-3: The Project would not 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	No mitigation measures are required.	Less than Significant
Impact 3.7-4: The Project would not result in inadequate emergency access.	Less than Significant	No mitigation measures are required.	Less than Significant
Cumulative Impacts			
The proposed Project would not result in a cumulatively considerable impact in relation to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	Less than Significant	No mitigation measures are required.	Less than Significant
The proposed Project would not result in a cumulatively considerable impact in relation to substantially increasing hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	Less than Significant	No mitigation measures are required.	Less than Significant
The proposed Project would not result in a cumulatively considerable impact in relation to inadequate emergency access.	Less than Significant	No mitigation measures are required.	Less than Significant

ES.6 AREAS OF KNOWN CONTROVERSY

Pursuant to Section 15123(b)(2) of the CEQA Guidelines, a lead agency is required to include areas of controversies raised by agencies and the public during the scoping process for an EIR. Areas of controversy have been identified for this EIR based on comments made during the 30-day public scoping period for the NOP (see Appendix A, Initial Study; Appendix B, Notice of Preparation; Appendix C, Scoping Period Comments). Commenting parties have expressed concern for hazards and hazardous materials during construction, pedestrian safety and traffic during construction and operation of the school, and operational greenhouse gas (GHG) emissions associated with vehicle miles traveled (VMT). These issues have been considered during preparation of this Draft EIR.

ES.7 PROJECT ALTERNATIVES

Two alternatives to the proposed Project were selected for consideration and analysis in this EIR. The goal for evaluating alternatives is to identify ways to avoid or lessen the significant environmental effects resulting from implementation of the proposed Project, while attaining most of the Project objectives. The following provides a summary of each of the alternatives analyzed.

- **Alternative 1: No Project/No Build Alternative.** The No Project/No Build Alternative assumes that the Project site would remain as it is in existing conditions. No demolition or construction of new buildings would occur on the Project site, and the existing facilities and infrastructure would continue to be susceptible to safety hazards and deterioration. Only essential repairs such as repair of portable classrooms, replacement of lead pipes, roof replacement, and maintenance of fire alarm and fire suppression systems would occur over time.

- **Alternative 2: Reduced Footprint New MPB and Retain Existing Classroom Building #20.** Alternative 2 would retain adjacent classroom Building #20 and involve the construction of a reduced-footprint MPB. Under this alternative, three permanent buildings would be demolished (MPB/Food Service, Student Store, Building #19), and two new structures would be constructed (new MPB/Food Service, and Student Store). There would be no change in the square footage of portable buildings removed. As compared to the proposed Project, this alternative would retain one additional historic district 'contributor' building and would reduce the effects related to the size and massing of the proposed MPB. Under this alternative, the smaller MPB would reduce encroachment into the group of remaining historic district 'contributor' resources, including original campus buildings, the parking lot at Borden Avenue, site design and landscaping.

Chapter 5, Alternatives Analysis, Sections 5.6 and 5.7, provide a comparative summary of the alternatives, including a summary of the ability of the alternatives to meet the Project objectives and a summary comparison of the potential impacts associated with each alternative and the proposed Project.

The No Project/No Build Alternative (Alternative 1) would reduce, or eliminate, all proposed Project impacts. The implementation of Alternative 1 would result in fewer environmental impacts compared to the proposed Project. However, Alternative 1 would result in greater impacts to hazards (seismic deficiencies) and would not meet any of the Project objectives.

With the implementation of Alternative 2, the significant and unavoidable impacts to cultural resources associated with the proposed development would remain. Alternative 2 would be partially inconsistent with Objective #2 and Objective #3, which would not be entirely met. The intent of the objectives is to increase safety for staff and students by addressing seismic and structural deficiencies; reduce the reliance on portable buildings; and to provide larger classroom spaces that could accommodate modern and efficient technology while meeting the needs of the school's instructional program. Therefore, Alternative 2 would meet some of the objectives but to a lesser degree than the proposed Project.

ES.8 ISSUES TO BE RESOLVED

Per CEQA Guidelines Section 15123(b)(3), issues must be resolved including the choice among alternatives and whether or how to mitigate the significant effects. The impact analysis in the Draft EIR found that the proposed Project would result in less than significant impacts after incorporation of mitigation measures in relation to hazards and hazardous materials. After implementation of Standard Conditions (SCs) and mitigation measures, impacts to cultural resources in relation to eligibility of the Sylmar High School Historic District for the National Register of Historic Places (NRHP) and California Register of Historic Places (CRHP) would remain significant and unavoidable. For all other environmental issues evaluated in the Draft EIR, impacts were determined to be less than significant.

Impacts on resources would be minimized under Alternative 2 as compared to the proposed Project, making Alternative 2 the environmentally superior alternative. But this alternative would be inconsistent with Objective #2, which would not be entirely met (see Table 5-3 *Consistency with Project Objectives*). The intent of the objectives is to increase safety for staff and students by providing upgraded buildings and to reduce the reliance on portable buildings. Further, the objectives aim to provide larger classroom spaces that could accommodate modern and efficient technology, which would not be entirely met with Alternative 2 as this Alternative would continue to rely on under-sized, original classroom Building #20. Therefore, this alternative would meet some of the objectives but to a lesser degree than the proposed Project.

1. Introduction

1.1 PURPOSE OF THE EIR

The Los Angeles Unified School District (LA Unified or District) is proposing a major modernization of the Sylmar Charter High School Campus (Campus or Sylmar Charter HS) located at 13050 Borden Avenue, City of Los Angeles, Los Angeles County, California. Major modernization projects are designed to address the most critical physical needs of the building and grounds at 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 Draft Environmental Impact Report (EIR) provides an evaluation of the potential environmental consequences associated with this proposed Project.

1.2 INTENDED USE OF THE EIR

This EIR provides information to the public and public agency decision-makers about the environmental effects that could result from the proposed Project, as well as mitigation that would reduce those effects. Section 15161 of the CEQA Guidelines states that a project EIR "should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project including planning, construction, and operation."[2]

1.3 CEQA ENVIRONMENTAL REVIEW PROCESS

1.3.1 CEQA Process Overview

The environmental compliance process is governed by CEQA[3] and CEQA Guidelines.[4] CEQA was enacted in 1970 by the California Legislature to disclose to decision-makers and the public the significant environmental effects of projects and to identify ways to avoid or reduce the environmental effects through feasible alternatives and/or mitigation measures. Compliance with CEQA applies to California government agencies at all levels: local, regional, and State agencies, boards, commissions, and special districts (such as school districts and water districts). LA Unified is the lead agency for this proposed Project and is, therefore, required to conduct an environmental review to analyze its environmental effects.

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, LA Unified has determined that an Initial Study is required to determine whether there is substantial evidence that construction and operation of the proposed Project would result in environmental impacts. An Initial Study is a preliminary environmental analysis to determine whether an EIR, a mitigated negative declaration (MND), or a negative declaration (ND) is required for a project.[5]

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

1. Introduction

When an Initial Study (IS) identifies the potential for significant environmental impacts, the lead agency must prepare an EIR;[6] however, if all impacts are found to be less than significant or can be mitigated to a less than significant level, the lead agency can prepare an ND or MND.[7] A "project" means the whole of an action that could result 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 (CEQA Guidelines Section 15378[a]):

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.

The proposed actions by LA Unified 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.

An Initial Study was prepared in accordance with CEQA and CEQA Guidelines to determine if the Project could have a significant impact on the environment (see Appendix 1, Initial Study). The purposes of the Initial Study, as described in CEQA Guidelines Section 15063, was 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, avoiding adverse impacts before an EIR is prepared, thereby enabling the project to qualify for an ND or MND; (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 would 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 the Initial Study have determined that an EIR is the appropriate level of environmental documentation for this Project.

This EIR includes information necessary for agencies to meet statutory responsibilities related to the proposed Project. State and local agencies will use the EIR when considering any permit or other approvals necessary to implement the Project. The environmental topics that have been identified for study in the EIR are:

- Air Quality
- Cultural Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Noise

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

- Pedestrian Safety
- Transportation and Traffic

Following consideration of public comments on the Initial Study, this Draft EIR has been prepared and circulated to the public and affected agencies for review and comment. One of the primary objectives of CEQA is to include 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 LA Unified. The environmental review process provides several opportunities for the public to participate through public notice and public review of CEQA documents and public meetings. Additionally, LA Unified is required to consider comments from the scoping process in the preparation of the Draft EIR and to respond to Draft EIR public comments in the Final EIR.

This type of project is one of many that were analyzed in the 2023 Subsequent Program EIR (Subsequent PEIR) that was certified by the LA Unified BOE on December 12, 2023[8] which replaced the previous School Upgrade Program (SUP) Program EIR that had been in effect since 2015[9] and was the governing Program EIR at the time the Notice of Preparation and Initial Study for the Project were issued. LA Unified's SUP Program EIR 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 2023 Subsequent PEIR enables LA Unified to streamline future environmental compliance and reduces the need for repetitive environmental studies.[10] The 2023 Subsequent PEIR serves as the framework and baseline for CEQA analyses of later projects through a process known as "tiering." Under CEQA Guidelines Sections 15152(a) and 15385, "tiering" refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a program) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.[11]

The 2023 Subsequent PEIR is applicable to all projects implemented under the SUP. The 2023 Subsequent PEIR provides the framework for evaluating environmental impacts related to ongoing facility upgrade projects planned by the District. 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:

- Type 1 – New Construction on New Property
- Type 2 – New Construction on Existing Campus

[8] Los Angeles Unified School District. 2023. Subsequent Program EIR for the School Upgrade Program. https://ceqanet.lci.ca.gov/2023010013/2
[9] Los Angeles Unified School District. 2015. Program EIR for the School Upgrade Program. Report. https://ceqanet.lci.ca.gov/2023010013/2
[10] Los Angeles Unified School District. 2023. Subsequent Program EIR for the School Upgrade Program. https://ceqanet.lci.ca.gov/2023010013/2
[11] California Code of Regulations Title 14, § 3 Article 1-15152(a).

- Type 3 – Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation
- Type 4 – Operational and Other Campus Changes

The proposed Project is categorized as Type 2 – New Construction on Existing Campus, which includes demolition and new building construction on existing campuses and the replacement of school buildings on the same location; and Type 3 – Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation, which includes modernization and infrastructure upgrades. The evaluation of environmental impacts related to Type 2 and Type 3 projects, and the appropriate project design features and mitigation measures to incorporate, are provided in the 2023 Subsequent PEIR.

The proposed Project is considered to be a site-specific project under the 2023 Subsequent PEIR; therefore, this EIR is tiered from the 2023 Subsequent PEIR. The 2023 Subsequent PEIR is available for review online at https://www.lausd.org/ceqa and at LA Unified Office of Environmental Health and Safety, 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017.

1.3.2 Notice of Preparation and Public Scoping

Under Section 150282 of the CEQA Guidelines, the lead agency is required to send a Notice of Preparation (NOP) that states that a Draft EIR will be sent to the state Governor's Office of Land Use and Climate Innovation (LCI), responsible and trustee agencies, and federal agencies involved in the approval or funding of the proposed Project. CEQA Guidelines Section 15083 encourages early consultation with interested parties to help identify "…the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in an EIR and in eliminating from detailed study issues found not to be important."

Sufficient information must be provided in the NOP for responsible agencies to respond meaningfully. The NOP must include a description of the project, location of the project, and probable environmental effects of the project (CEQA Guidelines Section 15082[a][1]). Within 30 days of receiving the NOP, responsible and trustee agencies and the LCI shall provide the lead agency with specific details about the scope and context of the environmental information related to statutory responsibility of the area. This information must be included within the Draft EIR, per CEQA Guidelines Section 15082(b).

In accordance with Sections 15063 and 15082 of the CEQA Guidelines, LA Unified published an NOP for the Draft EIR on April 9, 2025, and circulated it to government agencies, elected officials, organizations, and persons who may be interested in the proposed Project, which includes nearby residents, property owners, student parents/ legal guardians, and teachers/ staff (Appendix 2, Notice of Preparation). The NOP requested comments on the scope of the Draft EIR and asked those agencies with regulatory authority over any aspect of the proposed Project to describe that authority. The NOP provided a general description of the proposed Project, a description of the Project site, and a preliminary list of potential environmental impacts.

On Thursday, April 10, 2025, in accordance with CEQA Section 21083.9, LA Unified sponsored a public scoping meeting to obtain comments from interested parties regarding the scope of the Draft EIR. The scoping meeting presentation included an overview of the proposed Project and a summary of the findings contained in the Initial Study. The issues raised by participants are summarized and included in this Draft EIR. Two comment letters were received in response to the NOP, and a transcript from the public scoping meeting

recorded verbal comments (see Appendix 3, Scoping Comments). Comments received noting concern over environmental impacts related to the Project are discussed in Table 1-1, *Summary of NOP Comments*.

Table 1-1 Summary of NOP Comments

Commenter/Date	Summary of Environmental Issues Raised in Comment Letters	Applicable Draft EIR Section
Notice of Preparation – April 7, 2025, Agencies		
Department of Toxic Substances Control (DTSC), April 10, 2025	Requests consideration that if the District plans to use California Department of Education (CDE) State funds for the proposed Project, that the Project shall comply with Education Code (EDC), §17210, §17213.1, and §17213.2 unless otherwise exempt under section §17268. If the District is not using CDE State funds for the project, or is otherwise specifically exempt under section §17268, DTSC recommends the district continue to investigate, clean up the Site under the oversight of Los Angeles County and in concurrence with all applicable DTSC guidance documents. The commenter also requests that all imported soil and fill material be tested to ensure any contaminants are within approval screening levels for intended land use, as well as additional documentation and screening of soil and fill.	Section 3.4, Hazards and Hazardous Materials.
California Department of Transportation (Caltrans), May 1, 2025	The commenter raised the issue of the proposed Project's parking stall increases, which may induce vehicle miles traveled (VMT). The commenter recommends the Lead Agency integrate transportation and land uses in a way that reduces VMT and Greenhouse Gas (GHG) emissions, including reducing car parking to encourage public transit and other modes of active transportation, and increasing bike parking on Campus.	Section 3.6, Pedestrian Safety; Section 3.7, Transportation and Traffic, and Section 3.3, Greenhouse Gas Emissions. Exiting parking at the Campus (205 parking stalls) does not meet the District Standard for this size of Campus (258 parking stalls). Transit and bike parking facilities are available at Campus frontage. Further, with respect to SUP modernization projects, these projects would not increase capacity to existing schools, and net Project emissions would be minimal. Overall District enrollment is forecast to decrease over the next 10 years, and operational emissions are not expected to increase in the long-term.

	The commenter also requests consideration of right-of-way (ROW) improvements, such as upgrading existing pedestrian crossings to provide safer infrastructure at nearby intersections, as well as constructing a new pedestrian crossing location.	Pedestrian safety is evaluated in Section 3.6, Pedestrian Safety; Section 3.7, Transportation and Traffic.
	Finally, the commenter notes the requirement to prepare a Construction Traffic Management Plan (CTMP) for approval prior to the issuance of building or grading permits for the Project site, and the need for a Transportation Permit from Caltrans should the Project require use oversized-transport vehicles on State highways during construction.	Section 3.6, Pedestrian Safety; Section 3.7, Transportation and Traffic.
Scoping Meeting, April 10, 2025 – Verbal Comment Individuals		
Jessica	Why is priority given to an MPR over classrooms? Additionally, are you considering the other schools on the shared campus? Will the building be shared for all students?	Section 2.0, Project Description. The new Multipurpose Building was given priority due to its seismic condition and will include six standard sized classrooms. The new facility will be shared.
	When can we expect classroom modernization (which should be the priority) if it will be done "later"	Modernization of existing classrooms is not included as part of the proposed Project at this time.
Laura Alvarez	More options: we are concerned that our students currently do not have proper heating and cooling in classrooms yet the only improvement offered is for a center we use only sometimes. If classroom modernization is for later, how far is later if the multipurpose center project alone takes several years?	Section 2.2, Background. The Major Modernization program deals with seismic vulnerability as a priority for upgrade projects. Sylmar Charter High School was selected as a Major Modernization project due to seismic vulnerability of the existing Multipurpose Building. The new Multipurpose Building will include six standard sized classrooms. Modernization of existing classrooms is not included as part of the proposed Project at this time.
Myrna Gonzalez	Federal grant regulations emphasize that modernization efforts must enhance student learning experiences. If a multipurpose center is only used occasionally for events and assemblies, - rather than integrated into daily learning classroom instruction or learning activities, how does it meaningfully contribute to student learning?	Section 2.0, Project Description. The new Multipurpose Building will include six standard sized classrooms, as well as replace a building on the 'AB 300' list that has - seismic deficiencies. Sylmar Charter HS was selected specifically as a priority project for the Major Modernization program due to

		seismic vulnerability associated with the existing multipurpose building.
Stephanie Carillo	When is the project expected to be finished?	Section 2.6.5, Construction Phasing and Equipment. The project is anticipated to be finished in the 1st quarter of 2029.
Anonymous	Will tennis court be impacted?	Section 2.6, Figure 9 – Proposed Project Overview. The tennis courts would not be impacted by the project.
Myrna Gonzalez	If classroom modernization is being deferred, how long is that delay – especially when the multicenter project alone spans several years? What criteria were used to prioritize it over the more immediate needs of classrooms?	Section 2.2, Background. Measure RR funding and goals of the School Upgrade Program are to address the most critical physical conditions and essential safety issues. The existing Multipurpose Building is on the 'AB 300' list as a building with - seismic deficiencies. Replacement and upgrading the MPB with classroom is in line with goals of Measure RR and the SUP program. Modernization of existing classrooms is not included as part of the proposed Project at this time.
Myrna Gonzalez	Which specific portable classrooms are being replaced as part of the plan? And will those portables be prioritized in the next phase of modernization efforts?	Section 2.6, Project Characteristics, and Figure 9, Proposed Project Overview.
Mariela	Can the design also include entrances directly from biotech to the MPR without interference into the music class?	This comment is related to building design specifics and is not part of evaluation in the EIR.
Shannon	After looking at the design maps presented, the cafeteria is being moved more to the middle of the campus, where will deliveries and supplies be made?	Section 2.6.4, Site Access, Circulation, and Parking. The new Multipurpose Building will incorporate delivery and supply drop off operations from Borden Avenue.
	One more question, because we are a cafeteria that has multiple offsites we service, with multiple drivers, is parking available for the drivers that need to load and unload multiple daily trips by that delivery area?	Section 2.6.4, Site Access, Circulation, and Parking. The project proposes to increase parking on-site to the District standard for this size campus. Parking and unloading zones for deliveries will be provided at the new Multipurpose Building.

1.3.3 Draft EIR

The Draft EIR has been prepared pursuant to the requirements of CEQA Guidelines Section 15126. The environmental issues addressed in this Draft EIR were established through review of environmental documentation developed for the Project, environmental documentation for nearby projects, and public and agency responses to the NOP. This Draft EIR provides an analysis of reasonably foreseeable impacts associated with the construction and operation of the proposed Project. The environmental baseline for determining potential impacts is the date of publication of the NOP (CEQA Guidelines Section 15125[a]). Unless otherwise indicated, the environmental setting for each resource assessed in this Draft EIR describes the existing conditions as of April 2025. The impact analysis is based on changes to existing conditions that would result from implementation of the proposed Project.

In accordance with CEQA Guidelines Section 15126, the Draft EIR describes the proposed Project and the existing environmental setting, identifies environmental impacts associated with Project implementation, identifies mitigation measures for significant impacts, and provides an analysis of alternatives. Significance thresholds have been developed for each environmental resource analyzed in this Draft EIR (see Chapter 3). Public Review

In accordance with CEQA Guidelines Section 15105, this Draft EIR is being circulated and made available to local, state, federal agencies, and interested organizations and individuals who may wish to review and comment on it during the 45-day review period. All written comments should be directed to:

Bryan Ramos Fernandez, AICP
Los Angeles Unified School District – Office of Environmental Health & Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017

Comments on the Draft EIR must be received by close of business on the last day of the 45-day review period.

1.3.4 Final EIR Review and Publication

Written and oral comments received in response to the Draft EIR will be addressed in a Response to Comments document that, together with the Draft EIR, will constitute the Final EIR. The LA Unified Board of Education will then consider EIR certification (CEQA Guidelines Section 15090). If the EIR is certified, the Board of Education may consider Project approval. Prior to approving the Project, LA Unified must make written findings with respect to each significant environmental effect identified in the Draft EIR in accordance with Section 15091 of the CEQA Guidelines. In addition, LA Unified must adopt a Statement of Overriding Considerations concerning each unmitigated significant environmental effect identified in the Final EIR (if any). The Statement of Overriding Considerations would be included in the record of the Project's approval and mentioned in the Notice of Determination (NOD) following CEQA Guidelines Section 15093(c). Pursuant to Section 15094 of the CEQA Guidelines, LA Unified will file a NOD with the State Clearinghouse and Los Angeles County Clerk within five working days after Project approval.

1.3.5 Mitigation Monitoring and Reporting Program

CEQA requires lead agencies to "adopt a reporting and mitigation monitoring program for the changes to the Project which it has adopted or made a condition of Project approval in order to mitigate or avoid significant effects on the environment" (CEQA Guidelines Section 15097). The mitigation monitoring program will be available to the public at the same time as the Final EIR.

1.3.6 Standard Conditions of Approval

LAUSD Standard Conditions of Approval (SC) are uniformly applied development standards and were updated in 2023in order to incorporate and reflect changes in the recent laws, regulations and the District's standard policies, practices and specifications.[12] The SCs were compiled from established LA Unified standards, guidelines, specifications, practices, plans, policies, and programs, as well as typically applied mitigation measures. The SCs are divided into 16 of the 21 LA Unified CEQA environmental topics (Appendix G of the CEQA Guidelines and 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 SC is not required.

1.4 ORGANIZATION OF THE EIR

This Draft EIR is organized into the following chapters and appendices:

ES. Executive Summary. The summary provides a synopsis of the Project's impacts. It identifies, in an overview fashion, the Project under consideration and its objectives. The section also summarizes the Project's impacts and mitigation measures and contains a summary analysis of the alternatives to the Project.

1. **Introduction.** The introduction includes the purpose of an EIR and procedural information.

2. **Project Description.** The Project description includes the Project background, Project location and setting, site characteristics, Project objectives, and the characteristics of the Project. The section also includes a summary of the necessary permits and approvals for the Project.

3. **Environmental Analysis.** This chapter describes the environmental setting and identifies impacts of the proposed Project for each of the following environmental resource areas: Air Quality, Cultural Resources, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Noise, Pedestrian Safety, and Transportation and Traffic. Mitigation measures to reduce significant impacts of the proposed Project are presented for each resource area. This section also provides an analysis of the cumulative impacts for each issue area analyzed in the Draft EIR.

4. **Other CEQA Considerations.** This chapter provides an analysis of the extent to which the Project's primary and secondary effects would commit resources to uses that future generations

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

would probably be unable to reverse. This chapter also discusses the resource areas determined to have no impact with implementation of the Project.

5. **Alternatives.** This chapter presents an overview of the alternatives development process and describes and analyzes the alternatives to the Project, including the No Project Alternative.

6. **Report Preparation.** This chapter provides a list of the individuals who contributed to the preparation of the Draft EIR.

7. **Appendices.** The appendices contain important information used to support the analyses and conclusions made in the EIR.

    - Appendix 1 – Initial Study
    - Appendix 2 – Notice of Preparation
    - Appendix 3 – Scoping Comments
    - Appendix 4 - Preliminary Environmental Assessment – Equivalent Report
    - Appendix 5 - Cultural Resources Technical Report
    - Appendix 6 - Emissions Calculations
    - Appendix 7 - Noise Background and Modeling Data
    - Appendix 8 - Pedestrian and Safety Study

2. Project Description

2.1 INTRODUCTION

The purpose of the project description is to explain the proposed Project in a way that is meaningful to the public, reviewing agencies, and decision makers. As described in Section 15124 of the CEQA Guidelines, the project description in an EIR is required to contain the following information: (1) the location and boundaries of the proposed Project; (2) a statement of Project objectives; (3) a general description of the Project's technical, economic, and environmental characteristics, including a consideration of the supporting public service facilities; and (4) a statement briefly describing the intended uses of the EIR. The CEQA Guidelines state that a project description need not supply extensive detail beyond that needed for the evaluation and review of the environmental impact.

The proposed Project would include renovations, modernizations, new construction, and demolition at Sylmar Charter HS to address the most critical physical conditions and essential safety issues of the school's buildings and grounds, further described below.

2.2 BACKGROUND

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

In 2014, the District embarked on a new bond program known as the "School Upgrade Program" (SUP). Initially in 2014, $7.85 billion was allocated for the development of projects. Over the course of the last 7 years new sources of funds have been allocated to the program, increasing the total amount of funds to support the development of projects to $9.2 billion. To date, nearly 2,000 projects valued at approximately $1.5 billion have been funded by the SUP and completed by Facilities, and nearly 690 additional projects valued at approximately $5.4 billion are underway.

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

The bond program is now focused on improving equity between newer and older schools so that every student has an equal opportunity for success. The updated SUP framework and the Measure RR Implementation Plan

reflect the goals of and priorities for Measure RR, as outlined in the bond language approved by voters and the Proposed 2020 Bond Funding Priorities Package previously adopted by the Board. Moreover, they also reflect the input solicited earlier this year from Community of Schools Administrators and Local District leadership. The overarching goals and principals of the SUP will drive the development of future projects to upgrade, modernize, and replace aging and deteriorating District school facilities; update technology; and address District school facilities inequities in order to provide students with physically and environmentally safe, secure, and updated school facilities that support 21st century learning.

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

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

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

2.3 PROJECT LOCATION

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

The Campus is approximately 1,261 feet above mean sea level (amsl) in elevation. The topography of the site is generally flat, with a slope to the south-southeast.[13] The total topographic relief across the site is approximately 175 feet. Elevations are higher at the Physical Education Building and field areas located in the northwest corner of the Campus, with the overall site stepping down and toward the southeast corner of the Campus. The Campus is not in an Alquist-Priolo Earthquake Fault Zone. The nearest fault is the Sylmar fault, mapped approximately 0.5 miles to the southeast of the Campus. The Campus is not located in a seismic hazard zone for soil liquefaction. The Campus is not within any mapped flood hazard zone or designated floodplain. The Campus is listed in the California Department of Toxic Substances Control (DTSC) Hazardous Waste

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

Tracking System database for information pertaining to hazardous waste.[13] The Campus was historically identified as an active generator of hazardous waste (ID CAD982039414) first issued in 1988.

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

2.4 EXISTING SETTING

2.4.1 Existing General Plan and Zoning

The Campus and surrounding development are located within the Sylmar Community Plan area, which is one of the 35 community plans that comprises the Land Use Element of the General Plan of the City of Los Angeles. The Project site is designated PF (Public Facilities) and zoned PF-1VL: Public Facility, Height District 1 – Very Low.[14] Surrounding residential land uses are designated Very Low I Residential, Low II Residential, and Medium Residential. Residential parcels surrounding the Campus are zoned R1-1 (Single Family Residential), RA-1-K (Suburban), and R3-1-CPIO (Multiple Family Residential) (see Figures 3a and 3b, *Existing Zoning and General Plan Land Use Designations*). On February 19, 2019, pursuant to Government Code Section 53094, the Board of Education adopted a Resolution to exempt all LA Unified school sites, including Sylmar HS, from local land use regulations[15] and as a result, LA Unified school sites are exempt from all local ordinances, such as those pertaining to building height, parking, preservation and replacement of trees, construction permits (except those in the public right-of-way), recordation of parcel maps, signage, site plan review, and inspection.

2.4.2 Surrounding Land Use

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

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

Figure 1. Regional Location

Figure 2. Local Vicinity

Figure 3a. Existing Zoning

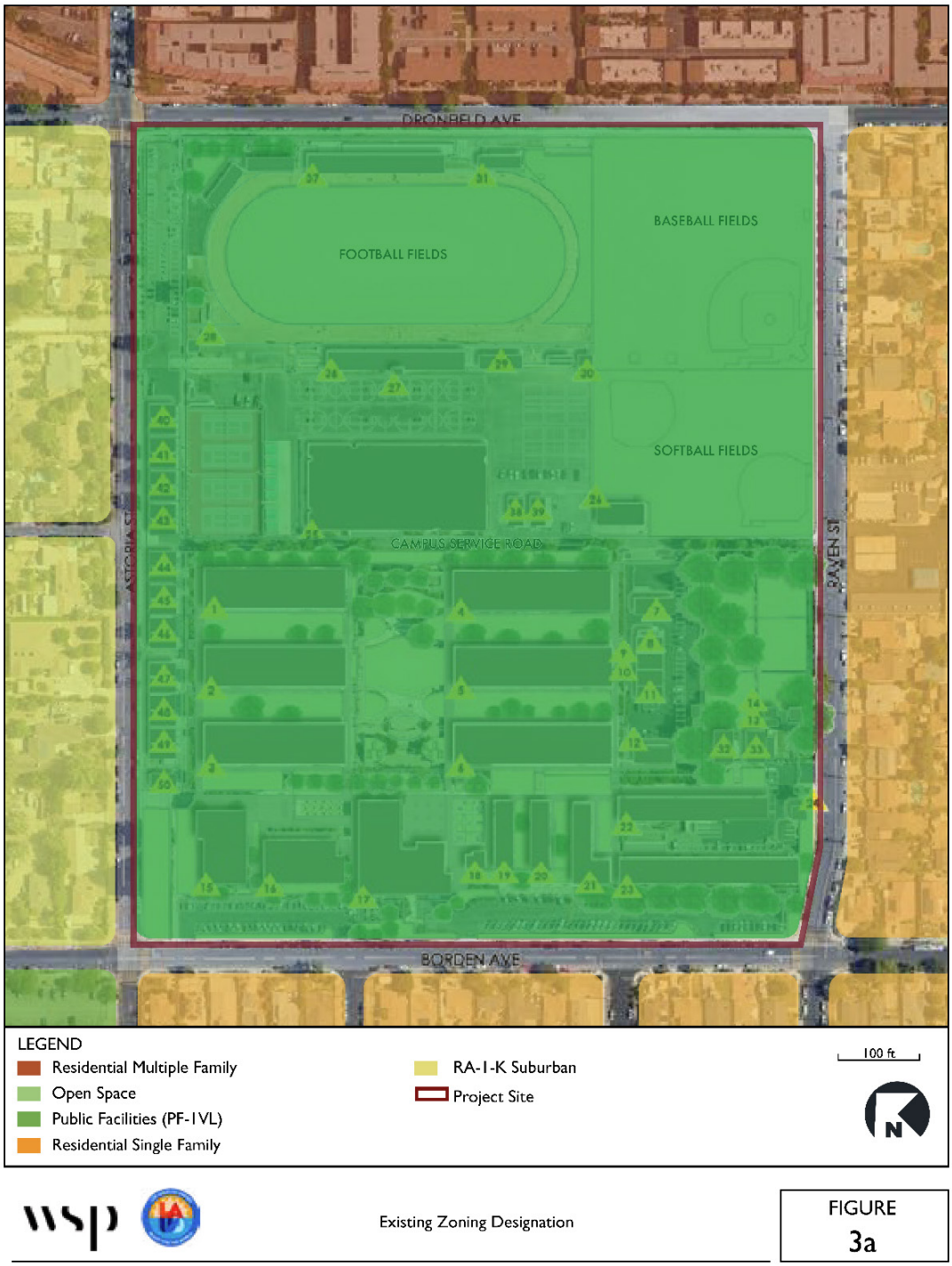
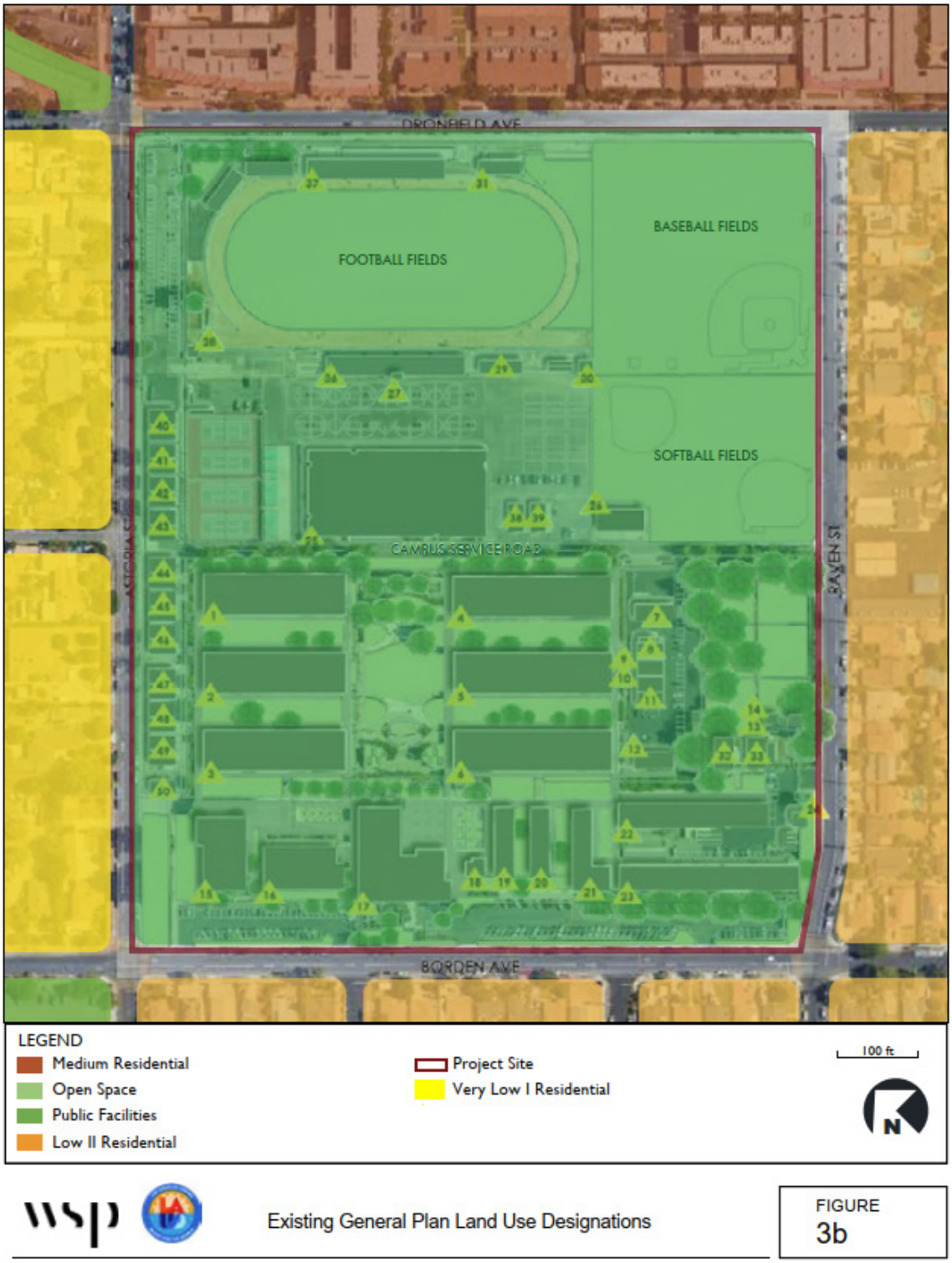


Figure 3b. Existing General Plan Land Use Designations



2.4.3 Sensitive Receptors

The District has defined sensitive receptors as residences, schools, daycares, long-term care facilities, dormitories, motels, hotels, transient lodgings, hospitals, libraries, auditoriums, concert halls, outdoor theaters, nature and wildlife preserves, parks, and places of worship. The District has identified the nearest sensitive receptors within 200 feet to the Campus (see Table 2-1 and Figure 4, *Sensitive Receptors*).

Table 2-1 Nearby Sensitive Receptors

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

Figure 4. Sensitive Receptors

2.4.4 Campus History

As described in the Historic Resources Evaluation Report (HRER) prepared for the proposed Project, construction of the Sylmar High School Campus was completed in September 1961.[16] Prior to its development as a Campus, the Project site was used for agricultural (orchards) and rural residential purposes. The original Campus was designed with four general areas, separating various school classrooms, gathering, and outdoor recreation areas. The Campus' focal point was the landscaped central courtyard, or "mall," containing an outdoor stage for large programs and special events.

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

On February 9, 1971, the San Fernando Earthquake damaged the Campus's connecting arcades, walkways, and retaining walls. The floors in the Physical Education (PE) Building and Multipurpose Building (MPB) sustained damage, as did the concrete columns at the cafeteria. Repair work was completed in the next year, and a new classroom building, Building #26, was constructed in the northwestern portion of the original softball field. Additionally, a series of five temporary, relocatable classroom buildings were erected on the asphalt-paved area north of the agricultural area, which remain in use today.[16] The Northridge Earthquake on January 17, 1994, damaged Campus buildings and arcades that were later repaired. In 1978, a small unused area in the northernmost corner of the Campus was carved out for the establishment of Evergreen Continuation High School. In 2016, Sylmar High School became an affiliated[17] charter school, the Sylmar Charter High School.

2.4.5 Potential Historic District

The Sylmar High School Campus has been identified as a potential historic district eligible for listing in the National Register of Historic Places (National Register), California Register of Historical Resources (California Register), and as a City of Los Angeles Historical-Cultural Monument (HCM) under significant Criteria A/1/1 for its association with postwar school development.

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

As described in the HRER, most improvements to the Campus have been additive or have involved relatively minor facilities upgrades (See Appendix 1-A in the *Initial Study*).

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

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

The significance of the resource is conveyed through the site plan and contributing resources. The period of significance is 1961 when the school was completed and opened. There are 22 contributing resources (or contributors) that date to the Campus' original 1961 construction. The Potential Historic District is further discussed in *Chapter 3.2, Cultural Resources*. The boundary of the potential historic district is shown on Figure 5, *Sylmar High School Potential Historic District* and contributing resources to the potential historic district are listed in Table 2-2, *Existing School Campus and Potential Historic District Status*.

2.4.6 Existing Conditions

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

Sylmar Charter HS and SBHEM occupy separate classroom buildings and share Campus facilities such as the assembly area, athletic areas, food service, library, and student store. Their combined total of classrooms is 101 standard sized classrooms.[18] Sylmar Charter HS and SBHEM served a cumulative population of 1,830 students in grades 9 – 12 according to the 2023-2024 E-CAR[19]. The projected enrollment for planning purposes is 2,025. The proposed Project is not designed or expected to increase student enrollment or capacity of the Campus.

2.4.7 Existing Campus Uses

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

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

Community Use. In compliance with the Civic Center Act, (CA Education Code Sections 38130-38139), the Campus is available for community use at selected times when not in use by LA Unified.[20]

[18] LAUSD. 2023. Major Modernization Project Preliminary Site Analysis and Program Development Phase Critical Findings Presentation. July 21, 2023.
[19] Electronic Capacity Assessment Review (E-CAR) data. Provided by LAUSD June 21, 2024.
[20] 15 California Education Code Sections 38130–38139.

Figure 5. Sylmar High School Potential Historic District

2.4.8 Existing Buildings and Site Improvements

General Campus buildings, including the Administration Building, the Spartan Theater and Library Building, and the MPB with Lunch Pavilion are clustered along the front of the Campus toward Borden Avenue. The centralized portion of the Campus is composed of a series of six parallel one-story classrooms separated by narrow landscaped courtyards and connected by a covered walkway canopy system, or "arcades," surrounding a main quad area. The southern portion of the Campus contains several specialized classroom buildings, two shop buildings, and an agricultural area. Recreational areas are concentrated in the northern portion of the Campus, including athletic fields for softball, baseball, and football, as well as paved tennis, handball, basketball, and volleyball courts. A 6,780 SF "safe-dispersal area" used during drills and emergencies is located at the hardcourts area adjacent to the softball field. A complete list of buildings and structures located on the Campus includes the following (see Table 2-2 and Figure 6, *Existing Sylmar Charter High School Campus*). Photographs of key buildings related to the proposed Project are included as Figure 7a, *Photo Location* and 7b, *Site Photographs*.

Table 2-2 Existing School Campus and Potential Historic District

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

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

Building Number	Building Name*	Approx. Square Footage*	Year Built**	Number of Stories*	Potential Historic District Status**
D	Site Plan/Landscape Design[21]	-	1961	-	Contributor
E	Football Field and Track	166,650	1961	-	Non-Contributor
F	Tennis Courts	23,600	1961	-	Non-Contributor
G	Handball Courts	5,418	1961	-	Non-Contributor
H	Basketball and Volleyball Courts	43,336	1961	-	Non-Contributor
I	Baseball Field	128,390	1961	-	Non-Contributor
J	Softball Field	86,500	1961	-	Non-Contributor
K	Agriculture/Planting Area	43,921	1961	-	Non-Contributor
L	Parking Area	18,350	1961	-	Non-Contributor
M	Marquee Sign	-	2008	-	Non-Contributor

*Source: LA Unified, 2023
**Source: Historic Resources Group (HRG), 2022

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

Figure 6. Existing Sylmar Charter High School Campus

wsp

Existing Sylmar Charter High School Campus

FIGURE 6

Figure 7a. Photo Location

Figure 7b. Site Photographs

Photo 1 SBHEM Main Entrance and Library (Building 15)

Photo 2 Administration (Building 16)

Photo 3 Multipurpose Building (Building 17), exterior

Photo 4 Multipurpose Building, interior

Photo 5 Multipurpose Building, interior

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

Photo 7 Main Electrical Switch Board at Multipurpose Building

Photo 8 Parking Area at SBHEM Entrance, Borden Ave.

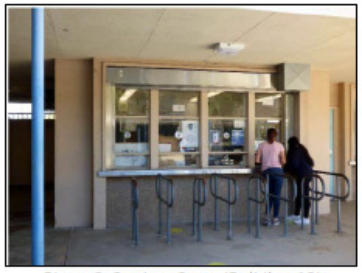


Photo 9 Student Store (Building 18)

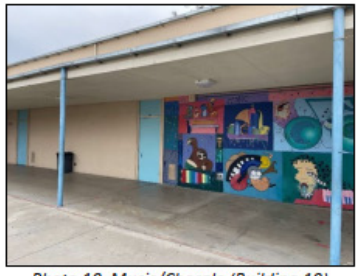


Photo 10 Music/Chorale (Building 19)

Photo 11 Drafting Building/Classroom (Building 20)

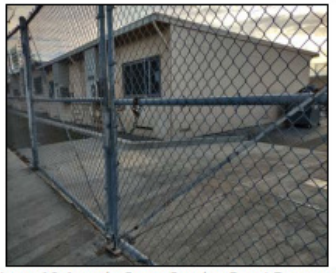


Photo 12 Astoria St. at Service Road Entrance; DSA Buildings to be removed

2. Project Description

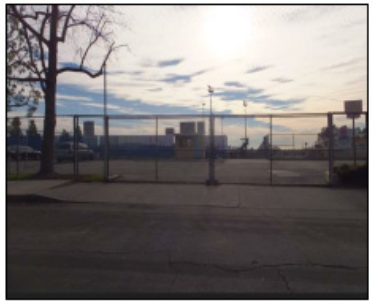


Photo 13 Astoria St. Parking Entrance (Lot No. 1)

Photo 14 DSA Buildings #38 and #39

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

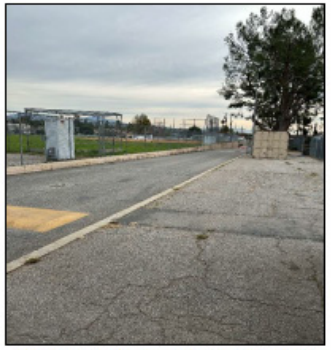


Photo 16 Service Road looking toward Softball Field

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

Photo 18 Outdoor Seating, looking toward Main Quad

Photo 19 Main Quad

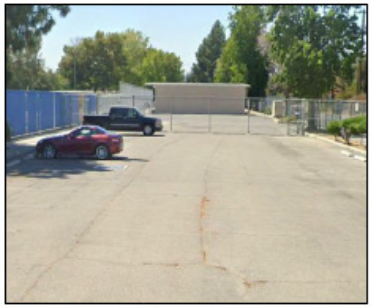


Photo 20 Astoria Street Parking (Lot No. 1)

2.4.9 Existing Campus Access and Parking

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

Pedestrian and Bicycle

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

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

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

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

Transit

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

Parking and Vehicular Access

There are five parking areas on the Campus, as further described below and depicted in Figure 8, *Pedestrian and Vehicle Access Existing Conditions*. There are a total of 205 total marked parking stalls within the Campus: 193 standard stalls, and 12 accessible stalls compliant with the ADA. There are nine unmarked stalls in Parking Area No. 5. The District Standard for this size of Campus is 258 parking stalls. Bicycle parking and skateboard storage are provided adjacent to Buildings #15 and #17.

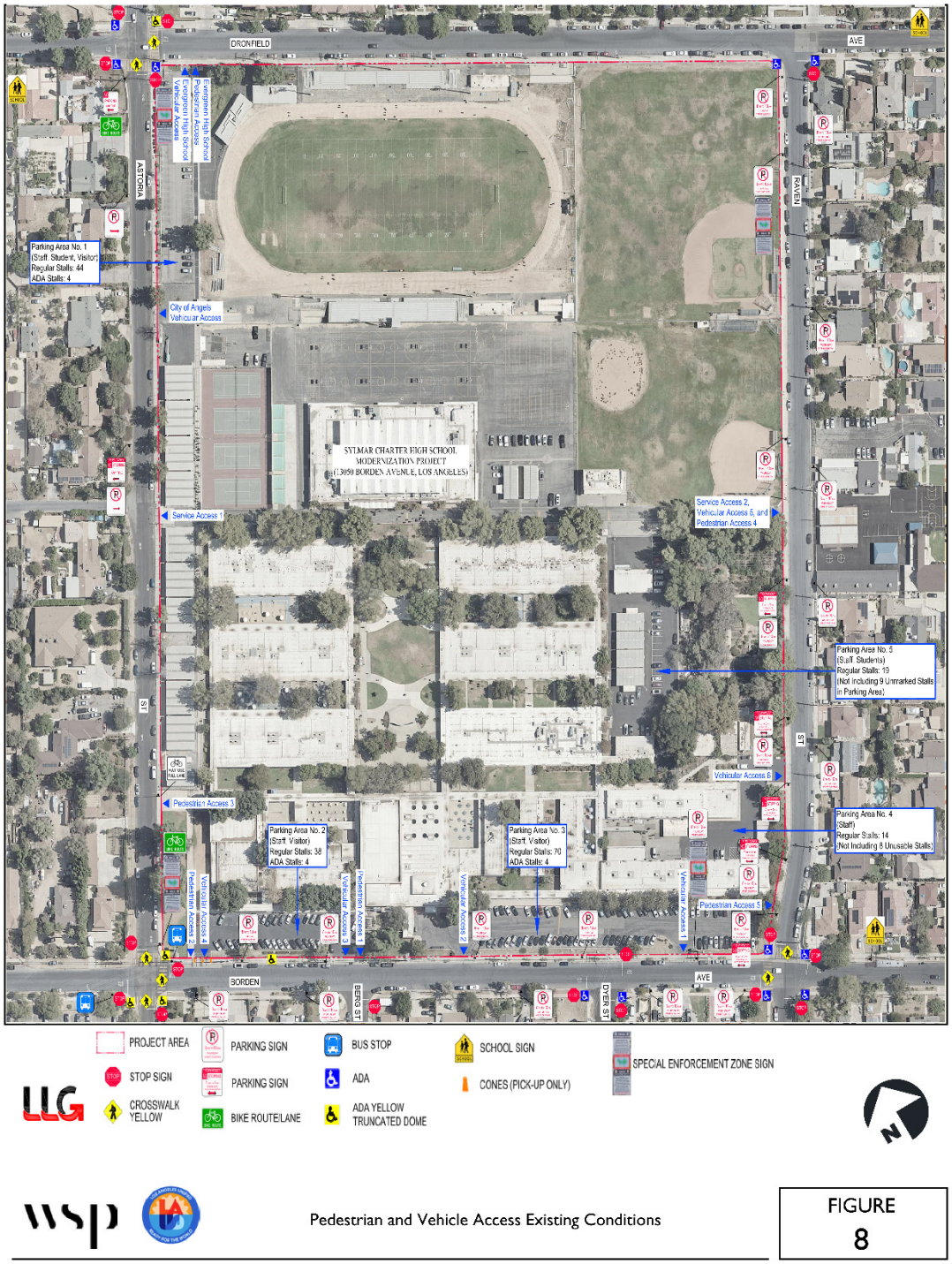
- Parking Area No. 1, located in the northern corner of Campus on Astoria Street: 44 regular stalls, four ADA stalls (48 total stalls).

- Parking Area No. 2, located at the main SCHS Campus entrance along Borden Ave: 38 regular stalls, four ADA stalls (42 total stalls).
- Parking Area No. 3, located at the main SBHEM Campus entrance along Borden Ave: 70 regular stalls, four ADA stalls (74 total stalls).
- Parking Area No. 4, separated in two locations among industrial arts buildings: 15 regular stalls, seven restricted stalls (22 total stalls).
- Parking Area No. 5, located adjacent to portable classroom buildings: 19 regular stalls, nine unmarked spaces (28 total stalls).

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

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

Figure 8. Pedestrian and Vehicle Access Existing Conditions



2.4.10 Existing Utilities and Infrastructure

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

Electrical

There are eight electrical substations on Campus that serve existing buildings. The majority of electrical distribution throughout the Campus was originally constructed in 1960 and is in poor condition.[22] Newer 5 kilovolt (kV) distribution was added in 1995 to support a heating, ventilation, and air conditioning (HVAC) upgrade. The main electrical distribution vault is an LADWP above-ground transformer located on Borden Avenue. This vault transforms utility power from overhead DPW utility lines located at the street on Borden Avenue, Raven Street, and Dronfield Avenue and runs power underground from the main switchboard to an underground 5 kV electrical line. The Campus currently does not have a renewable energy system.

Natural Gas

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

Domestic and Fire Water

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

Stormwater

Campus stormwater runoff is captured by an on-site underground storm drain system. There are various low points around the site that generally have an inlet that collects the surface runoff.[23] The main storm drain servicing classroom buildings is a line running along the corridor between Buildings #3 and #6, and Buildings #15 to #21. This main storm drain discharges to the street as an 18-inch line connected to a 7.5-foot-wide parkway drain that discharges to Raven Street Additionally, the fields north of the gym and classrooms have separate storm drain lines that discharge to Raven Street with multiple parkway drains.

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

[22] LAUSD. 2023. Preliminary Site Analysis and Program Development Report. August 2023.
[23] Ibid

Sanitary Sewer

There are two public sewer connections at the southwest of the Campus along Raven Street. The public main on Raven Street is an 8-inch vitrified clay pipe (VCP) line. Building #23 has a separate 3-inch sewer lateral that connects to the public main on Raven Street. The sewer lateral north of this lateral serves most buildings, including the portable classroom buildings on Campus. The main sewer main starts at the northwest of Campus along the portable classrooms then routes southeasterly within the service road, then routes southwesterly along Buildings #4 to #6. The main sewer serving the Campus connects to the public lateral through an 8-inch VCP north of the Industrial Arts #2 Building (Building #22). Each building has an individual sanitary sewer system that exits the building to the Campus sewer system(s). Unless previously renovated, the existing sewer systems are mostly original and are assumed to be in fair to poor condition.[24]

2.5 PROJECT CHARACTERISTICS

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

The proposed Project consists of a major modernization to a portion of the Sylmar Charter HS Campus to provide facilities that are safe, secure, and aligned with the instructional program. The proposed Project would involve the demolition of up to approximately 35,640 square feet (SF) of existing building floor area and up to 75,000 SF of new building construction (see Table 2-3, *Proposed Demolition* and Table 2-4, *Proposed Building Construction*). The proposed Project also includes Campus-wide utility upgrades; parking reconfiguration; accessibility upgrades, painting of exterior buildings, landscaping, and hardscaping. The construction and use of interim facilities would be required to allow the school to remain operational during the proposed Project. These temporary facilities would include portable classrooms, food service building(s), trash enclosure, lunch shelter, portable restroom building(s), and contractor trailers. The proposed Project would not increase student enrollment or capacity, and the total number of standard-sized classrooms would decrease by two (see Figure 9, *Proposed Project Overview*).

2.5.1 Demolition and Removal

The proposed Project involves the demolition of four permanent buildings as summarized in Table 2-3: the MPB (Building #17), Student Store (Building #18), Music/Chorale (Building #19), and Drafting Building/Classroom (Building #20). Additionally, four portable DSA buildings (Buildings #40, #41, #42, and #43) along Astoria Street would be removed and two portable DSA buildings (Buildings #38 and #39) adjacent to the volleyball court would be removed for a total of six portable buildings for removal. City of Angels Independent Study School, which currently occupies Building #40, would be relocated to a different place on Campus. Demolition also includes adjacent areas and features adjacent to these buildings such as food services and lunch shelter area, outdoor dining areas, electrical vault, landscaping, and covered walkways and arcades. Buildings #17, #18. #19, and #20 and Parking Area No. 3 are contributors to the Sylmar High School Campus

[24] Ibid

Potential Historic District. Upon completion of construction, the proposed Project would reduce the total number of standard classrooms on the Campus by two standard classrooms while providing additional outdoor learning and gathering spaces for its students.

Table 2-3 Proposed Demolition

Existing Building/Structure Name	Classrooms	Demolition (square feet)
Building 17 - Multipurpose Building	None	19,052
Building 18 - Student Store	None	814
Building 19 – Music/Chorale	2	3,257
Building 20 – Drafting Building (Classrooms)	4 small	2,849
Building 38 - DSA BLDG - 21726 Portable Classroom	1	994
Building 39 - DSA BLDG – 21727 Portable Classroom	1	994
Building 40 - AA-2371 – 22926 Portable Classroom	2	1,920
Building 41 - DSA BLDG - 21810 Portable Classroom	2	1,920
Building 42 - DSA BLDG - 21809 Portable Classroom	2	1,920
Building 43 - DSA BLDG - 21808 Portable Classroom	2	1,920
Demo Total	**16 classrooms**	35,640

2.5.2 Construction

The proposed Project would construct a new, two-story, 53-foot high, and approximately 73,219-square-foot MPB with lunch shelter and new Student Store. The ground floor of the MPB (61,184 SF) would include a 600-seat performing arts space, dining areas, kitchen, and four classrooms. The second floor (approximately 12,035 SF) would include a deck, a staff workroom, and six classrooms. An approximately 7,500 SF covered lunch pavilion would be constructed off the new MPB. The new Student Store building (approximately 1,200 SF) would be constructed to the north of the new MPB.

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

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

Table 2-4 Proposed Building Construction

Building/Structure	Classrooms	New Square Footage*
Multipurpose Building	10	73,219
1. First Floor	*(4)*	*61,184*
2. Second Floor	*(6)*	*12,035*

Building/Structure	Classrooms	New Square Footage*
Student Store	-	1,200
Total	10	74,419**

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

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

2.5.3 Landscaping and Other Site Improvements

There are approximately 286 trees on Campus.[25] The only trees that are considered protected pursuant to the District's Tree Trimming and Removal Procedure are three California western sycamores. Trees within 50 feet of construction, grading or excavation would be evaluated for necessary removal or measures needed to protect it in place. Approximately 21 trees would be removed in and around the site of the new MPB; no California western sycamores would be removed (refer to Figure 10, *Tree Removal*). Landscaping and hardscaping would be used to create outdoor learning environments that will be placed in areas around the new MPB as well as other portions of the Campus. These outdoor learning areas are intended as gathering spaces for small groups or classes and includes seating and tables integrated into a landscaped setting that includes trees. The proposed landscaping would be designed to be compatible with the Campus and incorporate, to the extent possible, native plants and vegetation. All plants and vegetation proposed for the Campus will be selected from the District's approved plant list.

The number and tree locations may be subject to change as the proposed design is refined and finalized. All tree removal would comply with the District's Tree Trimming and Removal Procedure and would further implement Tree Preservation Specifications as described in Section 4, *Biological Resources*. Any new marquee sign would be designed to comply with the District's School Marquee (Outdoor Sign with Electronic Message Display) policy BUL 5004.2.[26]

[25] LAUSD. 2023. Arborists Tree Survey Report. Prepared for the Sylmar Charter High School Preliminary Site Analysis and Program Development Report. August 2023.

[26] Los Angeles Unified School District. 2021. School Marquee (Outdoor Sign with Electronic Display Message) (BUL-5004.2). Facilities Services Division, August 16, 2021. https://my.lausd.net/webcenter/wccproxy/d?dID=113482. Accessed March 5, 2025.

Figure 9. Proposed Project Overview

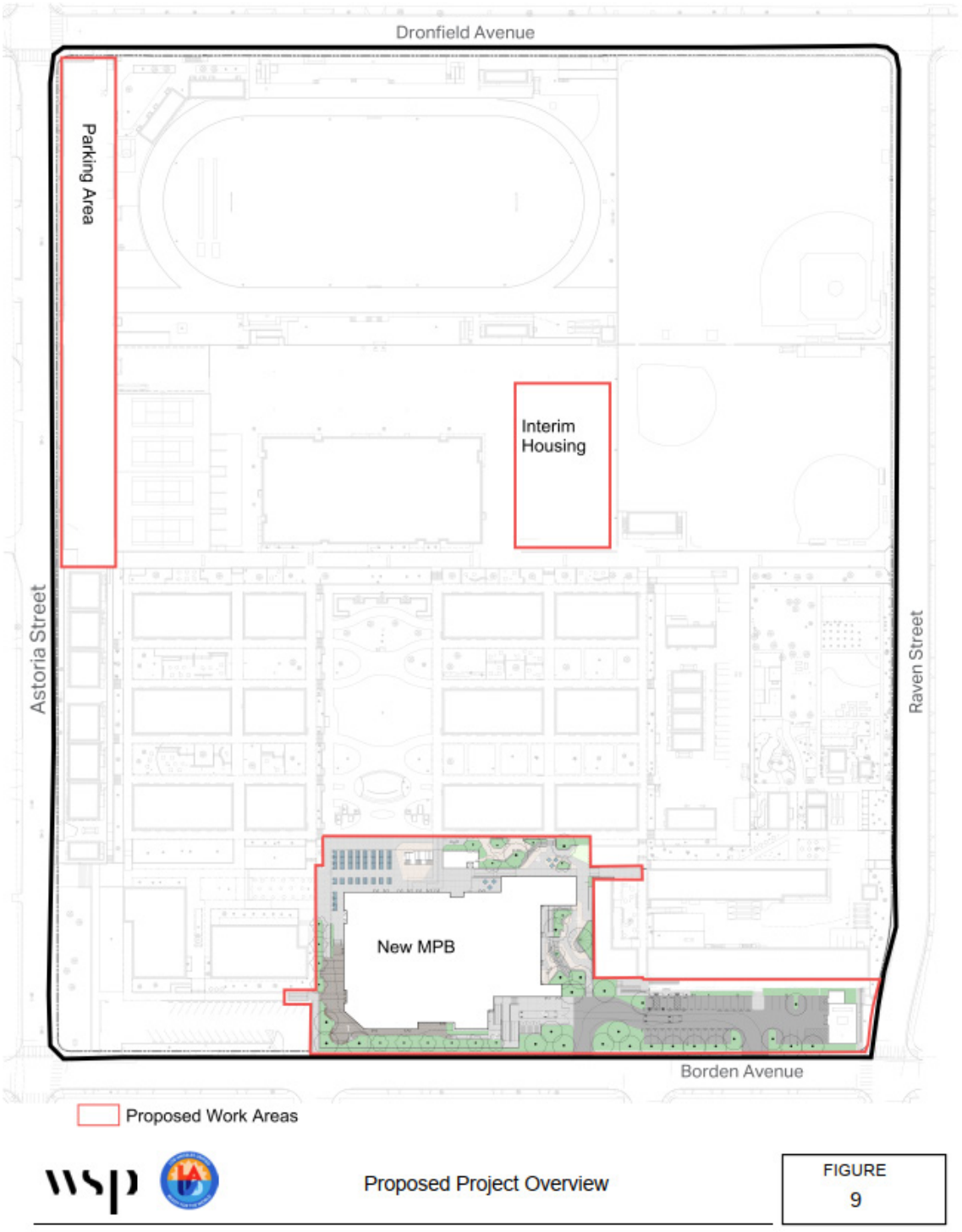
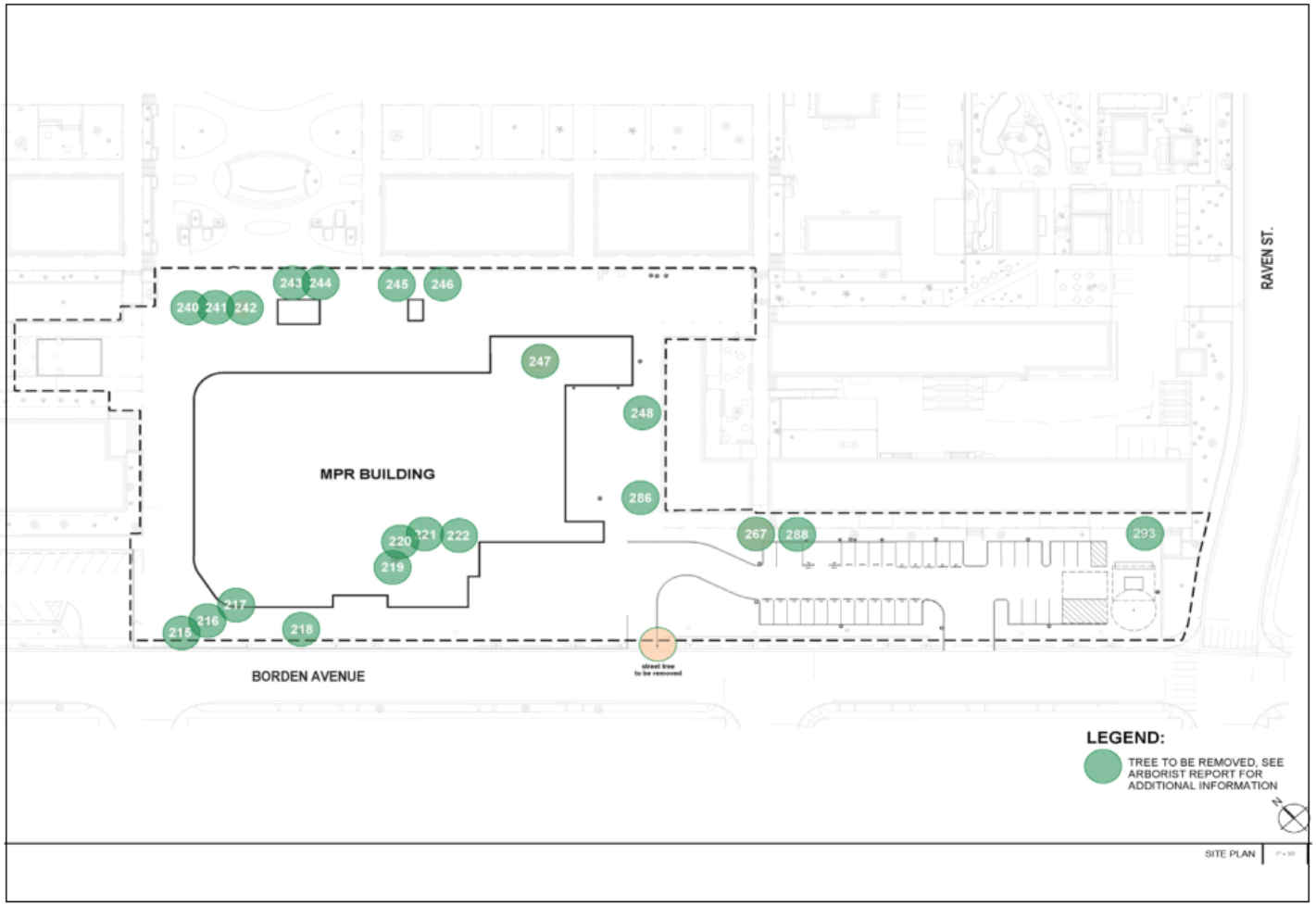


Figure 10. Tree Removal



Tree Removal

FIGURE 10

2.5.4 Site Access, Circulation, Parking

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

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

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

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

2.5.5 Construction Phasing and Equipment

The proposed Project would be constructed over three Phases, beginning in June 2026 and completed by May 2029 as outlined below (see Table 2-5, *Phasing Schedule and Description*). The proposed construction schedules are based on a conservative phasing plan but may be subject to change as the proposed design is refined. Construction staging would occur on-site. Construction access would be provided from Raven Street, with access to the staging areas provided via the Campus service road. Staging, interim facilities, and construction activities in general are required to be kept separate from student access areas, such as the safe dispersal area, located between the hardcourts and softball field.

Table 2-5 Phasing Schedule and Description

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

Phase	Description	Start Date	End Date
	Demobilize – Remove construction equipment and materials (1 Month).*	Q1-2029	Q1-2029

*Contractor's current schedule includes 6 Months following the Demobilize activity for Schedule Contingency and Final Completion.

Temporary relocation of sports and recreational activities is expected to occur throughout construction. Public parks and/or other recreational facilities near the school site may provide temporary recreational accommodations for Sylmar Charter HS students while sports facilities on Campus are unavailable during construction. Table 2-6, *Construction Phase and Equipment* summarizes anticipated construction equipment to be used to help evaluate the Project's environmental impacts.

Table 2-6 Construction Phase and Equipment

Phase	Equipment	Number
Phase 1 Install interim housing, setup contractor trailer with new electrical service, restripe existing Parking Lot 1 for interim staff parking, provide temporary staff parking at basketball courts, new chiller yard and installation of new chiller line; demolition of bungalow classroom Buildings #38 & #39.	Concrete/Industrial Saws	1
	Cranes	1
	Forklifts	1
	Generator Sets	1
	Rubber Tired Dozers	1
	Tractors/Loaders/Backhoes	1
	Air Compressor	1
	Generator Set	1
Phase 2A Abatement & demolition of existing MPB/Food Service and Buildings #19 & #20.	Concrete/Industrial Saws	1
	Cranes	1
	Forklifts	1
	Generator Sets	1
	Rubber Tired Dozers	1
	Tractors/Loaders/Backhoes	1
	Air Compressors	1
	Generator Sets	2
Phase 2B Construct new building and site work &barrier removal construction.	Cranes	1
	Forklifts	2
	Generator Sets	2
	Pavers	1
	Rollers	1
	Tractors/Loaders/Backhoes	2
	Welders	2
	Air Compressor	1
	Generator Set	1
Phase 3	Air Compressor	1

Phase	Equipment	Number
Remove interim housing and reinstall volleyball courts. Remove fencing for temporary staff parking and repair existing basketball courts. Remove four existing portables and restore Parking Lot No. 1. Remove Construction trailers and restripe parking at Parking Lot No. 3.	Generator Sets	2
Occupancy of New MPB and Campus exterior painting.	Air Compressors	1
	Generator Sets	1
	Crane	1
	Forklift	2
	Tractor/Loader/Backhoe	1

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

2.6 AGENCY REVIEWS AND APPROVALS

The proposed Project would require the approval of the Los Angeles Unified School District as the Lead Agency. It is anticipated that all or portions of the proposed Project would require agency review and approvals from the following entities:

- California Department of Fish and Game as a Trustee Agency
- California Department of General Services, Division of State Architect (DSA) Approval of site-specific construction drawings.
- California Department of Transportation (Caltrans), Approval of use of oversized vehicles for transport of heavy construction materials and/or equipment on State highways.
- South Coast Air Quality Management District (South Coast AQMD), Permit for compliance with Rule 1166.
- City of Los Angeles, Public Works Department Permit for curb, gutter, driveways, and other offsite improvements.
- City of Los Angeles, Fire Department, Approval of plans for emergency access and emergency evacuation as well as fire hydrants pursuant to the Los Angeles Fire Code and part of DSA permit approval.
- Los Angeles Department of Water and Power, Approval of above-ground transformer.

2.7 RELATED PROJECTS

Section 15130 of the CEQA Guidelines requires that an EIR consider the significant environmental effects of a project as well as "cumulative impacts." A cumulative impact is defined as an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts (CEQA Guidelines Section 15355). As stated in the CEQA Guidelines Section 15130(a)(1), the cumulative impacts discussion in an EIR need not discuss impacts that do not result in part from the project evaluated in the EIR. All projects that are proposed (i.e., with pending applications), recently approved, under construction, or otherwise reasonably foreseeable that could produce a cumulative impact on the local environment when considered in conjunction with a project are required to be evaluated in an EIR. These projects can include, if necessary, projects outside of the control of the lead agency. If a concise list of related projects is not available, cumulative impacts may be analyzed using the regional or area-wide growth projections contained in an adopted or certified general plan or related planning document.

Section 4.8.2, Achievements, of the Subsequent PEIR lists the 22 comprehensive modernization projects that have been completed under the Repair and Modernization Program, as well as the seven major modernization projects that have project definitions approved by the LA Unified Board of Education, which includes the proposed Project (Table 2-7, *Related Projects*).

Table 2-7 Related Projects

Project Location	Proximity to Project Site	Project Status[2]	Planned Construction Period[2]
32nd Street/USC Performing Arts Magnet	23 miles southeast	CEQA environmental review in process	Q1 2026 to Q4 2028
49th Street Elementary	25 miles southeast	Final Negative Declaration was adopted by the Board of Education on April 9, 2024	Q2 2025 to Q2 2029
Canoga Park High School	13 miles southwest	Final Negative Declaration was adopted by the Board of Education on May 7, 2024	Q4 2025 to Q4 2029
Fairfax High School	16 miles southeast	Initial Study and Draft Negative Declaration released for 30-day public comments on May 7, 2025	Q1 2026 to Q1 2030
Garfield High School	26 miles southeast	Final IS/MND was adopted by the Board of Education on September 10, 2024	Q1 2026 to Q3 2029
Irving Middle School	18 miles southeast	Final EIR was certified by the Board of Education on January 14, 2025	Q1 2026 to Q3 2029

Source:
[1] Los Angeles Unified School District. December 13, 2023. Los Angeles Unified School District School Upgrade Program Subsequent EIR. https://ceqanet.lci.ca.gov/2023010013/2

[2] Los Angeles Unified School District Office of Environmental Health & Safety. N.d. CEQA Documents. https://www.lausd.org/Page/2799 (accessed March 10, 2025).

In addition to these six school modernization projects, the City of Los Angeles environmental planning website was reviewed to identify other related projects in proximity to the Project site. No other related projects were identified within a mile radius of the Project site.[27]

[27] City of Los Angeles Planning. Environmental Impact Reports. Environmental Impact Reports | Los Angeles City Planning. Accessed April 2, 2025.

2.8 REFERENCES

California Education Code Sections 38130-38139. https://california.public.law/codes/ca_educ_code_title_2_div_3_part_23_chap_4_art_2

City of Los Angeles. June 2015. Sylmar Community Plan. https://planning.lacity.gov/plans-policies/community-plan-area/sylmar

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---------- 2023. Arborists Tree Survey Report. Prepared for the Sylmar Charter High School Preliminary Site Analysis and Program Development Report. August 2023.

---------- 2023. Los Angeles Unified School District School Upgrade Program Subsequent EIR. December 13, 2023. https://ceqanet.lci.ca.gov/2023010013/2

---------- 2023. Major Modernization Project Preliminary Site Analysis and Program Development Phase Critical Findings Presentation. July 21, 2023.

---------- 2023. Preliminary Site Analysis and Program Development Report. August 2023.

Los Angeles Unified School District. November 15, 2022. Board of Education Report (File #: Rep-074-22/23). Approve the Redefinition of Five Major Modernization Projects at 49th Street Elementary School, Canoga Park High School, Garfield High School, Irving Middle School, and Sylmar Charter High School, and Amend the Facilities Services Division Strategic Execution Plan to Incorporate Therein.

Los Angeles Unified School District Office of Environmental Health & Safety. N.d. CEQA Documents. https://www.lausd.org/Page/2799 (accessed March 10, 2025).

3. Environmental Analysis

3.1 AIR QUALITY

This section evaluates impacts related to air emissions generated by construction and operation of the proposed Project. The analysis also addresses consistency of the Project with air quality policies set forth within the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP) and LA Unified. The analysis of project-generated air emissions focuses on whether the Project would cause exceedance of an ambient air quality standard, or a SCAQMD significance threshold. Details regarding the air quality analysis are provided in Appendix 6, *Air Quality Report and Emissions Calculations*, of this Draft EIR.[28]

3.1.1 Environmental Setting

REGIONAL AIR QUALITY

The proposed Project site is located in the South Coast Air Basin (SoCAB) and the SCAQMD. Approximately 12,000 square miles span SCAB's jurisdiction, consisting of Orange County and the urbanized areas of San Bernardino, Riverside, and Los Angeles counties. The SCAB is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the southwest and high mountains around the perimeter. The boundaries of the SCAB were altered in May 1996 by the California Air Resources Board (CARB) to include the Beaumont-Banning area. The distinctive climate of the SCAB is determined by its terrain and geographic location. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The usually mild climatological pattern is interrupted occasionally by periods of extremely hot weather, winter storms, or Santa Ana winds. The SCAB is classified as a dry-hot desert climate.[29]

The vertical dispersion of air pollutants in the SCAB is hampered by the presence of persistent temperature inversions. High-pressure systems, such as the semipermanent high-pressure zone in which the SCAB is located, are characterized by an upper layer of dry air that warms as it descends, restricting the mobility of cooler marine-influenced air near the ground surface, and resulting in the formation of subsidence inversions. These inversions restrict the vertical dispersion of air pollutants released into the marine layer and, together with strong sunlight, can produce worst-case conditions for the formation of photochemical smog. The basin wide occurrence of inversions at 3,500 feet above sea level or less averages 191 days per year.[30]

The atmospheric pollution potential of an area is largely dependent on winds, atmospheric stability, solar radiation, and terrain. The combination of low wind speeds and low inversions produces the greatest concentration of air pollutants. On days without inversions, or on days of winds averaging over 15 miles per hour (mph), smog potential is greatly reduced.[31] Meteorological data from a weather station located in downtown Los Angeles (USC Campus) has indicated that the average high of 83.1 degrees Fahrenheit (°F) occurs during the summer months, and a low of 48.3°F occurs in the winter months. The average annual

[28] WSP. 2025. Air Quality Report for the Sylmar Charter High School Major Modernization Report. March 2025.

[29] South Coast Air Quality Management District. April 1993. CEQA Air Quality Handbook, p. A8-1.

[30] South Coast Air Quality Management District. April 1993. CEQA Air Quality Handbook, p. A8-2.

[31] South Coast Air Quality Management District. April 1993. CEQA Air Quality Handbook.

maximum temperature is 74.0°F, and the average annual minimum temperature is 55.8°F. Very little rainfall or no rainfall at all occurs during the summer months. Rainfall typically occurs from October through April, providing an average annual rainfall of 14.8 inches of rain.

The SCAB exceeds federal standards for ozone (O_3), particulate matter 10 microns or less in diameter, or respirable particulate matter (PM_{10}), particulate matter 2.5 microns or less in diameter, or fine particulate matter ($PM_{2.5}$), and lead. Section 107 of the 1977 Clean Air Act (CAA) Amendment mandates the U.S. Environmental Protection Agency (U.S. EPA) to publish a list of geographic areas and their compliance with National Ambient Air Quality Standards (NAAQS). A nonattainment status is attached to areas not in compliance with NAAQS and can be categorized into four designations of increasing severity: (1) moderate, (2) serious, (3) severe, and (4) extreme. Designations are assigned on a pollutant-by-pollutant basis. The U.S. EPA has classified the project area as an extreme nonattainment area for O_3 and a serious nonattainment area for $PM_{2.5}$ (Table 3-1, *Federal and State Attainment Status*). Mobile sources, including cars, trucks, and off-road equipment, are the largest contributors to the formation of O_3, $PM_{2.5}$, diesel particulate matter (DPM), and greenhouse gas (GHG) emissions in California.

Table 3-1 Federal and State Attainment Status

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

Sources: NAAQS and CAAQS Attainment Status for the Basin. SCAQMD 2016.

LOCAL AIR QUALITY

Existing Ambient Air Quality in Project Area

The SCAQMD has divided the Basin into source receptor areas (SRAs), based on similar meteorological and topographical features. The proposed Project site is located in the SCAQMD's East San Fernando Valley SRA (SRA No. 7). The most representative station of the Project site is the North Hollywood Station, which is located at 10659 W. Delano Street, North Hollywood CA 91606, approximately 9.5 miles southeast of the Project site. The NOHO Station monitors nitrogen dioxide (NO_2), ozone (O_3), respirable particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$).

Table 3-2, *East San Fernando Valley SRA – 2022 Air Quality Summary* summarizes the air pollution monitoring results for 2022 for the East San Fernando Valley SRA.

Sensitive Receptors

Certain population groups, such as children, elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases), are considered more sensitive to the effects of air pollution than others. For the purposes of CEQA, the SCAQMD considers a sensitive receptor to be a location where a sensitive

individual could remain for 24 hours, such as residences, hospitals, or convalescent facilities.[32] The Project site is predominantly surrounded by single-family residential uses. As shown in Figure 4, *Sensitive Receptors*, the nearest sensitive receptors are the existing students at the Campus (including students at Sylmar Charter HS, SBHEM, Evergreen Continuation High School, and City of Angels); PUC Community Charter Elementary School, located approximately 66 feet southeast of the Project site; two single-family residential addresses located 50 feet southwest of the project site; one residential and commercial (restaurant) address located 50 feet southwest of the Project site; and one residential address located 76 feet southeast of the Project site.

All other air quality sensitive receptors are located at greater distances from the Project site and would be less impacted by Project emissions.

Table 3-2 East San Fernando Valley SRA – 2022 Air Quality Summary

Monitoring Standard	Ozone (ppm)	Carbon Monoxide (ppm)	Nitrogen Dioxide (ppb)	PM_{10} ($\mu g/m^3$)	$PM_{2.5}$ ($\mu g/m^3$)
Max 1-Hr	0.106	--	54	--	--
National 1-Hr Days	--		--	--	--
California 1-Hr Days	*6*		--	--	--
Max 8-Hr	0.092	--	--	--	--
National 8-Hr Days	*13*		--	--	--
California 8-Hr Days	*15*		--	--	--
Max 24-Hr	--		--	--	--
National 24-Hr Days	--		--	--	43.4
California 24-Hr Days	--		--	--	--
Annual Average	--	--	--	19.0	12.9

Source: CARB 2024.
Notes: ppm = parts per million; $\mu g/m^3$ = micrograms per cubic meter.

[32] South Coast Air Quality Management District. July 2008. Final Localized Significance Threshold Methodology. https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodologydocument.pdf?sfvrsn=2

3.1.2 Regulatory Framework

FEDERAL

Federal Clean Air Act

Congress passed the first major CAA in 1970 (42 U.S. Code [USC] Sections 7401 et seq.). This Act gives the U.S. EPA broad responsibility for regulating emissions from many sources of air pollution from mobile to stationary sources. Pursuant to the CAA, the U.S. EPA is authorized to regulate air emissions from mobile sources like heavy-duty trucks, agricultural and construction equipment, locomotives, lawn and garden equipment, and marine engines; and stationary sources such as power plants, industrial plants, and other facilities.

The CAA sets NAAQS for the six most common air pollutants to protect public health and public welfare. These pollutants include particulate matter, O_3, CO, sulfur oxides, nitrogen oxides, and lead. For each pollutant, the U.S. EPA designates an area as attainment for meeting the standard or nonattainment for not meeting the standard. A maintenance designation entails an area that was previously designated as nonattainment but is currently designated as attainment. The CAA directs states to develop state implementation plans (SIPs) to achieve these standards.

National Ambient Air Quality Standards

The federal CAA required the U.S. EPA to establish NAAQS. The NAAQS set primary standards and secondary standards for specific air pollutants (Table 3-3, *National Ambient Air Quality Standards*). Primary standards define limits for the intention of protecting public health, which include sensitive populations such as asthmatics, children, and the elderly. Secondary standards define limits to protect public welfare to include protection against decreased visibility, damage to animals, crops, vegetation, and buildings.

Table 3-3 National Ambient Air Quality Standards

Pollutant		Primary/Secondary	Averaging Time	Level
Carbon monoxide		Primary	8 hours	9 ppm
			1 hour	35 ppm
Lead		Primary and secondary	Rolling 3-month average	0.15 µg/m^3
Nitrogen dioxide		Primary	1 hour	100 ppb
		Primary and secondary	Annual	53 ppb
Ozone		Primary and secondary	8 hours	0.070 ppm
Particulate matter	$PM_{2.5}$	Primary	Annual	12 µg/m^3
		Secondary	Annual	15 µg/m^3
		Primary and Secondary	24 hours	35 µg/m^3
	PM_{10}	Primary and Secondary	24 hours	150 µg/m^3
Sulfur dioxide		Primary	1 hour	75 ppb
		Secondary	3 hours	0.5 ppb

Note: ppm = parts per million by volume; µg/m^3 = micrograms per cubic meter; ppb = parts per billion by volume.
Source: California Air Resources Board. May 4, 2016. Ambient Air Quality Standards.
https://www.arb.ca.gov/research/aaqs/aaqs2.pdf

STATE

California Clean Air Act of 1988

The California CAA of 1988 (CCAA) allows states to adopt ambient air quality standards and other regulations if they are at least as stringent as federal standards. CARB, as part of the California Environmental Protection Agency (Cal EPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California, including setting the CAAQS. The CCAA, amended in 1992, requires all AQMDs in the state to achieve and maintain the CAAQS. The CAAQS are generally stricter than national standards for the same pollutants and has also established state standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles, for which there are no national standards. CARB also conducts research, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB also has primary responsibility for the development of California's SIP, for which it works closely with the federal government and the local air districts.

California Ambient Air Quality Standards

The federal CAA permits states to adopt additional or more protective air quality standards if needed. California has set standards for certain pollutants, such as particulate matter and ozone, which are more protective of public health than respective federal standards (Table 3-4, *California Ambient Air Quality Standards*). California has also set standards for some pollutants that are not addressed by federal standards.

State Implementation Plan/Air Quality Management Plans

An SIP is required by the U.S. EPA to ensure compliance with the NAAQS. States must develop a general plan to maintain air quality in areas of attainment and a specific plan to improve air quality for areas of nonattainment. SIPs are a compilation of new and previously submitted plans, programs (such as monitoring, modeling, permitting, etc.), district rules, state regulations, and federal controls. The SIP verifies that the state has a proper air quality management program that adheres to or strives to reach the most up to date emissions requirements. The 1990 amendments to the federal CAA set deadlines for attainment based on the severity of an area's air pollution problem. In adherence to CAA Section 172, states must adopt additional regulatory programs for nonattainment areas.[33]

AQMPs, developed by the air districts, are required to ensure compliance with the state and federal requirements by demonstrating a pathway to achieving attainment for the criteria air pollutants. The CARB is the lead agency and responsible agency for submitting the SIP to the EPA. CARB forwards SIP revisions to the U.S. EPA for approval and publication in the *Federal Register*. The CFR Title 40, Chapter I, Part 52, Subpart F, Section 52.220, lists the items required to be included in the California SIP.[34]

Table 3-4 California Ambient Air Quality Standards

Pollutant	Averaging Time	Level
Carbon monoxide	8 hours	9 ppm
	1 hour	20 ppm
Lead	30-day average	1.5 μg/m^3
Nitrogen dioxide	1 hour	0.18 ppm

[33] 42 U.S.C. §§ 7502 et seq. 172.
[34] Federal Register. May 31, 1972. 37:10850.

		Annual	0.03 ppm
Ozone		8 hours	0.07 ppm
		1 hour	0.09 ppm
Particulate matter	$PM_{2.5}$	Annual	12 μg/m^3
	PM_{10}	24 hours	50 μg/m^3
		Annual	20 μg/m^3
Sulfur dioxide		1 hour	0.25 ppm
		24 hours	0.04 ppm
Sulfates		24 hours	25 μg/m^3
Hydrogen sulfide		1 hour	0.03 ppm
Vinyl chloride		24 hours	0.01 ppm
Visibility reducing particles		Extinction coefficient of 0.23 per kilometer – visibility of 10 miles or more due to particle when relative humidity is less than 70 percent	

Note: ppm = parts per million by volume; μg/m^3 = micrograms per cubic meter; ppb = parts per billion by volume.
Source: California Air Resources Board. May 4, 2016. Ambient Air Quality Standards.
https://www.arb.ca.gov/research/aaqs/aaqs2.pdf

California Code of Regulations

The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended, or repealed by state agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions. Section 2485 in Title 13 of the CCR states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.

CARB Off-Road Regulation

In November 2022, CARB approved amendments to the In-Use Off-Road Diesel-Fueled Fleets Regulation (Off-Road Regulation) to further reduce emissions from the off-road sector by setting certification standards through new engine emissions control regulation and the development of zero-emission certification standards.[35]

REGIONAL

South Coast Air Quality Management District

The SCAQMD is primarily responsible for planning, implementing, and enforcing air quality standards for the SCAB. The SCAB is a subregion within the western portion of the SCAQMD jurisdiction. The potential air quality impacts occurring during the construction and operation of the proposed project were evaluated using the CEQA Guidelines and the quantitative thresholds of significance established by the SCAQMD (see Table 3-5, *SCAQMD Air Quality Significance Thresholds*). The 2022 SCAQMD AQMP provides the applicable rules and regulations to ensure compliance with all federal and state ambient air quality standards for the areas under the SCAQMD jurisdiction.[36]

[35] California Air Resources Board. 2022. In-Use Off-Road Diesel-Fueled Fleets Regulation. https://ww2.arb.ca.gov/ourwork/programs/use-road-diesel-fueled-fleets-regulation.
[36] South Coast Air Quality Management District. December 2022. 2022 Air Quality Management Plan. http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan

2022 Air Quality Management Plan

To meet the NAAQS and CAAQS, the SCAQMD has adopted a series of AQMPs, which serve as a regional blueprint to develop and implement an emission reduction strategy that will bring the area into attainment with the standards in a timely manner. The most significant air quality challenge in the Air Basin is to reduce nitrous oxide (NO_X) emissions sufficiently to meet the upcoming O_3 standard deadlines, as NO_X plays a critical role in the creation of O_3. NO_X emissions also lead to the formation of $PM_{2.5}$, which requires NO_X reductions to meet the O_3 standards, resulting in an improvement of $PM_{2.5}$ levels and attainment of standards. Meeting the 2015 federal ozone standard requires reducing NO_X emissions by 67 percent more than is required by adopted rules and regulations in 2037. The 2022 AQMP, in addition to federal action to regulate mobile sources, requires substantial reliance on future deployment of advanced technologies to meet the standard, requiring more expensive control strategies to meet federal standards.

The main source of NO_X emissions within SCAQMD is from heavy-duty trucks, ships, and other State and federally regulated mobile sources. The 2022 AQMP includes strategies to achieve the required NO_x reductions through the extensive use of zero emission technologies across all stationary and mobile sources. The 2022 AQMP's goal is to transition to zero and low emission technologies in an equitable and affordable way and incorporate transportation strategies and control measures provided in the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), referred to as Connect SoCal. The 2022 AQMP includes additional strategies including regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, cost-effective and feasible technologies, and low NO_X technologies in other applications), best management practices (BMP), co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard.

Table 3-5 SCAQMD Air Quality Significance Thresholds

Pollutant	Construction	Operation
NO_x	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM_{10}	150 lbs/day	150 lbs/day
$PM_{2.5}$	55 lbs/day	55 lbs/day
SO_x	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Toxic Air Contaminants 9TACs), Odor, and GHG Threasholds		
TACs (including carcinogens and noncarcinogens)	Maximum Incremental Cancer Rate ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic and Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
GHG	10,000 MT/yr CO_2eq for industrial facilities	
Ambient Air Quality Standards for Criteria Pollutants[a]		
NO_2 1-hour average Annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state and 0.0534 ppm (federal)	
PM_{10} 24-hour average Annual average	 10.4 µg/m^3 (construction)[b] & 2.5 µg/m^3 (operation) 1.0 µg/m^3	

$PM_{2.5}$ 24-hour average	 10.4 µg/m³ (construction)[b] & 2.5 µg/m³ (operation)
SO_2 1-hour average 24-hour average	 0.25 ppm (state) & 0.075 ppm (federal – 99th percentile) 0.04 ppm (state)
Sulfate 24-hour average	25 µg/m³ (state)
CO 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)
Lead 30-day average Rolling 3-month average	 1.5 µg/m³ (state) 0.15 µg/m³ (federal)

Note: lbs/day = pounds per day; ppm = parts per million by volume; µg/m³ = micrograms per cubic meter; MT/year CO_2eq = metric tons per year of CO_2 equivalents; NOx = nitrogen oxide; VOC = volatile organic compounds; PM_{10} = particulate matter 10 microns or less in diameter (coarse PM); $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter (fine PM); SOx = sulfates; CO = carbon monoxide; TACs = toxic air contaminants; GHG = greenhouse gases; NO_2 = nitrogen dioxide; SO_2 = sulfur dioxide.

[a] Ambient air quality thresholds for criterial pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.

[b] Ambient air quality thresholds based on SCAQMD Rule 403.

Source: South Coast Air Quality Management District. 2022. 2022 Air Quality Management Plan (AQMP).

SCAG Connect SoCal

SCAG is a Joint Powers Authority established pursuant to California Government Code Section 6502 et seq., to maintain a continuing, cooperative, and comprehensive transportation planning. Through the implementation of transportation and land use strategies, Connect SoCal outlines how the region can achieve the state's GHG reduction goals and federal CAA requirements. Connect SoCal provides transportation strategies and technologies to improve the regional transportation network, prioritizes the use of streets and curb space for pedestrian access and alternative transportation modes rather than vehicles. When implementing transportation projects, the plan encourages coordination with land use planning to develop housing and employment opportunities closer to each other and to public transit. The plan also includes a financial analysis considering costs for operations and maintenance of the existing transportation system's reliability, longevity, resilience, and cost effectiveness.

SCAQMD Rules and Regulations

The SCAQMD has adopted several rules and regulations to regulate sources of air pollution in the Air Basin and to help achieve air quality standards for projects, which include, but are not limited to the following:[37]

- Rule 401 – Visible Emissions: states that a person shall not discharge into the atmosphere from any single source of emission any air contaminant for a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade, designated No. 1 on the Ringelmann Chart or of such opacity.

- Rule 402 – Nuisance: a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or

[37] South Coast Air Quality Management District. N.d. South Coast AQMD Rule Book. http://www.aqmd.gov/home/rulescompliance/rules/scaqmd-rule-book/regulation.

safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

- Rule 403 – Fugitive Dust: requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM_{10} emissions to less than 50 $\mu g/m^3$ and restricts the tracking out of bulk materials onto public roads. Project shall utilize one or more of the best available control measures provided. Mitigation measures may include adding freeboard to haul vehicles; fugitive dust management using chemical stabilizers or frequent watering to unpaved areas; covering loose material on haul vehicles; and/or ceasing all activities.

- Rule 1113 – Architectural Coatings: establishes limits on the VOC content of specific architectural coating applications. Non-residential building envelope coatings are required to have VOC content less than 50 grams per liter.

- Rule 1401 – New Source Review of Toxic Air Contaminants: specifies limits for maximum individual cancer risk, cancer burden, and noncancer acute and chronic hazard index from new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants.

SCAQMD Air Quality Guidance Documents

The SCAQMD published the CEQA Air Quality Handbook, approved by the AQMD Governing Board in 1993, to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts.[38] The CEQA Air Quality Handbook provides standards, methodologies, and procedures for conducting air quality analyses. Several sections of the CEQA Air Quality Handbook are obsolete. These primarily include sections containing or referencing emissions factors and screening tables that were derived from now outdated source documentation. South Coast AQMD is in the process of developing an "Air Quality Analysis Guidance Handbook" (Handbook) to replace existing analysis guidance documentation. In order to assist the CEQA practitioner in conducting an air quality analysis while the new Handbook is being prepared, the SCAQMD has provided supplementation information by which air quality impacts should be analyzed. These include supplemental guidance for air quality significance thresholds and analysis, emission factors, potential control strategies, and mitigation measures.

LOCAL

LAUSD Standard Conditions

The 2023 Subsequent PEIR includes Standard Conditions of Approval (SCs) for reducing impacts on air quality in areas where future projects would be implemented under the SUP. Applicable SCs related to Project air quality impacts are provided in Table 3-6, *Air Quality Standard Conditions of Approval*, below.

According to the 2023 Subsequent PEIR, projects implemented under the SUP are anticipated to have less than significant and significant impacts on air quality within the LA Unified service area.[19] However, the Project-specific analysis provided below concludes that implementation of the proposed Project would have less-than-

[38] South Coast Air Quality Management District. 1993. CEQA Air Quality Handbook 1993. https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)

significant impacts on the surrounding community during construction and significant and unavoidable impacts with respect to localized operational impacts.

Table 3-6 Air Quality Standard Conditions of Approval

Applicable SC	Description
SC-AQ-2	Construction Contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.
SC-AQ-3	Construction Contractor shall: • Maintain speeds of 15 miles per hour (mph) or less with all vehicles. • Load impacted soil directly into transportation trucks to minimize soil handling. • Water/mist soil as it is being excavated and loaded onto the transportation trucks. • Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site. • Minimize soil drop height into haul trucks or stockpiles during dumping. • During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks. • Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed. • Place stockpiled soil on polyethylene sheeting and cover with similar material. • Place stockpiled soil in areas shielded from prevailing winds.
SC-AQ-4	LAUSD shall analyze air quality impacts: If site-specific review or monitoring data of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast (AQMD) regional and localized significance thresholds. Construction bid contracts shall include protocols that reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. The Construction Contractor shall be responsible for documenting compliance with the identified protocols. Specific air emission reduction protocols include, but are not limited to, the following. <u>Exhaust Emissions</u> • Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM).

	• Consolidate truck deliveries and limit the number of haul trips per day. • Route construction trucks off congested streets, as permitted by local jurisdiction haul routes. • Employ high pressure fuel injection systems or engine timing retardation. • Use ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment. • Use construction equipment rated by the United States Environmental Protection Agency as having at least Tier 4 (model year 2008 or newest available model) emission limits for engines between 50 and 750 horsepower. • Restrict non-essential diesel engine idle time, to not more than five consecutive minutes. • Use electrical power rather than internal combustion engine power generators. • Use electric or alternatively fueled equipment, as feasible. • Use construction equipment with the minimum practical engine size. • Use low-emission on-road construction fleet vehicles. • Ensure construction equipment is properly serviced and maintained to the manufacturer's standards.
	<u>Fugitive Dust</u> • Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for 10 days or more). • Replace ground cover in disturbed areas as quickly as possible. • Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water). • Install wheel washers where vehicles enter and exit unpaved roads onto paved roads or wash off trucks and any equipment leaving the site each trip. • Pave unimproved construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles. • Pave all unimproved construction access roads for at least 100 feet from the main road to the project site. • Enclose, cover, water twice daily, or apply non-toxic soil binders according to manufacturers' specifications to exposed piles (i.e., gravel, dirt, and sand) with a 5% or greater silt content.

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

3.1.3 Thresholds of Significance

Pursuant to Appendix G of the CEQA *Guidelines*, the Project would result in a significant impact related to air quality if it would:

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?

Pursuant to CEQA Guidelines Section 15064.7, a lead agency may consider using, when available, the significance criteria established by the applicable air quality management district or air pollution control district when making determinations of significance. The proposed Project would be under SCAQMD's jurisdiction. SCAQMD has established air quality significance criteria in its CEQA Air Quality Handbook. These criteria are based on the recognition that the Air Basin is a distinct geographic area with a critical air pollution problem for which ambient air quality standards have been promulgated to protect public health.[39] The air quality impacts of the Project are, therefore, evaluated according to the most recent criteria adopted or recommended by the SCAQMD as part of supplemental information provided by SCAQMD to assist CEQA practitioners in conducting air quality analysis..

Construction Emissions

The SCAQMD has established numerical emission indicators of significance for construction. The numerical emission indicators are based on the recognition that the Air Basin is a distinct geographic area with a critical air pollution problem for which ambient air quality standards have been promulgated to protect public health.[40] Given that construction impacts are temporary and limited to the construction phase, the SCAQMD has established numerical indicators of significance specific to construction activity. Based SCAQMD's *Air Quality Significance Thresholds*, the Project would cause or contribute to an exceedance of an ambient air quality standard if the following would occur:

Regional construction emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed daily regional emissions criteria:

- 75 pounds a day for VOC;
- 100 pounds per day for NO_X;
- 550 pounds per day for CO;
- 150 pounds per day for SO_2;
- 150 pounds per day for PM_{10}; or
- 55 pounds per day for $PM_{2.5}$.

In addition, the SCAQMD has developed a methodology to assess the potential for localized emissions to cause an exceedance of applicable ambient air quality standards. Impacts would be considered significant if the following were to occur:

- Maximum daily localized emissions of NO_X and/or CO during operation are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project site greater than the most stringent ambient air quality standards for NO_2 and/or CO.
- Maximum daily localized emissions of PM_{10} and/or $PM_{2.5}$ during operation are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the

[39] South Coast Air Quality Management District. November 1993. CEQA Air Quality Handbook. http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)
[40] Ibid.

vicinity of the Project site to exceed 10.4 μg/m3 over 24 hours (SCAQMD Rule 403 control requirement).

As discussed in detail in Section 3.1-4, *Methodology*, the SCAQMD has established screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds, and, therefore, not cause, or contribute to, an exceedance of the applicable ambient air quality standards, or ambient concentration limits without Project-specific dispersion modeling. This analysis uses the screening criteria to evaluate impacts from localized emissions for a 5-acre site located within 25 meters from a sensitive receptor in the East San Fernando Valley:

- 172 pounds per day for NOx;
- 1,434 pounds per day for CO;
- 14 pounds per day for PM_{10}; or
- 8 pounds per day for $PM_{2.5}$.

Carbon Monoxide Hotspots

With respect to the formation of CO hotspots, the Project would be considered significant if the following would occur:

- The Project would cause, or contribute to, an exceedance of the CAAQS 1-hour or 8-hour CO standard of 20 or 9.0 ppm, respectively.

Toxic Air Contaminants

Based on criteria set forth by the SCAQMD, the project would expose sensitive receptors to substantial concentrations of toxic air contaminants if any of the following were to occur:

- The Project would emit carcinogenic materials or TACs that exceed the maximum incremental cancer risk of ten in one million or a cancer burden greater than 0.5 excess cancer cases (in areas greater than or equal to 1 in 1 million) or an acute or chronic hazard index of 1.0.

Cumulative Impacts

The SCAQMD has provided guidance on an acceptable approach to addressing cumulative impacts for air quality as discussed in the SCAQMD's *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*:[41] 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.

[41] South Coast Air Quality Pollution Control District. August 2003. White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution – Appendix D. http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf?sfvrsn=2

Based on SCAQMD guidance, individual construction projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. The cumulative analysis of air quality impacts within this Draft EIR follows SCAQMD's guidance such that construction or operational Project emissions will be considered cumulatively considerable if Project-specific emissions exceed an applicable SCAQMD recommended significance threshold.

3.1.4 Methodology

CONSISTENCY WITH AIR QUALITY PLAN

CEQA Guidelines Section 15125 requires an analysis of project consistency with applicable governmental plans and policies. In accordance with guidance provided by SCAQMD, the following criteria were used to assess the proposed Project's consistency with the SCAQMD's 2022 AQMP:

- Criterion 1: Will the proposed Project result in any of the following:
    - An increase in the frequency or severity of existing air quality violations; or
    - Cause or contribute to new air quality violations; or
    - Delay timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.
- Criterion 2: Will the proposed Project exceed the assumptions utilized in preparing the AQMP?
    - Is the Proposed project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
    - Does the proposed Project include air quality mitigation measures; or
    - To what extent is the proposed Project development consistent with the AQMP control measures?

The SCAQMD is required, pursuant to the CAA, to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment of the NAAQS (e.g., O_3 and $PM_{2.5}$). The SCAQMD's AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving the NAAQS. These strategies are developed, in part, based on regional growth projections prepared by the SCAG. As part of its air quality planning, SCAG has prepared the Regional Comprehensive Plan and Guide and the RTP/SCS, which provide the basis for the land use and transportation components of the AQMP and are used in the preparation of the air quality forecasts and the consistency analysis included in the AQMP. Both the Regional Comprehensive Plan and AQMP are based, in part, on projections originating with county and city general plans.

The 2022 AQMP builds off previously prepared AQMPs to accommodate growth, reduce the high levels of pollutants within the areas under the jurisdiction of SCAQMD, return clean air to the region, and minimize the impact on the economy. Projects that are consistent with the assumptions used in the AQMP do not interfere

with attainment because the growth is included in the projections utilized in the formulation of the AQMP. Thus, projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's numerical indicators.

CONSTRUCTION EMISSIONS

Construction of the proposed Project could generate temporary criteria pollutant emissions through the use of heavy-duty construction equipment, such as excavators and forklifts, and through vehicle trips generated from worker trips and haul trucks traveling to, and from, the Project site. In addition, fugitive dust emissions would result from demolition and various soil-handling activities. Mobile source emissions, primarily NO_X, would result from the use of construction equipment such as dozers and loaders. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions. The assessment of construction air quality impacts considers each of these potential sources.

Daily regional emissions during construction are forecasted by assuming conservative construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source and fugitive dust emissions factors.

Estimated regional air emissions from the Project's onsite and offsite construction activities were calculated using the California Emissions Estimator Model (CalEEMod), Version 2022.1.1.29 (California Air Pollution Control Officers Association 2022). CalEEMod is a planning tool for estimating emissions related to land use projects. The model incorporates EMFAC2017 emission factors to estimate on-road vehicle emissions; and emission factors and assumptions from the CARB's OFFROAD2011 model to estimate off-road construction equipment emissions. The model also incorporates measures which would serve to reduce construction-related emissions which are informed by SCAQMD rules and regulations, as well as the District's SCs which are applicable to the Project. Model-predicted Project emissions are compared with applicable thresholds to assess regional air quality impacts.

CalEEMod uses many default assumptions based upon surveys of various types of construction projects. However, the user may override the default values where project-specific data are available. The District provided a set of construction equipment and construction phasing/schedule assumptions for this Project (summarized in Chapter 2, Tables 2-5 and 2-6). While the District provided a construction phasing/schedule for the Project, the proposed construction phasing/schedule includes phases that cover multiple activities (e.g., demolition, construction, paving, architectural coating). For the purpose of estimating emissions in CalEEMod, the construction phasing/schedule provided by the District was further defined and broken into smaller phases, each covering a specific construction activity. Table 3-7, *Construction Equipment Assumptions for CalEEMod Assessment*, below lists the construction equipment types and characteristics used for emissions modelling. For instance, Phase 3 (Barrier Removal Construction) was separated into three separate phases spanning to summer months of 2026, 2027, and 2028, since the majority of construction activities during this phase would be limited only to the summer months when school is not in session. The overall duration of construction and proposed construction equipment provided by the District remain unchanged in this modified construction phasing/schedule.

Table 3-7 Construction Equipment Assumptions for CalEEMod Assessment

Phase	Phase Name	Construction Activity	Equipment Type	Pieces	Hours/Day
1	Interim Housing	Site Preparation	Tractors/Loaders/Backhoes	1	7
			Graders	1	8
			Scrapers	1	8
			Cranes	1	6
			Air Compressors	1	6
			Generator Sets	1	8
			Rubber Tired Dozers	1	8
			Forklifts	2	7
2A	Abatement & Demolition	Demolition	Rubber Tired Dozers	1	8
			Tractors/Loaders/Backhoes	3	8
			Concrete/Industrial Saws	1	8
2B	Construction	Building Construction	Cranes	1	8
			Forklifts	2	7
			Generator Sets	1	8
			Tractors/Loaders/Backhoes	1	6
			Welders	3	8
3	Barrier Removal Construction	Building Construction	Tractors/Loaders/Backhoes	1	6
			Forklifts	1	7
			Generator Sets	1	8
			Rollers	1	6
4	Remove Interim Housing	Building Construction	Cranes	1	8
			Forklifts	2	7
			Generator Sets	1	8
			Tractors/Loaders/Backhoes	1	6
			Welders	3	8

Phase	Phase Name	Construction Activity	Equipment Type	Pieces	Hours/Day
5	Building Repainting / Demobilize	Architectural Coating	Air Compressors	1	6

Table 3-8, *Assumed Project Schedules for CalEEMod Assessment*, shows the construction phasing/schedule developed for the purposes of estimating emissions in CalEEMod.

Table 3-8 Assumed Project Schedules for CalEEMod Assessment

Phase	Activities	Starting Date	Ending Date	Work Days per Phase
1	Remove Interim Housing	June 1, 2026	October 30, 2026	110
2A	Abatement & Demolition	December 1, 2026	March 31, 2027	87
2B	Construction	April 1, 2027	January 31, 2029	480
3	Barrier Removal Construction (2026)	June 15, 2026	August 9, 2026	40
	Barrier Removal Construction (2027)	June 14, 2027	August 8, 2027	40
	Barrier Removal Construction (2028)	June 12, 2028	August 6, 2028	40
4	Remove Interim Housing	February 1, 2029	April 30, 2029	63
5	Building Repainting / Demobilize	May 1, 2029	May 31, 2029	23

OPERATIONAL EMISSIONS

With respect to SUP modernization projects, the 2023 Subsequent PEIR states that operational activities would be less than significant, as these projects would not increase capacity to existing schools, and net Project emissions would be minimal. Additionally, overall District enrollment is forecast to decrease over the next 10 years, and operational emissions are not expected to increase in the long-term.

The proposed Project would replace and upgrade facilities on the Campus, but it would not increase the number of students, or faculty, at the school and would not introduce major new emission sources. No new vehicle trips would be generated, and there would be no increase in mobile source emissions. Implementation of regulatory compliance measures such as Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings) from the SCAQMD would help keep emissions below SCAQMD thresholds. Furthermore, the proposed Project would be required to abide by CalGreen mandatory guidelines. The proposed Project's modernization initiative

would facilitate building upgrades and the replacement of old, energy-inefficient structures with those that use less energy and reduce emissions from space heating and other onsite sources to meet the most current Title 24 building energy standards. Therefore, there would be no net increase in regional operational emissions of any criteria pollutant, and the impact would be less than significant. Additionally, the District is required to comply with all applicable SCs and would implement SC-AQ-4 to further reduce Project-related operational impacts. Therefore, operational emissions on a regional scale are not discussed further in this document.

LOCALIZED EMISSIONS

The localized effects from the on-site portion of construction emissions are evaluated at nearby sensitive receptor locations potentially impacted by the proposed Project according to the SCAQMD's Localized Significance Threshold Methodology, which relies on onsite mass emission rate screening tables and project-specific dispersion modeling, where appropriate. The localized significance thresholds (LSTs) are only applicable to NO_X, CO, PM_{10}, and $PM_{2.5}$. The SCAQMD has established screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the LSTs and, therefore, would not cause, or contribute to, an exceedance of the applicable ambient air quality standards without project-specific dispersion modeling. The screening criteria depend on (1) the area in which the project is located, (2) the size of the project site, and (3) the distance between the project site and the nearest sensitive receptor (e.g., residences, schools, hospitals). The Project site is in the SCAQMD's SRA 7 - East San Fernando Valley. The total estimated area of disturbance for the Project is 4.8 acres, which has been rounded up to 5 acres. The nearest sensitive receptors would be the students onsite at Sylmar Charter HS during construction of the proposed Project and residences adjacent to the Project site located approximately 50 feet (15 meters) from proposed construction areas. Therefore, to ensure a conservative analysis, the screening criteria was applied to a 5-acre site in SRA 7 with a 25-meter receptor distance. According to the SCAQMD, projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters (82 feet).[42]

CARBON MONOXIDE HOTSPOTS

Emissions of CO are produced in greatest quantities from motor vehicle combustion and are usually concentrated at, or near, ground level because they do not readily disperse into the atmosphere, particularly under cool, stable (i.e., low or no wind) atmospheric conditions. Localized areas where ambient concentrations exceed state and/or federal standards are termed CO hotspots. The potential for the proposed Project to cause, or contribute to, the formation of offsite CO hotspots is evaluated based on prior dispersion modeling conducted by SCAQMD in the Los Angeles area, as discussed in the 2023 Subsequent PEIR. The 2023 Subsequent PEIR states that a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air do not mix-in order to generate a significant CO impact.

The proposed Project would replace, or upgrade, facilities at Sylmar Charter HS, but it would not increase the number of students, or faculty, at the high school, and would not introduce major new emission sources. No new operational vehicle trips would be generated, and there would be no increase in mobile source CO emissions. The operational emissions from the proposed project, including natural gas and landscaping, would

[42] South Coast Air Quality Management District. July 2008. Final Localized Significance Threshold Methodology. https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodologydocument.pdf?sfvrsn=2

not be high enough to produce a CO hotspot. CO concentrations in the State of California and SCAB have gradually declined based on the transition to cleaner fuels, turnover of older vehicles, and implementation of control technology on industrial facilities. Therefore, CO Hotspots are not discussed further in this document.

TOXIC AIR CONTAMINANTS

The greatest potential for TAC emissions during construction would be related to the release of diesel particulate emissions associated with heavy-duty equipment during demolition, excavation, and grading activities. Construction activities associated with the Project would be sporadic, transitory, and short-term in nature. During long-term operations, TACs could be emitted as part of periodic maintenance operations, cleaning, painting, etc., and from periodic visits from delivery trucks and service vehicles. However, these uses are expected to be occasional and result in minimal exposure to offsite sensitive receptors. The potential for the proposed Project to result in significant health risk impacts are evaluated based on guidance provided in the 2023 Subsequent PEIR.

3.1.5 Impact Analysis

AIR QUALITY PLAN

Impact 3.1.-1. The project would not conflict with, or obstruct, implementation of the applicable air quality plan.

SCAQMD CEQA Air Quality Handbook Policy Analysis

The proposed Project's impacts with respect to consistency with the applicable air quality plan are discussed in regard to the SCAQMD's 2022 AQMP. The two evaluation criteria (as discussed in Section 3.1.4) are evaluated in the following sections:

a) Criteria 1 – Increase the Frequency or Severity of Violations

The proposed Project type is consistent with a modernization, repair, replacement, upgrade, remodel, renovation, and installation initiative as discussed in Section 4.6.2.1 of the 2023 Subsequent PEIR. As shown below, the proposed Project would not exceed SCAQMD LST threshold for air quality emissions during construction. AQMP and Connect SoCal goals to reduce VMT and vehicle emissions would be advanced by the proposed Project. The proposed Project site is located in an area served by public transportation service provided by Metro, which operates Bus Line 234 that has a stop at Borden Avenue and Astoria Street at the front entrance of the Campus. Additionally, LA Unified encourages ride-sharing programs for students and teachers, including riding bikes to school (see Section 3.7, *Transportation and Traffic*).

As demonstrated in Table 3-10 below, emissions resulting from short-term construction impacts will not exceed the SCAQMD regional and local significance thresholds for construction. As referenced in Section 3.1.4, emissions resulting in long-term operational activities are not expected to increase in the long-term. Therefore, as emissions from the proposed Project would not exceed the SCAQMD regional thresholds, the proposed Project would not contribute to the exceedance of any air pollutant concentration standards, cause or contribute to new air quality violations, or delay timely attainment of air quality standards or the interim emission reductions stated in the AQMP. The proposed Project is found to be consistent with the AQMP for the first criterion.

b) Criteria 2 – Exceed Assumptions in the AQMP?

The projections in the 2022 AQMP for achieving air quality goals are based on assumptions in SCAG's Connect SoCal regarding population, housing, and growth trends. This criterion is assessed with the emphasis of ensuring that the proposed Project does not deviate from the 2022 AQMP forecasts. Connect SoCal includes chapters on the challenges in a changing region, creating a plan for our future, and the road to greater mobility and sustainable growth. These contexts directly respond to the state and federal requirements placed on SCAG. Local governments are mandated to use these requirements to maintain consistency with their plans and applicable regional plans under CEQA.

a. Is the proposed Project consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based?

A project is consistent with the AQMP if it is consistent with the population, housing and employment assumptions that were used in the development of the AQMP. Neither the proposed Project nor the SUP is a large, regionally significant project that would affect the regional growth projections made by the SCAG and used by the SCAQMD in formulating its AQMP. The student and faculty population at the school would not increase as a result of the proposed Project. Under this criterion, the SCAQMD recommends that lead agencies demonstrate that a project would not directly obstruct implementation of an applicable air quality plan and that a project be consistent with the assumptions (typically land-use related, such as resultant employment or residential units) upon which the air quality plan is based. Being relatively small in number and temporary in nature, construction jobs under the Project would not conflict with the long-term employment projections upon which the AQMP is based.

b. To what extent is project development consistent with the control measures set forth in the AQMP?

Control strategies in the AQMP with potential applicability to short-term emissions from construction activities include mobile-source strategies denoted in the AQMP as measures MOB-08 and MOB-10, which are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment by accelerating the replacement of older, emissions-prone engines with newer engines meeting more stringent emission standards. The proposed Project would not conflict with the implementation of these strategies as the construction contractor hired would comply with the current requirements for fleet emissions. Additionally, the Project would comply with CARB requirements to minimize short-term emissions from on-road and off-road diesel equipment. The proposed Project would also comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403 and implement SC-AQ-2, SC-AQ-3, and SC-AQ-4. SC-AQ-2 would obligate construction contractors to have off-road equipment properly tuned and maintained in accordance with the manufacturer's specifications. SC-AQ-3 would implement methods for reducing onsite dust emissions during soil removal. These methods would include maintaining slow speeds for vehicles, applying water/mist to dirt as it is loaded and unloaded, minimizing soil drop heights, covering haul truck loads, and using polyethylene sheeting to cover excavated areas and dirt stockpiles. SC-AQ-4 is intended to reduce construction exhaust and fugitive dust emissions with a number of features, including, but not limited to, restricting diesel engine idling times to no more than five consecutive minutes, utilizing ultra-low sulfur diesel fuel, utilizing off-road construction equipment that is compliant with Tier 3 engine standards at a minimum, applying soil stabilizers, replacing ground cover as soon as possible, and installing wheel washers. Compliance with these requirements

is consistent with, and meets, or exceeds, the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

As the proposed Project would not conflict with the control strategies intended to reduce emissions from construction equipment, the proposed Project would not conflict with, or obstruct, implementation of the AQMP. Additionally, the projected emissions from the proposed Project would not exceed the SCAQMD's regional significance thresholds, as discussed in Impact 3.1-2. Thus, the proposed Project would not be considered by SCAQMD to be a substantial source of air pollutant emissions, and would not conflict with, or obstruct, implementation of the AQMP. Therefore, impacts would be less than significant to the 2022 AQMP with respect to construction activities.

Significance Determination

Less than Significant.

Mitigation Measures

No mitigation measures are required.

REGIONAL EMISSIONS AND CUMULATIVELY CONSIDERED NON-ATTAINMENT POLLUTANTS

Impact 3.1-2: The proposed Project would not 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.

Short-term pollutants would be generated by construction of the proposed Project. The proposed Project site currently operates as a middle school and would continue to remain so after construction. The proposed Project would not introduce any new long-term pollutants when operational (see Section 3.1.4). Therefore, only short-term construction emissions were evaluated for cumulative impacts.

Regional Construction Emissions

The worst-case daily emissions were calculated as maximum daily construction emissions for the duration of construction for the proposed Project. Appendix 6 to the Draft EIR includes detailed emissions calculations for the proposed Project. Results of the criteria pollutant calculations are presented in Table 3-10, *Maximum Daily Unmitigated Construction Emissions (by Year).*

Table 3-9 Maximum Daily Unmitigated Construction Emissions (by Year)

Construction Activity	Maximum Emissions (lbs/day)					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2026	3.00	25.45	29.82	0.06	5.04	2.55
2027	2.53	20.49	27.28	0.05	1.65	0.84
2028	2.42	19.53	26.98	0.05	1.58	0.78
2029	29.74	9.36	13.14	0.02	0.76	0.36
Maximum Daily Emissions	29.74	25.45	29.82	0.06	5.04	2.55
SCAQMD Significance Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Exceeds Threshold?	No	No	No	No	No	No

Source: Calculated by WSP with CalEEMod (Version 2022.1.1.29).

As shown in Table 3-10, construction-related daily emissions for the criteria and precursor pollutants (ROG, NOx, CO, SOx, PM_{10}, and $PM_{2.5}$) would be below the SCAQMD numeric thresholds. These calculations include compliance with appropriate dust control measures mandated to be implemented during each phase development, as required under SCAQMD Rule 403 (Control of Fugitive Dust) and SC-AQ-2 through SC-AQ-4. As previously discussed, 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. SC-AQ-4 is intended to reduce construction exhaust and fugitive dusts emissions with a number of features including utilizing off-road construction equipment that is compliant with Tier 3 engine standards (at a minimum) and applying soil stabilizers. SC-AQ-4 requires that Tier 3- or Tier 4-compliant off-road construction equipment be used during construction. The District would require that all equipment meet Tier 4 standards when feasible and equipment is available. Where Tier 4 equipment is not feasible or available for use on the proposed Project, Tier 3-compliant equipment will be required. As the possibility of Tier 3 equipment exists, construction emissions were estimated assuming Tier 3 equipment as a worst-case emissions estimate. Therefore, impacts would be less than significant with respect to regional emissions from construction activities.

With respect to all SUP projects, including the proposed Project, Section 5.3-2 of the 2023 Subsequent PEIR states that construction activities may generate short-term emissions that exceed significance thresholds. Although construction emissions for this Project are not expected to exceed regional thresholds, the District will implement SCs AQ-2, SC-AQ-3, and SC-AQ-4 to ensure that construction emissions would be minimized.

Cumulatively Considerable Non-Attainment Pollutants

Since the District has no control over the timing or sequencing of the related projects, any quantitative analysis of related projects to ascertain daily construction emissions that assumes multiple, concurrent projects would be speculative. For this reason, the SCAQMD's methodology to assess a project's cumulative impact differs from the cumulative impact methodology employed for other environmental topics. SCAQMD recommends that Project-specific air quality impacts of the proposed Project be used to determine the cumulative impacts to regional air quality. The proposed Project would result in the emission of criteria pollutants for which the area is in nonattainment during construction. A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or state non-attainment pollutant. The SCAB is currently in non-attainment for O_3, PM_{10}, and $PM_{2.5}$.

Construction emissions from the proposed Project are not projected to exceed the SCAQMD regional significance impact thresholds and, therefore, are not expected to cause, or substantially contribute to, ground level concentrations that exceed the NAAQS or CAAQS. Further, the District would implement SC-AQ-2, SC-AQ3, and SC-AQ-4 to ensure that construction emissions would minimize off-site impacts. Therefore, the proposed Project would not result in a cumulatively considerable net increase for non-attainment pollutants, or O_3 precursors, and would result in a less than significant impact for construction emissions.

Significance Determination

Less than Significant.

Mitigation Measures

No mitigation measures are required.

SENSITIVE RECEPTORS

Impact 3.1-3: The Proposed Project would not expose sensitive receptors to substantial pollutant concentrations.

Localized Emissions

The localized construction and operational air quality analysis was conducted using the methodology described in the SCAQMD's LST Methodology.[43] The screening criteria provided in the LST Methodology were used to determine localized construction and operation emissions thresholds for the Project.

Construction

The nearest sensitive receptors to Project constructure are located closer than 25 meters (82 feet). Pursuant to SCAQMD's Final Localized Significance Threshold Methodology, Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.[44] Therefore, the LSTs for sensitive receptors located at 25 meters were utilized for this analysis. The maximum daily localized emissions for each construction year and LSTs are presented in Table 3-11, *Maximum Unmitigated Localized Construction Emissions*. According to the CalEEMod analysis, the highest onsite NO_X, CO, PM_{10}, and $PM_{2.5}$ emissions would occur in 2026 during overlapping site preparation (Phase 1: Remove Interim Housing) and building construction (Phase 2B: Barrier Removal Construction) phases from off-road equipment. The total estimated area of disturbance for the Project is 4.8 acres, which has been rounded up to five acres for the purposes of providing a conservative worst-case analysis.

Maximum localized construction emissions for sensitive receptors would not exceed the localized thresholds for ROG, NOx, CO, PM10, and PM2.5. Therefore, impacts would be less than significant during construction with respect to localized emissions from construction activities.

Table 3-10 Maximum Unmitigated Localized Construction Emissions

	NO_x	CO	PM_{10}	$PM_{2.5}$
Peak Onsite Emissions (lbs/day)	24.45	29.82	5.04	2.55
Localized Significance Threshold (lbs/day)	*172*	*1,434*	*14*	*8*
Significant?	No	No	No	No

Sources: SCAQMD 2009.
Emissions calculated by WSP with CalEEMod (Version 2022.1.1.29).

Operations

The proposed Project would replace or upgrade facilities on the Sylmar Charter HS Campus, but it would not increase the number of students or faculty at the school and would not introduce new emission sources. As such, no new vehicle trips would be generated, and there would be no increase in mobile source emissions. Furthermore, building upgrades and replacement of old, energy-inefficient structures with those that use less

[43] South Coast Air Quality Management District. July 2008. Final Localized Significance Threshold Methodology. https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=8c641d61_2.
[44] Ibid.

energy would reduce emissions related to space heating and other onsite sources. Therefore, there would be no net increase in emissions of any criteria pollutant, and the impact would be less than significant.

Health Impacts

The health-based ambient air quality standards for ozone are as concentrations of ozone and not as tonnages of their precursor pollutants (i.e., NOx and VOCs). It is not necessarily the tonnage of precursor pollutants that causes human health effects, but the concentration of resulting ozone or particulate matter. Because of the complexity of ozone formation and the non-linear relationship of ozone concentration with its precursor gases and given the state of environmental science modeling in use at this time, it is infeasible to convert specific emission levels of NO_X or VOCs emitted in a particular area to a particular concentration of ozone in that area. Meteorology, the presence of sunlight, seasonal impacts, and other complex chemical factors all combine to determine the ultimate concentration and location of ozone.[45]

As expressed in the *amicus curiae* brief submitted by SCAQMD for the *Sierra Club v. County of Fresno* case *(Friant Ranch Case)*, the CEQA criteria pollutants significance thresholds from the air district were set at emission levels tied to the region's attainment status, they are emission levels at which stationary pollution sources permitted by the air district must offset their emissions and CEQA projects must use feasible mitigations, and they are not intended to be indicative of any localized human health impact that a project may have.[46] Therefore, a project's exceedance of the mass regional emissions threshold (i.e., pounds per day VOC thresholds) from project-related activities does not necessarily indicate that the project will cause or contribute to the exposure of sensitive receptors to ground-level concentrations in excess of health-protective levels.

The primary health concern with exposure to VOC emissions is the secondary formation of ozone. As the amicus curiae briefs submitted for the Friant Ranch Case suggested, because of the complexity of ozone formation and given the state of environmental science modeling in use at this time, it is infeasible to determine whether, or the extent to which, a single project's precursor (i.e., NOx and VOCs) emissions would result in the formation of secondary ground-level ozone and the geographic and temporal distribution of such secondary formed emissions.[47] As previously stated, meteorology, the presence of sunlight, seasonal impacts, and other complex chemical factors all combine to determine the ultimate concentration and location of ozone. Furthermore, available models today are designed to determine regional, population-wide health impacts, and cannot accurately quantify ozone-related health impacts caused by NOx or VOC emissions from a local (Project) level. Notwithstanding these scientific constraints, the disconnect between Project-level VOC emissions and ozone-related health impacts cannot be bridged at this time.

However, since construction of the proposed Project would not exceed the regional significance thresholds, the Project is not anticipated to contribute to health impacts related to these criteria pollutants.

[45] South Coast Air Quality Management District. Adopted December 2, 2022. 2022 Air Quality Management Plan. https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-managementplan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16

[46] Supreme Court of California. April 2015. Amicus Curiae: Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno. https://www.courts.ca.gov/documents/7-s219783-ac-san-joaquin-valley-unified-air-pollution-control-dist-041315.pdf

Toxic Air Contaminants

Project-related construction could expose sensitive receptors to substantial pollutant concentrations of TACs. TACs are pollutants for which neither California nor the federal government has set ambient air quality thresholds, but which still pose health risks to sensitive individuals. The primary TAC of concern from construction is DPM. Inhalation of DPM has been linked to increased cancer risk and chronic health hazards.[48]

The proposed Project includes the modernization and upgrade of facilities on the Sylmar Charter HS Campus. The 2023 Subsequent PEIR states that modernization projects would not cause a change in TAC exposure levels.[49] Therefore, impacts to sensitive receptors associated with the release of TACs would be less than significant, and no mitigation is required.

Significance Determination

Less than Significant.

Mitigation Measures

No mitigation measures are required.

3.1.6 Cumulative Impact Analysis

The proposed Project would result in the emission of criteria pollutants for which the region is in nonattainment during both construction and operation. The South Coast Air Basin fails to meet national standards for O_3 and $PM_{2.5}$ and, therefore, is considered a federal "non-attainment" area for these pollutants. Consistent with accepted and established SCAQMD cumulative impact evaluation methodologies, the assessment of the potential for the proposed Project to result in cumulative impacts is based on SCAQMD thresholds (see Section 3.1.3, *Thresholds of Significance*).

With respect to the proposed Project's short-term construction-related air quality emissions and cumulative conditions, the SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the federal CAA mandates. Construction of the proposed Project would comply with SCAQMD Rule 403 requirements and CARB's Off-Road Regulation to limit heavy duty diesel motor vehicle idling to no more than five minutes at any given time (per SC-AQ-4). Per SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, the implementation of all feasible mitigation measures, and compliance with adopted AQMP emissions control measures) would also be imposed on all construction projects in the Air Basin, which would include the cumulative projects in the proposed Project area. As shown in Table 3-10, *Maximum Daily Unmitigated Construction Emissions (by Year)*, regional construction emissions calculated for the proposed Project would not exceed the applicable SCAQMD daily significance thresholds. The thresholds are designed to assist the region in attaining the applicable State and national ambient air quality standards. These standards apply to both primary (criteria and precursor) and secondary pollutants (O_3). Although the proposed Project site is located in a region that is in non-attainment for O_3 and $PM_{2.5}$, the emissions associated with the proposed

[48] Occupational Safety and Health Administration. N.d. Hazard Alert – Diesel Exhaust/Diesel Particulate Matter. https://www.osha.gov/sites/default/files/publications/OSHA-3590.pdf

[49] Los Angeles Unified School District. December 2023. Final Subsequent Environmental Impact Report for the School Upgrade Program. https://www.lausd.org/ceqa

Project would fall below SCAQMD daily significance thresholds. The proposed Project would additionally be consistent with the AQMP, which is intended to bring the Air Basin into attainment for all criteria pollutants. As such, the proposed Project's contribution to cumulatively significant construction impacts to air quality would not be cumulatively considerable, and cumulative impacts would be less than significant for regional and local criteria pollutants during construction and operation.

3.1.7 References

42 U.S.C. §§ 7502 et seq. 172.

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3.2 CULTURAL RESOURCES

This section assesses the potential impacts of the proposed Project to cultural resources in the Project vicinity in accordance with the significance criteria established in Appendix G of the CEQA Guidelines. This section is based on a CEQA Historical Resources Evaluation Report prepared by Historic Resources Group (HRER; Appendix 1-A in the Initial Study) and a Cultural Resources Technical Report prepared by ASM, Inc. (CRTR; Appendix 5).

Cultural resources include prehistoric and historic-period sites, structures, districts, places, and landscapes, or any other physical evidence associated with human activity considered important to a culture, a subculture, or a community for scientific, traditional, religious, or other reasons. Under CEQA, for the purposes of this analysis, cultural resources may be categorized into the following groups: archaeological resources, historic resources (including architectural/engineering resources), contemporary Native American resources, and human remains. With implementation of Standard Conditions SC-CUL-6 through -10, which require for evaluation and appropriate treatment of any unanticipated discovery of archaeological resources, impacts to archaeological resources were determined to be less than significant impacts are not carried forward for further analysis in the EIR. Similarly, potential impacts related to human remains were determined to result in less than significant impacts with implementation of Standard Condition SC-CUL-10 and Section 7050.5 of the California Health and Safety Code for appropriate treatment of any unanticipated disturbance of human remains and, therefore, are not carried forward for analysis in the EIR.

3.2.1 Environmental Setting

BUILT ENVIRONMENT

The Campus is bounded by Astoria Street on the northwest, Dronfield Avenue on the northeast, Borden Avenue on the southwest, and Raven Street on the southeast. The Campus perimeter is defined by metal fencing and gates with slender metal pickets along the Borden Avenue frontage, with chain-link fencing elsewhere. Sylmar Charter HS is identified by a free-standing marquee sign at the Campus west corner, at the intersection of Borden Avenue and Astoria Street.

The Campus plan displays elements of the condensed finger-plan and cluster-plan typologies which were typical of LA Unified campus development in the 1960s.[50] General campus buildings are clustered along the front the campus toward Borden Avenue. These include the Administration Building, the Spartan Theater & Library building, and the Multipurpose Building (MPB) & Lunch Pavilion. The main portion of the Campus is composed of a series of six parallel one-story classrooms wings separated by narrow landscaped courtyards and connected by covered walkways, or "arcades." The southern portion of the Campus contains several specialized classroom buildings, two shop buildings, and an agricultural area. Recreational areas are concentrated in the rear portion of the campus, including athletic fields for softball, baseball, and football; as well as paved tennis, handball, basketball, and volleyball courts.

Campus buildings are designed in a Modernist style. Buildings display simple boxy forms, use standardized components, and have little or no exterior decorative detail. Roofs are typically flat with built-up composition roofing. Original Campus buildings are connected via a system of arcades, which provide for sheltered

[50] Historic Resources Group (HRG). 2022 Historic Resources Evaluation Report, Sylmar High School. Prepared for LAUSD.

circulation throughout much of the campus. The arcades feature flat canopies with composition roofing set on slender metal pipe supports. Landscaped courtyards comprise an important component of the overall campus plan.

Classrooms are arranged in a linear configuration opening directly to the outdoors, with no interior corridor. The campus' focal point is the Main Quad area which contains a symmetrical landscape design and an elliptical raised concrete stage for large outdoor events. Grade changes across campus are accommodated by concrete walks with steps and ramps.

PREHISTORIC AND ETHNOGRAPHIC SETTING

The prehistoric occupation of Southern California can be roughly divided into four temporal phases or periods; the Late Pleistocene (pre-10,000 B.P), the Early Millingstone Period (10,000 – 3,500 B.P), the Intermediate Period (3,500 – 800 B.P), and the Late Historic Period (800 – 200 B.P). The Project site is situated within an area that is considered the ethno-linguistic ancestral home of the Tongva (also known as Gabrieliño) people who were present during the time of European contact. Refer to ASM's CRTR for a full discussion of the prehistoric and ethnographic setting of the region.

HISTORIC SETTING

History of LA Unified

As noted in the LAUSD Historic Context Statement, the history of LA Unified, founded in 1872, comprises four distinct eras within its history: the Founding Years (1870s–1909); the Progressive Education Movement: Standardization and Expansion (1910–1933); the Era of Reform: Great Depression, Earthquake, and Early Experiments in the Modern, Functionalist School (1933–1945); and Educating the Baby Boom: Postwar Expansion and the Functional, Modern School (1945–1969).[51]

Founding Years (1870s-1909)

The schools of the founding era of LA Unified were wood-framed, one- or two-room schoolhouses with bell towers, similar to early schools around the country in this time period. Population growth as a result of completion of the transcontinental railroad led to the need for more modern school facilities. By 1898, LA Unified expanded to include 57 facilities and almost 400 classrooms. From this era, however, only three original schoolhouses remain; social and political reform as well as population growth resulted in construction of larger schools to accommodate larger classroom sizes and grade separation.

Progressive Education Movement: Standardization and Expansion (1910-1933)

During this time, the Progressive Education Movement significantly shaped the American education system, influencing school architecture to support individualized learning and community engagement. In response to the population boom in Los Angeles County, new schools were built with modern, functional designs that emphasized safety, outdoor connectivity, and vocational education, driven by compulsory schooling laws.

[51] Sapphos Environmental, Inc. 2014. Los Angeles Unified School District Historic Context Statement, 1870 to 1969. Prepared for Los Angeles Unified School District, Office of Environmental Health and Safety.

Era of Reform: Great Depression, Earthquake, and Early Experiments in the Modern, Functionalist School (1933-1945)

During this era, LA Unified schools embraced modern, functional, and flexible architecture, integrating classrooms with outdoor spaces and reinforcing the school's role in community life. Following the 1933 Long Beach earthquake, a major construction boom—largely funded by the Public Works Administration (PWA)—led to the widespread adoption of the PWA Moderne style, such as the "spread out" campus. These design styles improved building techniques with landscaped campuses that reflected Southern California's horizontal growth and available land. PWA also constructed Irving Middle School in 1936. Unlike the dense, vertical development of East Coast cities during this time, Southern California's abundant land allowed for expansive, horizontally oriented school designs.

Educating the Baby Boom: Postwar Expansion and the Functional, Modern School (1945-1969)

After World War II, rising birthrates and migration in California led to housing and classroom shortages, prompting widespread construction and maintenance of schools. Educational architecture shifted toward economical, child-centered designs that emphasized openness, natural light, and functionality, reflecting democratic ideals and national standardization. As suburban schools expanded in 1945, downtown LA Unified school enrollment declined, and both traditional curriculum and school designs became more standardized and interconnected.

Construction of Sylmar High School

In 1958, plans were announced for the construction of "Sylmar Senior High School", a modern 30-acre campus designed to serve 2,500 students. Opened in 1961, the campus featured a four-level layout with specialized buildings for academics, arts, trades, and athletics, centered around a landscaped courtyard. The school reflected post-WWII educational design ideals, emphasizing functionality, openness, and community use. The approximately 195,000-square-foot Campus was designed in four levels, separating various school activities. The Campus' focal point is the landscaped central courtyard, or "mall," containing an outdoor stage for large programs and special events. Upon completion, the new high school Campus included the following:

- An Administrative Building
- A library with a capacity for 120 students and a capacity of 10,000 books, plus a textbook stockroom with a 35,000-book capacity
- A multipurpose building with a completely equipped stage and cafeteria seating for 600 students
- 42 classrooms in four separate buildings for math, business education, English, foreign language and social studies
- A home-making unit containing five classrooms for food, clothing studies and sewing
- A science unit with 11 classrooms for life science, physiology, physics and chemistry
- An art department with four classrooms for general art, art craft, ceramics and photography
- A music building with choral and instrument classrooms
- Two industrial arts buildings with autos shops, metal shops, an electrical shop, wood shop, graphic arts and drafting rooms in nine classrooms
- A driver education unit with two classrooms

- A study hall for 100 students
- An agricultural unit covering two acres and serviced by a classroom and green house
- A physical education building housing gymnasiums for boys and girls and seating for 1,240 students
- Athletic fields for boys and girls, including baseball diamonds, and a football field and track with 3,000-seat capacity bleachers

The 1971 San Fernando Earthquake caused significant damage, making Sylmar the most affected school in the valley. Temporary structures and repairs allowed the school to remain open, and minor additions followed through the 1970s. In 1978, a small unused area in the northernmost corner of the Campus was carved out for the establishment of Evergreen Continuation High School. Another earthquake in 1994 (the Northridge Earthquake) led to further repairs and updates, including new portable classrooms and facilities.

The Sylmar HS Campus has been evaluated collectively for its potential eligibility for historic listing and/or designation as a historic district. Sylmar High School is considered a well-preserved example of 1960s LAUSD school planning, representing the district's postwar expansion to meet the needs of a growing San Fernando Valley population.[52]

3.2.2 Regulatory Framework

STATE

California Environmental Quality Act

Under CEQA (PRC Section 21084.1), a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. An archaeological resource may qualify as an "historical resource" under CEQA. The CEQA Guidelines (Title 14 California Code of Regulations [CCR] Section 15064.5) recognize that an historical resource includes: (1) a resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (California Register); (2) a resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record. The fact that a resource does not meet the three criteria outlined above does not preclude the lead agency from determining that the resource may be an historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

If a lead agency determines that an archaeological site is a historical resource, the provisions of Section 21084.1 of CEQA and Section 15064.5 of the CEQA Guidelines apply. If a project may cause a substantial adverse change (defined as physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired) in the

[52] Historic Resources Group (HRG). 2022 Historic Resources Evaluation Report, Sylmar High School. Prepared for LAUSD.

significance of an historical resource, the lead agency must identify potentially feasible measures to mitigate these effects (CEQA Guidelines Sections 15064.5[b][1], 15064.5[b][4]).

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired" (CEQA Guidelines Section 15064.5(b)(1)). According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

> A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
>
> B. Account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
>
> C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

California Register of Historical Resources

The California Register is "an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1[a]). The criteria for eligibility for the California Register are based upon the National Register of Historic Places (National Register) criteria (PRC Section 5024.1[b]). Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register.

To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four criteria:

> 1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
>
> 2. Is associated with the lives of persons important in our past;
>
> 3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
>
> 4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and

to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register. Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and
- Those California Points of Historical Interest that have been evaluated by the California Office of Historic Preservation (OHP) and have been recommended to the State Historical Commission for inclusion on the California Register.
- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historical resources contributing to historic districts; and
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as a historic preservation overlay zone.

LOCAL

Los Angeles Municipal Code

The Los Angeles Municipal Code (LAMC) Section 91.106.4.5 states that the Building Department "shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated" by a federal, state, or local authority.

LAUSD Standard Conditions

The following SCs are applicable to historical, archaeological, and paleontological resources (Table 3-12, *Cultural Resources Standard Conditions of Approval*).

Table 3-11 Cultural Resources Standard Conditions of Approval

Applicable SC	Description
SC-CUL-1	**Historic Architect** For projects involving structural upgrades to historic resources, the Design Team shall include a qualified Historic Architect with demonstrated project-level experience in historic projects.

	For campuses with qualifying historical resources under CEQA, the Design Team shall include a LAUSD-qualified Historic Architect. The Historic Architect/s shall meet the Secretary of the Interior's Professional Qualifications Standards, and the standards described on page 8 of the LAUSD Design Guidelines and Treatment Approaches for Historic Schools. Throughout the project design progress, the Historic Architect shall provide input to ensure compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD requirements and guidelines for the treatment of historical resources. Role of the Historic Architect The tasks of the Historic Architect on the Design Team shall include, but are not limited to: The Historic Architect shall work with the Design Team (including the Structural Engineer) and LAUSD to ensure that project components, including new construction and modernization of existing facilities, comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The Historic Architect shall work with the Design Team and LAUSD throughout the design process to develop project options that facilitate compliance with the applicable historic preservation standards. For new construction, the Historic Architect shall work with the Design Team and LAUSD to identify options and opportunities for: (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors, and (2) ensuring that new construction is designed and sited in such a way that reinforces and strengthens, as much as feasible, character-defining site plan features, landscaping, and circulation corridors throughout campus. For modernization and upgrade projects involving contributing (significant) buildings or features, the Historic Architect shall work with the Design Team and LAUSD to ensure that specifications for design and implementation of projects comply with the applicable historic preservation standards. The Historic Architect shall participate in Design Team meetings during all phases of the project through 100% construction drawings, pre-construction, and construction phases, as applicable. The Historic Architect shall prepare a memo at the 50% and at the 100% construction drawings stages, demonstrating how principal project components and treatment approaches comply with applicable historic preservation standards, including the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The memos shall be submitted to LAUSD OEHS for review. The Historic Architect shall participate in pre-construction and construction monitoring activities, as appropriate, to ensure continuing conformance with

	Secretary's Standards and/or avoidance of a material impairment of the historical resources. The Historic Architect shall provide specifications for architectural features or materials requiring restoration or removal, maintaining and protecting relevant features in place, or on-site storage. Specifications shall include detailed drawings or instructions where historic features may be impacted. The Design Team and Historic Architect shall be responsible for incorporating LAUSD's recommended updates and revisions during the design development and review process.
SC-CUL-2	LAUSD shall follow the guidelines outlined in these documents to the maximum extent practicable when planning and implementing projects and adjacent new construction involving historical resources. The Design Team, Historic Architect, and Construction Contractor shall apply LAUSD School Design Guide and LAUSD Design Guidelines and Treatment Approaches for Historic Schools and the Secretary's Standards for all new construction and modernization projects. In keeping with the District's adopted policies and goals, historical resources shall be reused rather than destroyed, where feasible. General guidelines include: • Retain and preserve the character of historic resources. • Repair rather than remove, replace, or destroy character-defining features; if replacement is necessary, replace in-kind to match materials, dimensions, and appearance. • Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity. • Where practical, conceal reinforcement required for structural stability or the installation of life safety or mechanical systems. • Where necessary to halt deterioration and after the preparation of a condition assessment, undertake surface cleaning, preparation of surfaces, and other projects involving character-defining features using the least invasive, gentlest means possible. Avoid using any abrasive materials or methods including sandblasting and chemical treatments.
SC-CUL-3	Prior to any major alteration to or adjacent to a historic resource that may potentially damage historic resources (or previously identified historic features), the Historic Architect shall develop a Temporary Protection Plan that identifies potential risks to the historic resource. The Temporary Protection Plan shall be prepared in coordination with the Construction Contractor and LAUSD prior to

	demolition or construction. The Temporary Protection Plan may include, but not be limited to, the following components: • Notation of the historic resource on construction plans. • Pre-construction survey to document the existing physical condition of the historic resource. • Procedures and timing for the placement and removal of temporary protection features, around the historic resource. • Monitoring of the installation and removal of temporary protection features by the Historic Architect, or designee. • Post-construction survey to document the condition of the historic resource after project completion. • Preparation of a technical memorandum documenting the pre-construction and post-construction conditions of the historic resource and compliance with protective measures outlined Temporary Protection Plan.
SC-CUL-4	Prior to significant alteration or demolition of a historical resource, LAUSD shall retain an Architectural Photographer and/or a Historian or Architectural Historian who meet the Secretary of the Interior's Professional Qualifications Standards and who shall prepare a HABS-like Historic Documentation Package (Package). The Package shall include photographs and descriptive narrative. Documentation will draw upon primary- and secondary-source research including available studies prepared for the property (measured drawings are not required). The specifications for the Package include: • Photographs: Photographic documentation shall focus on the historical resources/features proposed to be significantly altered or demolished, with overview and context photographs for the campus and adjacent setting. A professional-quality camera will be used to take photographs of interior and exterior features of the buildings. Photographs will include context views, elevations/exteriors, architectural details, overall interiors, and interior details (if warranted). Digital photographs will be in black and white (as well as in color or as requested by the District) and provided in an electronic format. • Descriptive and Historic Narrative: The Historian or Architectural Historian shall prepare descriptive and historic narrative of the historical resources/features. Physical descriptions will detail each resource, elevation by elevation, with accompanying photographs and information on how the resource fits within the broader campus during its period of significance. The historic narrative will include available information on the campus design, history, architect/contractor/designer as appropriate,

	history of the area, and historic context. In addition, the narrative will include a methodology section specifying the name of researcher, date of research, and sources/archives visited, as well as a bibliography. Within the written history, statements shall be footnoted as to their sources, where appropriate. • Historic Documentation Package Submittal: Upon completion of the descriptive and historic narrative, all materials will be compiled in electronic format and presented to LAUSD for review and comment. Upon approval, one electronic copy and one hard copy shall be submitted to LAUSD OEHS. Photographs will be individually labeled and provided to LAUSD in electronic format.
SC-CUL-5	LAUSD shall comply with Design Specification 01 3591, Historic Treatment Procedures, as applicable. This Specification requires the Construction Contractor to submit a Historic Treatment Plan to the District for the protection, repair, and replacement of historic materials and features.
SC-CUL-6	LAUSD shall retain a qualified Archaeologist to be available on-call. The Archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology. To reduce impacts to previously undiscovered buried archaeological resources, following completion of the final grading plan and prior to any ground disturbance, a qualified archaeologist shall prepare an Archaeological Monitoring Program as described under SCCUL-7
SC-CUL-7	The Construction Contractor shall halt construction activities within a 30-foot radius of the find and shall notify the LAUSD. • LAUSD shall retain an Archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology. • The Archaeologist shall have the authority to halt any project-related construction activities that could impact potentially significant resources. • The Archaeologist shall be afforded the necessary time to recover and assess the find. Ground-disturbing activities shall not continue until the discovery has been assessed by the Archaeologist. With monitoring, construction activities may continue on other areas of the project site during evaluation and treatment of historic or unique archaeological resources. • If the find is determined to be of value, the Archaeologist shall prepare an Archaeological Monitoring Program and shall monitor the remainder of the ground-disturbing activities.

	• Significant archaeological resources found shall be curated as determined necessary by the Archaeologist and offered to a local museum or repository willing to accept the resource. • Archaeological reports shall be submitted to the South Central Coastal Information Center at the California State University, Fullerton. • The Archaeological Monitoring Plan shall include: o Extent and duration of the monitoring based on the grading plans o At what soil depths monitoring of earthmoving activities shall be required o Location of areas to be monitored o Types of artifacts anticipated o Procedures for temporary stop and redirection of work to permit sampling, including anticipated radius of suspension of ground disturbances around discoveries and duration of evaluation of discovery to determine whether they are classified as unique or historical resources o Procedures for maintenance of monitoring logs, recovery, analysis, treatment, and curation of significant resources o 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. o Accommodation and procedures for Native American monitors, if required. o Procedures for discovery of Native American cultural resources. o The construction manager shall adhere to the stipulations of the Archaeological Monitoring Plan
SC-CU-L8	Cultural resources sensitivity training shall be conducted for all construction workers involved in ground-disturbing activities. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources and shall be included in a worker's environmental awareness program that is prepared by LAUSD with input from a qualified Archaeologist, as needed.
SC-CUL-9	LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. If feasible, the Archaeologist shall prepare a

	Phase III Data Recovery/Mitigation Program to outline procedures to recover a statistically valid sample of the archaeological remains and to document the site and reduce impacts to be less than significant. All documentation shall be prepared in the standard format of the ARMR Guidelines, as prepared by the OHP. Once a Phase III Data Recovery/Mitigation Program is completed, an Archaeological Monitor shall be present to oversee the ground-disturbing activities to ensure that construction proceeds in accordance with the Program.
SC-CUL-10	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified Archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.
SC-CUL-11	LAUSD shall retain a Paleontological Monitor to oversee specific ground-disturbing activities as determined by the scope of work and final grading plan. The Monitor shall provide the construction crew(s) with a brief summary of the sensitivity, the rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources. If paleontological resources are uncovered, the Construction Contractor shall halt construction activities within a 30-foot radius of the find and shall notify the LAUSD. • Ground-disturbing activities shall not continue until the discovery has been assessed by the Paleontologist. • The paleontologist shall have the authority to halt construction activities to allow a reasonable amount of time to identify potential resources. • Significant resources found shall be curated as determined necessary by the Paleontologist.

3.2.3 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, the proposed Project could have a potentially significant impact with respect to cultural resources if it would:

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 formal cemeteries.

Criteria (b) and (c) were determined to result in less than significant impacts by the Initial Study (Appendix 1) and, therefore, are not carried forward for analysis in the EIR.

3.2.4 Methodology

A CRTR was prepared by architectural historians who meet the Secretary of the Interior's Professional Qualifications Standards in the fields of History and Architectural History (see Appendix 5). Prior to the commencement of field investigations, previous documentation of historic resources in the City of Los Angeles was reviewed, including the LA Unified Historic Context Statement, historic resource surveys, and survey report for the Northeast Los Angeles Community Plan Area (CPA), databases and historic newspapers, Los Angeles County Assessor's Maps, Los Angeles Zoning Information Map Access Systems (ZIMAS), and Sanborn Maps. In addition, the listings for the City of Los Angeles in the California Historical Resources Information System (CHRIS), which is maintained by the Office of Historic Preservation (OHP) in Sacramento and available through the South-Central Coastal Information Center (SCCIC) in the Department of Anthropology at California State University at Fullerton, were examined. Site-related correspondence from OHP to the City of Los Angeles, provided by LA Unified, was taken into account. Additional research on the history of the City and the development of the CPA was undertaken using a variety of online sources. On January 26, 2024, ASM's Director of Architectural History, Shannon Davis, ASM Senior Archaeologist Sherri Andrews, and ASM Senior Architectural Historian Laura Taylor Kung performed a field investigation of the proposed Project site. ASM documented viewsheds toward and from resources within the potential historic district from the Project site. Further, an intensive archaeological pedestrian survey was performed. Potential resources were evaluated using the criteria of significance for the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR).

3.2.5 Impact Analysis

Impact 3.2-1. The Project would result in a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.

As described in the HRER (Appendix 1-A), the Campus is eligible for federal, state, or local designation and is considered a historical resource for the purposes of CEQA.[53]

Evaluation and Survey

The Sylmar HS Campus was previously surveyed in August 2015 as part of SurveyLA, the City of Los Angeles' citywide historic resources survey. SurveyLA evaluated the Campus as eligible for individual listing in the National Register of Historic Places and the California Register of Historical Resources, and for local designation as a Los Angeles Historic-Cultural Monument. The Campus was found historically significant under criteria A/1/1 as an "excellent example of a post-World War II LAUSD high school campus, reflecting LA Unified school planning and design concepts of the postwar period and the increase in facilities to accommodate postwar growth in the San Fernando Valley;" and under criteria C/3/3 as an "excellent example of Mid-Century Modern school architecture in Sylmar; work of master architect Albert C. Martin, Jr." Thus, the Campus was assigned California Historical Resources Status Codes 3S, 3CS, and 5S3. Sylmar High School is not locally designated as a Los Angeles Historic-Cultural Monument, or as part of a Historic Preservation Overlay Zone.

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

Historic Resources Group (HRG) prepared a HRER for Sylmar High School in 2022 to evaluate the Campus collectively for its potential eligibility for historic listing and/or designation as a historic district. Results of this study found that the Sylmar High School Campus is a highly intact 1960s LAUSD senior high school campus which reflects post-World War II school planning and design principles; exemplifies the LAUSD's robust postwar building program in an attempt to keep up with a booming population; and is representative of the expansion of governmental services to accommodate postwar growth in the San Fernando Valley. As such, this postwar high school campus meets the eligibility standards for historic significance under the theme of "LAUSD, Educating the Baby Boom: The Postwar Modern Functionalist School Plant, 1945-1969," as outlined in the LAUSD Historic Context Statement.

Potential Historic District

The HRER identified a single potential historic district (Figure 5, *Sylmar High School Campus Potential Historic District*) at the Campus with a period of significance of 1961, when all original campus buildings and features were constructed, the Campus was completed, and the high school opened to students. The boundaries of the eligible historic district are limited to the grouping of contributing resources. No buildings on the Project site are individually eligible historic resources.[54]

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

Contributors to the historic district include original Campus buildings and features that are critical to understanding the significance of the resource. Table 2-2, *Existing School Campus and Potential Historic District Status*, and Figure 5 in Section 2 indicate each building that is part of the potential historic district, the year of construction, and its status as contributing resource to the potential historic district.

According to the HRER, the Campus is eligible for historic listing in the NRHP under Criterion A, and the CRHR under Criterion 1, and for local designation as a Los Angeles Historic-Cultural Monument under Criterion 1, for its association with postwar school development in Los Angeles.

The 22 contributing resources (or contributors) date to the Campus' original 1961 construction and include:

- The overall site plan/landscape design as one contributing resource, including arcades, concrete walks, steps and ramps, landscaped courtyards, paved open patios, rusticated concrete block retaining and planter walls, square-tube and pipe metal handrails, metal fencing and gates along the front of the Campus, and mature landscaping throughout the site as contributing elements;

[54] ASM Affiliates (ASM). 2025. Cultural Resources Technical Report for Sylmar Charter High School Major Modernization Project, Los Angeles County, California. May 2025.

- All general buildings (Spartan Theater and Library, Administration Building, Multipurpose Building and Lunch Pavilion, Student Store, and PE Building);
- All original general classroom, specialized classroom, and shop buildings (Industrial Arts buildings);
- Central Courtyard and Outdoor Stage and all its original elements
- Two surface parking lots at the front of the Campus (Parking Lot No. 2 and Parking Lot No. 3)

Non-contributors include ancillary buildings and structures, outdoor recreational facilities, the rear parking lot, and Campus buildings and features that were added after 1961.

The HRER identified character-defining features for each of the Sylmar High School campus buildings and features that have been evaluated as contributors to the identified historic district. Character-defining features—sometimes called essential physical features—are those features that define both why a property is significant and when it was significant. These features are illustrative of a historic property's period, type or style and contribute to its integrity, thereby allowing the property to convey its historic significance. In general, if a property retains its important character-defining features, it is said to retain integrity from the period of significance and therefore is eligible as a historic resource.

The Campus retains all seven aspects of integrity of Location, Design, Setting, Materials, Workmanship, Feeling, and Association. The Sylmar High School Campus is highly representative of a postwar modern functionalist school plant, as defined by the LAUSD historic context. It displays the overwhelming majority of the character-defining features, both of the various buildings and features, as well as of the Campus overall, from the period of significance. Therefore, the Sylmar High School Campus is significant as a historic district under NRHP Criterion A, CRHP Criterion 1, and Los Angeles Historic-Cultural Monument Criterion 1 for its association with postwar school development in Los Angeles. None of the individual school buildings or features appear to have any additional historic significance beyond their association with the Campus overall.[55]

Under CEQA, for a project to be considered a "substantial adverse change" to the potential historic district, it must be demonstrated that they would result in the physical alteration of the potential historic district such that its integrity, or ability to convey its historical significance and eligibility for historic listing, would be threatened. CEQA Guidelines Section 15064.5 defines significant impacts as a substantial adverse change to a historic resource, encompassing "demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." The Guidelines also state: "[g]enerally, a project that follows the *Secretary of the Interior's Standards for Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Rehabilitating Historic Buildings* … shall be considered as mitigated to a less than significant level."[56]

The proposed Project would cause significant direct impacts to the integrity of the potential historic district with the removal of five contributing resources and their character-defining features. Project activities would

[55] ASM Affiliates (ASM). 2025. Cultural Resources Technical Report for Sylmar Charter High School Major Modernization Project, Los Angeles County, California. May 2025.
[56] Association of Environmental Professionals. *California Environmental Quality Act Statute and Guidelines*. Palm Desert. 2024.

have the potential to adversely impact the potential historic district by removing or altering existing contributing resources and character-defining features identified shown in Table 3-13 and Figure 5:

Table 3-12 HRER Historic District Eligibility; Recommended Contributors to the Sylmar High School Potential Historic District Affected by Project

Name	Year Built	Proposed Activity	Potential Historic District Status
Multipurpose Building	1961	Demolish	Contributor
Student Store	1961	Demolish	Contributor
Music/Chorale	1961	Demolish	Contributor
Drafting Building (Classrooms)	1961	Demolish	Contributor
Building 38 DSA BLDG - 21726 Portable Classroom	2000	Demolish	Non-Contributor
Building 39 DSA BLDG – 21727 Portable Classroom	2000	Demolish	Non-Contributor
Building 40 AA-2371 – 22926 Portable Classroom	2004	Demolish	Non-Contributor
Building 41 DSA BLDG - 21810 Portable Classroom	2004	Demolish	Non-Contributor
Building 42 DSA BLDG - 21809 Portable Classroom	2004	Demolish	Non-Contributor
Building 43 DSA BLDG - 21808 Portable Classroom	2004	Demolish	Non-Contributor
Parking Area (No. 3)	1961	Reconfigure Parking Stalls	Contributor
Parking Area (No. 1)	1961	Reconfigure Parking Stalls	Non-Contributor
Site Plan/Landscape Design[57]	1961	Demolish	Contributor
Basketball and Volleyball Courts	1961	Interim Facilities	Non-Contributor

As a direct result of demolition of five contributing resources to the historic district (MPB - Building #17, Student Store - Building #18, Music/Chorale - Building #19, Drafting Building/Classroom - Building #20, and Parking Area No. 3), and their adjacent contributing features, the proposed Project would have adverse effects on the historic district that could result in the loss of eligibility of the district.[55] This constitutes a potentially significant adverse impact to the historic district because it would reduce the number of contributors to the historic district from 22 to 17. It is also the first demolition of any of the original buildings of a previously intact campus. The MPB (Building #17) and adjacent contributors, Music/Chorale Building (Building #19) and Drafting Building/Classroom (Building #20) are essential elements of the finger-plan design of the campus and would be disrupted by the project plan to construct a single building with a dominating footprint, replacing the smaller buildings. Views within the historic district would also be impacted, particularly since the proposed Project calls for a large-scale, two-story building to replace the existing MPB. The arrangement and orientation

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

of patios and courtyards, such as the Lunch Pavilion, is a character-defining feature. The views from the Lunch Pavilion to the central quad would be lost in the new layout as the open space adjacent to the new MPB does not align with the quad.

ASM analyzed the proposed Project in the context of the SOI Standards as described further below:

Standard 1: A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships. As addressed above, the spaces and spatial relationships created through the use of a finger-plan design inwardly focused on the central quad will be lost when the current MPB is replaced by a much larger structure. Therefore, the Project does not comply with Standard 1.

Standard 2: The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize the property will be avoided. The spaces and spatial relationships established with the use of the finger-plan design for the school will be lost at the southwest end of the campus, therefore the Project does not comply with Standard 2.

Standard 3: Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historical properties, will not be undertaken. As currently planned, no element of the Project attempts to create a false sense of history or adds conjectural elements. Therefore, the Project complies with Standard 3.

Standard 4: Changes to a property that have acquired significance in their own right will be retained and preserved. Standard 4 is not applicable because there are no alterations or additions to the campus that appear to have attained significance in their own right.

Standard 5: Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved. Since the Project calls for removal (demolition) of character-defining features of the contributors the Project does not comply with this Standard.

Standard 6: Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Standard 6 is not applicable to this Project as repair or replacement of features in existing buildings is not included.

Standard 7: Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used. As currently planned, there appear to be no chemical or physical treatments associated with Project and therefore Standard 7 is not applicable.

Standard 8: Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken. No archeological resources were identified, but the Project requires compliance Standard Conditions such as retention of an on-call qualified archaeologist, implementation of an archaeological resources monitoring program, halting and redirecting work in the event of a discovery until it is evaluated for significance, cultural resources sensitivity training, and Phase III Data Recovery/Mitigation Program in the event that a significant resource is discovered and cannot be avoided. After implementation of these conditions, the Project would comply with Standard 8.

Standard 9: New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and environment. As mentioned previously, as proposed the new construction does impact the spatial relationships that characterize the property. Although the new construction is differentiated from the old and is visually compatible with the historic district, the proposed building is much larger than the existing structure and is not compatible with the size, scale, proportion and massing of other buildings in the historic district. Therefore, the Project does not comply with Standard 9.

Standard 10: New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired. The proposed construction replaces six contributors, including construction over parking areas. If the new construction was removed in the future buildings 17, 18, 19 and 20 and the parking areas could not be replaced, and the essential form and integrity of the finger-plan campus would still be altered. Therefore, the Project does not comply with Standard 10.

Summary: The Project does not fully comply with the SOI's Standards for the Treatment of Historic Properties, specifically Standards for Rehabilitation Numbers 1, 2, 5, 9 and 10 as the new construction would diminish some of the historic materials, features, and spatial relationships that characterize the historic district.

As required by SC-CUL-1 and SC-CUL-2, a qualified Historic Architect would be part of the design team to ensure that the Project would be designed in compliance with SOI Standards and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. Any new construction would comply with SOI Standards to be compatible with the size, scale, and height of the remaining contributing buildings and landscape features and would not destroy spatial relationships that characterize the historic district. Per SC-CUL-3 (and further defined by SC-N-7), a Temporary Protection Plan will be prepared to protect the 12 remaining PWA-era contributor buildings during construction. SC-CUL-4 requires that the MPB be properly photo-documented prior to demolition. SC-CUL-5 requires the construction contractor to submit a Historic Treatment Plan to protect, repair, and replace historic materials and features, as required by LAUSD Design Specification 01 3591. This includes provisions to reuse or display salvage materials and features that may have historic significance. These SC's would ensure that the history and significance of the contributors to be demolished and their relationship with the larger campus will be fully documented and that the character-defining features and materials of demolished buildings may be salvaged and made available to the public for sale or reuse.

MM-CUL-1 requires the provision of an Interpretive Program that contains information regarding the history of the Campus, and specifically the Multipurpose Building.

Significance Determination

Potentially Significant

Mitigation Measures

MM-CUL-1. To communicate information on the historic development and character of Sylmar Charter HS, including the Multipurpose Building, an Interpretative Program shall be developed and implemented. This Interpretive Program shall be accessible to the general public and include information on the history and architecture of the Campus (both exterior

and interior), from the founding of the City (1781, incorporated 1850) until 1961, when the contributing buildings were completed. A historian or architectural historian who meets the Secretary of the Interior's professional qualifications shall be engaged to research and write the information to be provided in the Interpretive Program. The Interpretive Program shall be initiated within 1 year of the approval of the proposed Project and shall be completed by substantial completion of construction. Potential elements of such an Interpretive Program could include:

- Physical exhibit located on the Campus. Potential location of an exhibit could be in the new construction building that will replace the demolished Multipurpose Building, or potentially an Interpretive Garden or landscape/hardscape feature that is placed in the location of the demolished Multipurpose Building. Historical salvage materials may be incorporated or displayed as part of the exhibit.
- Creation of a brochure or website that includes both text and historical images of the Sylmar Charter HS Campus, including the Multipurpose Building.

Significance After Mitigation

Significant and Unavoidable. Even after application of implementation of SCs and MM-CUL-1, the demolition of five contributing resources and construction of a large, two-story building to replace the existing MPB would still result in a significant and unavoidable impact with respect to NRHP and CRHP eligibility criteria as the new construction would diminish the historic materials, features, and spatial relationships that characterize the historic district. This is discussed further in Chapter 4, Section 4.3, Significant Environmental Effects That Cannot Be Avoided if The Project Is Implemented.

3.2.6 Cumulative Impacts

The proposed Project includes the demolition of five contributing resources (the MPB - Building #17, Student Store - Building #18, Music/Chorale - Building #19, Drafting Building/Classroom - Building #20, and Parking Area No. 3), and their adjacent contributing features, and construct a new, large-scale MPB, an action that would invalidate the eligibility of the Campus as a historic district on both the national and state level. Although the four buildings are key examples of Mid-Century Modern architecture on the Campus, subsequent to their demolition, the 12 remaining contributor buildings would remain in place and would continue to convey the historic significance of the district.

The proposed Project is one of several school modernization projects evaluated in the 2023 Subsequent PEIR. The Project site is one of dozens of intact examples of this property type in the communities surrounding Sylmar Charter HS, which include El Dorado Avenue Elementary School, Sylmar Elementary School, Olive Vista Middle School, and San Fernando Senior High School. There are no projects planned at these campuses or any similar campuses that would result in a significant and unavoidable impact to those historical resources at this time. The loss of the four contributing buildings and one contributing parking lot from the Sylmar High School potential Historic District would constitute a less than significant cumulative impact on this resource type. Therefore, the proposed Project would not substantially contribute to a significant cumulative impact.

Significance Determination

Less than Significant.

Mitigation Measures

No mitigation measures are required.

3.2.7 References

ASM Affiliates (ASM). 2025. Cultural Resources Technical Report for Sylmar Charter High School Major Modernization Project, Los Angeles County, California. May 2025.

Association of Environmental Professionals. California Environmental Quality Act Statute and Guidelines. Palm Desert. 2024.

Historic Resources Group (HRG). 2022, September 30. LAUSD Sylmar High School Historic Resources Evaluation Report (HRER).

Sapphos Environmental, Inc. 2014. Los Angeles Unified School District Historic Context Statement, 1870 to 1969. Prepared for Los Angeles Unified School District, Office of Environmental Health and Safety.

3.3 GREENHOUSE GAS EMISSIONS

This section evaluates potential impacts related to greenhouse gas (GHG) emissions that would result from the proposed Project. This analysis describes the existing conditions in the proposed Project area, regulatory framework, thresholds of significance, methodology, and whether the Project would generate GHG emissions that may have a significant impact on the environment or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Details regarding the GHG analysis are provided in Appendix 6, *Air Quality Report and Emissions Calculations*, of this Draft EIR.[58]

3.3.1 Environmental Setting

GHG emissions refer to a group of emissions generally believed to affect global climate conditions, which include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), black carbon (black carbon is the most strongly light-absorbing component of particulate matter emitted from burning fuels such as coal, diesel, and biomass), and water vapor. The dominant human activities that contribute to GHGs are electricity production and vehicular emissions. Specifically, vehicular 'tailpipe emissions' are tracked by the United States Environmental Protection Agency (U.S. EPA); per year, the typical passenger vehicle emits roughly 4.6 metric tons of carbon dioxide equivalent (CO_2e) but is dependent on the type of fuel used, fuel economy, and annual miles driven.[59] GHG atmospheric concentrations have risen based on these two emission sources, and many scientists have argued that these gaseous concentrations have been causing Earth's temperature to rise. Consequently, this phenomenon is expected to alter rainfall patterns, reduce polar ice caps, lead to sea-level rise, and contribute to a diverse array of impacts to biodiversity and humans across the globe.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), Connect SoCal, aims to create a course to closely integrate land use, transportation, and technology to achieve a more sustainable growth pattern in certain areas of the region. The Project site is within the SCAG Metropolitan Planning Organization (MPO), which is currently on track to meet target GHG emissions reduction goals. Connect SoCal encourages integrated planning for land use and transportation to achieve specific federal air quality standards. California law requires the region to reduce per capita GHG emissions in the SCAG region by 8 percent by 2020—compared with 2005 levels—and by 19 percent by 2035.[60] The strategies, programs, and projects outlined in Connect SoCal are projected to result in GHG emissions reductions in the SCAG region that meet or exceed these targets.

The Project site is located within an urbanized location and near low-to medium-density residential development. Existing conditions at the proposed Project site entail a developed high school in the northern end of Los Angeles County. Existing GHG emissions are generated from energy use, indirectly from purchased electricity use and directly through fuel consumed for building heating; and area sources, from landscaping equipment used on site for maintenance, consumer products, and architectural coating. Mobile source emissions typically associated with the current facilities include vehicle trips from parents dropping off their

[58] WSP. 2025. Air Quality Report for the Sylmar Charter High School Major Modernization Project. March 2025.
[59] U.S. Environmental Protection Agency. March 2025. Greenhouse Gas Emissions from a Typical Passenger Vehicle. https://www.epa.gov/greenvehicles/greenhouse-gas-emissions-typical-passenger-vehicle
[60] Southern California Association of Governments. April 2024. Connect SoCal: A Plan for Navigating to a Brighter Future. https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1714175547

children, buses, and school employees travelling to and from the proposed Project site. The City of Los Angeles has developed both community and municipal GHG emissions inventories, which include a summary of the City's emissions from each sector between 2008 and 2022.[61] In 2022, power generation was found to account for at least 93 percent of overall municipal GHG emissions in the City, followed by solid waste consumption.

According to CARB's California Greenhouse Gas Emissions from 2000 to 2022: Trends of Emissions and Other Indicators Report,[62] emissions from statewide emitting activities in 2022 were 371.1 million metric tons of carbon dioxide equivalent ($MMTCO_2e$), which is 9.3 $MMTCO_2e$ lower than 2021 levels. Per capita GHG emissions in California have dropped from a 2001 peak of 13.8 metric tons per person to 9.7 metric tons per person in 2021, a 30.0 percent decrease.[63] Overall trends in the inventory also demonstrate that the carbon intensity of California's economy (the amount of carbon pollution per million dollars of gross state product) is declining. From 2000 to 2022, the carbon intensity of California's economy has decreased by 54.8 percent from 2000 emissions, while California's gross state product has simultaneously increased by 77.5 percent.

3.3.2 Regulatory Framework

FEDERAL

Greenhouse Gas Reporting Program (GHGRP)

The U.S. EPA adopted the GHGRP (40 Code of Federal Regulations [CFR] Part 98), a mandatory GHG reporting rule in September 2009. The rule requires suppliers of fossil fuels or entities that emit industrial GHGs, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons or more per year of GHG emissions to submit annual reports to the U.S. EPA beginning in 2011 (covering the 2010 calendar year emission). Vehicle and engine manufacturers were required to begin reporting GHG emissions for model year 2011. In January 2012, U.S. EPA made the first year of GHGRP reporting data available to the public through its interactive Data Publication Tool, called Facility Level Information on Greenhouse gases Tool. The U.S. EPA will continue to update the tool and release additional data each reporting year.[64]

Corporate Average Fuel Economy Standards

The U.S. EPA regulates and tests gas mileage or fuel economy in order to deter air pollution in the United States. Since the transportation sector produces 28 percent of GHG emissions in the U.S. as a whole, fuel economy regulations are an important way to reduce GHG emissions. The U.S. EPA's Corporate Average Fuel Economy (CAFE) standards require vehicle manufacturers to comply with the gas mileage or fuel economy standards to reduce energy consumption by increasing the fuel economy of cars and light trucks. The most recent CAFE GHG emissions standards were set in 2024, which will increase the fuel economy to at a rate of 2 percent per year for cars and light trucks by Model Year 2029–2031.[65]

[61] City of Los Angeles. February 2024. 2022 Community and Municipal Greenhouse Gas Inventory Report. https://clkrep.lacity.org/onlinedocs/2022/22-1402_rpt_BOS_02-14-24.pdf

[62] CARB. 2024. California Greenhouse Gas Emissions from 2000 to 2022: Trends of Emissions and Other Indicators. September 2024. https://ww2.arb.ca.gov/sites/default/files/2024-09/nc-2000_2022_ghg_inventory_trends.pdf

[64] U.S. Environmental Protection Agency. December 2024. Learn About the Greenhouse Gas Reporting Program (GHGRP). https://www.epa.gov/ghgreporting/learn-about-greenhouse-gas-reporting-program-ghgrp

STATE

Renewable Portfolio Standards (RPS)

California's RPS, established in 2002 by the California State Senate in Senate Bill (SB) 1078, accelerated in 2006 and expanded in 2011, is one of the most ambitious renewable energy standards in the country. The RPS requires each energy provider to supply 33 percent of their electricity from eligible renewable energy resources by 2020. Signed in October 2015, SB 350 requires providers to supply 50 percent of their electricity from eligible renewable energy resources by 2030.

Governor's Executive Order S-3-05 (EO S-3-05)

Executive Order S-3-05 (EO S-3-05) issued in 2005 recognizes California's vulnerability to increased temperatures causing human health impacts, rising sea levels, and a reduced Sierra snowpack due to a changing climate. The EO established targets to reduce GHG emissions to 2000 levels by 2010, to 1990 levels, and by 2050, 80 percent below 1990 levels.[66]

Governor's Executive Order S-14-08 (EO S-14-08)

In 2008, Executive Order S-14-08 expanded the State's RPS goal to 33 percent renewable power by 2020. In 2009, Executive Order S-21-09 directed CARB, under its authority pursuant to AB 32 to enact regulations to help the State meet the 2020 goal of 33 percent renewable energy. The 33 percent by 2020 RPS goal was codified with the passage of Senate Bill X1-2 (SB X1-2). This new RPS applied to all electricity retailers in the state, including publicly owned utilities (POUs), investor-owned utilities, electricity service providers, and community choice aggregators.

Global Warming Solutions Act of 2006 (AB 32)

The Global Warming Solutions Act of 2006 (Assembly Bill 32, or AB 32) codifies the targets set in EO S-3-05 of statewide reductions to 1990 emissions levels by 2020. AB 32 directs CARB to develop and implement a scoping plan and regulations to meet the 2020 target. CARB approved the Scoping Plan in 2008, which provides guidance for local communities to meet AB 32 and EO S-3-05 targets. The Scoping Plan adopted a quantified cap on GHG emission representing 1990 emission levels, instituted a schedule to meet the emission cap, and developed tracking, reporting, and enforcement tools to assist the State in meeting the required GHG emissions reductions.

Governor's Executive Order S-1-07 (EO S-1-07; Low Carbon Fuel Standard)

Executive Order S-1-07, the Low Carbon Fuel Standard (LCFS) of 2007, requires a reduction of at least 20 percent in the carbon intensity of California's transportation fuels by 2030.[67] The LCFS requires oil refineries and distributors to ensure that the mix of fuel sold in California meets this reduction. The reduction comes from production cycle (upstream) emissions from the production and distribution of transport fuels within the state, rather than the combustion cycle (tailpipe) emissions from the use of those transport fuels.

[66] State of California. June 2005. Executive Order S-3-05. https://www.library.ca.gov/wp-content/uploads/GovernmentPublications/executive-order-proclamation/5129-5130.pdf

[67] University of California, Berkeley Center for Law, Energy & the Environment. N.d. California Climate Policy Fact Sheet: Low Carbon Fuel Standard. https://www.law.berkeley.edu/wp-content/uploads/2019/12/Fact-Sheet-LCFS.pdf

California Senate Bill 350

SB 350 increases California's renewable electricity procurement goal from 33 percent by 2020 to 50 percent by 2030. This objective will increase the use of RPS eligible resources, including solar, wind, biomass, geothermal and others. SB 350 also requires the State to double statewide energy efficiency savings in electricity and natural gas end uses by 2030. To help meet these goals and reduce GHG emissions, large utilities will be required to develop and submit Integrated Resource Plans. These plans detail how utilities will meet their customers' resource needs, reduce GHG emissions, and ramp up the use of clean energy resources. SB 350 also transforms the California Independent System Operator, a nonprofit public corporation, into a regional organization, contingent upon approval from the State Legislature. The bill also authorizes utilities to undertake transportation electrification.

California Senate Bill 375

SB 375 (2008) mandates each MPO in the state to adopt an RTP aimed at achieving a coordinated and balanced regional transportation system, including mass transit, highways, railroads, bicycles, and pedestrians, among other forms of transit. Each MPO is required to prepare an SCS, which sets forth forecast development patterns and describes the transportation system that achieve the regional GHG emission reduction targets set by CARB. CARB's 2010 targets called for the SCAG region, the MPO in which the proposed Project is located, to reduce per capita emissions by 8 percent by 2020 and 13 percent by 2035 based on a 2005 baseline. New targets were adopted in 2018, increasing SCAG's 2035 per capita emissions reduction target to 19 percent. SCAG adopted its own RTP/SCS in April 2012. The SCS lays out how the region will meet GHG targets to reduce per capita emissions 9 percent by 2020 and 16 percent by 2035 based on a 2005 baseline. In April 2016, SCAG adopted targets of 8 percent, 18 percent, and 21 percent reduction per capita GHG emissions by 2020, 2035, and 2040, respectively, based on a 2005 baseline.

Pavley Fuel Economy Standards (AB 1493)

In 2009, CARB adopted amendments to the Pavley regulations to reduce GHG emissions in new passenger vehicles from 2009 to 2016. The standards became the model for the updated federal CAFE standards.

Title 24 Building Standards & CALGreen

Title 24 is California's Building Energy Code, which is updated every three years. In 2010, Title 24 was updated to include the "California Green Building Standards Code," referred to as CALGreen. CALGreen requires that new buildings reduce water consumption, increase system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. CALGreen has mandatory measures that apply to nonresidential and residential construction. The most recent 2022 CALGreen code was adopted in 2022 and became effective in January 2023. A notable change under this update is the requirement for new multi-family dwellings to provide future Electric Vehicle Supply Equipment Level 2 Chargers per section 4.106.4.[68] CALGreen contains voluntary Tier 1 and Tier 2 levels, which are designed to exceed energy efficiency and other standards by 15 percent or 30 percent. In 2011, AB 341 set the goal of 75 percent recycling, composting, or source reduction of solid waste by 2020 calling for the California Department of Resources Recycling and

[68] State of California Building Standards Commission. July 2022. 2022 California Green Building Standards Code, Title 24, Part 11. https://codes.iccsafe.org/content/CAGBC2022P1

Recovery (CalRecycle) to take a statewide approach to decreasing California's reliance on landfills. This goal was an update to the former goal of 50 percent waste diversion set by AB 939.

Advanced Clean Cars (ACC) Program

In 2012, CARB adopted the ACC program, developed in coordination with the U.S. EPA. ACC II was adopted in 2022. These regulations rapidly scale down emissions of light-duty passenger cars, pickup trucks and SUVs and require an increased number of zero-emission vehicles to meet air quality and climate change emissions goals. In October 2023, CARB launched a new effort to consider potential amendments to the Advanced Clean Cars II regulations, including updates to the tailpipe greenhouse gas emission standard and limited revisions to the Low-emission Vehicle and Zero-emission Vehicle regulations.[69]

SB 32 / AB 197

On September 8, 2016, Governor Jerry Brown signed SB 32 into law. SB 32 mandates California to decrease GHG emissions by 40 percent below 1990 levels by 2030. SB 32 is a continuation of AB 32, signed into law in 2006, which set a GHG reduction target of reducing GHG emissions to 1990 levels by 2020. AB 197 is a bill that is tangentially tied to SB 32, which requires the CARB to prioritize disadvantaged communities in climate change related regulations and to prepare a scoping plan that uses the maximum technologically feasible and cost-effective GHG emissions reductions.[70]

Governor's Executive Order B-55-18 (EO B-55-18)

EO B-55-18, issued in 2018, established a statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and to achieve and maintain net negative emissions thereafter. EO B-55-18 is established in addition to the existing statewide targets of reducing GHG emissions. To achieve this target, remaining emissions must be offset by equivalent net removals of CO_2 from the atmosphere, including through sequestration in forests, soils and other natural landscapes.

100 Percent Clean Energy Act

The 100 Percent Clean Energy Act of 2018 (SB 100) sets a state policy that eligible renewable energy and zero-carbon resources supply 100 percent of all retail sales of electricity in California by 2045. SB 100 accelerates California's Renewable Portfolio Standards established under SB 350. In recognition that California retail sellers are well on their way to achieving the target in advance of the existing deadlines, SB 100 requires providers to supply 50 percent of their electricity from eligible renewable energy resources by 2026 and 60 percent by 2030.[71]

REGIONAL

SCAG Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)

SCAG is a Joint Powers Authority established pursuant to California Government Code Section 6502 et seq., to maintain continuing, cooperative, and comprehensive transportation planning. Through the implementation

[69] CARB. Advanced Clean Cars Program. https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program#:~:text=Advanced%20Clean%20Cars%20I%20was,and%20climate%20change%20emissions%20goals.
[70] University of California, Davis CLEAR Center. March 2020. How California is working to reduce greenhouse gas emissions. https://clear.ucdavis.edu/explainers/how-california-working-reduce-greenhouse-gas-emissions
[71] California Energy Commission. 2023. SB 100 Joint Agency Report. https://www.energy.ca.gov/sb100

of transportation and land use strategies, Connect SoCal outlines how the region can achieve the state's GHG reduction goals and federal CAA requirements. Connect SoCal provides transportation strategies and technologies to improve the regional transportation network, prioritizes the use of streets and curb space for pedestrian access and alternative transportation modes rather than vehicles.[72] When implementing transportation projects, the plan encourages coordination with land use planning to develop housing and employment opportunities closer to each other and to public transit. The plan also includes a financial analysis considering costs for operations and maintenance (O&M) of the existing transportation system's reliability, longevity, resilience, and cost effectiveness. The most recent version of Connect SoCal was adopted on April 4, 2024.

LOCAL

LAUSD Standard Conditions

Applicable SCs related to Project GHG emissions impacts include:

Table 3-13 GHG Emissions Standard Conditions of Approval

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

[72] Southern California Association of Governments. April 2024. Connect SoCal: A Plan for Navigating to a Brighter Future. https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1714175547

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

According to the 2023 Subsequent PEIR, projects implemented under the SUP are anticipated to have less than significant and potentially significant impacts on GHG emissions within the LAUSD service area.[73]

3.3.3 Thresholds of Significance

Pursuant to Appendix G of the CEQA *Guidelines,* the Project would result in a significant impact related to greenhouse gas emissions if it would:

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?

The proposed Project would result in significant impacts if construction or operation activities are anticipated to generate a substantial increase of GHG emissions, directly or indirectly; or if it would conflict with an applicable plan, policy, or regulation adopted to reduce GHG emissions. The estimated emissions would be compared to the goals and policies provided in the 2022 CARB Scoping Plan Update, and SCAG's Connect SoCal. GHG impacts are exclusively cumulative impacts, which employs the "business-as-usual" projection based on current technologies and regulatory requirements. No clearly defined or quantified threshold has been formally adopted by an air district or other lead agencies in the region. The California Air Pollution Control Officers Association (CAPCOA) suggested an interim significance threshold of 900 $MTCO_2e$/year, which would capture 90 percent of all development projects.

SCAQMD implemented CAPCOA's policy objective of capturing 90 percent of all GHG emissions for this region and established a screening level of 3,000 $MTCO_2e$/year to identify whether projects would require further analysis for mitigation measures, if GHG emissions are exceeded. SCAQMD released its most current

[73] Los Angeles Unified School District. December 2023. Subsequent Program EIR for the School Upgrade Program. https://www.lausd.org/ceqa

version of draft GHG emissions thresholds in 2010, recommending a tiered approach providing a quantitative annual threshold of 3,500 $MTCO_2e$ for residential uses, 1,400 $MTCO_2e$ for commercial uses, and 3,000 $MTCO_2e$ for mixed uses. SCAQMD also proposed an alternative annual threshold of 3,000 $MTCO_2e$ for all land use types, which is the significance threshold applied of this impact analysis. Based on recommended SCAQMD guidance, estimated annual emissions calculated for the proposed Project will be amortized over an assumed 30-year Project lifetime so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies, and will be compared to SCAQMD thresholds to determine whether the proposed Project would result in potential impacts.

3.3.4 Methodology

CONSTRUCTION EMISSIONS

Significance thresholds were applied based on federal energy policies, state building codes, and local energy efficiency policies. Implementation of the proposed Project was evaluated with regard to the proposed Project's Initial Study, the 2022 CARB Scoping Plan Update,[74] the National Ambient Air Quality Standards (NAAQS), the California Ambient Air Quality Standards (CAAQS), the Clean Air Act (CAA), and SCAG's 2024–2050 RTP/SCS – Connect SoCal.[75]

Annual emissions during construction are forecasted by using seasonal weighting factors and are based on the product of the daily construction emissions (in pounds per day) and working days per year by phase. These emissions are estimated using the CalEEMod (Version 2022.1.1.29) software, an emissions inventory software program recommended by the SCAQMD, and are based on assumptions of a worst-case scenario. CalEEMod is based on outputs from OFFROAD and EMFAC, which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, including on-and off-road vehicles. Default CalEEMod inputs were used for the modeling unless Project-specific details were available to adjust the input values for the proposed Project based on construction equipment and schedule information from similar land use development projects in the District. These values were then applied to the construction phasing assumptions used in the GHG emissions analysis to generate emissions values for each construction activity. This analysis uses $MTCO_2e$ to represent the cumulative sum of all measurable GHG emissions generated annually during construction, including CH_4, CO_2, and N_2O. Detailed construction equipment lists, construction scheduling, and emissions calculations are provided in Appendix 6 of this Draft EIR.

As described in Chapter 2, *Project Description*, construction of the proposed Project was assumed to begin in June 2026 and complete in the second quarter of 2029. Construction may commence at a later date than that analyzed in this GHG impact analysis. If this occurs, construction impacts should be less than those analyzed herein, because a more energy-efficient and cleaner burning construction equipment fleet mix are expected in the future, pursuant to State regulations that require construction equipment fleet operators to phase-in less polluting heavy-duty equipment. As a result, should the proposed Project commence construction at a later date, GHG impacts are anticipated to be less than the impacts disclosed herein. Sub-phases of construction would include demolition, site preparation, grading, building construction, and architectural coating. Emissions

[74] California Air Resources Board. November 2022. 2022 Scoping Plan for Achieving Carbon Neutrality. https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp_1.pdf
[75] Southern California Association of Governments. April 2024. Connect SoCal: A Plan for Navigating to a Brighter Future. https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1714175547

from these activities are estimated for the duration of construction for the proposed Project. As discussed above, estimated annual GHG emissions calculated for the proposed Project would be compared to SCAQMD thresholds to determine whether the proposed Project would result in potential impacts.

OPERATIONAL EMISSIONS

With respect to SUP modernization projects, the 2023 Subsequent PEIR states that operational activities would be less than significant, as these projects would not increase capacity to existing schools, and net Project emissions would be minimal. Additionally, overall District enrollment is forecast to decrease over the next 10 years, and operational emissions are not expected to increase in the long-term.[76]

The proposed Project would replace and upgrade facilities on the Sylmar Charter HS Campus, but it would not increase the number of students, or faculty, at the school and would not introduce major new emission sources. No new vehicle trips would be generated, and there would be no increase in mobile source emissions. Furthermore, the proposed Project would be required to abide by CALGreen mandatory guidelines. The proposed Project's modernization initiative would facilitate building upgrades and the replacement of old, energy-inefficient structures with those that use less energy and reduce emissions from space heating and other onsite sources to meet the most current Title 24 building energy standards. Therefore, there would be no net increase in regional operational GHG emissions, and the impact would be less than significant. Additionally, the District is required to comply with all applicable SCs and would implement SC-GHG-1 through SC-GHG-5, requiring the installation of water and energy efficient features, to further reduce Project-related operational impacts. Therefore, operational GHG emissions on a regional scale are not discussed further in this document.

3.3.5 Impact Analysis

Impact 3.3-1: The Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

As discussed in Section 3.1, *Air Quality*, short-term pollutants would be generated by construction of the proposed Project. The proposed Project site currently operates as a high school and would continue to remain so after construction. The proposed Project would not introduce any new net regional GHG emissions when operational (see Section 3.3.4). Therefore, only short-term construction emissions were evaluated for the generation of GHG emissions, either directly or indirectly.

Construction

Construction of the proposed Project would generate two types of short-term emissions: mobile-source emissions from the transport of workers, material deliveries, and debris/soil hauling; and on-site emissions from operating construction equipment. The construction equipment associated with the proposed Project activities is provided in Table 2-6 (see Section 2.6.5, Construction Phasing and Equipment). Estimated annual construction-generated emissions, provided in **Table 22, *Construction GHG Emissions Summary and Significance Evaluation***, are compared to the SCAQMD significance threshold of 3,000 $MTCO_2e$ per year.

[76] Los Angeles Unified School District. December 2023. Subsequent Program EIR for the School Upgrade Program. https://www.lausd.org/ceqa

Table 3-14 Construction GHG Emissions Summary and Significance Evaluation

	Construction Year (MTCO2e/year)			
	2026	2027	2028	2029
Construction Annual Emissions	330.0	406.8	405.4	116.4
Total Construction Emissions	1,258.6			
Amortized Annual Emissions (over 30 years)	42.0			
SCAQMD Threshold ($MTCO_2e$/year)	3,000			
Exceeds Threshold?	No			

Note: SCAQMD methodology recommends amortization of total construction emissions over 30 years.
Source: CalEEMod, version 2022.1.1.29; Appendix 6, Air Quality Report and Emissions Calculations.

Amortized GHG emissions from construction activities would result in 42.0 annual $MTCO_2e$. Construction emissions are based on the type, amount, and duration of off-road construction equipment, as well as the size of the Project. Annual construction emissions, in addition to operation emissions, would not exceed the regulatory threshold. Implementation of measure SC-AQ-2 would lower construction equipment emissions by reducing excessive emissions and maintaining use of equipment in compliance with regulatory standards. The proposed Project would also comply with CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation (Off-Road Regulation) by implementing strategies to control off-road equipment idling, control fugitive dust impacts, and utilize new engine off-road equipment during construction activities to reduce cumulative statewide GHG emissions. Construction impacts would be less than significant. No further analysis is warranted.

Significance Determination

Less than Significant.

Mitigation Measures

No mitigation measures are required.

Impact 3.3-2: The Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The proposed Project would result in no impacts in relation to conflicting with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. The primary plans and policies applicable to the proposed Project include the CARB Scoping Plan and SCAG's Connect SoCal.

CARB Scoping Plan

The CARB has set GHG reduction targets for the SCAG region of reducing per capita GHG emissions 8 percent below 2005 levels by 2020 and 19 percent by 2035.[77] The CARB Scoping Plan is applicable to state agencies and is not directly applicable to individual projects but has been the primary tool used to develop performance-based and efficiency-based GHG reduction targets for climate planning efforts. Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard, California Appliance Energy

[77] California Air Resources Board. December 2022. Final 2022 Scoping Plan. https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents

Efficiency regulations, changes to the California Renewable Energy Portfolio standard, changes in the Corporate Average Fuel Economy standards, and other early action measures to ensure attainment of emission reduction goals provided by AB 32 and SB 32.

The proposed Project would employ strategies provided in the Scoping Plan by contributing to the transition of energy production and transmission infrastructure to produce zero-carbon electricity and hydrogen. By removing existing buildings and constructing a two-story building with classrooms, the proposed Project would comply with the latest applicable Building Energy Efficiency Standards and CALGreen. Through measures provided by the Scoping Plan, the proposed Project would reduce emissions compared to existing settings and would adhere to the CARB Scoping Plan. Since the proposed Project would comply with GHG emission reduction measures, as provided in the 2023 Subsequent PEIR, the proposed Project would result in no impacts.

Connect SoCal 2024

SCAG's most recent RTP/SCS, Connect SoCal 2024, focuses on four categories that influence the regional challenges addressed in the plan: economy, mobility, environment, and healthy/complete communities.[78] The proposed Project contributes to these categories by improving the existing school campus through the replacement of classrooms to better support the community and addressing infrastructure vulnerabilities. SCAG's green region policy focuses on the balance of land use patterns between the built and natural environments by deemphasizing growth in rich natural environments and supporting local policies to reduce carbon emissions. LAUSD is committed towards a 100 percent renewable energy production commitment by 2040 in accordance with the Clean Energy Resolution, signed on December 3, 2019.[79] This resolution will gradually reduce GHG emissions from nonrenewable energy expenditures throughout the school district, including at the proposed Project site during operations. Additionally, this commitment aligns with Connect SoCal's environmental policy to promote sustainable development, in relation to the responsible management of energy resources and corresponding reduction of GHG emissions.

The proposed Project would provide new facilities for existing and future students and would serve the local population in the nearby communities. The proposed Project site is located within 0.3-mile of a SCAG-designated High-Quality Transit Corridor (HQTC) due southwest, which signifies the availability of fixed-route bus service with service intervals of no longer than 15 minutes during peak commute hours.[80,81] HQTCs help reduce GHG emissions impacts by providing alternate public transportation opportunities to an area and thereby reduce the number of vehicles traveling to and from the proposed Project site. The proposed modernization and retrofitting activities would not result in any changes to existing land uses or the existing roadway network; no conflicts with Connect SoCal are expected and the proposed Project would result in reduced GHG emissions during operation.

[78] Southern California Association of Governments. April 2024. Connect SoCal: A Plan for Navigating to a Brighter Future. https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1714175547
[79] The Climate Reality Project. December 2019. Los Angeles Unified School District Commits to 100 Percent Clean, Renewable Energy. https://www.climaterealityproject.org/press/los-angeles-unified-school-district-commits-100-percent-clean-renewable-energy
[80] Southern California Association of Governments. N.d. High Quality Transit Corridors Interactive. https://maps.scag.ca.gov/portal/apps/experiencebuilder/experience/?id=97f9699f14654b3b8895c74846541f75&page=home
[81] Southern California Association of Governments. April 2024. Connect SoCal: A Plan for Navigating to a Brighter Future. https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1714175547

With implementation of SC-USS-1, construction contractors shall reuse, recycle, and salvage non-hazardous materials generated during demolition and/or new construction. Material recovery during construction activities would minimize the need to produce and transport new materials and reduce emissions from mobile sources and energy use. The proposed Project would also maintain water and energy efficiency practices, pursuant to SC-GHG-1 through SC-GHG-5; and the implementation of SCS-USS-1 measures would ensure compliance with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions.

Significance Determination

Less than Significant.

Mitigation Measures

No mitigation measures are required.

3.3.6 Cumulative Impacts

As discussed in Section 3.3.3, *Thresholds of Significance*, the assessment of GHG emissions is inherently cumulative impacts analysis as these emissions contribute to global climate change and emissions from one project alone would be considered negligible compared to worldwide GHG emissions. The assessment of significance for cumulative impacts under CEQA is based on incremental impacts assuming implementation of the proposed Project as identified in CEQA Guidelines Section 15064(h)(3),[82] which states:

> "A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program.."

The lead agency, the District, has determined that the proposed Project would meet this criterion based on the conclusion that the proposed Project would not conflict with the applicable regulatory plans and policies to reduce emissions as discussed under Impact 3.3-2, including CARB's 2022 Scoping Plan Update and SCAG's Connect SoCal. The proposed Project would also not conflict with CALGreen's mandatory guidelines and Title 24 building energy standards. Moreover, the proposed Project would result in a less than significant impact related to GHG emissions during construction, as evidenced in Impact 3.3-1. Therefore, the proposed Project's incremental impacts regarding GHG emissions would not be cumulatively considerable.

Significance Determination

Less than Significant.

Mitigation Measures

No mitigation measures are required.

[82] 14 California Code of Regulations Section 15064.

3.3.7 References

14 California Code of Regulations Section 15064.

California Air Resources Board. November 2022. 2022 Scoping Plan for Achieving Carbon Neutrality. https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp_1.pdf (accessed April 3, 2025).

California Air Resources Board. December 2022. Final 2022 Scoping Plan. https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents (accessed April 7, 2025).

California Air Resources Board. 2023. California Greenhouse Gas Emissions from 2000 to 2021: Trends of Emissions and Other Indicators. https://ww2.arb.ca.gov/sites/default/files/2023-12/2000_2021_ghg_inventory_trends.pdf (accessed April 3, 2025).

California Air Resources Board. 2024. California Greenhouse Gas Emissions from 2000 to 2021: Trends of Emissions and Other Indicators. September 2024. https://ww2.arb.ca.gov/sites/default/files/2024-09/nc-2000_2022_ghg_inventory_trends.pdf (accessed April 3, 2025).

California Air Resources Board. Advanced Clean Cars Program. https://ww2.arb.ca.gov/our-work/programs/advanced-clean-carsprogram#:~:text=Advanced%20Clean%20Cars%20I%20was,and%20climate%20change%20emissions%20goals. (accessed April 14, 2025).

California Energy Commission. 2023. SB 100 Joint Agency Report. https://www.energy.ca.gov/sb100 (accessed April 3, 2025).

City of Los Angeles. February 2024. 2022 Community and Municipal Greenhouse Gas Inventory Report. https://clkrep.lacity.org/onlinedocs/2022/22-1402_rpt_BOS_02-14-24.pdf (accessed April 3, 2025).

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University of California, Berkeley Center for Law, Energy & the Environment. N.d. California Climate Policy Fact Sheet: Low Carbon Fuel Standard. https://www.law.berkeley.edu/wp-content/uploads/2019/12/Fact-Sheet-LCFS.pdf (accessed April 3, 2025).

University of California, Davis CLEAR Center. March 2020. How California is working to reduce greenhouse gas emissions. https://clear.ucdavis.edu/explainers/how-california-working-reduce-greenhouse-gas-emissions (accessed April 3, 2025).

U.S. Department of Transportation. U.S. Department of Transportation. June 2024. Corporate Average Fuel Economy Standards for Model Years 2029-2031 Passenger Cars and Light Trucks. https://www.govinfo.gov/content/pkg/FR-2024-06-24/pdf/2024-12864.pdf (accessed April 14, 2025).

U.S. Environmental Protection Agency. March 2025. Greenhouse Gas Emissions from a Typical Passenger Vehicle. https://www.epa.gov/greenvehicles/greenhouse-gas-emissions-typical-passenger-vehicle (accessed April 3, 2025).

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The White House. November 2021. Fact Sheet: The Bipartisan Infrastructure Deal Boosts Clean Energy Jobs, Strengthens Resilience, and Advances Environmental Justice. https://bidenwhitehouse.archives.gov/briefing-room/statements-releases/2021/11/08/fact-sheet-the-bipartisan-infrastructure-deal-boosts-clean-energy-jobs-strengthens-resilience-and-advances-environmental-justice/ (accessed April 3, 2025).

WSP. 2025. Air Quality Report for the Sylmar Charter High School Major Modernization Project. March 2025.

3.4 HAZARDS AND HAZARDOUS MATERIALS

This section evaluates the potential for the proposed Project to result in adverse impacts related to hazards and hazardous materials. The information presented below is based in part on the research conducted for the Phase I Environmental Site Assessment (ESA) (see Appendix 1-C, Phase I ESA, in the Initial Study), prepared by Geosyntec Consultants., the Geotechnical and Geological Investigation Report (see Appendix I-B in the Initial Study), prepared by TGR, the Preliminary Environmental Assessment Equivalent Work Plan (PEA-E Work Plan) Report (see Appendix 1-D, PEA-E Work Plan, in the Initial Study) prepared by Geosyntec Consultants, the Preliminary Environmental Assessment - Equivalent Report (see Appendix 4) prepared by Civil-Environmental-Survey Group (CES) and approved by the LAUSD OEHS. The information presented below is also based on maps of the Project area, including reports and information posted on State Water Resources Control Board (SWRCB) Geotracker database and the DTSC EnviroStor database. This section includes relevant regulations, and a discussion of the methodology and thresholds used to determine whether the proposed Project would result in significant impacts. An evaluation of the proposed Project's contribution to potential cumulative impacts is also provided.

3.4.1 Environmental Setting

The Project site is an existing high school, improved with an Administration Building, Library, Multipurpose Building (MPB) with lunch pavilion, several single and double story classroom buildings, Industrial Arts Buildings, an Automotive Shop, Agricultural Unit with plant nursery, green house, garden area, animal area, and compost area, tennis courts, a running track, and sports fields. The remaining open areas of the site are occupied by either lawns, walkways/arcades, or parking areas. A wastewater clarifier installed in 1963 is reportedly present but inactive within the Automotive Shop at the site. Prior to its development circa 1960 for its current use, the Site was used for agricultural (orchards) and rural residential purposes.

The Phase I ESA identified recognized environmental constrains (RECs) and other potential environmental impacts at the school which included past agricultural use, historical presence of possible residential structures, hydraulic lifts in automotive shop and localized staining, and a potential underground storage tank (UST). Potential environmental impacts in areas proposed for demolition and construction improvements at the Site were investigated by a soil sampling program.

RECOGNIZED ENVIRONMENTAL CONDITIONS

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

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

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

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

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

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

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

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

- **Former Residential Septic System(s):** According to information provided to Geosyntec, septic systems were historically present at the Campus associated with Former residential dwellings. Septic system leach fields may contain pathogens that pose a risk to human health if improperly managed. It is likely that the septic systems were removed during the development of the Campus for its current use. Therefore, this finding is considered de minimis condition.

HAZARDOUS MATERIALS DATABASE LISTINGS

According to the Phase I ESA, the Project Site was listed in the following environmental databases: the Facility Registry Service/Facility Index (FINDS/FRS), Hazardous Waste Manifest Data (HAZNET), Historical Hazardous Waste Manifest Data (HIST MANIFEST), California Environmental Reporting System Hazardous Waste Sites (CERS HAZ), Los Angeles County – City of Los Angeles Hazardous Materials Facilities (HAZMAT LA CITY), Los Angeles County Certified Unified Program Agency Program Records (CUPA LA COUNTY), Los Angeles County – City of Los Angeles Underground Storage Tank List (UST LA CITY), and Resource Conservation and Recovery Act Large Quantity Generator (RCRA-LQG). The Phase I ESA Report, DTSC EnviroStor database, and GeoTracker database show that the proposed Project site is not listed as a

hazardous waste site.[83],[84] No violations were noted, and one offsite listing was considered an environmental concern to the Project site as detailed below.

SOIL CONDITIONS

The general geology summary provided in the Phase I ESA specifies that the sediments beneath the Project site have been identified as part of the Quaternary Series of the Pliocene to Holocene Era (see Appendix 1-B). Soils in the central and eastern portions of the site is comprised of well drained fine sandy loam of the Capistrano-Urban land complex, while soils in the north and western portions is comprised of "somewhat excessively" drained sands of the Tujunga-Urban land complex.

Based on the age of the buildings and prior uses of the site, the Phase 1 ESA indicates there is the potential for asbestos containing materials (ACM), lead based paint (LBP), arsenic and pesticides, polychlorinated Biphenyls (PCBs), volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), and total petroleum hydrocarbons (TPHs) to be present within in shallow soils.

The PEA-E included a soil sampling investigation to determine potential for contaminants of potential concern (COPC), including hazardous materials. The soil sampling investigation was focused on locations of planned modernizations of the school which include areas of proposed demolition and construction as well as utility and stormwater infrastructure corridors. Most of the boring/sampling locations were laid out along a southeast-trending alignment in the southwestern part of the Campus, following a main utility corridor and traversing grass lawn areas, other planters, and the southwest side of the quad area. Other sample locations were established surrounding and in the vicinity of the MPB and food service, and along two perpendicular lines extending southwest and northeast from the utility corridor. The primary COPCs analyzed for all initial shallow/surficial samples were metals (including lead and arsenic) and organochlorine pesticides (OCPs). VOCs, PAHs, TPH, PCBs, and asbestos were also analyzed in five of the 45 primary samples collected for analysis. No significant subsurface contamination impacts were identified other than two areas with dieldrin impacts and one location with benzo (a) pyrene impact above screening levels.

GROUNDWATER CONDITIONS

The aquifers in the San Fernando Valley Groundwater Basin are generally unconfined with some confinement within the Saugus Formation in the western part of the basin. Groundwater flows toward the middle of the basin, then south beneath the Los Angeles River Narrows into the Central Subbasin of the Coastal Plain of Los Angeles Basin.

Groundwater was not encountered in subsurface explorations to 51.5 feet below existing grade during the geotechnical investigation for the proposed Project. Based on review of available historical groundwater information, regional historic high groundwater has been recorded at approximately 120 to 150 feet below existing grade across the Project site.[85]

[83] California Department of Toxic Substances Control (DTSC). N.d. EnviroStor: 3010 Estara Ave, Los Angeles, CA 90065. https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=13050+Borden+Ave+Los+Angeles.
[84] California State Water Resources Control Board. N.d. GeoTracker: 13050 Borden Avenue, Los Angeles, CA. https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=13050+borden+ave+los+angeles.
[85] TGR. 2022. Geotechnical and Geologic Investigation Report, Proposed Major Modernization and Seismic Retrofit, Sylmar Charter High School.

The 13180 Dronfield Avenue property is located approximately 150 feet from the Project site toward the north-northwest, hydraulically cross gradient, and is a groundwater production facility for the City of San Fernando subject to Waste Discharge Requirements (WDRs) under the Regional Water Quality Control Board (RWQCB). The property includes a drinking water supply well identified as Well 7A. Given the proximity of the property to the Project site it can be reasonably assumed that groundwater conditions underlying the Project site are similar to those reported for Well 7A. The presence of low concentrations of perchlorate and nitrate and slightly elevated concentrations of sulfate in underlying groundwater are considered reflective of regional groundwater conditions and are not considered to present a specific threat to the Project site.

FLOOD ZONES

According to the EDR database report presented in the Phase I ESA (Appendix 1-C) and Federal Emergency Management Agency (FEMA) data, the Site is not located in a flood hazard area per FEMA Flood Plain Panel 06037C1075G.

EARTHQUAKE FAULTS/LIQUEFACTION

The Project site is not within or immediately adjacent to (i.e., within a few hundred feet of) an Alquist-Priolo Earthquake Fault Zone (surface fault rupture only). A review of geologic literature indicates that there are no known active or potentially active faults located within or immediately adjacent to the Campus. The nearest fault to the Project site is the Sylmar fault mapped approximately 0.5 miles to the southeast.[86] Further, a review of the Seismic Hazards Zone Map of the Los Angeles quadrangle indicates that the Project site is not in a seismic hazard zone for soil liquefaction.[87]

RADON AND METHANE

According to the Phase I ESA, the Campus is located in a "Zone 2" for radon, which has average indoor basement radon levels between 2 and 4 picoCuries per liter (pCi/L).[88] The USEPA's continuous exposure limit applicable to residential properties, which is also the limit at which further testing or remedial action is suggested, is 4.0 pCi/L. According to the City of Los Angeles, Bureau of Engineering, Department of Public Works' Methane and Methane Buffer Zones map, the site is not located in a methane or methane buffer zone.[89]

3.4.2 Regulatory Framework

This section outlines key regulatory frameworks relevant to the District's SUP and related projects, though it does not cover every applicable policy or site-specific requirement. These regulations aim to minimize risks to human health and the environment during both routine operations and emergencies and help assess potential impacts of SUP-related projects. Applicable federal, state, and local laws, regulations, and guidelines, including LAUSD Standard Conditions are summarized below.

[86] TGR Geotechnical, Inc. (TGR). 2022, March 4. *Geotechnical and Geologic Investigation Report, Proposed Major Modernization and Seismic Retrofit for Sylmar Charter High School.*
[87] California Department of Conservation. N.d. Earthquake Zones of Required Investigation Maps and Reports. https://maps.conservation.ca.gov/cgs/informationwarehouse/regulatorymaps/
[88] Geosyntec Consultants Inc. March 2022. *Phase I Environmental Site Assessment for Sylmar Charter High Schoo*l.
[89] LADBS Methane and Methane Buffer Zone Map. https://planning.lacity.gov/eir/WetherlyProject/DEIR/Graphics/Figure%20IV.F-2_LADBS%20Methane%20and%20Methane%20Buffer%20Zone.pdf

FEDERAL

Resource and Recovery Act of 1976

The Resource Conservation and Recovery Act (RCRA) of 1976 is the principal federal law governing the generation, treatment, storage, and disposal of hazardous waste in the U.S. It gives the U.S. EPA authority to manage hazardous waste from its creation to final disposal and addresses nonhazardous solid waste. The 1984 Hazardous and Solid Waste Amendments strengthened the law by regulating underground storage tanks and restricting hazardous waste disposal, requiring pretreatment to reduce environmental risks.

Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA)

The Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986, commonly known as Title III of SARA, was created to protect public health and the environment from chemical hazards by requiring facilities to report hazardous chemical storage and environmental releases. This data is compiled in the EPA's public Toxics Release Inventory (TRI). EPCRA also mandates that each state establish a State Emergency Response Commission (SERC) and Local Emergency Planning Committees (LEPCs) to coordinate emergency planning. In California, the program is managed by CalEMA, the Governor's Office of Emergency Services, six LEPCs, and 83 Certified Unified Program Agencies (CUPAs), ensuring broad community and industry involvement.

Toxic Substances Control Act of 1976 (TSCA)

The Toxic Substances Control Act of 1976 empowers the U.S. EPA to monitor and regulate the approximately 75,000 industrial chemicals produced or imported into the U.S. The U.S. EPA can require testing, restrict, or ban chemicals that pose environmental or health risks, and it also oversees the introduction of new chemicals each year. This Act complements other environmental laws, such as the Clean Air Act and EPCRA's TRI, to help protect public health and the environment.

STATE

Department of Toxic Substances Control

The California Department of Toxic Substances Control (DTSC), authorized by the U.S. EPA and overseen by California EPA, oversees hazardous waste laws and the cleanup of contaminated sites. Under California Health and Safety Code Section 25187.5, DTSC must maintain and annually update a list of hazardous waste facilities requiring corrective action. These are facilities where the owner or operator failed to meet cleanup deadlines or where DTSC determined that immediate action was needed to address a significant threat to human health or the environment.

California Hazardous Waste Source Reduction and Management Review Act of 1989

The California Hazardous Waste Source Reduction and Management Review Act of 1989 (SB 14) requires large-quantity hazardous waste generators to regularly evaluate their operations and develop plans to reduce waste through methods like process changes, product reformulation, and employee training. Aimed at protecting public health and the environment, the law mandates that facilities generating over 13.2 tons of hazardous or 26.4 pounds of extremely hazardous waste annually submit waste minimization reports to the DTSC every four years.

California Education Code

The California Education Code requires school districts to ensure that new or expanding school sites are free from hazardous materials and safe for students and staff. The California Department of Education (CDE), with support from the DTSC, oversees this process. Districts must conduct a Phase I ESA, and if needed, a Preliminary Environmental Assessment (PEA). If contamination is found, the district must enter into a cleanup agreement with DTSC and complete response actions before construction or occupancy. Construction cannot proceed unless DTSC confirms it will not interfere with cleanup efforts or pose health risks. Additionally, districts may not acquire sites with certain hazards, such as former hazardous waste disposal sites or those near hazardous pipelines, unless specific conditions are met. These requirements aim to ensure school sites are environmentally safe and suitable for long-term educational use.

Leroy Greene School Facilities Act of 1998

The Leroy Greene School Facilities Act of 1998 (SB 50) established the School Facility Program, which provides state funding for school construction and modernization through five main programs: New Construction, Modernization, Critically Overcrowded Schools, Joint Use Projects, and Charter School Facilities. To receive funding, school districts must obtain approvals from multiple state agencies, including the CDE, Office of Public School Construction, State Allocation Board, DSA, and DTSC, ensuring that projects meet safety, environmental, and educational standards.

California Occupational Safety and Health Administration

The California Occupational Safety and Health Administration (Cal OSHA) regulates the safe handling of Asbestos Containing Construction Materials, requiring employers to implement exposure controls, provide hazard information, inspect containers, and establish decontamination and emergency procedures. These measures must be in place before any hazardous waste operations begin to ensure worker safety, including. has work requirements for disturbance of Asbestos Containing Construction Materials (ACCMs) including removal operations for all types of ACCMs.

California Office of Emergency Services

The California Office of Emergency Services (CAL OES) Hazardous Materials Section under the Fire and Rescue Division coordinates statewide hazardous materials prevention and emergency response programs, providing technical assistance and emergency coordination to state and local managers during hazardous materials incidents. Within the project area, the Los Angeles County Fire Department provides first response support when needed.

California Code of Regulations Title 8

This section of the CCR regulates asbestos exposure in all construction-related activities defined in Code's Section 1502 involving asbestos, including demolition, removal, repair, installation, cleanup, transportation, storage, and excavation where asbestos may be naturally present.

Hazardous Waste Control Act

The Hazardous Waste Control Act established California's more stringent hazardous waste program, detailed in Title 26 of the CCR, covering waste identification, handling, facility operations, and disposal. It requires

generators to track waste using a manifest system filed with DTSC, ensuring proper management of over 800 listed hazardous materials.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) consolidates six hazardous materials and waste regulatory programs under one local agency, CUPA, to streamline compliance and enforcement. CUPAs, often part of local environmental health or fire departments, coordinate with participating agencies to implement these programs consistently across jurisdictions

California Vehicle Code

The California Vehicle Code (Title 13 of the CCR) requires motor carriers transporting hazardous materials to obtain a CHP-issued license and display appropriate placards on their vehicles. Additionally, hazardous waste transporters must carry a valid DTSC registration while in transit, as mandated by the California Health and Safety Code Section 25163. Additionally, Title 22, Chapter 13 of the CCR includes a number of requirements specific to registration and transport of hazardous materials.

South Coast Air Quality Management District

The South Coast Air Quality Management District (SCAQMD) Rule 1403 regulates asbestos emissions during demolition and renovation by requiring surveys, notifications, and specific work practices to prevent airborne asbestos release. It incorporates and enforces federal National Emission Standards for Hazardous Air Pollutants found in the CFR Title 40, Part 61, Subpart M, with SCAQMD serving as the local enforcement authority.[90]

California Environmental Quality Act

PRC Section 21151.8 and 14 CCR Section 15186 require school districts to assess potential risks from hazardous materials for new school sites or construction projects. Projects using state funds must undergo a formal hazardous materials review, while those without state funding are reviewed by the District OEHS.

LOCAL

City of Los Angeles General Plan Safety Element

The City of Los Angeles General Plan Safety Element, implemented by the Emergency Operations Organization (EOO), guides citywide emergency preparedness, response, and recovery through coordinated plans and protocols. Each city agency follows EOO procedures tailored to specific hazards or events, ensuring efficient resource management and public safety.

Los Angeles Unified Emergency Operations Plan

The Los Angeles Unified Emergency Operations Plan is a citywide framework managed by the Emergency Management Department that outlines how Los Angeles prepares for, responds to, and recovers from

[90] Rule 1403. Asbestos Emissions from Demolition/Renovation Activities. October 5, 2007. https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf (Accessed April 3, 2025).

emergencies and disasters. It uses an all-hazards approach, coordinating efforts across city departments through a centralized Emergency Operations Center, and includes department-specific annexes, hazard-specific plans, and community engagement strategies to ensure efficient and unified emergency management.

LA Unified Local Hazard Mitigation Plan

The LA Unified Local Hazard Mitigation Plan (LHMP) is a strategic document aimed at reducing long-term risks from natural and human-caused disasters affecting district facilities and communities. Originally approved by FEMA in 2004 and most recently updated in April 2025, the LHMP ensures the District remain eligible for federal disaster assistance programs like FEMA's Hazard Mitigation Grant Program, Pre-Disaster Mitigation, Building Resilient Infrastructure and Communities, and Flood Mitigation Assistance, while guiding decision-makers in prioritizing mitigation efforts.[91]

Integrated Safe School Plan

All California public schools, including Sylmar Charter HS, are required to prepare school safety plans relevant to the needs and resources of the school. The ISSP is customized to each school and includes emergency response protocols to coordinate with police, fire and other agencies, annual updates to reflect current staff, compliance with federal, traffic safety, and mandatory training modules.LA Unified's ISSP is compliant with the National Incident Management System and the California Standardized Emergency Management System.[92]

Los Angeles Fire Code

The Los Angeles Fire Code, part of the Los Angeles Municipal Code (LAMC) and based on the California Fire Code with local amendments, sets safety standards for fire hazards and emergency response. The Los Angeles Fire Department enforces hazardous materials regulations, requiring businesses that store materials above threshold quantities to submit a Risk Prevention Program and Business Emergency Plan, obtain permits, and comply with disclosure and training requirements under state law.

Los Angeles Methane Seepage Regulations

The City has prepared a map of methane zones and methane zone buffer areas within the LAMC, Chapter IX, Article 1, Division 71, Section 91.7103, also known as the Los Angeles Methane Seepage Regulations, establishes requirements for buildings and paved areas located in areas classified as being located either in a methane zone or a methane buffer zone. Requirements for new construction within such zones include methane gas sampling to determine the Site Design Level and, depending on the detected concentrations of methane and gas pressure at the site, application of design remedies for reducing potential methane impacts. According to the Methane Buffer Zones map the Project site is not located within a city-designated Methane Hazard Zone.[93]

[91] City of Los Angeles. June 2024. 2024-2029 Local Hazard Mitigation Plan. Tetra Tech. https://emergency.lacity.gov/Local-Hazard-Plan (accessed April 3, 2025).

[92] LA Unified. *Integrated Safe School Plan*. https://www.lausd.org/Page/2643. Accessed July 14, 2025.

[93] LADBS Methane and Methane Buffer Zone Map. https://planning.lacity.gov/eir/WetherlyProject/DEIR/Graphics/Figure%20IV.F-2_LADBS%20Methane%20and%20Methane%20Buffer%20Zone.pdf

LAUSD Standard Conditions

Projects implemented under the 2023 Subsequent PEIR are anticipated to have less than significant impacts related to hazards and hazardous material within the District's service area with the incorporation of Standard Conditions of Approval (SCs). Applicable SCs related to Project-specific impacts to hazards and hazardous material are provided in Table 3-16, *Hazards and Hazardous Materials Standard Conditions of Approval.*

Table 3-15 Hazards and Hazardous Materials Standard Conditions of Approval

Applicable SC	Definition
SC-HAZ-1	LAUSD shall determine the proximity of electromagnetic field (EMF) generators to new classrooms or outdoor play areas to ensure the EMF generator does not pose a threat. **Criteria for School Siting in Proximity to High Voltage Power Lines or Cell Towers** Board of Education resolutions (Effects of Non-Ionizing Radiation-2000, Wireless Telecommunication Installations – 2009 and T-Mobile – Cell Tower Notification and Condemnation-2009) regarding electromagnetic field (EMF) and radio frequency exposures associated with cellular towers near schools whereby a prohibition exists regarding siting towers on school campuses. LAUSD's screening perimeter for new classroom construction or outdoor play area is 200 feet from cell towers and 500 feet from high voltage power lines.
SC-HAZ-2	LAUSD shall determine the proximity of new classrooms or outdoor play areas to ensure that these new facilities are placed outside of the established exclusion zone. **Pipeline Safety Hazard Analysis** This document outlines the process for evaluating safety hazards associated with underground and above-ground natural gas and hazardous liquid pipelines. The pipeline safety hazard assessment (PSHA) process determines whether potential releases of natural gas, petroleum product, and crude oil from pipelines located near a school site pose a safety risk to students and staff.
SC-HAZ-4	The Construction Contractor shall comply with the following OEHS Site Assessment practices and requirements (as applicable): • District Specification Section 01 4524, Environmental Import / Export Materials Testing. • Removal Action Workplan or Remedial Activities Workplan. • California Air Resources Board Rule 1466. • Guidelines and Procedures to Address Polychlorinated Biphenyls (PCBs) in Building Materials - particularly applicable to buildings that were constructed or remodeled between 1959 and 1979. • Lead and asbestos abatement requirements identified by the Facilities Environmental Technical Unit (FETU) in the Phase I/Phase II, or abatement plan(s).

3.4.3 Thresholds of Significance

The proposed Project would result in a significant impact if any of the following would occur:

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

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

Criteria (e), (f), and (g) were determined to result in no impacts or less than significant impacts by the Initial Study (see Appendix 1 to the EIR) and, therefore, are not carried forward for further analysis in the EIR.

3.4.4 Methodology

This assessment includes review of existing adopted plans, public databases, maps, and reports, to assess the potential presence of hazards and hazardous materials sites within the Project site and vicinity. Several site-specific studies were completed for the proposed Project to evaluate the current environmental conditions at the Project site, include: the Phase I ESA (see Appendix 1-C, Phase I ESA, in the Initial Study), prepared by Geosyntec Consultants.; the Geotechnical and Geological Investigation Report (see Appendix I-B in the Initial Study), prepared by TGR, the PEA-E Work Plan Report (see Appendix 1-D, PEA-E Work Plan, in the Initial Study) prepared by Geosyntec Consultants, the Preliminary Environmental Assessment - Equivalent Report (see Appendix 4) prepared by CES and approved by the LAUSD OEHS. These studies included visual site inspections of the Project site and surrounding vicinity, records search, and preparation of an environmental regulatory database report(s).

It is anticipated that Campus operations would be more efficient or would be otherwise improved following implementation of the proposed Project, which would result in new and upgraded facilities, and would not result in substantive changes to the existing operation of the school. Project implementation would not provide for an increase in the number of students attending the school or staff required to operate the school. As such, operational activities associated with the proposed Project are not additive to those operations analyzed in the 2023 Subsequent PEIR and would not result in substantial changes that have not previously been identified in

the 2023 Subsequent PEIR. This analysis focuses on potential impacts associated with temporary use of hazardous materials associated with Project construction activity and ongoing operations of the school.

3.4.5 Impact Analysis

Impact 3.4-1: The Project could create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials.

Construction

Construction of the proposed Project could result in significant impacts with regard to the routine transport, storage, production, use, or disposal of hazardous materials due to the potential for the site to have residual impacted soils. The contaminated soils onsite would require transportation offsite, thereby creating a potential impact to the surrounding community. As required by MM-HAZ-1, transport of any contaminated soils shall be conducted by a U.S. EPA and DOT qualified transporter of hazardous materials as outlined in Title 40 of the CFR Part 263.[94] These requirements include obtaining a U.S. EPA ID number, complying with EPA's Hazardous Waste Manifest System, and obeying all applicable DOT hazardous materials regulations. During demolition and other soil disturbing activities, there is potential for residual hazardous particles to enter the air. MM-HAZ-2 requires implementation of a Dust Control Plan to include measures such as application of water, wind speed and wind direction monitoring, and airborne particulate monitoring to prevent hazardous particles from impacted soils entering air space as a result of construction activities. Finally, site compliance inspections of the working areas shall be conducted by the Environmental Consultant or designated site manager to ensure ongoing compliance with regulations and mitigation measures as outlined in MM-HAZ-3.

LA Unified OEHS Site Assessment Team manages environmental project activities related to site investigations of existing District properties and new acquisitions. State and local agencies, such as the DTSC and SCAQMD, have rules and regulations to address potentially toxic or hazardous conditions on or in the vicinity of existing school sites. The LAUSD Site Assessment Team should be consulted prior to construction activities to approve the routine transport, storage, production, use, or disposal of hazardous materials as a result of removal and transport of impacted soils.

Compliance with the regulations discussed above, with instructions outlined in the specific mitigation measures MM-HAZ-1, MM-HAZ-2, and MM-HAZ-3 would limit the potential for impacts from contaminated soil, including dust from contaminated soils generated during construction to less than significant.

Operation

The proposed Project would result in less than significant impacts during operation with regard to the routine transport, use, or disposal of hazardous materials during operation. The school's day-to-day operations do not require routine transport or use of significant amounts of hazardous materials and the proposed Project would not change operational characteristics of the school. However, the school's lab classes and maintenance workers may produce small amounts of hazardous waste. Wastes generated by these sources shall be tracked and disposed of in accordance with all applicable LA Unified guidelines including, but not limited to, Disposal

[94] U.S. Environmental Protection Agency. May 21, 2023. Hazardous Waste Transportation. https://www.epa.gov/hw/hazardous-waste-transportation

Procedures for Hazardous Waste and Universal Waste (REF-4149.2),[95] the LA Unified OEHS Environmental Guidance Manuals,[96] and the Environmental Compliance Guidance Manual for Science Centers guidelines,[97] which identifies types of hazardous waste that could be present at schools, LA Unified approved chemicals,[98] proper chemical storage and handling, and tracking, transport, and disposal of hazardous waste that may be present at the school.[99] Therefore, impacts during operation would be less than significant.

Significance Determination

Potentially Significant

Mitigation Measures

Implementation of the following mitigation measure is required to reduce impacts to hazards and hazardous materials during pre-construction and construction:

> **MM-HAZ-1: Soil Management Plan.** A soil management plan shall be required for all earth-moving construction activities conducted at the site. The purpose of the soil management plan is to provide guidance for identifying impacted soil and the proper handling, onsite management, transport, and disposal of impacted soil that may be encountered during construction activities. The soil management plan shall be prepared by a licensed State of California Civil Engineer or Professional Geologist. The plan shall outline specific areas where impacted soils must be removed and describe specific measures to ensure that transport of any contaminated soils will be conducted by a U.S. EPA and U.S. Department of Transportation (DOT) qualified transporter as outlined in Title 40 of the Code of Federal Regulations Part 263.[100] The soil management plan shall include the following sections at a minimum.
>
> - Introduction
> - Background
> - Potential Contaminants of Concern
> - Contaminated Soil Management
> - Health and Safety
> - Excavation/Grading Contractor
> - Identification of Contaminated Soil
> - Excavation and Handling of Contaminated Soil

[95] Los Angeles Unified School District. June 12, 2020. Los Angeles Unified School District Reference Guide. Disposal Procedures for Hazardous Waste and Universal Waste. REF-4149.2. https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/REF-4149.2%20Hazardous%20Waste%20.pdf
[96] Los Angeles Unified School District Office of Environmental Health and Safety. 2020. Environmental Compliance/Hazardous Waste. https://www.lausd.org/Page/2798
[97] Los Angeles Unified School District. N.d. Environmental Guidance Manual for Science Centers. https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/135/pdf%20files/EnvironmentalGuidanceManualforScience Centers11-06.pdf
[98] Los Angeles Unified School District. January 21, 2005. LAUSD approved Chemicals list (inventory list) https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/Approved%20Chemical%2011-9-2023.pdf
[99] Los Angeles Unified School District Office of Environmental Health and Safety. 2014. Chemical Hygiene and Labels. https://www.lausd.org/Page/3987
[100] U.S. Environmental Protection Agency. May 21, 2023. Hazardous Waste Transportation. https://www.epa.gov/hw/hazardous-waste-transportation

- Soil Staging
- Dust Mitigation and Track-Out Controls
- Stormwater Management
- Waste Characterization and Profiling
- Transportation Requirements and Procedures
- Requirements for Haulers
- Truck Loading Operations
- Transportation Route
- Traffic Control Procedures
- Shipment Documentation
- Contingency Plan
- Soil Sampling and Analysis Protocol
- Confirmation Soil Sampling
- Screening Levels
- Actions Based on Soil Results
- Reporting
- References

Before excavation or other soil-disturbing activities begin, a preparatory inspection must be conducted by the Contractor to ensure the proper soil management provisions, including initiation of the DigAlert notification(s) and stormwater Best Management Practices (BMPs) are evaluated.

MM-HAZ-2: Dust Control Plan. A dust control plan shall be required for all construction activities conducted on the site. The primary dust control requirement is for no visible dust to exit the site during construction activities. Dust control measures will be required daily during earth-moving activities to limit emissions of fugitive dust generated by their activities. The contractor is responsible for meeting requirements specified in Rule 403 and implementing reasonable Best Available Control Measures (BACMs) to minimize dust emissions. The following dust control measures shall be implemented to stabilize exposed surfaces and minimize suspended or tracked dust particles:

- Apply water to excavation areas to minimize dust generated by vehicles, trucks, and heavy equipment.
- Apply water to the staged soil piles before and during loading of trucks, and after completion of loading for the day.
- Adequately tarp truck trailers, and clean truck tires as necessary prior to leaving the Site. Place shaker plates on the ingress and egress routes to the Site.
- Cover and secure staged soil piles at the end of each day.

Wind speed and wind direction shall be monitored at 15-minute intervals using a tripod-mounted weather station with data logging capabilities. Airborne particulate monitoring shall be conducted with aerosol monitors near the property boundary at locations upwind (one) and downwind (one) of excavation activities with an aggregate particle diameter of 10 microns or less (PM_{10}). The monitors

shall provide real-time concentration and median particle size information and shall log the data at one-minute intervals for the duration of the monitoring period. The dust monitors shall be zeroed daily and an action level of 25 micrograms per cubic meter ($\mu g/m^3$) (per Rule 1466) shall be established and measured as the difference between upwind and downwind monitors.

MM-HAZ-3: Compliance Inspections – Site compliance inspections of the working areas shall be conducted by the Environmental Consultant or designated site manager to determine if any failed compliance has occurred. Stop-work orders shall be promptly issued if any failed compliance has occurred and corrective actions shall be immediately implemented to address the noncompliant issue.

Significance after Mitigation

Impacts would be less than significant after implementation of MM-HAZ-1 through MM-HAZ-3 due to the requirements of precise excavation, handling, testing, transportation, and disposal of dieldrin and benzo (a) pyrene impacted soil. MM-HAZ-1 through MM-HAZ-3 address potential health risks to construction workers, onsite students and staff, and surrounding residents through implementation of a soil management process intended to close potential exposure routes to potentially impacted soils. Additionally, the plan will minimize offsite migration of potentially impacted soils during excavation, soil stockpiling, and transportation of soil offsite for disposal. As a result, MM HAZ-1 through MM HAZ-3 would reduce impacts to a less than significant level in relation to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials during construction.

Impact 3.4-2: The Project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment.

Construction

As discussed in the PEA-E, the Project site contains dieldrin and benzo (a) pyrene impacted soil to an estimated depth of 1 foot. Removal of the contaminated soils, as well as their transport for disposal during construction, creates potential for release of hazardous materials through upset or accident conditions. Therefore, the proposed Project would result in potentially significant impacts with regard to the upset and accident conditions involving the release of hazardous materials or waste into the environment.

According to the Phase I ESA, the Project site was listed in the following environmental databases: FINDS/FRS, HAZNET, HIST MANIFEST, CERS HAZ, HAZMAT LA CITY, CUPA LA COUNTY, UST LA CITY, and RCRA-LQG. Violations regarding failures to maintain Hazardous Waste Manifests, active generator permit, and improper labeling were reported from 2017 to 2020. The Project site was listed in HAZNET for as a facility that has submitted hazardous waste manifests to the DTSC; including unspecified aqueous solution, asbestos containing waste, other inorganic solid waste, waste oil and mixed oil, unspecified oil-containing waste, PCBs, and material containing PCBs, off-specification aged or surplus organics, other organic solids, laboratory waste chemicals, and liquids with cadmium concentrations greater than 100 milligrams per liter (mg/L). All listings relate to tracking; and therefore, none of these listings represent an obvious environmental concern.

The PEA-E identified several COPCs that may occur in and around proposed construction areas; therefore, there is potential for the upset or accident conditions involving the release of hazardous materials or waste into the environment due to improper or incomplete removal of these materials before the start of construction. Therefore, removal of all materials from the school prior to demolition shall be conducted as outlined in the LAUSD OEHS Environmental Disposal Procedures for Hazardous Waste and Universal Waste,[101] specifically in the shallow soils surrounding the MPB construction area.

Compliance with regulatory measures and the additional requirements outlined in MM-HAZ-1 through MM-HAZ-3 will ensure the significant impacts with regard to the upset and accident conditions involving the release of hazardous materials or waste into the environment would be less than significant.

Operation

The proposed Project would result in a less than significant impact to the public or the environment during operation through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment because operation of the existing school would continue to comply with OEHS Environmental Guidance Manual for Maintenance and Operations, which addresses waste streams generated by operation and maintenance of a school facility and transportation and tracking requirements for disposal of hazardous wastes at a School Hazardous Waste Collection Consolidation Accumulation Facility.[102] These guidance documents include labeling and tracking of materials within the school to prevent potential accident conditions as a result of unidentified or improperly handled materials. In addition, Sylmar Charter HS is required to adhere to the Environmental Compliance Guidance Manual for Science Centers,[103] which identifies types of hazardous waste that could be present at schools, District approved chemicals,[104] proper chemical storage and handling including suggested chemical storage patterns, chemical storage compatibility categories, and proper labeling.[105] As a result, these impacts would be less than significant during school operation.

Impact 3.4-3: The Project could emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

The proposed Project would result in significant impacts regarding hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. During the construction phase, it is possible school attendants could come in contact with dieldrin and benzo (a) pyrene contaminated soils on-site or fugitive dust from contaminated soil (see Phase I ESA and PEA-E). Further, there is potential for potentially hazardous emissions and handling of hazardous

[101] Los Angeles Unified School District. June 12, 2020. Los Angeles Unified School District Reference Guide. Disposal Procedures for Hazardous Waste and Universal Waste. REF-4149.2
https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/REF-4149.2%20Hazardous%20Waste%20.pdf
[102] Los Angeles Unified School District Office of Environmental Health and Safety. 2020. Environmental Compliance/Hazardous Waste. https://www.lausd.org/Page/2798
[103] Los Angeles Unified School District. N.d. Environmental Guidance Manual for Science Centers.
https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/135/pdf%20files/EnvironmentalGuidanceManualforScience Centers11-06.pdf
[104] Los Angeles Unified School District. January 21, 2005. LAUSD Approved Chemicals List (inventory list)
https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/Approved%20Chemical%2011-9-2023.pdf
[105] Los Angeles Unified School District Office of Environmental Health and Safety. 2014. Chemical Hygiene and Labels.
https://www.lausd.org/Page/3987

materials within one-quarter mile of the PUC Charter Elementary School due to removal of contaminated soils on-site.

However, District SC-HAZ-4 would ensure that the following guidelines are followed: District Specification Section 01 4524, Environmental Import / Export Materials Testing; Soil Removal Plan; California Air Resources Board Rule 1466 Guidelines and Procedures to Address PCBs in Building Materials, particularly applicable to buildings that were constructed or remodeled between 1959 and 1979; lead and asbestos abatement requirements identified by the FETU in the Phase I/Phase II; or abatement plan(s). It should be noted that the school is located within "Zone 2" for radon, which is considered 'moderate' and has average indoor basement radon levels between 2 and 4 pCi/L.[106] As stated in the Los Angeles Unified School District Reference Guide REF-5314.2, Procedures for Environmental Review of Proposed Projects: "building design and construction Measures – Should a building or similar structure be constructed or renovated for student and/or staff occupancy and is located in a 'high' radon zone, U.S. EPA guidance entitled 'Radon Prevention in the Design and Construction of Schools and Other Large Buildings, EPA/625/R-92/016, June 1994' (or latest published version) shall be followed and all relevant and appropriate measures incorporated in its design and construction to prevent radon gas infiltration". The District Office of Environmental Health and Safety does not require radon testing or mitigation for school sites in moderate radon zones.[107]

The proposed Project would result in significant impacts regarding hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school due to the Project's location on a school campus, nearby PUC Charter Elementary School, and the identification of contaminated soils within the Project boundaries. Some phases of construction may be conducted during school operating hours.

The contaminated soils and their handling shall be managed through compliance with the SMP (MM-HAZ-1); dust control BMPs outlined in MM-HAZ-2; and ongoing compliance inspections outlined in MM-HAZ-3. In addition, all activities must adhere to all applicable LAUSD, local, state, and federal laws and regulations. The removal and handling of undisclosed materials within the MPB prior to demolition shall be conducted in accordance with the OEHS Environmental Guidance Manual for Maintenance and Operations, which addresses waste streams generated by operation and maintenance of a school facility and transportation and tracking requirements for disposal of hazardous wastes at a School Hazardous Waste Collection Consolidation Accumulation Facility.[108] These guidance documents include directions for the tracking, transport, and disposal of hazardous waste that could be present at the school. As a result of these measures, the impacts related to handling hazardous or acutely hazardous substances or waste within one-quarter mile of an existing or proposed school would be reduced to a less than significant level during construction.

Operation

The proposed Project would not significantly alter existing operations at the Campus. The proposed Project would comply with the LA Unified OEHS Environmental Guidance Manual for Maintenance and Operations,

[106] Geosyntec Consultants Inc. March 2022. *Phase I Environmental Site Assessment for Sylmar Charter High Schoo*l.
[107] Los Angeles Unified School District. June 12, 2017. Reference Guide. Procedures for Environmental Review of Proposed Projects.
https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/Ref_Guide_5314.2_Procedures_for_Envir_Rev_of_Proposed_Projects_w_Att.pdf
[108] Los Angeles Unified School District Office of Environmental Health and Safety. 2020. Environmental Compliance/Hazardous Waste. https://www.lausd.org/Page/2798

which addresses waste streams generated by operation and maintenance of a school facility and transportation and tracking requirements for disposal of hazardous wastes at a School Hazardous Waste Collection Consolidation Accumulation Facility.[109] In addition, Sylmar Charter HS required to adhere to the Environmental Compliance Guidance Manual for Science Centers,[110] which identifies types of hazardous waste that could be present at schools, identifies District approved chemicals,[111] proper chemical storage, and handling.[112] Therefore, the proposed Project would result in less than significant impacts with regard to hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school during operation.

Significance Determination

Potentially Significant.

Mitigation Measures

Mitigation Measures MM-HAZ-1 through MM-HAZ-3 would reduce pre-construction and construction hazard impacts.

Significance after Mitigation

Impacted soils on the Project site would result in impacts related to emitting hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The SMP as part of MM HAZ-1 shall outlines specific areas where impacted soils must be removed, and would reduce accident conditions via detailed outline of potential contaminates of concerns and subsequent measures to completely manage soil onsite including but not limited to characterization, excavation and handling, staging, transportation, contingency plans, as well as sampling and reporting requirements. MM-HAZ-2 outlines BMPs for dust and particulate management from pre-construction to final completion. MM-HAZ-3 would ensure all regulations and mitigation measures are being met. Finally, compliance with the District's OEHS Environmental Disposal Procedures for Hazardous Waste and Universal Waste[113] when disposing of hazardous materials currently stored on the school grounds would reduce the impacts related to emitting hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school to be a less than significant level.

[109] Los Angeles Unified School District Office of Environmental Health and Safety. 2020. Environmental Compliance/Hazardous Waste. https://www.lausd.org/Page/2798
[110] Los Angeles Unified School District. N.d. Environmental Guidance Manual for Science Centers. https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/135/pdf%20files/EnvironmentalGuidanceManualforScienceCenters11-06.pdf
[111] Los Angeles Unified School District. N.d. Environmental Guidance Manual for Science Centers. https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/135/pdf%20files/EnvironmentalGuidanceManualforScienceCenters11-06.pdf
[112] Los Angeles Unified School District Office of Environmental Health and Safety. 2014. Chemical Hygiene and Labels. https://www.lausd.org/Page/3987
[113] Los Angeles Unified School District. June 12, 2020. Los Angeles Unified School District Reference Guide. Disposal Procedures for Hazardous Waste and Universal Waste. REF-4149.2 https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/REF-4149.2%20Hazardous%20Waste%20.pdf

Impact 3.4-4: The project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment.

The proposed Project would result in impacts regarding creating a significant hazard to the public or the environment due to location on a listed hazardous materials site. The site is not listed on the DTSC's Hazardous Waste and Substances Sites (Cortese) list or the SWRCB GeoTracker database.[114,115] However, the Campus is listed in the DTSC Hazardous Waste Tracking System database for hazardous waste generation (ID CAD982039414) first issued in 1988. During site investigations, several RECs were identified, including elevated levels of dieldrin and benzo (a) pyrene concentrations above screening levels in proposed construction areas surrounding the MPB.

The contaminated soils would be removed in accordance with the SMP in MM-HAZ-1, and the Project would comply with MM-HAZ-1 for the entirety for construction activities, including tracking and documentation of site conditions with appropriate agencies, thereby reducing this impact to a less than significant level.

Significance Determination

Less than Significant

Mitigation Measures

None Required

3.4.6 Cumulative Impacts

There would be no cumulative impacts in relation to the transport, storage, production, use, or disposal of hazardous materials because the proposed Project, any additional projects being completed on the school campus, and any surrounding projects would be required to adhere to project/use specific, local, state and federal regulations related to the transportation, storage, production, use or disposal of hazards and hazardous waste materials. The proposed Project would adhere to MM-HAZ-1 during the pre-construction phase where potentially hazardous soils are to be removed and, therefore, would not create a cumulative impact with any other hazardous waste transportation that regularly happens on the Campus. There would be no cumulative impacts in relation to creating a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment as the proposed Project would be required to adhere to MM-HAZ-1 and would subsequently avoid the potential for accidental release. Each project stage would be subject to these mitigation measures and, therefore, there is no potential for a cumulative impact related to emitting hazardous emissions or handling hazardous materials within one-quarter mile of an existing or proposed school as the nearest school is the Project site itself, and PUC Charter Elementary School located within one-quarter mile. There would not be additional work efforts happening in conjunction with the construction phases of the proposed Project. There may be ongoing maintenance activities that would occur throughout the Campus during operation of the

[114] California Department of Toxic Substances Control (DTSC). N.d. EnviroStor: 3010 Estara Ave, Los Angeles, CA 90065. https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=3010+Estara+Ave+Los+Angeles
[115] California State Water Resources Control Board. N.d. GeoTracker: 3010 Estara Ave, Los Angeles, CA 90065. https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=3010+Estara+Ave+Los+Angeles

proposed Project; however, maintenance projects would not have the same scope or scale associated with the proposed Project and are not anticipated to generate significant hazardous wastes. Additionally, compliance with MM-HAZ-2 and MM-HAZ-3 would avoid cumulative impacts related to hazardous emissions on the school grounds. There would be no cumulative impacts in relation to inclusion on a list of hazardous materials sites as the site is not located on a hazardous waste site and the proposed Project would not change that. Collectively, all potentially significant impacts would be mitigated through MM-HAZ-1 through MM-HAZ-3, and state, federal, and District regulations for the identification, handling, transport, reporting, and disposal of hazardous materials identified on the site.

Significance Determination

No Impact

Mitigation Measures

No mitigation measures are required.

3.4.7 References

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California State Water Resources Control Board. N.d. GeoTracker: 13050 Borden Avenue, Los Angeles, CA. https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=13050+borden+ave+los+angeles (accessed December 3, 2024).

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Los Angeles Unified School District. June 12, 2020. Los Angeles Unified School District Reference Guide. Disposal Procedures for Hazardous Waste and Universal Waste. REF-4149.2. https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/135/REF-4149.2%20Hazardous%20Waste%20.pdf (accessed April 3, 2025).

Los Angeles Unified School District. November 15, 2022. Board of Education Report (File #: Rep-074-22/23). Approve the Redefinition of Five Major Modernization Projects at 49th Street Elementary School, Canoga Park High School, Garfield High School, Irving Middle School, and Sylmar Charter High School, and Amend the Facilities Services Division Strategic Execution Plan to Incorporate Therein.

Los Angeles Unified School District. December 2023. Final Subsequent Program EIR for the School Upgrade Program. https://www.lausd.org/ceqa(accessed April 3, 2025).

Los Angeles Unified School District. N.d. Environmental Guidance Manual for Science Centers. https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/135/pdf%20files/EnvironmentalGuidanceManualforScienceCenters11-06.pdf (accessed April 3, 2025).

Los Angeles Unified School District Office of Environmental Health and Safety. 2014. Chemical Hygiene and Labels. https://www.lausd.org/Page/3987 (accessed April 3, 2025).

LADBS Methane and Methane Buffer Zone Map. https://planning.lacity.gov/eir/WetherlyProject/DEIR/Graphics/Figure%20IV.F-2_LADBS%20Methane%20and%20Methane%20Buffer%20Zone.pdf (accessed April 2, 2025).

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U.S. Environmental Protection Agency. May 21, 2023. Hazardous Waste Transportation. https://www.epa.gov/hw/hazardous-waste-transportation (accessed April 3, 2025).

3.5 NOISE

This section analyzes potential noise and vibration impacts that would result from the proposed Project. The analysis describes the existing noise environment at the Project site, estimates future noise and vibration levels at surrounding land uses resulting from construction and operation of the proposed Project, and identifies the potential for significant impacts. An evaluation of the proposed Project's contribution to potential cumulative noise impacts is also provided. Noise worksheets and technical information and data used in this analysis are provided in Appendix 7, *Noise Background and Modeling Data*, of this Draft EIR.

3.5.1 Environmental Setting

FUNDAMENTALS OF NOISE

Noise Principals and Descriptors

Sound, traveling in the form of waves from a source, exerts a sound pressure level (referred to as sound level) that is measured in decibels (dB), which is the standard unit of sound amplitude measurement. Sound pressure fluctuations can be measured in units of hertz (Hz), which correspond to the frequency of a particular sound. When assessing potential noise impacts, sound is measured using an electronic filter that deemphasizes the frequencies below 1,000 Hz and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to these extremely low and extremely high frequencies. This method of filtering, or weighting, is referred to as A-weighting, expressed in units of A-weighted decibels (dBA), which is typically applied to community noise measurements.

When noise propagates over a distance, the noise level reduces with distance depending on the type of noise source and the propagation path. Noise from a localized source (i.e., point source) propagates uniformly outward in a spherical pattern, referred to as "spherical spreading." Stationary point sources of noise, including stationary mobile sources such as idling vehicles, attenuate (i.e., reduce) at a rate between 6 dBA for acoustically "hard" sites (such as asphalt or concrete surfaces) and 7.5 dBA for "soft" sites (such as dirt and grass) for each doubling of distance from the reference measurement, as their energy is continuously spread out over a spherical surface (e.g., for hard surfaces, 80 dBA at 50 feet attenuates to 74 dBA at 100 feet, 68 dBA at 200 feet).

Fundamentals of Vibrations

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal in inches per second (in/sec), and is most frequently used to describe vibration impacts to buildings. The effects of ground-borne vibration include movement of the building floors, rattling of windows, shaking of items on shelves, or hanging on walls, and rumbling sounds. Building damage is not a factor for most projects, with the occasional exception of blasting and pile-driving during construction. Human annoyance occurs when vibration rises significantly above the

threshold of human perception for extended periods of time. A threshold commonly used to assess when construction vibration becomes annoying is above 78 VdB for residential uses.[116]

SENSITIVE RECEPTORS

Some land uses are considered more sensitive to ambient noise levels than are others due to the amount of noise exposure (in terms of both exposure duration and insulation from noise) and the types of activities typically involved. According to the City of Los Angeles General Plan, residential areas are considered to be the most sensitive type of land use to noise, and industrial/commercial areas are considered to be the least sensitive. Land uses considered noise sensitive by the *City of Los Angeles CEQA Thresholds Guide* include residences, schools, libraries, churches, playgrounds, hospitals, nursing homes, and neighborhood parks.[117] Sylmar Charter HS is considered a sensitive receptor during the school year, when school is in session and students and faculty are on the Campus. The nearest off-site sensitive receptors from proposed construction areas are the single-family residences across from the Campus on Borden Avenue and Astoria Street.

AMBIENT NOISE LEVELS

Schools can generate noise from sports events, athletic fields, playgrounds, and parking lot activity, and some of these features may potentially cause noise increases at nearby receptors, as schools are typically located in residential areas. Sylmar Charter HS is predominantly surrounded by single- and multi-family residential uses. Existing noise levels at the Campus also includes traffic generated noise on surrounding roadways. Using noise monitoring data collected along Astoria Street and Raven Avenue[118] and Housing and Urban Development's (HUD) *Day/Night Noise Level (DNL) Calculator*,[119] the existing street traffic noise levels along Astoria Street and Raven Avenue are anticipated to be between 55 to 56 dBA for daytime level, and 45 to 50 dBA for nighttime level. The existing street traffic noise levels for Borden Avenue is anticipated to have a daytime level of 60 to 65 dBA, and a nighttime level of 55 to 60 dBA.

EXISTING GROUNDBORNE VIBRATION LEVELS

Aside from periodic construction work that may occur throughout the City, sources of groundborne vibration in the Project site vicinity may include heavy-duty vehicular travel (e.g., refuse trucks, delivery trucks, etc.) on local roadways. According to the Federal Transit Administration (FTA), rubber-tire vehicles rarely create ground-borne vibration problems unless there is a discontinuity, or bump, in the road that causes the vibration. A typical bus operating on smooth roadway would generate groundborne vibration velocity levels of approximately 63 vibration decibels (VdB) (approximately 0.006 in/sec PPV) at 50 feet.

[116] Federal Transit Administration, 2020. *Transit Noise and Vibration Impact Assessment Manual*. September. https://www.transit.dot.gov/research-innovation/transit-noise-and-vibration-impact-assessment-manual-report-0123

[117] City of Los Angeles. 2005. L.A. CEQA Thresholds Guide. https://planning.lacity.gov/eir/CrossroadsHwd/deir/files/references/A07.pdf

[118] City of Los Angeles. Sound Level Meter Summary. Granada Hills-Sylmar NCP EIR. Available at: 11_AppE2_NoiseData(Sylmar).pdf

[119] HUD Exchange. Day/Night Noise Level (DNL) Calculator. Available at: Day/Night Noise Level (DNL) Calculator - HUD Exchange

3.5.2 Regulatory Framework

FEDERAL

The 2023 Subsequent PEIR uses the FTA's guidance, the 2006 Transit Noise and Vibration Impact Assessment, to evaluate vibration levels resulting from Project construction activities on human annoyance and structural damage. Based on this guidance, the vibration standards are presented in Table 3-17, *FTA Construction Vibration Impact Criteria for Building Damage*.

Table 3-16 FTA Construction Vibration Impact Criteria for Building Damage

Building Category	PPV (in/sec)[120]
I. Reinforced-concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

STATE

CCR Title 24 establishes the California Building Code (CBC). The most recent building standard adopted by the legislature and used throughout the state is the 2022 version, which took effect on January 1, 2023. The State of California's noise insulation standards are codified in the CBC (Title 24, Part 2, Chapter 12). Additionally, the 2025 California Building Standards Code (Title 24) has been published on July 1, 2025, with an effective date of January 1, 2026.[121] These noise standards are for new construction in California for the purposes of interior compatibility with exterior noise sources. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL.

The State of California has developed a Land Use Compatibility Matrix[122] for community noise environments that further defines the four categories of acceptance and assigns CNEL values to them. Pursuant to the State Land Use Compatibility Standards, noise levels of up to 70 dB are normally acceptable for schools, libraries, churches, hospitals, and nursing homes. .

CALGreen has requirements for insulation that affect exterior-interior noise transmission for non-residential structures.[123] Pursuant to CALGreen Section 5.507.4.1, Exterior Noise Transmission,[124] wall and roof-ceiling assemblies exposed to the noise source making up the building or addition envelope or altered envelope shall meet a composite sound transmission class (STC) rating of at least 50 or a composite outdoor-indoor transmission class (OITC) rating of no less than 40 with exterior windows of a minimum STC of 40 or OITC of 30 within a 65 dBA CNEL or day-night average sound level (L_{dn}) noise contour of an airport, freeway or

[120] U.S. Department of Transportation, Federal Transit Administration. 2006. Transit Noise and Vibration Impact Assessment.
[121] California Department of General Services. 2025. California Building Standards Code. https://www.dgs.ca.gov/bsc/codes
[122] California Governor's Office of Planning and Research. Updated September 1, 2019. General Plan Guidelines: 2017 Update. Appendix D: Noise Element Guidelines. https://lci.ca.gov/docs/OPR_Appendix_D_final.pdf
[123] Multi-family residential buildings greater than three stories are considered under the non-residential standards in Title 24.
[124] California Green Building Standards Code. Chapter 5 Nonresidential Mandatory Measures. Division 5.1 PLANNING AND DESIGN. Section 5.507 Environmental Comfort. 5.507.4.1 Exterior noise transmission, prescriptive method. https://up.codes/viewer/california/ca-green-code-2016/chapter/5/nonresidential-mandatory-measures#5

expressway, railroad, industrial source or fixed-guideway source. Where noise contours are not readily available, buildings exposed to a noise level of 65 dBA L_{eq} during any hour of operation shall have building, addition or alteration exterior wall and roof-ceiling assemblies exposed to the noise source meeting a composite STC rating of at least 45 (or OITC 35), with exterior windows of a minimum of STC 40 (or OITC 30).

CITY OF LOS ANGELES NOISE REGULATIONS

The City of Los Angeles has established policies and regulations concerning the generation and control of noise that could adversely affect noise sensitive land uses.[125] The City does not have established standards for school operational noise.

For construction noise, Los Angeles Municipal Code LAMC Section 41.40 (Noise Due to Construction, Excavation Work – When Prohibited)[126] states that no construction or repair work, or any excavating for, any building or structure, shall be conducted during the following:

- No work performed between the hours of 9:00 PM and 7:00 AM.
- No operation, repair or servicing of construction equipment the job-site delivery of construction materials shall occur between the hours of 9:00 PM and 7:00 AM.
- No construction (other than individual homeowners) within 500 feet of land so occupied before 8:00 AM or after 6:00 PM on any Saturday or on a federal holiday, or at any time on Sunday. Under certain conditions, the City may grant a waiver to allow limited construction activities to occur outside of the limits described above. This code does not apply to emergency repair work.

LAMC Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools)[127] states that "Between the hours of 7:00 a.m. and 10:00 p.m., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding 75 dB(A) for construction. at 50 feet therefrom.

However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means the above noise limitation cannot be met despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of equipment.

LAUSD STANDARD CONDITIONS

The 2023 Subsequent PEIR establishes Standard Conditions (SCs) for reducing impacts on noise and vibration in areas where future projects would be implemented under the SUP, including the proposed Project. The SCs

[125] The City of Los Angeles General Plan identifies noise-sensitive receptors as: single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodgings and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves, and parks.

[126] Los Angeles Municipal Code. Chapter IV Public Welfare. Section 41.40 (Noise Due to Construction, Excavation Work – When Prohibited) http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc

[127] Los Angeles Municipal Code. Chapter XI Noise Regulation. Article 2 Special Noise Sources Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools). http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc

minimize noise and vibration impacts due to both construction and operation of the proposed Project (Table 3-18, *Noise Standard Conditions of Approval*).

Table 3-17 Noise Standard Conditions of Approval

Applicable SC	Description
SC-N-1	LAUSD shall design new buildings and other noise-generating sources to include features such as sound walls, building configuration, and other design features that attenuate exterior noise levels on a school campus to less than 67 dBA L_{eq}.[23]
SC-N-2	LAUSD shall analyze the acoustical environment of the site (such as traffic) and the characteristics of planned building components (such as Heating, Ventilation, and Air Conditioning [HVAC]), and designs shall achieve interior classroom noise levels of less than 45 dBA L_{eq} with a target of 40 dBA L_{eq} (unoccupied), and a reverberation time of 0.6 seconds. Noise reduction methods shall include, but are not limited to, sound walls, building and/or classroom insulation, HVAC modifications, double-paned windows, and other design features. • New construction should achieve classroom acoustical quality consistent with the current School Design Guide and CHPS (California High Performance Schools) standard of 45 dBA L_{eq}. • New HVAC installations should be designed to achieve the lowest possible noise level consistent with the current School Design Guide. HVAC systems shall be designed so that noise from the system does not cause the ambient noise in a classroom to exceed the current School Design Guide and CHPS standard of 45 dBA L_{eq} • Modernization of existing facilities and/or HVAC replacement projects should improve the sound performance of the HVAC system over the existing system. • The District's purchase of new units should give preference to HVAC manufacturers that sell the lowest noise level units at the lowest cost. • Existing HVAC units operating in excess of 45 dBA Leq inside classrooms should be modified
SC-N-3	LAUSD shall incorporate long-term permanent noise attenuation measures between new playgrounds, stadiums, and other noise-generating facilities and adjacent noise-sensitive land uses, to reduce noise levels to meet jurisdictional standards or an increase of 3 dB or less over ambient. Operational noise attenuation measures include, but are not limited to: • Buffer zones; • Berms; • Sound barriers; • Buildings; • Masonry walls; • Enclosed bleacher foot wells; and/or • Other site-specific project design features
SC-N-4	LAUSD or its Construction Contractor shall consult and coordinate with the school principal or site administrator, and other nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. Coordination between the school, nearby land uses and the Construction Contractor shall continue on an as-needed basis throughout the construction phase of the project to reduce school and other noise sensitive land use disruptions.
SC-N-5	LAUSD shall require the Construction Contractor to minimize blasting for all demolition and construction activities, where feasible.

SC-N-6	For projects where pile driving activities are required within 150 feet of a structure, a detailed vibration assessment shall be provided by an acoustical engineer to analyze potential impacts related to vibration to nearby structures and to determine feasible mitigation measures to eliminate potential risk of architectural damage.
SC-N-7	LAUSD shall meet with the Construction Contractor to discuss alternative methods of demolition and construction for activities within 25 feet of a historic building to reduce vibration impacts. During the preconstruction meeting, the Construction Contractor shall identify demolition methods not involving vibration-intensive construction equipment or activities. For example: sawing into sections that can be loaded onto trucks results in lower vibration levels than demolition by hydraulic hammers. • Prior to construction activities, the Construction Contractor shall inspect and report on the current foundation and structural condition of the historic building. • The Construction Contractor shall implement alternative methods identified in the preconstruction meeting during demolition, excavation, and construction, such as mechanical methods using hydraulic crushers or deconstruction techniques. • The Construction Contractor shall avoid use of vibratory rollers and packers adjacent to the building. • During demolition, the Construction Contractor shall not phase any ground-impacting operations near the building to occur at the same time as any ground impacting operation associated with demolition and construction. During demolition and construction, if any vibration levels cause cosmetic or structural damage to the building or structure, a “stop-work” order shall be issued to the Construction Contractor immediately to prevent further damage. Work shall not restart until the building is stabilized and/or preventive measures to relieve further damage to the building are implemented.
SC-N-8	Projects within 500 feet of a non-LAUSD sensitive receptor, such as a residence, shall be reviewed by OEHS to determine what, if any, feasible project specific noise reduction measures are needed. The Construction Contractor shall implement project specific noise reduction measures identified by OEHS. Noise reduction measures may include, but are not limited to, the following: <u>Source Controls</u> • Time Constraints – prohibiting work during sensitive nighttime hours. • Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential: only between 7:00 AM and 7:00 PM). • Equipment Restrictions – restricting the type of equipment used. • Substitute Methods – using quieter methods and/or equipment. • Exhaust Mufflers – ensuring equipment has quality mufflers installed. • Lubrication and Maintenance – well maintained equipment is quieter. • Reduced Power Operation – use only necessary size and power. • Limit Equipment On-Site – only have necessary equipment on-site. • Noise Compliance Monitoring – technician on site to ensure compliance. • Quieter Backup Alarms – manually-adjustable or ambient sensitive types.

	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 the school environment, through implementation of noise control measures, as necessary.[24] Noise control measures may include, but are not limited to: Path Controls • Noise Attenuation Barriers[25] – Temporary noise attenuation barriers installed blocking the line of sight between the noise source and the receiver. Intervening barriers already present, such as berms or buildings, may provide sufficient noise attenuation, eliminating the need for installing noise attenuation barriers. Source Controls • Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential areas: only between 7:00 AM and 7:00 PM). • Substitute Methods – using quieter methods and/or equipment. • Exhaust Mufflers – ensuring equipment has quality mufflers installed. • Lubrication and Maintenance – well maintained equipment is quieter. • Reduced Power Operation – use only necessary size and power. • Limit Equipment On-Site – only have necessary equipment on-site. • Quieter Backup Alarms – manually-adjustable or ambient sensitive types. If OEHS determines that the above noise reduction measures will not reduce construction noise to below the levels permitted by LAUSD's noise standards LAUSD shall mandate that construction bid contracts include the following receptor controls:

	Receptor Controls • Temporary Window Treatments – temporarily reinforcing the building's noise reduction ability. • Temporary Relocation – in extreme otherwise unmitigable cases, students shall be moved to temporary classrooms / facilities away from the construction activity.

3.5.3 Thresholds of Significance

According to Appendix G of the State CEQA Guidelines, the proposed Project could have a potentially significant impact with respect to noise if it would:

a) 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.

b) Generate 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, expose people residing or working in the project area to excessive noise levels.

Criteria (c) was determined to result in no impacts by the Initial Study and, therefore, is not carried forward for analysis in the EIR.

CITY OF LOS ANGELES THRESHOLDS

Operational Traffic Noise

A project would have a long-term operational noise impact if noise levels from project operations cause the ambient noise levels at the property line of affected uses to increase by 3 dBA CNEL, and noise levels reach, or are within the "normally unacceptable," or "clearly unacceptable" category, or increase by 5 dBA CNEL, or greater.

Operational Stationary Noise

Stationary noise sources are prohibited from causing the ambient noise level to increase by more than 5 dBA Leq.

Construction Noise

Project construction-related activities would result in a significant noise impact at nearby sensitive uses if:

- Construction-related noise levels exceed 75 dBA Leq measured at a distance of 50 feet from equipment when construction activities are located within 500 feet of a residential area unless technically feasible mitigation measures are incorporated;

- Construction activities lasting more than 1 day would exceed existing ambient exterior noise levels by 10 dBA Leq, or more, at a noise sensitive use;
- Construction activities lasting more than 10 days in a 3-month period would exceed existing ambient exterior noise levels by 5 dBA Leq, or more, at a noise sensitive use; or
- Construction activities would exceed the ambient noise level by 5 dBA Leq at a noise sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m., or after 6:00 p.m., on Saturday, or on a national holiday, or at any time on Sunday.

LA UNIFIED THRESHOLDS

The 2023 Subsequent PEIR outlines the following LA Unified noise level thresholds for school sites according to Education Code Section 17215. The Project would result in a significant long-term noise impact if:

- Exterior noise levels exceed 67 dBA Leq;
- Interior classroom noise levels exceed 45 dBA Leq; or
- Noise levels at nearby noise-sensitive land uses are permanently increased by 3 dBA CNEL

3.5.4 Methodology

CONSTRUCTION NOISE

Predicted noise levels were identified for the nearest sensitive receptors, as well as for classrooms on Campus, based on their respective distances from the construction equipment. To present a conservative impact analysis, the estimated noise levels were calculated for a scenario in which the loudest equipment was assumed to be located in the construction area, and the distance to the nearest sensitive receptor was calculated. The loudest construction equipment would not always be located at the nearest distance to sensitive receptors, but would typically be active throughout the Project site, and would routinely be located further away from the affected sensitive receptors. The construction noise levels were calculated, in terms of maximum hourly Leq, for sensitive receptor locations based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance. The estimated noise levels at the affected receptors were then analyzed against the construction noise standards.

Mobile Source Noise

To determine if a project would cause a substantial noise increase from project-related traffic, consideration must be given to the magnitude of the increase and the affected receptors. In general, for community noise, a noise level increase of three dBA (which equals a doubling of the noise source energy) is considered barely perceptible, while an increase of five dBA is considered clearly noticeable. An increase of three dBA is often used as a threshold for a substantial increase.

GROUNDBOURNE VIBRATION

Vibration annoyance is typically assessed via a spatial-averaging methodology (i.e., as heavy construction equipment moves around the construction site, average vibration levels at the nearest structures would diminish with increasing distance between structures and the equipment). This methodology is implemented by using

the distance from the center of the construction zone to the nearest sensitive receptors. Groundborne vibration levels resulting from construction activities at the Project site were estimated using data in the *FTA Transit Noise and Vibration Impact Assessment* guidance document. Potential vibration levels resulting from construction of the Project are identified for offsite locations that are sensitive to vibration (i.e., existing residential buildings) based on their distance from construction activities, as well as classrooms on Campus.

Construction Vibration-Induced Architectural Damage

Damage from vibrational energy is typically a one-time event and is most likely to occur when the source and receptor are very close. The threshold for the assessment of risk of architectural damage is 0.2 inches per second peak particle velocity (in/sec PPV) for typical residential and school buildings.[128] Vibration levels exceed 0.2 PPV in/sec if a vibratory roller is operated within approximately 25 feet of the receiving structure, or when large bulldozers or loaded trucks are operated at distances closer than 15 feet.

OPERATIONAL NOISE

During operation of the Project, noise levels would be generated onsite by stationary noise sources, such as generators and air conditioning units, and student activities, which would be similar to the existing conditions. The noise levels generated by the stationary noise sources are not assessed because proposed equipment would replace existing equipment that is potentially louder and less efficient. Additionally, the locations and specifications of equipment would not be available at this stage of the proposed Project. Instead, a qualitative assessment is used and the applicable SCs from the 2023 Subsequent PEIR are incorporated.

3.5.5 Impact Analysis

Impact 3.5-1: The Project would not result in 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.

The proposed Project would result in potentially significant impacts in relation to exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. To evaluate potential impacts, noise levels were estimated for the nearest sensitive receptors to proposed construction activities, (refer to Figure 4, Section 2.4.3 – *Sensitive Receptors*) using the FHWA Roadway Construction Noise Model (RCNM)[129] (Appendix 7 – Noise Modeling Data). Based on the anticipated construction equipment and operational activities, the proposed Project noise level is not expected to exceed applicable noise significance thresholds.

Sensitive Receptors

Land uses considered noise sensitive by the *City of Los Angeles CEQA Thresholds Guide* include residences, schools, libraries, churches, playgrounds, hospitals, nursing homes, and neighborhood parks.

The nearest off-site sensitive receptors from proposed construction areas are the single-family residences across from the Campus on Borden Avenue and Astoria Street. Construction of the new MPB, associated site work,

[128] FTA category "non-engineered timber and masonry buildings"
[129] Federal Highway Administration (FHWA). 2006, January. FHWA Roadway Construction Noise Model (RCNM) User's Guide. https://www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/

and Parking Lot No. 3 improvements would occur as close as 66 feet to the nearest single-family homes along Borden Avenue. Parking Lot No. 1 expansion activities, including portable building demolition, would occur within 77 feet of the nearest home along Astoria Street (see Figure 11 – *Acoustical Noise*).

Construction Noise

Two types of short-term noise could occur during construction: 1) mobile-source noise from the transport of workers, material deliveries, and debris/soil hauling; and 2) onsite noise from use of construction equipment. Construction is anticipated to second quarter of 2026 and finish in the first quarter of 2029.

Each stage of construction involves the use of different kinds of construction equipment and therefore has its own distinct noise characteristics. Table 3-19 lists maximum construction equipment noise levels at 50 feet.[130]

Table 3-18 Construction Equipment Noise Levels

Equipment	Noise Level (dBA, L_{max}) at 50 ft
Auger Drill Rig	85
Backhoe	80
Chain Saw	85
Clam Shovel	93
Compactor (ground)	80
Compressor (air)	80
Concrete Mixer Truck	85
Concrete Pump	82
Concrete Saw	90
Crane (mobile or stationary)	85
Dozer	85
Dump Truck	84
Excavator	85
Front End Loader	80
Generator (25 KVA or less)	70
Generator (more than 25 KVA)	82
Grader	85
Hydra Break Ram	90
Jackhammer	85
Mounted Impact Hammer (hoe ram)	90
Paver	85
Pneumatic Tools	85

[130] Duty cycles (see table) are related to the percentage of utilization of each piece of equipment at typical construction phases for development projects such as schools and are used to calculate average noise levels in a given period.

Equipment	Noise Level (dBA, L_{max}) at 50 ft
Pumps	77
Tractor	84
Vacuum Excavator	85
Vibratory Concrete Mixer	80
Scraper	85

Source: Federal Highway Administration (FHWA), 2006. Construction Noise Handbook. August.
Note: KVA = kilovolt amps

Construction equipment typically moves around the site and has variable power levels. Noise from construction equipment decreases by approximately 6 dBA with each doubling of distance from the source. For example, the noise levels from a bulldozer that generates 85 dBA at 50 feet would attenuate to 79 dBA at 100 feet, 73 dBA at 200 feet, 67 dBA at 400 feet, and 61 dBA at 800 feet. Also, noise levels are reduced by the amount of use as well as barrier effects provided by buildings.

On-Campus Receptors

Interim portable classroom facilities at 50 feet from construction activities that have a direct sightline may experience exterior noise levels as high as 90 dBA L_{max}. With a typical 25 dB exterior-to-interior noise reduction, interior noise levels may be as high as 65 dBA L_{max}.

LA Unified's interior noise threshold is 45 dBA and depending on the classroom activity, interior levels above this threshold may be disruptive to the learning environment. However, low-intensity construction phases would generate lower noise levels and would be less likely to result in disruptions due to excessive interior noise environments. Additionally, for some construction activities, noise would be further reduced by shielding effects from buildings between the construction zone and classrooms.

Buildings #4, #6, #16, #21, #22 and #23 are within 50 feet and direct line of sight from proposed work areas and may experience exterior noise levels as high as 90 dBA L_{max} during the use of a concrete saw associated with demolition activities. With a typical 25 dB exterior-to-interior noise reduction, interior noise levels in these buildings may be as high as 65 dBA L_{max}.

Noise impacts will be less than significant to building occupants after the implementation of SC-N-4, SC-N-7 and SC-N-9, which requires: construction equipment that is properly tuned and maintained to ensure excessive noise is not generated, coordination between construction contractor and school administrators prior to and throughout construction to schedule high noise producing activities at times that minimize disruption to classes (SC-N-4); and where feasible, alternative methods of demolition and construction for activities within 25 feet of a historic building (or non-historic buildings more than 45 year old) to reduce vibration impacts (SC-N-7; this measure would also reduce noise in classrooms). Additionally, compliance with SC-N-8 requires source controls (time constraints, equipment location and type restrictions, etc.), path controls (noise barriers capable of attenuating construction noise by 15 dBA), and/or receptor controls (notification and noise complaint process) to reduce noise impacts. The specific method under SC-N-8 would depend on the type of construction noise, duration, and classroom disruption. As with other construction projects occurring at schools throughout the District, if construction occurs while classes are in session, SC-N-4 and SC-N-7 would be implemented to avoid noise disruptions. Additionally, SC-N-8 would be implemented to control the timing for the operation

of noise-generating equipment and would make every effort to move students away from noisy construction phases. Finally, if the construction noise disruption cannot be avoided the contractor would install noise barriers, as appropriate, to limit construction noise levels.

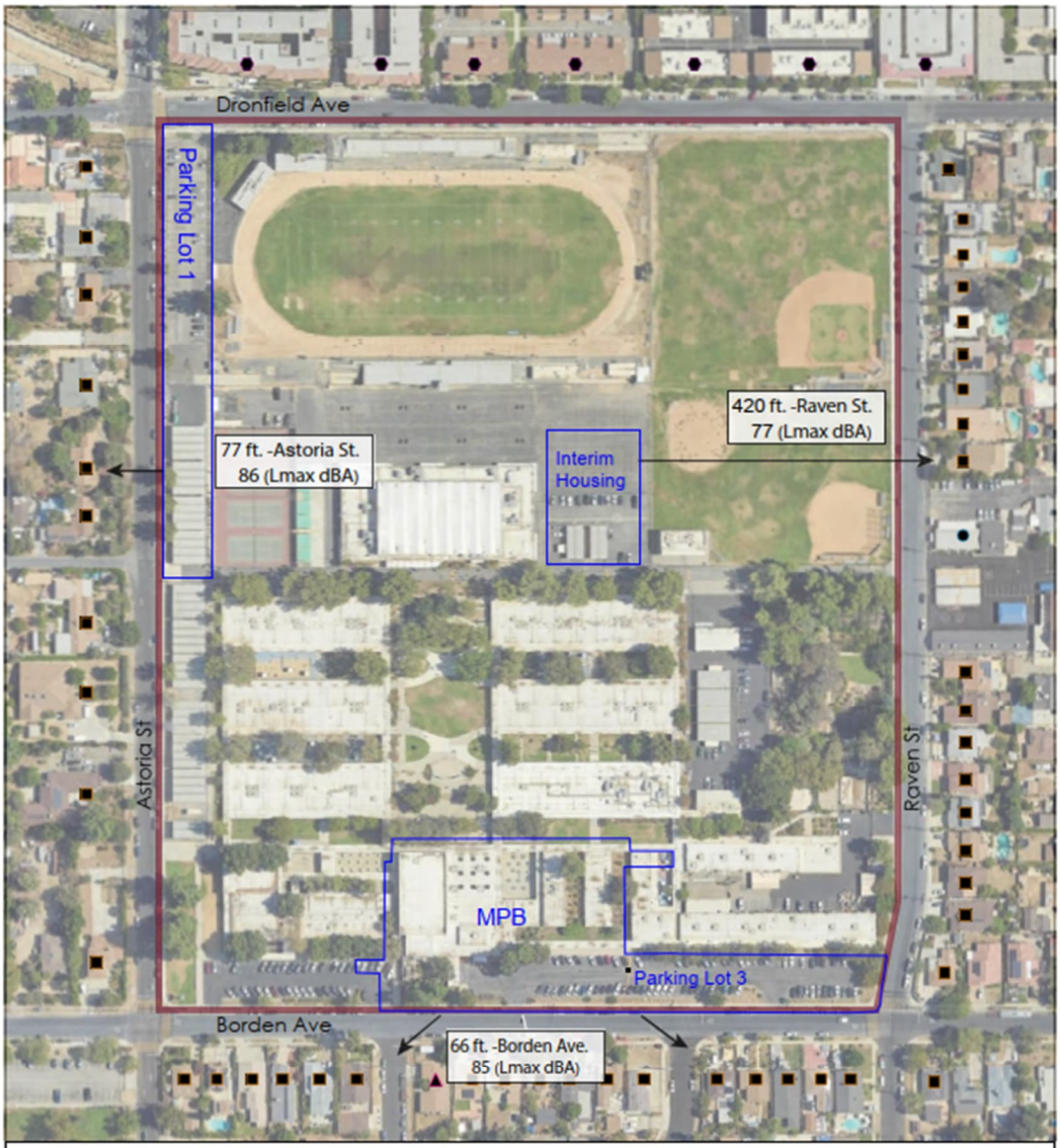
Off-Site Receptors

Figure 11 presents the chosen receptors for analysis purposes below, utilizing the outer extent of proposed construction areas for analysis of impact to the nearest sensitive receptors. The anticipated construction equipment mix was categorized by construction activity using the FHWA RCNM. The maximum and average noise levels were assessed for all three Phases, which are assumed to have the highest noise generation due to building demolition and new building construction (Table 3-20, *Project-Related Construction Noise Levels*).

Table 3-19 Project-Related Construction Noise Levels

Construction Area: Parking Lot 1 and Interim Housing	**Impact Threshold**	**Maximum at 50 feet (L_{max} dBA)**	**Residences along Astoria Street (77 Feet from Construction (L_{max} dBA)**	**Residences along Borden Avenue (685 Feet from construction) L_{max} dBA)**	**Residences along Raven Street (420 feet from construction) (L_{max} dBA)**
Phase 1 – Interim housing, demolition of bungalows #38 and #39	75 dBA	90	86	67	77
Phase 3 – Demolish four portables and extend Parking Lot No. 1.	75 dBA	81	77	58	56
Construction Area: MPB and Parking Lot 3	**Impact Threshold**	**Maximum at 50 feet (L_{max} dBA)**	**Residences along Borden Ave. (66 feet from MPB construction) (L_{max} dBA)**	**Residences along Astoria St. (420 feet from MPB construction) (L_{max} dBA)**	**Residences along Raven Street 480 Feet from MPB construction) (L_{max} dBA)**
Phase 2A – Abatement and demolition of existing MPB/food service/student store and buildings #19 and #20.	75 dBA	90	85	71	70
Phase 2B – Construct new MPB, student store and site work.	75 dBA	82	77	65	62

Figure 11. Acoustical Noise



According to LAMC Section 41.40, construction or repair work is allowed between 7:00 AM and 9:00 PM, Monday through Friday, and between 8:00 AM and 6:00 PM on Saturdays or national holidays (not allowed on Sundays). District contractors would comply with City regulations for construction hours.

LAMC Section 112.05 specifies the maximum noise level of 75 dBA at 50 feet. As shown in Table 3-10, the construction noise levels would average between 56 and 86 dBA L_{max} at the nearest sensitive receptors, with demolition of existing buildings having the highest estimated levels of noise due to use of concrete saws.

Implementation of SC-N-8 requires all feasible measures to reduce construction noise below the Municipal Code standard through source controls (e.g., scheduling, equipment restrictions, mufflers, reduced power, noise compliance monitoring), path controls (e.g., temporary noise barriers, noise curtains, enclosures), and receptor controls (e.g., community participation, noise complaint response and communications). With implementation of SC-N-8, particularly use of noise barriers along Astoria Street, Borden Avenue, and Raven Street, construction noise levels could be reduced by up to 15 dBA. During demolition, which is estimated to be the loudest phase, this would reduce construction noise levels to approximately 71 dBA L_{max}, which meets the 75 dBA L_{max} criterion. Construction would not generate a substantial noise increase in excess of established standards. Impacts would be less than significant.

Mobile Source Noise

The proposed Project would not result in an increase in student capacity and therefore would not increase traffic volumes and corresponding noise levels. Therefore, long-term noise impacts along local roadways would be less than significant.

Stationary Source / Operational Noise

Following the completion of construction activities, operational noise sources would include use of rooftop HVAC. Such equipment would typically generate noise levels ranging up to 72 dBA at a distance of three feet. The noise generated by mechanical systems to be installed on the new building is expected to be similar to the mechanical equipment noise generated by surrounding buildings in the area. Conservatively assuming the nearest proposed building is within 50 feet of the Project site boundary, the nearest sensitive receptors would be residents abutting to Project site boundary to the west. At this distance, HVAC noise would attenuate to approximately 48 dBA, thereby the overall noise from HVAC would be less than 50 dBA during the daytime, which would not exceed City noise standards for residential uses. SC-N-2 has restrictions on HVAC noise to limit potential noise impacts for HVAC installation that would exceed established standards. Vehicle-related sounds during student drop-off and pick-up times (such as braking, car doors closing, honking, and idling engines) would temporarily raise the localized ambient noise along the school frontage since pick-up and drop-off activity would occur curbside, however, it would only occur twice a day during the school year. Therefore, student drop-off and pick-up activities would not significantly raise the community noise levels.

Significance Determination

Less than significant impact.

Mitigation Measures

No mitigation measures are required.

Impact 3.5-2: The project would not result in generation of excessive groundborne vibration or groundborne noise levels.

Construction Vibration

Construction activities can generate varying degrees of ground vibration, depending on the construction procedures, the equipment used, and the proximity to vibration-sensitive uses. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings near a construction site varies depending on soil type, ground strata, and receptor building construction. The generation of vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight damage at the highest levels. Ground vibrations from construction activities rarely reach levels that can damage structures but can achieve levels in buildings close to a construction site that are perceptible.[131] Table 3-21 lists vibration levels for different types of construction equipment. Construction of the proposed Project would not require blasting or other activities that would result in excessive ground-borne vibrations; and construction equipment would not produce substantial vibration impacts

Table 3-20 Construction Equipment Vibration Levels

Equipment	Approximate RMS1 Velocity at 25 feet (VdB)	Approximate PPV2 at 25 feet (in/sec)
Pile Driver, Impact (Upper Range)	112	1.518
Pile Driver, Impact (Typical)	104	0.644
Pile Driver, Sonic (Upper Range)	105	0.734
Pile Driver, Sonic (Typical)	93	0.170
Vibratory Roller	94	0.210
Large Bulldozer	87	0.089
Caisson Drilling	87	0.089
Loaded Trucks	86	0.076
Jackhammer	79	0.035
Small Bulldozer	58	0.003

1RMS velocity calculated from vibration level (VdB) using the reference of 1 microinch/second and a crest factor of 4.
2PPV – peak particle velocity measured in inches/second.
Source: Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment, September 2018.

Groundborne vibration is rarely annoying to people who are outdoors, so it is usually evaluated in terms of indoor receivers. For annoyance, vibration is typically noticed nearby when objects in a building generate noise from rattling windows or picture frames; impacts are based on the distance to the nearest building. Table 3-22 shows the vibration levels from typical construction equipment at adjacent receptors. As shown, vibration from construction activities is not anticipated to be perceptible at the nearest receptors.

[131] Federal Transit Administration (FTA). 2020, September. Transit Noise and Vibration Impact Assessment. U.S. Department of Transportation (DoT). FTA-VA-90-1003-06. https://www.transit.dot.gov/research-innovation/transit-noise-and-vibration-impact-assessment-manual-report-0123

Table 3-21 Construction Equipment Vibration Annoyance

Construction Area: Parking Lot 1 and Interim Housing	**Impact Threshold (Damage to Non-engineered timber and masonry buildings PPV, in/sec)**	**Maximum at 50 feet (PPV, in/sec)**	**Astoria Street Homes 77 feet from Edge of Construction Zone to Building (PPV, in/sec)**	**Borden Avenue Homes 685 feet from Edge of Construction Zone to Building (PPV, in/sec)**	**Raven Street Homes 420 feet from Edge of Construction Zone to Building (PPV, in/sec)**
Phase 1 – Install Interim Housing, Setup Contractor Trailer with New Electrical Service, Restripe existing Parking Lot 1 for Interim Staff Parking, Provide Temporary Staff Parking at Basketball Courts, New Chiller Yard and installation of new chiller line; demolition of bungalow buildings # 38 & 39.	0.2	0.028	0.015	0.001	NA
Phase 3 – Remove Interim Housing and reinstall volleyball courts, Remove fencing for temporary staff parking and repair existing basketball courts, Remove 4 existing portables and restore Parking Lot 1. Remove Construction trailers and restripe parking at Parking Lot 3.	0.2	NA	NA	NA	NA
Construction Area: MPB and Parking Lot 3	**Impact Threshold (Damage to Non-engineered timber and masonry buildings PPV, in/sec)**	**Maximum at 50 feet (PPV, in/sec)**	**Astoria Street Homes 420 Feet from Edge of Construction Zone to Building (PPV, in/sec)**	**Borden Avenue Homes 66 Feet from Edge of Construction Zone to Building (PPV, in/sec)**	**Raven Street Homes 480 Feet from Edge of Construction Zone to Building (PPV, in/sec)**
Phase 2A – Abatement & demolition of existing MPB/Food Service and Buildings 19 & 20.	0.2--	0.074	0.003	0.031	0.002
Phase 2B – Construct New MPB and Site Work	0.2	0.028	0.001	0.017	0.001

As heavy construction equipment moves around the Project site, average vibration levels at the nearest structures would diminish with increasing distance between structures and the equipment would generally not be perceptible and would fall well below the 78 VdB marker. As part of the proposed Project, implementation of SC-N-5 requires the use of less-vibration-intensive equipment when working next to existing buildings. Under SC-N-4, LA Unified Facilities Division or its construction contractor shall consult and coordinate nearby

noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. As required by the LAMC Section 41.40, construction activities would not occur outside of the allowable hours of 7:00 AM to 9:00 PM Monday through Friday or 8:00 AM and 6:00 PM on Saturdays. No construction activities would occur on Sundays or federal holidays. Annoyance vibration impacts would be less than significant.

On-Campus Receptors

Since construction activities may take place while school is in session and since temporary classroom facilities may be located near the construction site, it is possible that the students' learning activities could be affected. However, to the extent feasible, a substantial amount of construction work would be conducted during school periods when students are not on Campus.

Depending on construction and classroom schedule construction areas may be adjacent to active classrooms; however, it is not possible to assess specific vibration levels over the course of the construction period. Generally, students in classrooms may experience vibration levels more than 78 VdB when vibratory rollers operate within approximately 85 feet of the classrooms, and within approximately 50 feet of large bulldozers and other heavy equipment. At 78 VdB vibrations are barely felt, but groundborne noise may be audible. Vibration levels would diminish rapidly with increased distance between the receptors and the equipment, and construction activities farther than 85 feet from classrooms would not be felt.

Implementation of SC-N-5 provides requirements for discussions between construction contractor and school administrators prior and throughout construction to schedule high vibration producing activities at times that minimize disruption to classes. SC-N-5 would reduce construction vibration and annoyance to staff and students in adjacent buildings. School administration and the construction contractor will work together to communicate and coordinate construction activities, location, schedule, and potential vibration-intensive activities during each construction phase. Administrators may arrange for alternative classroom occupancy in the event that construction vibration causes any disturbance to classroom instruction. Other typical methods for dealing with classroom disruption are for the construction contractor to conduct vibration-intensive activities before or after class instruction at the nearest classrooms. Some construction work would be conducted during school breaks when students are not on Campus. Therefore, construction-generated vibration annoyance for on-Campus receptors would be less than significant.

Architectural Damage

On-Campus Receptors

Many onsite buildings are located adjacent to areas where demolition of existing buildings and/or construction of new buildings would occur. Some of these buildings are considered as contributors to the potential historic district associated with the Campus. As shown in Table 3-23, operation of large heavy construction equipment (vibratory rollers, large bulldozers or loaded trucks) close to Campus buildings may exceed the FTA's 0.2 in/sec PPV criterion, which could potentially result in vibration-induced architectural damage. Table 3-23 shows the reference vibration levels for typical construction equipment.

Table 3-22 Construction Equipment Vibration Damage

Equipment	Vibration Levels at 25 Feet PPV (inch/sec)
Vibratory Roller	0.21
Static Roller	0.05
Large Bulldozer	0.089
Small Bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076

Source: Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment, September 2018.

As part of the proposed Project, implementation of SC-N-7 would be applied to reduce the possibility of architectural damage. SC-N-7 requires the use of less-vibration-intensive equipment when working within 25 feet of historic buildings. Alternatives shall include mechanical methods using static, non-vibratory rollers or small bulldozers in lieu of large bulldozers. Additionally, implementation of inspection and reporting on the current foundation and structural condition of the existing building. As part of the proposed Project, implementation of SC-N-6 requires that if demolition is necessary adjacent to historic or fragile structures the Construction Contractor would avoid using impact tools, if feasible. SC-N-8 requires the construction contractor to identify alternative methods of demolition and construction for activities that do not involve vibration-intensive equipment or activities. Therefore, with implementation of these SCs, impacts from vibration-induced architectural damage would be less than significant to the historic on-site buildings.

Off-Site Receptors

The nearest off-Campus structures are residential homes along Borden Avenue and Astoria Street. At these distances from proposed construction work (66 to 77 feet respectively), there would be no potential for architectural damage due to construction vibration from vibratory rollers or large bulldozers. However, the District would still implement SC-N-7 which requires use of alternative methods of demolition and construction to minimize construction related vibration. Therefore, with implementation of these SCs, impacts from vibration-induced architectural damage would be less than significant to off-site sensitive receptors.

Groundborne Noise

Construction-related groundborne noise occurs mainly from the powered mechanical equipment for rock breaking/drilling works (e.g., hydraulic breaker, rock drill, pile rig, etc.) and tunnel boring machine. Operation-related groundborne noise occurs when trains operate in tunnels that are located in close proximity to occupied structures. The proposed Project does not include activities or equipment that would generate substantial construction or operational groundborne noise. No impacts would occur.

Operational Vibration

Typically, the land uses that result in vibration impacts are industrial businesses that use heavy machinery or railroads where passing trains generate perceptible levels of vibration. The proposed Project is a high school, and there would be no significant vibration-generating sources during operation; therefore, no impacts would occur.

Significance Determination

Less than significant impact.

Mitigation Measures

No mitigation measures are required.

3.5.6 Cumulative Impacts

As an active school campus, Sylmar Charter HS is anticipated to have ongoing maintenance activities that would occur throughout the Campus. However, subsequent projects on the Campus would not have the same scope, or scale, associated with this Project and would generate little or no construction noise. In addition, the District has more than 22 comprehensive modernization, upgrade, or new development projects planned for campuses located within the District's boundaries but none of these would occur within one mile of the Campus. No other construction activities would occur on the Campus, other than activities described and analyzed herein, that would contribute to a cumulative construction noise environment. There are no ongoing or reasonably foreseeable projects located within 500 feet of the Project site. Therefore, the cumulative construction and operational noise and vibration impacts would be less than significant.

3.5.7 References

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California Green Building Standards Code. Chapter 5 Nonresidential Mandatory Measures. Division 5.1 PLANNING AND DESIGN. Section 5.507 Environmental Comfort. 5.507.4.1 Exterior noise transmission, prescriptive method. https://up.codes/viewer/california/ca-green-code-2016/chapter/5/nonresidential-mandatory-measures#5 (accessed April 3, 2025).

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Los Angeles Municipal Code. Chapter XI Noise Regulation. Article 2 Special Noise Sources Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools). http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc (accessed April 3, 2025).

3.6 PEDESTRIAN SAFETY

This section provides an assessment of potential impacts related to pedestrian safety that could result from implementation of the Project. Potential impacts addressed in this section are associated with substantial increases in vehicular and/or pedestrian hazards due to design features or incompatible uses; creation of unsafe routes to schools for students walking from local neighborhoods, and site location that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard.

The analysis in this section is primarily based on the Linscott, Law, & Greenspan, Engineers (LLG) *Pedestrian and Safety Study for Sylmar Charter High School Major Modernization Project* findings, which is included as Appendix 8 of this EIR. Scoping comments from the California Department of Transportation (Caltrans) were received (Appendix 3 of the EIR) regarding potential increase in vehicle miles traveled (VMT) and greenhouse gas emissions (GHGs) due to an increase in vehicle parking spaces on Campus, and recommendations for ROW improvements to improve pedestrian safety on the streets surrounding the Campus including Astoria Street, Borden Avenue intersections of Berg Street and Dyer Street, and intersections of Dronfield Avenue and Raven Street, and Borden Avenue and Astoria Street. These comments are addressed in this section with recommendations for implementation during construction phases of the Project.

3.6.1 Environmental Setting

Students, faculty, and staff can currently travel to school using public transit routes, bicycles, and by walking. In addition to the six (6) pedestrian access points, there are eight (8) vehicle entry points to the Campus (refer to Figure 8, *Existing Site Plan* in Section 2.4.9). No formal signage for drop-off/pick-up loading zones were posted on any of the Campus frontages during LLG's site observations. During the morning drop-off period, it was observed that the majority of guardians conducted student drop-off procedures along the east side of Astoria Street, the west side of Raven Street, and the north side of Borden Avenue along the Campus frontages. No existing crossing guards to assist with student/pedestrian crossing were observed during peak periods at the schools main entrance intersection of Astoria Street/Borden Avenue.

Most of the school bus loading/unloading activities were observed to occur along the Campus frontage on the west side of Raven Street. All of the 205 on-site parking spaces were observed to be utilized by the staff/administration for Sylmar Charter HS, SBHEM, Evergreen, and City of Angels as well as visitors.

3.6.2 Regulatory Framework

STATE

There are no state regulatory transportation plans or programs that are applicable to potential impacts of the proposed Project's temporary construction-period activities. As described below in Section 3.6.5, because the proposed Project would not increase capacity for enrollment or staff at the school, there would be no permanent increase in traffic generated by the Project and no permanent (ongoing) pedestrian safety effects caused by the Project (i.e., after construction is complete).

REGIONAL

There are no regional regulatory transportation plans or programs that are applicable to potential impacts of the proposed Project's temporary construction-period activities.

LOCAL

Vision Zero Initiative

Former Mayor Eric Garcetti issued Executive Directive No. 10 in August 2015, formally launching the Vision Zero initiative in Los Angeles. Vision Zero is also a stated safety objective in the Mobility Plan 2035, which sets the goal of zero traffic deaths by 2035. Vision Zero is a policy which prioritizes the safety of pedestrians and bicyclists on public streets, with the understanding that roads which are safe for vulnerable users would be safer for all users, in an effort to eliminate traffic fatalities.[132] The Vision Zero Task Force has identified streets where investments in safety will have the most impact in reducing severe injuries and traffic fatalities in the City. These roads are collectively known as the High Injury Network (HIN). The roadways in the vicinity of the Sylmar Charter HS Campus that have been identified on the City's HIN are noted below:

- Polk Street between Borden Avenue and Woodcock Avenue (approximately 0.3-mile west of campus);
- Sayre Street between Gladstone Avenue and Dronfield Avenue (approximately 0.10-mile east of campus);
- Hubbard Street between Foothill Boulevard and Glenoaks Avenue (approximately 0.30-mile east of campus); and
- Foothill Boulevard between Polk Street and Arroyo Street (approximately 0.25-mile north of campus).

If a proposed project results in significant traffic impacts at intersections located along a designated HIN, LADOT's Vision Zero group will review those specific locations and immediate vicinity for potential safety enhancements that are consistent with the City's Vision Zero initiative.

LAUSD School Design Guide

The 2023 LAUSD School Design Guide includes guidelines for vehicular access, parking, and pedestrian safety.[133] 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. LA Unified shall implement the applicable sidewalk requirements outlined in the School Design Guide. LA Unified 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.

[132] Los Angeles Department of Transportation. N.d. VISION ZERO: Fletcher Drive Safety Improvements. https://ladotlivablestreets.org/projects/fletcher
[133] Los Angeles Unified School District, Design Standards Department. August 2023. School Design Guide: Los Angeles Unified School District.

- 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.

OEHS Traffic and Pedestrian Safety Program

LA Unified has developed performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at 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.

Safe Routes to School (SR2S) Program

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.

3.6.3 Thresholds of Significance

For the purposes of this EIR, LA Unified has used the checklist questions in Appendix G of the CEQA Guidelines as the significance criteria, along with applicable thresholds of significance established by the local jurisdiction (City of Los Angeles), to determine whether the Project would have a significant environmental impact regarding Pedestrian Safety. Based on the size and scope of the Project and the potential for impacts, the criteria identified below are included for evaluation in this EIR.

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?

Criteria (c) was determined to result in less than significant impacts by the Initial Study (see Appendix 1 to the EIR) and, therefore, is not carried forward for further analysis in the EIR.

3.6.4 Methodology

It is anticipated that Campus operations would be more efficient or would be otherwise improved following implementation of the proposed Project, which would result in new and upgraded facilities, and would not result in substantive changes to the existing operation of the school. Project implementation would not provide for an increase in the number of students attending the school or staff required to operate the school. As such, operational activities associated with the proposed Project are not additive to those operations analyzed in the

2023 Subsequent PEIR and would not result in substantial changes that have not previously been identified in the 2023 Subsequent PEIR.

Specifically related to the traffic analysis presented herein, there would be no permanent increase in traffic generated by the school. Therefore, this analysis primarily focuses on potential impacts associated with temporary increases in traffic associated with Project construction activity. This analysis assesses existing pedestrian safety conditions and potential risks to pedestrian safety from the Project construction or operation. The analysis in this section is primarily based on the Pedestrian and Safety Study, (Appendix 8). LLG conducted field observation site visits to Sylmar Charter HS on January 31, 2024, for the traffic and pedestrian safety assessment.

LAUSD Standard Conditions

Projects implemented under the 2023 Subsequent PEIR are anticipated to have less-than-significant impacts related to pedestrian safety within the LA Unified service area with the incorporation of Standard Conditions (SCs). Applicable SCs related to Project-specific impacts to pedestrian safety are provided in Table 31, Pedestrian Safety Standard Conditions of Approval.

Table 3-23 Pedestrian Safety Standard Conditions of Approval

Applicable SC	Description
SC-PED-1	LAUSD shall participate in the Safe Routes to School (SR2S) program. **Caltrans SR2S program.** LAUSD is a participant in the SR2S program administered by Caltrans, local law enforcement, and transportation agencies. OEHS provides pedestrian safety evaluations as a component of traffic studies conducted for new school projects. This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25-mile radius of a proposed school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic.
SC-PED-2	LAUSD shall implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program. **OEHS Traffic and Pedestrian Safety Program** LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for: student drop-off areas, vehicle access, and pedestrian routes to school. School traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.
SC-PED-3	LAUSD shall implement the applicable sidewalk requirements outlined in the School Design Guide. LAUSD shall also coordinate with the responsible traffic jurisdiction/ agency to implement infrastructure improvements prior to the opening of a school. Improvements shall include, but are not limited to:

	• Clearly designate passenger loading areas with the use of signage, painted curbs, etc. • Install new walkway and/or sidewalk segments where none exist. • Substandard walkway/sidewalk segments shall be improved to a minimum of eight feet wide. 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-PED5	LAUSD shall design new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide. **School Design Guide.** The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.
SC-T-2	Implementation of SC-T-2.
SC-T-3	Implementation of SC-T-3.
SC-T-4	Implementation of SC-T-4.

3.6.5 Impact Analysis

Impact 3.6-1: The Project would not substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses.

Construction

The proposed Project would result in less than significant impact with implementation of LLG's *Pedestrian and Safety Study* recommendations. There is a possibility that driveway improvements and off-site utility hookups in the ROW may impact their use during the construction phase of the Project. Additionally, there is a possibility of construction activity-based traffic that may pose risks to pedestrian safety and access to the Sylmar Charter HS Campus.

Pedestrian Access During Construction Activities

The *Pedestrian and Safety Study* confirmed that due to the multiple loading areas on Campus, existing sidewalks along Borden Avenue, Raven Street, and Astoria Street are anticipated to be maintained to the extent possible during construction, depending upon the construction activity. In addition, the following intersections with crosswalks generally utilized for access to/from campus are expected to be maintained during construction activities:

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

As mentioned, there is no formal signage for drop-off/pick-up loading zones at any of the Campus frontages based on LLG's observations. Further, there are no existing crossing guards to assist with student/pedestrian crossing during peak periods at the school's main entrance intersection of Astoria Street / Borden Avenue. Compliance with SC-PED-1 through SC-PED-5 would ensure that potential pedestrian safety impacts during construction would be less than significant. As the Project would maintain pedestrian access and implement SC-T-4 requirements for contractors to submit a Construction Worksite Traffic Control Plan (including strategies to safely accommodate students walking from local neighborhoods) prior to construction, safety conditions for students would be maintained or improved during construction activities. Construction would include a traffic control plan, maintenance of existing sidewalks, access points, and crosswalks. Additional recommendations are contained in the *Pedestrian and Safety Study* to reduce construction related pedestrian safety hazards, but are not required to reduce significant impacts.

The Project site would still function as a school, and the school would remain operational throughout construction activity. The proposed Project would not interfere with public right-of-way, except for construction vehicle entry and exiting from the site, traffic from construction activities, and temporary encroachments for utility hookups and driveway improvements.

Operation

The Project would be bounded within the proposed site, and there are no plans for a design feature that would significantly decrease vehicular and/or pedestrian safety. The proposed Project plans to improve portions of parking lots and driveway access on the Project site and provide for ADA upgrades. During operation, there would be no impact regarding the substantially increasing vehicular and/or pedestrian safety hazards due to incompatible uses. Additional recommendations are contained in the *Pedestrian and Safety Study* to further improve operations related pedestrian safety hazards and circulation but are not required as part of the Project.

Significance Determination

Less than significant impact.

Mitigation Measures

No mitigation measures are required.

Impact 3.6-2: The Project would not create unsafe routes to schools for students walking from local neighborhoods.

Construction

The proposed Project would be implemented at the existing Campus and would not directly or indirectly eliminate sidewalks, crosswalks, or traffic control devices at intersections. All existing pedestrian access points to the Campus are expected to be maintained, depending upon the construction phasing activities.[134] The Project would not change the existing use of the site, increase the student enrollment capacity of the School, or alter the existing sidewalks surrounding the Project site. The proposed Project is limited to modernizing the Campus itself. Existing vehicle loading areas, sidewalks, and crosswalks are expected to be maintained during construction activities. The presence of additional vehicles, trucks, and equipment may disrupt pedestrian access during construction phasing. As the Project would maintain pedestrian access and implement SC-T-4 requirements for contractors to submit a Construction Worksite Traffic Control Plan (including strategies to safely accommodate students walking from local neighborhoods) prior to construction, safety conditions for students would be maintained or improved during construction activities. Construction would include a traffic control plan, maintenance of existing sidewalks, access points, and crosswalks. The *Pedestrian and Safety Study* contains additional recommendations related to providing safe routes for students to school, but they are not required as part of the Project.

Operation

The proposed Project would alter the configuration of the Campus and not affect surrounding routes for schools. Additional recommendations are contained in the *Pedestrian and Safety Study* to further improve safe routes to school but are not required as part of the Project. This includes providing sidewalks with a minimum width eight feet along the west side of Astoria Street between Dronfield Avenue and Borden Avenue, as well as along the east side of Astoria Street south of Borden Avenue.

Comments provided by the *Pedestrian and Safety Study* recommended that student pick-up/drop-off operations be included as a part of school policies for parents and guardians at the start of each new school year. This policy would include all general traffic procedures, drop-off/pick-up procedures, traffic circulation and parking policy reminders, and policies for local residents. The study also recommends reinforcement of communication of these policies throughout the year in the School's newsletter and to local residents living within a 500-foot radius of the school. School official contact information should be provided in newsletters and on the school website so that the community can comment and ask questions about parking, traffic, and access issues to an official specified traffic and parking ombudsman. It is also recommended that Sylmar Charter HS prepare a circulation and pedestrian routes plan to inform parents and guardians that students must cross within designated crosswalks, so that they do not block traffic. The OEHS Traffic and Pedestrian Safety Program includes measures that must be followed to ensure separation between pedestrians and vehicles along sidewalks and crosswalks. It is recommended by LLG that sidewalks with a minimum width of eight feet be installed along the west side of Astoria Street between Dronfield Avenue and Borden Avenue, as well as along the east side of Astoria Street. Caltrans further recommends formal pedestrian crossings, including high-visibility striping and pedestrian refuge islands, for the Borden Avenue intersections at Berg Street and Dyer Street, high-visibility yellow ladder style crossing upgrades at the intersections of Dronfield/Raven and Borden/Astoria to

[134] LLG. 2025. Pedestrian and Safety Study for the Sylmar Charter High School Major Modernization Project. March 25, 2025.

improve visibility and indicate a school zone and verify that all corners include ADA compliant curb ramps.[135] These recommendations would further improve safe routes for students to school, but they are not required as part of the Project to reduce significant impacts.

Significance Determination

Less than significant impact.

Mitigation Measures

No mitigation measures are required.

3.6.6 Cumulative Impacts

There would be temporary and short-term pedestrian safety impacts in relation to construction activities of the proposed Project. Access routes for construction vehicles may potentially increase hazards to pedestrian safety. There are no other proposed projects occurring within the Project site, so all potential cumulative impacts are related to this Project. Cumulative context includes temporary aspects of construction-related activities. Temporary and short-term construction-related impacts associated with the Project would be related to disrupted safe pedestrian access routes. Construction-related trucks would be limited to off-peak commute periods as much as practicable, avoiding cumulative impacts by having vehicle trips scheduled for times where other vehicles would not be on the road, and when school children are less likely to be commuting to school using passenger vehicles, public transit, pedestrian crossings, and sidewalks. As such, the proposed Project's temporary contribution to any pedestrian safety related cumulative impacts during construction would not be cumulatively considerable and the associated cumulative impacts would be less than significant.

3.6.7 References

California Department of Transportation (Caltrans). May 1, 2025. RE: Sylmar Charter High School Major Modernization Project (NOP).

Linscott, Law & Greenspan Engineers (LLG), 2025. Pedestrian and Safety Study for the Sylmar Charter High School Major Modernization Project. March 25, 2025.

Los Angeles County Public Works Department. 2016. Los Angeles County Highway Plan. https://planning.lacounty.gov/wp-content/uploads/2022/10/map_t04-hwy-plan-north-existing.pdf (accessed April 3, 2025).

Los Angeles Department of Transportation (LADOT). N.d. VISION ZERO: Fletcher Drive Safety Improvements. https://ladotlivablestreets.org/projects/fletcher (accessed March 25, 2025).

Los Angeles Unified School District, Design Standards Department. August 2023. School Design Guide: Los Angeles Unified School District.

[135] California Department of Transportation (Caltrans). May 1, 2025. RE: Sylmar Charter High School Major Modernization Project (NOP).

3.7 TRANSPORTATION AND TRAFFIC

This section provides an assessment of potential impacts related to transportation and traffic that could result from implementation of the Project. Potential impacts addressed in this section are associated with conflicts with a plan proposed, ordinance or policy establishing measures of effectiveness for the performance of the circulation system; introduction of safety/risk elements related to traffic hazards, and emergency vehicle access; and conflicts with adopted plans related to alternative transportation modes (transit, pedestrian, bicycle). The analysis in this section is primarily based on the Pedestrian and Safety Study (Appendix 8 to the EIR). LLG conducted field observation site visits to Sylmar Charter HS on January 31, 2024, for the traffic and pedestrian safety assessment. The *Pedestrian and Safety Study* is used for context in the analysis of this section. Scoping comments from the Caltrans were received (Appendix 3 of the EIR) regarding the potential for increase in vehicle miles traveled (VMT) and greenhouse gas emissions (GHGs) due to an increase in vehicle parking spaces on Campus, the need for construction traffic and pedestrian safety controls during construction, and recommendations for ROW improvements to improve pedestrian safety on surrounding streets. These comments are addressed in this section with recommendations for implementation during construction phases of the Project.

3.7.1 Environmental Setting

The Campus is in a developed urban area characterized by residential, recreation, and institutional (churches and schools) land uses. The school has passenger vehicle traffic (personal vehicles, trucks, and buses), non-motorized traffic (pedestrians and bicyclists), and limited truck traffic for school deliveries on the surrounding roadways and interior Service Road. The Campus is bounded by Astoria Street (west), Dronfield Avenue (north), and Borden Avenue (south), and Raven Street (south). All are two-lane roadways and are designated as Collectors except for Raven Street, which is designated as Local. Astoria Street is also designated as a Class III bicycle route in the frontage of Campus.

The Project site is approximately 0.5 mile west of I-210 and 1.8 miles east of I-5. The nearest four-lane arterial roadway to the Project site is Foothill Boulevard, approximately 0.25 mile to the north and east, classified as a Major Highway in the Los Angeles County Highway Plan.[136]

For regional construction traffic accessing I-210, access would be via the Polk Street or Hubbard Street on/off-ramps northeast and southeast of the site, before turning onto Dronfield Avenue to access the campus. Construction access would be provided from Raven Street, with access to the staging areas provided via the internal Service Road.

Field observations were conducted at Sylmar Charter HS during the morning drop-off peak period (i.e., between 7:30 AM and 8:30 AM) and afternoon pick-up peak period (i.e., between 2:45 PM and 3:45 PM) during a typical mid-week school day (Wednesday, January 31, 2024). As no signage for formal drop-off/pick-up loading zones were posted on any of the campus frontages, the field observations were primarily conducted at Astoria Street, Raven Street, and Borden Avenue, while minor field observations were conducted at Dronfield Avenue.

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

During the morning period, student drop-off was observed primarily along the east side of Astoria Street, the west side of Raven Street, and the north side of Borden Avenue along the campus frontages. For Astoria Street, vehicles were observed to park or stop along the east side of Astoria Street, from Phillippi Avenue to Borden Avenue. The majority of the school bus loading/unloading activities occur along the Campus frontage on the west side of Raven Street.

Students, faculty, and staff can currently also travel to school using public transit routes, bicycles, and by walking. Public sidewalks approximately eight feet in width (excluding landscaping) are provided along the Sylmar Charter HS Campus frontage on Astoria Street, Raven Street, Dronfield Avenue, and Borden Avenue. Sidewalks are not provided along the west side of Astoria Street north of Borden Avenue or along the east side of Astoria Street just south of Borden Avenue. Bicycle parking and skateboard storage are provided adjacent to Buildings #15 and #17 at the front of Campus. Transit service to the Campus is provided by the Los Angeles County Metropolitan Authority (Metro), which operates Bus Line 234 that has a stop at Borden Avenue and Astoria Street at the front entrance of the Campus. The closest passenger rail station is the Sylmar/San Fernando Metrolink located approximately one mile to the southeast of the Campus.

3.7.2 Regulatory Framework

STATE

There are no state regulatory transportation plans or programs that are applicable to potential impacts of the proposed Project's temporary construction-period activities.

REGIONAL

There are no regional regulatory transportation plans or programs that are applicable to potential impacts of the proposed Project's temporary construction-period activities.

LOCAL

City of Los Angeles Traffic Study Policies and Procedures. The significance of project-generated traffic impacts on roadways under the jurisdiction of the City of Los Angeles is determined based on criteria established by that jurisdiction.

LA Unified School Design Guide. The 2023 School Design Guide includes guidelines for vehicular access, parking, and pedestrian safety.1 Parent drop-off/pick-up areas, bus loading areas, and parking areas are required to be separated to allow safe student access. Parent drop-off/pick-up areas shall also be located adjacent to the main entry gate of the school. Additionally, parent and bus loading areas shall be separated to minimize traffic conflicts.

3.7.3 Thresholds of Significance

For the purposes of this EIR, LAUSD has used the checklist questions in Appendix G of the CEQA Guidelines as the significance criteria, along with applicable thresholds of significance established by the local jurisdiction (City of Los Angeles), to determine whether the Project would have a significant environmental impact regarding Transportation and Traffic. Based on the size and scope of the Project and the potential for impacts,

the criteria identified below are included for evaluation in this EIR. Criteria (b) was determined to be less than significant by the Initial Study and, therefore, is not carried forward for analysis in the EIR.

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?

3.7.4 Methodology

It is anticipated that Campus operations would be more efficient or would be otherwise improved following implementation of the proposed Project, which would result in new and upgraded facilities, and would not result in substantive changes to the existing operation of the school. Project implementation would not provide for an increase in the number of students attending the school or staff required to operate the school. As such, operational activities associated with the proposed Project are not additive to those operations analyzed in the 2023 Subsequent PEIR and would not result in substantial changes that have not previously been identified in the 2023 Subsequent PEIR. Specifically related to the traffic analysis presented herein, there would be no permanent increase in traffic generated by the school. Therefore, this analysis primarily focuses on potential impacts associated with temporary increases in traffic associated with Project construction activity.

This analysis estimates construction trip generation using forecasts of construction workers and trucks provided by LAUSD and evaluates the effect of Project construction-generated traffic on traffic flow, based on the general carrying capacities of two-lane roadways. The analysis in this section is primarily based on the *Pedestrian and Safety Study* (Appendix 8). LLG conducted field observation site visits to Sylmar Charter HS on January 23, 2024, for the traffic and pedestrian safety assessment.

LAUSD Standard Conditions Projects implemented under the 2023 Subsequent PEIR are anticipated to have less-than-significant impacts related to transportation and circulation within the LAUSD service area with the incorporation of Standard Conditions (SCs). Applicable SCs related to Project-specific impacts to traffic and transportation are provided in Table 3-25, *Transportation and Traffic Standard Conditions of Approval.*

Table 3-24 Transportation and Traffic Standard Conditions of Approval

Applicable SC	Description
SC-T-2	LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process. **School Design Guide** Vehicular access and parking shall comply with the Vehicular Access and Parking guidelines of the School Design Guide. The Design Guide contains the following regulations related to traffic: • Parking Space Requirements

	• General Parking Guidelines • Vehicular Access and Pedestrian Safety • Parking Structure Security
SC-T-3	LAUSD shall coordinate with the local City or County jurisdiction and agree on the following: • Compliance with the local jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project. • Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds. • Implementation of SR2S, traffic control and pedestrian safety devices. • Fair share contribution and/or other mitigation measures for potential traffic impacts. • Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events. • Traffic study will use the latest version of Institute of Transportation Engineer's (ITE) Trip Generation manual (or comparable guidelines) to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility and the specific school type (e.g., Magnet, Charter, etc.), unless otherwise required by local jurisdiction. • Loading zones will be analyzed to determine the adequacy as pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.
SC-T-4	LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.
SC-T-5	Prior to project approval of large-scale new construction (10,000 square feet or more) on new property or existing campus, LAUSD shall prepare a VMT assessment that documents the project trip generation, whether the project is expected to serve the immediate community or a broader area, and the expected net effect on VMT for the region. If necessary, the VMT assessment shall identify transportation demand management (TDM) measures to reduce VMT impacts.

3.7.5 Impact Analysis

Impact 3.7-1: The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Construction

Construction of the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. In general, adopted policies,

plans, and programs pertaining to public transit, bicycle, and pedestrian travel are intended to be used for long-term planning purposes and do not apply to construction activities. Based on information provided by LAUSD, the Project's construction would last an estimated 40 months. There would be three general activity construction phases in three separate construction areas:

- Phase 1 Interim Housing/Make Ready – 7 months (Q2 2026 to Q4 2026): Construction of interim housing and temporary parking, removal of portable classroom buildings (Buildings 38 and 39), new electrical service, new chiller, and slurry/restripe Parking Area 1

- Phase 2A Abatement and Demolition – 4 months (Q4 2026 to Q1 2027): Abatement and demolition of Multipurpose Building (Building 17), cafeteria, Student Store (Building 18), lunch shelter, and Music/Chorale Building (Building 19) and Drafting Building/Classroom (Building #20).

- Phase 2B Construction – 20 months (Q1 2027 to Q3 2028): Construction of new Multipurpose Building, food service, Student Store, lunch shelter, 10 classroom buildings and site work.
    - Barrier Removal – (Q2 2026 to Q4 2028): Barrier removal construction with the majority of work occurring in the summer months of years 2026, 2027 and 2028.

- Phase 3 Remove Interim Housing – 4 months (Q4 2028 to Q1 2029): Restore volleyball courts, demolish portable classroom buildings (Buildings 40, 41, 42, and 43). Restore Parking Areas 1A and 3.
    - Demobilize – 1 month (Q1 2029 to Q1 2029): Remove construction equipment and materials.

Construction-related activities would be scheduled during daylight hours, and construction-related traffic and deliveries would be scheduled with school administration to avoid student pick-up/drop-off hours. Trip generation equations provided by the *Pedestrian and Safety Study* (Appendix 8) were based on the development of construction worker and truck forecasts given the expected hauling/delivery capacities, with the additional application of passenger car equivalency factors.

The most intensive period of overall construction activity and construction truck traffic generation is expected to occur during Phase 2B (Building Construction). Based on information provided, during the peak phase of construction activities, it is estimated that no more than 44 workers would be on-site when students are present during Phase 2B of construction. As the grading is expected to be balanced on-site (i.e., no importing/exporting of soil), no haul truck trips are expected due to grading/site preparation activities. It is anticipated that construction worker parking would generally be accommodated on-site in the staging area during all phases of construction. Construction workers would not be permitted to park on local streets and would therefore not affect the current usage of street parking.

It is anticipated that delivery trucks/construction equipment would be brought onto the Project site and be stored within the perimeter fence of the construction site. Temporary lane and sidewalk closures are not expected to be required along the adjacent public streets to accommodate truck or equipment staging. If necessary, flagmen would be used to control traffic movement during the ingress or egress of trucks and heavy equipment from the construction site.

Equipment and Delivery Trucks

At the most, up to 34 vehicle trips a day (i.e., 17 inbound trucks and 17 outbound trucks) would be generated to and from the site. As provided in the Pedestrian and Safety Study, assuming passenger car equivalency (PCE) factor of 2.0, it is estimated that the trucks would generate approximately 68 daily PCE vehicle trips (i.e., 34 inbound PCE trips and 34 outbound PCE trips). It is also estimated that approximately eight PCE vehicle trips (4 inbound PCE trips and 4 outbound PCE trips) could occur during each of the weekday AM and PM peak hours.

Construction Workers/Employees

The most intensive period in terms of the number of construction workers would occur during the building construction and site work in Phase 2B. During the overlap with concurrent School operations, it is anticipated that no more than 44 workers would be on-site. For purposes of this review, the number of construction workers were reviewed during the concurrent operation of the School when students are present on-site.

Construction workers are expected to arrive at the Project site before 7:00 AM. Since the construction workday would commence by 7:00 AM, these trips would occur outside of the weekday commute AM peak hour but could occur during the weekday PM peak hour. Assuming the typical workday ends at 3:30 PM, 50 percent of the workers are assumed to leave the site between 3:30 PM and 4:00 PM, 25 percent between 4:00 PM and 4:30 PM, and the remaining 25 percent after 4:30 PM (including supervisors). Thus, while these construction worker trips would generally occur outside of the commute PM peak hour of adjacent street traffic, 50 percent of the work force (i.e., 22 workers) has been assumed to overlap with the weekday commute PM peak hour (i.e., between 5:00 PM and 6:00 PM) in order to provide a conservative forecast of construction worker traffic generation.

It is anticipated that construction workers would primarily remain on-site throughout the day. The number of construction worker vehicles is estimated using an average vehicle ridership (AVR) factor of 1.135 persons per vehicle (as provided in the SCAQMD in its *CEQA Air Quality Handbook*). Therefore, it is estimated that approximately 78 vehicle trips (39 inbound trips and 39 outbound trips) on a daily basis would be generated to/from the site by the construction workers during the peak period when a total of 44 construction workers are expected to be on-site. With 50 percent of the workers conservatively assumed to overlap with the weekday PM peak hour, this would result in 19 outbound construction worker vehicle trips.

Total Construction Traffic Generation

Taken together, the miscellaneous construction delivery vehicles and construction worker vehicles are forecast to generate up to 8 weekday AM peak hour PCE vehicle trips (i.e., 4 inbound PCE trips and 4 outbound PCE trips). During the PM peak hour, the construction traffic generation is expected to total 27 PCE vehicle trips (i.e., 4 inbound PCE trips and 23 outbound PCE trips). Over a 24-hour period, the construction traffic generation is forecast to generate an increase of 146 daily PCE trip ends during a typical weekday (73 inbound PCE trips and 73 outbound PCE trips). For comparison purposes, traffic generation for the existing Sylmar Charter HS campus was estimated based on the trip generation rates published in the ITE Trip Generation Manual for Land Use Code 525 (High School) and applied to the existing number of students.

When compared to the traffic generated by the operations of the School (i.e., 822 AM peak hour vehicle trips, 221 PM peak hour vehicle trips, and 3,065 daily vehicle trips), the short-term construction traffic anticipated during the peak construction activities are anticipated to be much less than the daily operations of the Sylmar Charter HS.

Access to and from the school during construction would be minimally altered, as the majority of the construction would occur within the Campus. Any temporary changes to pedestrian access during construction would be completed as outlined in a worksite traffic control plan for the proposed Project (per SC-T-4). The modified parking lots would be designed per the requirements of LA Unified and LADOT. Though parking may be reconfigured during construction, parking and circulation would be maintained throughout construction activities. Construction vehicles accessing the Campus would avoid drop-off and pick-up during peak hours, and construction-related access and traffic specifics would be coordinated with the Campus administrators, LAUSD's Transportation Branch, and OEHS and would be detailed in the worksite traffic control plan. The performance of vehicular, pedestrian, bicycle, or transit travel would not be significantly impacted by the proposed Project construction.

Operation

As the proposed Project would not increase the existing number of students or staff, it would not generate new (permanent) traffic to the study area. The proposed Project would not directly or indirectly eliminate alternative modes of transportation, transportation corridors, or facilities (e.g., bus stops). The Project site currently consists of 205 parking spaces, of which 193 are standard stalls and 12 are ADA compliant. There are an additional nine unmarked stalls in Parking Lot No. 5. The District Standard for this size of Campus is 258 parking stalls.

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

The proposed Project would expand the existing Parking Lot No. 1 by removing four existing portable classroom buildings. It would be restriped to accommodate up to approximately 102 parking stalls, an increase from the existing 48 parking stalls. To access the newly expanded parking area, a new driveway would be constructed off Astoria Avenue just north of the existing Service Road. During construction, the existing basketball courts on the Sylmar Charter HS campus would be utilized as a temporary staff parking area and would be restored upon Project completion. After construction, parking requirements would either be met or exceeded.

Finally, a new driveway would be constructed off Astoria Street to access the expanded area of Parking Lot No. 1. Given that the current student pick-up/drop-off operation was observed mostly along the east side of Astoria Street, from Phillippi Avenue to Borden Avenue, the new driveway for Parking Lot No. 1 is not expected to change the student loading operations/circulation. Caltrans recommends implementation of Transportation Demand Strategies (TMD) over increasing parking at the Campus in an effort to better promote public transit

and reduce VMT.[137] These strategies include providing an on-site transit stop and requiring safer infrastructure in the surrounding ROWs for people walking, biking, and taking transit to the Campus.

Additional recommendations for improving site accessibility for safe transportation and circulation were provided by the Pedestrian and Safety Study (Appendix 8) but are not required as part of the Project. These include:

- Proposed sidewalk be installed along the west side of Astoria Street between Dronfield Avenue and Borden Avenue

- Staff who are expected to park in designated parking lots on campus would be instructed to arrive at the Sylmar Charter HS campus outside of the peak student drop-off/pick-up time periods.

Thus, there would be less than significant impacts in relation to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Significance Determination

Less than significant impact.

Mitigation Measures

No mitigation measures are required.

Impact 3.7-3: The Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Construction

Construction of the Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Construction would result in temporary less than significant impacts to transportation uses at the street and sidewalk adjacent to the Project site. The Project would be constructed within the Campus and staging would be conducted outside of the public right-of-way. There is a possibility that ROW adjacent to the Campus would be temporarily impacted for off-site utility hookup and driveway work, meaning for a brief time during construction phasing, their use would be impacted. Additionally, construction activity-based traffic from haul routes and vehicles entering and exiting Campus driveways may pose risks to pedestrian safety and access to the Sylmar Charter HS Campus.

Existing sidewalks surrounding the Campus would be maintained through construction, and continued use of these sidewalks is expected.

The Project site would still function as a school, and the school would remain operational throughout construction activity. The proposed Project would not interfere with the public ROW, except for temporarily during construction for off-site work and vehicle entry and exiting from the site and traffic from construction

[137] California Department of Transportation (Caltrans). May 1, 2025. RE: Sylmar Charter High School Major Modernization Project (NOP).

activities, such as materials delivery and use of haul routes. Caltrans recommends working with Caltrans Office of Permits, Multi-Modal Unit for a designated truck route for construction trucks to transport construction equipment to and from the construction sites. Construction vehicles and equipment should use alternative routes to avoid congested state facilities, especially during peak hours.

Operation

The Project would not change the use of the school, and the Campus would continue to operate as a school. The Project would alter school building features, but would not introduce any incompatible uses, sharp curves, or dangerous intersections. The Project would be implemented at an existing school site and would not directly or indirectly alter the configuration of the existing street system. There would be no changes in traffic patterns around the school following construction completion. During operation, there would be no impact regarding the substantially increasing vehicular and/or pedestrian safety hazards due to incompatible uses.

Significance Determination

Less than significant impact.

Mitigation Measures

No mitigation measures are required.

Impact 3.7-4: The project would not result in inadequate emergency access.

Construction

Construction of the Project would not result in inadequate emergency access. Emergency vehicle access is required to be maintained during temporary construction activities. As stated in the *Pedestrian and Safety Study* (Appendix 8), emergency vehicles would continue to maintain use of the surrounding street system during construction activities. If portions of roadways are temporarily used for construction staging, emergency drivers are trained to use an alternative path, including center turn lanes and oncoming traffic lanes. Thus, even in the event of temporary construction closures, emergency vehicles within urban areas are capable of navigating such closures. Additionally, this Project must conform to local ordinances to ensure emergency access before and after the Project is constructed and implemented, such as preparation of a traffic control/management plan for approval by the City of Los Angeles Department of Transportation, and implementation of a Construction Staging and Traffic Management Plan (CSTMP), approved by the City. With other these standard construction management practices, there would be less than significant impacts in relation to inadequate emergency access.

Operation

There would be no anticipated access issues for the Campus during operation. The Project would conform to local ordinances to ensure emergency access during operation of the Campus following construction completion. The expansion of a new parking lot with a driveway to the site would allow greater access for emergency services during operation. All existing vehicular access points would remain after construction is complete. Therefore, there would be less than significant impacts in relation to inadequate emergency access.

Significance Determination

Less than significant impact.

Mitigation Measures

No mitigation measures are required.

3.7.6 Cumulative Impacts

There would be temporary and short-term traffic impacts in relation to construction activities of the proposed Project. Access routes for construction vehicles may increase hazards associated with construction activities. Cumulative context includes temporary aspects of construction-related activities. Temporary and short-term construction-related impacts associated with the Project would be related to truck routes and construction area access routes used by construction workers and material haulers, which would have potential impacts on transportation and traffic related hazards. Pursuant to SC-T-4, LAUSD shall require its contractors to submit a construction worksite traffic control plan to the City of Los Angeles for review prior to construction. The plan shall show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods, avoiding cumulative impacts by having vehicle trips scheduled for times where other vehicles would not be on the road. As such, the proposed Project's contribution to any transportation and traffic-related cumulative impacts during construction would not be cumulatively considerable and the associated cumulative impacts would be less than significant.

3.7.7 References

California Department of Transportation (Caltrans). May 1, 2025. RE: Sylmar Charter High School Major Modernization Project (NOP).

Linscott, Law & Greenspan Engineers (LLG), 2025. Pedestrian and Safety Study for the Sylmar Charter High School Major Modernization Project. March 25, 2025.

Los Angeles County Public Work Department. 2016. Los Angeles County Highway Plan. https://planning.lacounty.gov/wp-content/uploads/2022/10/map_t04-hwy-plan-north-existing.pdf (accessed April 3, 2025).

Los Angeles Unified School District, Design Standards Department. August 2023. School Design Guide: Los Angeles Unified School District.

4. Other CEQA Considerations

This chapter represents the evaluation of environmental impacts required by the CEQA that are not covered within the earlier chapters of this Draft EIR. These CEQA considerations include environmental effects that were found not to be significant, significant irreversible environmental changes that would be caused by the Project, growth-inducing impacts, and significant and unavoidable adverse impacts.

4.1 EFFECTS NOT FOUND TO BE SIGNIFICANT

The Los Angeles Unified School District, through the scoping process, determined that the proposed Project could cause or result in significant environmental impacts, and has warranted further analysis, public review, and disclosure through the preparation of an EIR. The NOP, dated April 4, 2025, was sent to the California Governor's Office of Land Use and Climate Innovation (LCI), State Clearinghouse (SCH), and was circulated for public review and public comment. The public comment period for the NOP was April 7, 2025, to May 17, 2025. The assigned SCH reference number for the Project is 2025040524. The NOP is included as Appendix 2 of this Draft EIR. The locations in the EIR where each comment has been addressed are indicated in Chapter 1, Introduction, Table 1-1, Summary of NOP Comments.

The Initial Study that was prepared for the Project and circulated with the NOP determined that some of the impacts would not occur or would be less than significant; therefore, these impact topics have not been further analyzed in this Draft EIR. Refer to Appendix 1 for the Initial Study.

Aesthetics

- Scenic Vista – No Impact
- Scenic Resources – No Impact
- Visual Character – Less than Significant Impact
- Light and Glare – Less than Significant Impact

Agriculture and Forestry Resources

- Convert Prime Farmland, Unique Farmland, or Farmland with Statewide Importance – No Impact
- Williamson Act Contract – No Impact
- Timberland – No Impact
- Forest Land – No Impact
- Other Changes – No Impact

Air Quality

- Odors – Less Than Significant Impact

Biological Resources

- Candidate, Sensitive, or Special Status Species – No Impact

- Riparian Habitat/Sensitive Natural Community – No Impact
- Wetlands – No Impact
- Wildlife Migration - Less than Significant Impact
- Local Policies/Ordinances Protecting Biological Resources – No Impact
- Conservation Planning – No Impact

Cultural Resources

- Archaeological Resource – Less than Significant Impact
- Human Remains – Less than Significant Impact

Energy

- Energy Consumption – Less than Significant Impact
- State/Local Plan – No Impact

Geology and Soils

- Alquist-Priolo Fault Rupture – Less than Significant Impact
- Seismic Ground Shaking – Less than Significant Impact
- Ground Failure including Liquefaction – No Impact
- Landslides – No Impact
- Erosion or Loss of Topsoil – Less than Significant Impact
- Unstable Geologic Unit – Less than Significant Impact
- Expansive Soils – Less than Significant Impact
- Septic Tanks – No Impact
- Paleontological Resource – Less than Significant Impact

Hazards and Hazardous Materials

- Airport Land Use Plan – No Impact
- Emergency Planning – No Impact
- Wildland Fires – No Impact

Hydrology and Water Quality

- Water Quality Standards – Less than Significant Impact
- Groundwater Recharge – Less than Significant Impact
- On- or Off-site Erosion or Siltation – Less than Significant Impact
- On- or Off-site Flooding – Less than Significant Impact
- Runoff Water Quality – No Impact
- Flood Flows – No Impact
- Inundation by seiche, tsunami, or mudflow – No Impact
- Water Management Plan – No Impact

Land Use and Planning

- Divide an Established Community – No Impact
- Conflict with Applicable Plans and/or Policies – No Impact

Mineral Resources
- Regional Mineral Resources – No Impact
- Local Mineral Resources – No Impact

Noise
- Private Airstrip – No Impact

Pedestrian Safety
- Arterial Road / Highway – Less than Significant Impact

Population and Housing
- Population Growth – No Impact
- Displacement of People/Housing – No Impact

Public Services
- Fire Protection – Less than Significant Impact
- Police Protection – Less than Significant Impact
- Schools – No Impact
- Parks – Less than Significant Impact
- Other Public Facilities – No Impact

Recreation
- Accelerated Deterioration of Existing Facilities – Less than Significant Impact
- Construction or Expansion of Recreational Facilities Causing Adverse Physical Effect on Environment – Less than Significant Impact

Transportation and Circulation
- Vehicle Miles Traveled – Less than Significant Impact

Tribal Cultural Resources
- Tribal Cultural Resources – Less than Significant Impact
- California Register of Historical Resources – No Impact
- Significance to Native American Tribe – Less than Significant Impact

Utilities
- Construction or Relocation of water, wastewater treatment or stormwater drainage, electric power, natural gas, telecommunication facilities – Less than Significant Impact
- Water Supplies – Less than Significant Impact
- Inadequate Wastewater Treatment Capacity – Less than Significant Impact
- Landfill Capacity – Less than Significant Impact
- Solid Waste Regulations – Less than Significant Impact

Wildfire
- Located in High Fire Severity Zone – No Impact
- Emergency plans – No Impact
- Pollutant Concentration – No Impact

- Require Installation of Infrastructure That May Impact the Environment – No Impact
- Exposure to Flooding/Landslides – Less than Significant Impact

4.2 SIGNIFICANT ENVIRONMENTAL EFFECTS

Table ES-1, Summary of Impacts and Mitigation Measures for the Irving Middle School Major Modernization Project, which is in Chapter ES, Executive Summary, and Section 3.1 through Section 3.7 of this Draft EIR provide a comprehensive identification of the Project's environmental effects, including the level of significance both before and after mitigation.

4.3 SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROJECT IS IMPLEMENTED

CEQA Guidelines Section 15126.2(c) requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Development of the Project would result in significant and unavoidable impacts to Cultural Resources. Sections 3.1 through Section 3.7 of this Draft EIR provide a comprehensive identification of the Project's environmental effects, including the level of significance both before and after mitigation.

Cultural Resources

The proposed Project would result in significant and unavoidable impacts with respect to Impact 3.2.1, Significant Historical Resource. As documented in the Historic Resource Evaluation Report (HRER; Appendix 1-A), the Sylmar High School Historic District, with 22 contributing resources on the Campus, is eligible for federal, state, and local designation, and is considered to be a historical resource for the purposes of CEQA and a historic property for the purposes of the National Historic Preservation Act (NHPA). The grouping of contributors in the historic district is eligible for National Register of Historic Places (NRHP) criteria A/1/1 and California Register of Historic Resources (CRHR) criteria C/3/3. The property was assigned California Historical Resources Status Codes 3S, 3CS, and 5S3 (ASM, 2025). None of the buildings are considered individually eligible under these same criteria.

A Cultural Resources Technical Report (CRTR), prepared as part of this Draft EIR (Appendix 5), evaluated the potential for implementation of the Project to substantially change the significance of historical resources on the campus. As the Project would result in the demolition of five contributors to the Historic District, Impact 3.2.1 would be potentially significant, and implementation of mitigation measure MM-CUL-1 would be required.

Implementation of LAUSD SCs and mitigation measure MM-CUL-1 should be undertaken to lessen the adverse impact to the historic resource; however, even after application of the SCs and MM-CUL-1, the demolition of five contributing resources and construction of a large, two-story building to replace the existing multipurpose building (MPB) would still result in a significant and unavoidable impact with respect to NRHP and CRHP eligibility criteria as the new construction would diminish the historic materials, features, and spatial relationships that characterize the historic district. As such, the Project would result in significant unavoidable impact pursuant to CEQA Guidelines Section 15064.5 (*Determining the Significance of Impacts to Archeological and Historical Resources*) even after implementation of SCs and mitigation.

4.3.1 Significant Irreversible Changes

CEQA Guidelines 21100(b)(2) and 15126.2(d) require that any significant effect on the environment that would be irreversible if the proposed Project is implemented must be identified. Pursuant to CEQA Guidelines Section 15126.2(d), an EIR must consider any significant irreversible environmental changes that would be caused by the proposed Project should it be implemented.

Resources that would be permanently and continually consumed by implementation of the proposed Project include energy, water, and fossil fuels; however, the amount and rate of consumption of these resources would not result in the unnecessary, inefficient, or wasteful use of resources, as discussed in the Initial Study (Appendix 1).

Construction and operation of the proposed Project would require the use and consumption of nonrenewable resources, such as steel and other metals. Renewable resources, such as lumber and other wood byproducts, would also be used. Unlike renewable resources, nonrenewable resources cannot be regenerated over time. Construction of school facilities would require the commitment of a relatively small amount of building materials. The quantity of building materials used during implementation of the proposed Project would result in a less than significant impact because these types of resources are anticipated to be in adequate supply into the foreseeable future.

Energy would be consumed during construction and operation of the proposed Project. Nonrenewable resources and energy would also be consumed during the manufacturing and transportation of building materials, preparation of the site, and construction and site restoration activities. The proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of energy during construction or operation. he proposed Project would result in the irretrievable and irreversible commitment of energy resources in the form of diesel fuel, gasoline and electricity during construction and operation. However, these types of resources are anticipated to be in adequate supply into the foreseeable future. Further, the proposed Project's new buildings and structures would be designed to reduce energy use below current levels by incorporating modernized and energy-efficient features, which may include lighting, windows, electrical transformers, building insulation, or installation of irrigation smart controllers, etc. The roofing of the new buildings would meet "cool roof" building certification requirements. All new construction would exceed by 10 percent or more the California Title 24, Part 6 energy efficient standards. These energy management systems, and Project design features, would reduce potential significant impacts regarding energy use to less than significant levels. Therefore, impacts due to these irretrievable and irreversible commitments of resources would be less than significant.

4.4 GROWTH INDUCING IMPACTS

The CEQA Guidelines (Section 15126.2[e]) require that an EIR discuss the potential growth-inducing impacts of a proposed project. A project could directly and/or indirectly induce growth. Direct growth inducement, for example, would result if a project involved construction of new housing. A project could induce indirect growth, for example, if it establishes substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises) or if it would involve a substantial construction effort with short-term employment opportunities while indirectly stimulate the need for additional housing and services to support the new employment demand. Similarly, under CEQA, a project would indirectly induce growth if it would

remove an obstacle to additional growth and development, such as removing a constraint on a required public service. Under CEQA, growth is not considered necessarily detrimental or beneficial.

Based on the CEQA definition above, assessing the growth-inducement of the proposed Project involves answering the question: "Would implementation of the proposed Project directly, or indirectly, support economic expansion, population growth, or residential construction?" Schools are one of the chief public services needed to support growth and community development. While schools play a role in supporting additional growth, it is not the single determinant of such growth. Other factors, including General Plan policies, land use plans, and zoning, the availability of solid waste disposal capacity, wastewater treatment, transportation services, and other important public infrastructure also influence business and residential population growth. Economic factors, in particular, greatly affect development rates and locations.

Growth Projections

Implementation of the proposed Project would not result in substantial permanent, or short-term, construction employment that could indirectly induce population growth by establishing new employment opportunities. The proposed Project would reduce the number of standard-sized classrooms by two. Therefore, an increase in staff requirements is not anticipated. The temporary construction employment opportunities are expected to be sufficiently filled by workers within 30 miles of the Project site, and new housing for construction employees would not be required.[138] The labor force, as of February 2025, for Los Angeles County is 5,061,900 with an unemployment rate of 5.9 percent.[139] Project implementation would not extend major infrastructure to places currently unserved by such facilities. The proposed Project is a modernization Project of an existing school campus. There is no existing housing, or any proposed housing, within the proposed Project site. The surrounding area is developed and served by existing infrastructure and utilities. Therefore, the Project would not remove obstacles to growth. Therefore, the proposed Project would not have substantial direct, or indirect, growth-inducing impacts.

4.5 REFERENCES

City of Los Angeles. 2021. City of Los Angeles General Plan. 2021-2029 Housing Element. https://planning.lacity.gov/plans-policies/housing-element (Accessed April 15, 2025).

State of California, Employment Development Department. March 2025. Monthly Labor Force Data for Cities and Census Designated Places (CDP). https://labormarketinfo.edd.ca.gov/geography/losangeles-county.html (accessed April 15, 2025).

State of California, Employment Development Department. February 2025. Unemployment Rates and Labor Force. Labor Market Information for Los Angeles-Long Beach-Glendale Metropolitan District (Los Angeles County). https://labormarketinfo.edd.ca.gov/geography/losangeles-county.html (accessed April 15, 2025).

[138] State of California, Employment Development Department. March 2025. Monthly Labor Force Data for Cities and Census Designated Places (CDP). https://labormarketinfo.edd.ca.gov/geography/losangeles-county.html (accessed April 15, 2025).
[139] State of California, Employment Development Department. February 2025. Unemployment Rates and Labor Force. Labor Market Information for Los Angeles-Long Beach-Glendale Metropolitan District (Los Angeles County). https://labormarketinfo.edd.ca.gov/geography/losangeles-county.html (accessed April 15, 2025).

5. Alternatives

5.1 INTRODUCTION

This section addresses alternatives to the proposed Project, describes the rationale for their evaluation in this Draft EIR, evaluates the potential environmental impacts associated with each alternative, and compares the relative impacts of each alternative to those of the proposed Project. In addition, this section analyzes the extent to which each alternative meets the Project's objectives identified in Chapter 2, *Project Description*.

CEQA requires that an EIR consider a reasonable range of feasible alternatives (CEQA Guidelines Section 15126.6[a]). According to the CEQA Guidelines, alternatives should be those that would attain most of the basic project objectives and avoid, or substantially lessen, one, or more, significant effects of the project (CEQA Guidelines Section 15126.6). The "range of alternatives" is governed by the "rule of reason," which requires the EIR to set forth only those alternatives necessary to permit an informed and reasoned choice by the lead agency and to foster meaningful public participation (CEQA Guidelines Section 15126.6[f]).

CEQA also requires that the feasibility of alternatives be considered. The CEQA Guidelines Section 15126.6(f)(1) states that among the factors that may be taken into account in determining feasibility are: site suitability; economic viability; availability of infrastructure; general plan consistency; other plans and regulatory limitations; jurisdictional boundaries; and (when evaluating alternative project locations) whether the proponent can reasonably acquire, control, or otherwise have access to an alternative site. Furthermore, an EIR need not consider an alternative whose effects could not be reasonably identified, whose implementation is remote, or speculative, or that would not achieve the basic project objectives.

The alternatives addressed in this EIR were identified in consideration of the factors listed below.

- The extent to which the alternative could avoid, or substantially lessen, the identified significant environmental effects of the proposed Project
- The extent to which the alternative could accomplish basic objectives of the proposed Project
- The feasibility of the alternative
    - Including economic viability or regulatory limitations
- The requirement of the CEQA Guidelines to consider a "no project" alternative

CEQA Guidelines Section 15126.6(e)(1) states that a no project alternative shall also be evaluated along with its impacts. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed Project with the impacts of not approving the proposed Project. The no project alternative analysis is not the baseline for determining whether the proposed Project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline.

5.2 PROJECT OBJECTIVES

Four objectives have been established for the SUP and aid decision-makers in their review of the Project and associated environmental impacts:

1. Repair aging schools and improve student safety.
2. Upgrade schools to modern technology and educational needs.
3. Create capacity to attract, retain, and graduate more students through a comprehensive portfolio of small, high-quality pre-K through adult schools.
4. Promote healthier environment through green technology.

Further, the District has established six core principles/objectives for the scoping of major modernization projects:

1. Buildings meeting Assembly Bill (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 reliance on relocatable buildings, especially for K–12 instruction, should be reduced.

4. Necessary and prioritized upgrades must be made throughout the school site in order to comply with the program accessibility requirements of the Americans with Disabilities Act (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 around new buildings and/or areas impacted by construction to improve the visual appearance including landscape and hardscape.

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

The primary objective of the proposed Project is to address the most critical physical conditions and essential safety of the site, which includes alleviating known seismic and structural risks on the campus.

5.3 ALTERNATIVES NOT FURTHER EVALUATED IN THIS EIR

Additional alternatives (Development Options, or 'DOs') were considered but eliminated from further analysis due to infeasibility. Both of these DO's included new building construction at a secondary site within the Campus, located at the Parking Lot No. 5 / portable classroom area adjacent to Raven Street.

- **DO-1: Lunch Shelter Facing Horticultural Garden (two building scenario)**
- **DO-2: Lunch Shelter Facing Classroom Buildings (two building scenario)**

DOs 1 and 2 included a 'two-building' scenario, where demolished core facilities including multipurpose room, food service, student store, and classroom facilities are replaced across two new buildings including the Multipurpose Building (MPB), and one two-story classroom building with food service. The MPB would be constructed in the primary construction area of the existing building, whereas a new classroom/food service building would be constructed in the secondary construction area.

The 'two-building' scenario was ultimately eliminated from consideration, as development in the secondary construction area would limit future development opportunities on Campus property. Furthermore, the secondary construction area contained extensive utility and grade conflicts.

5.4 REVIEW OF SIGNIFICANT ENVIRONMENTAL IMPACTS

Based on the CEQA Guidelines, several factors need to be considered in determining the range of alternatives to be analyzed in an EIR and the level of analytical detail that should be provided for each alternative. These factors include: (1) the nature of the significant impacts of the proposed Project; (2) the ability of alternatives to avoid, or lessen, the significant impacts associated with the Project; (3) the ability of the alternatives to meet the objectives of the Project; and (4) the feasibility of the alternatives. Implementation of the proposed Project would result in a significant and unavoidable impact to Cultural Resources (3.2.1, Historic Resources). Implementation of the proposed Project would result in less than significant impacts with implementation of mitigation measures to Hazards and Hazardous Materials (Impacts 3.4.1, 3.4.2, and 3.4.3).

This chapter includes a discussion of whether the alternatives would lessen these impacts. As the lead agency, the District will decide whether to proceed with the proposed Project, or whether to accept, or reject, an alternative identified in this chapter. As required by the CEQA Guidelines, if the District ultimately rejects an alternative, the rationale for the rejection will be presented in the findings that are required to be made before the District certifies the EIR and takes action on the Project.

5.5 ALTERNATIVES SELECTED FOR ANALYSIS

The No Project Alternative and one Project alternative scenario were selected for detailed analysis and represent a range of reasonable alternatives to the proposed Project (Table 5-1, *Comparison of Project Alternatives*). The identification of other alternatives beyond those evaluated below, and those not further evaluated as presented above in Section 5.4, is not practical given that the nature of the Project—improvements to an existing school site—inherently limits the feasibility and applicability of additional alternatives. Although the one action alternative evaluated below has been determined in a feasibility analysis by LAUSD to have limited economic

feasibility and may not meet all Project objectives (see Table 5-1 below), it was evaluated for the potential to reduce significant and unavoidable impacts of the Project in relation to cultural resources to a less than significant level based on the findings of the Cultural Resources Technical Report (CRTR). The goal for evaluating these alternatives is to identify ways to avoid, or lessen, the significant environmental effects resulting from implementation of the proposed Project, while attaining most of the Project objectives.

Alternative 1: No Project/No Build Alternative

The No Project/No Build Alternative assumes that the Project site would remain as it is in existing conditions. A total of 211,545 square feet of existing permanent and portable buildings would remain on the campus. No demolition or construction of new buildings would occur on the Project site, and the existing facilities and infrastructure would continue to be susceptible to seismic damage and deteriorate. The Campus would continue to rely on portable classroom buildings and existing classrooms would remain undersized and compromised without specialty spaces. Only essential repairs such as repair of portable classrooms, replacement of lead pipes, roof replacement, and maintenance of fire alarm and fire suppression systems would occur over time.

The existing MPB, on the Assembly Bill 300 (AB 300) list due to seismic deficiencies, would continue to be operational and used as a core Campus facility.

Alternative 2: Reduced Footprint New Multipurpose Building and Retain Existing Classroom Building #20

Under this alternative, three permanent buildings would be demolished: the MPB/Food Service (Building #17), Student Store (Building #18), and the Music/Chorale Classroom (Building #19). There would be no change in the square footage of portable buildings removed. As compared to the proposed Project, this alternative would retain one additional historic district 'contributor' building and would reduce the effects related to the size and massing of the proposed Multipurpose Building, by reducing encroachment into the group of remaining historic district 'contributor' resources, including original campus buildings, the parking lot at Borden Avenue, site design and landscaping.

By leaving Building #20 as-is, classroom spaces would continue to fail to align with the current educational standards of the District. Building #20 contains four small classrooms that do not meet the District standards for classroom size, diminishing the flexibility to use the rooms for a variety of instructional program needs. When built, Building #20 did not require a fire suppression system, now required by code for improved safety. Retaining Building #20 would require extensive modifications throughout the building to add a fire suppression system. Further, with a reduced-size footprint for the proposed MPB, the overall building volume would need to be higher to accommodate the school's capacity standard classroom count; otherwise, more portable classrooms would need to remain on Campus. The reduced MPB footprint under Alternative 2 would also decrease the amount of roof area available to place solar PV panels necessary to promote a healthier environment through green technology.

Sections 5.6 and 5.7 provide a comparative summary of the alternatives, including a summary of the ability of the alternatives to meet the Project objectives and a summary comparison of the potential impacts associated with the alternatives and the proposed Project.

Table 5-1 Comparison of Project Alternatives for Affected Campus Facilities

Building ID	Building Name (Square footage)	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Footprint MPB and Retain Building #20
Permanent Buildings				
Building 17	Multipurpose Building (19,052)	Historic Contributor and AB 300 building. Demolish building and replace with new 73,219 SF MPB*.	Building would be retained as-is to reduce impact to historic resources. Seismic deficiencies and risk would remain. No construction to occur.	Demolish building and replace with reduced-size MPB with no classroom/support facilities.
Building 18	Student Store (814)	Historic Contributor. Demolish building and construct new Student Store.	Historic Contributor building would remain as-is.	Demolish building.
Building 19	Music/Chorale (3,257)	Historic Contributor. Demolish building and replace classroom/music room within new MPB.	Historic Contributor building would remain as-is.	Demolish building.
Building 20	Classrooms/Drafting Building (2,849)	Historic Contributor. Demolish building and replace classrooms within new MPB.	Historic Contributor building would remain as-is.	Building would be retained as-is, with four undersized classrooms.
Portables				
Building 38 DSA - 21726	Bungalow Classroom (994)	Demolish portable classroom building.	Building would be retained as-is.	Remove building.
Building 39 DSA - 21727	Bungalow Classroom (994)	Demolish portable classroom building.	Building would be retained as-is.	Remove building.
Building 40 - AA-2371 – 22926	Portable Classroom (1940)	Demolish portable classroom building.	Building would be retained as-is.	Remove building.
Building 41 DSA - 21810	Portable Classroom (1940)	Demolish portable classroom building.	Building would be retained as-is.	Remove building.
Building 42 DSA - 21809	Portable Classroom (1940)	Demolish portable classroom building.	Building would be retained as-is.	Remove building.
Building 43 DSA - 21808	Portable Classroom (1940)	Demolish portable classroom building.	Building would be retained as-is.	Remove building.
Total Square Footage*		**Demolition:** 35,640 **New Construction:** 74,419	**Demolition:** 0 **New Construction:** 0	**Demolition:** 23,123 **New Construction:** 36,500***

***** Note: All numbers are in square feet. All new square footages are approximate and subject to change during final site and architectural planning and design phases. These square footage changes would not significantly change the environmental analysis or findings in this EIR.
** Represents the gross square footage of the two-story building (61,184 SF first floor area, 12,035 second floor area).
*** Represents the first floor area

5.6 ENVIRONMENTAL ANALYSIS OF ALTERNATIVE 1 (NO PROJECT/NO BUILD)

AIR QUALITY

Alternative 1 would not result in any demolition, grading, or building construction. Campus structures as they exist currently would remain and be repaired as needed. Existing conditions would persist, and no new pollutant emissions associated with operation of heavy-duty construction equipment, or haul trucks, would be generated. The Project's less than significant impacts in relation to air quality plans, sensitive receptors, and criteria pollutants would be reduced under the No Project/No Build Alternative. Alternative 1 would result in lesser impacts than the proposed Project.

CULTURAL RESOURCES

Alternative 1 would not result in any demolition, grading, or building construction. Campus structures as they exist currently would remain and be repaired as needed. Sylmar Charter HS was given the California Historical Resources Status Codes 3S (appears eligible for NRHP as an individual property through survey evaluation) and 3CS (appears eligible for CRHP as an individual property through survey evaluation), and 5S3 (appears to be individually eligible for local listing or designation through survey evaluation) (ASM 2025). The Campus is considered to be a historical resource under CEQA. Figure 5 shows the Campus and the contributors accounting for its eligibility as a historical resource within the historic district. Alternative 1 would result in no direct or indirect impact to a historic resource because no demolition or new development would occur.

GREENHOUSE GAS EMISSIONS

As Alternative 1 would not result in any demolition, grading, or building construction, there would be no impacts compared to existing conditions. Campus structures as they exist currently would remain and be repaired, as needed. No new GHG emissions associated with heavy-duty construction equipment and construction worker and hauling trips would be generated. The proposed Project's less than significant impacts in relation to GHG emissions would be reduced under Alternative 1 since there would be no new construction activity. No new vehicle trips would be generated under Alternative 1. However, impacts in relation to a conflict with an applicable plan, policy, or regulation to reduce GHG emissions would increase under Alternative 1 because this alternative would not include the Project's energy efficiency features that would reduce operational GHG emissions in conformance with CALGreen standards. Overall, under Alternative 1, impacts would be similar to proposed Project.

HAZARDS AND HAZARDOUS MATERIALS

Alternative 1 would not result in any demolition, grading, soil remediation, or building construction. Existing conditions would persist; therefore, Alternative 1 would not expose the public to potential hazardous conditions associated with an accidental release of hazardous substances, hazardous building materials, and/or impacted soils. Impacts related to hazardous materials would be less under this alternative compared to the proposed Project.

NOISE

Alternative 1 would not result in any demolition, grading, or building construction. Existing conditions would continue, and no changes to ambient noise or groundborne vibration, whether permanent, periodic, or temporary, would occur. In addition, because no construction activity would occur, the construction noise and vibration associated with the proposed Project would not occur. The less than significant noise impacts associated with the proposed Project would not occur under Alternative 1. Therefore, impacts under this alternative would be less than those of the proposed Project.

PEDESTRIAN SAFETY

Under Alternative 1, existing site conditions would remain unchanged, and there would be no changes to existing external pedestrian safety, such as would occur during construction activity associated with the proposed Project. Therefore, impacts under this alternative would be less than those of the proposed Project.

TRANSPORTATION AND TRAFFIC

Under Alternative 1, existing site conditions would remain unchanged, and there would be no changes to existing external transportation and traffic conditions, such as would occur during construction activity associated with the proposed Project. Therefore, impacts under this alternative would be less than those of the proposed Project.

CONCLUSION

As detailed above, with the implementation of Alternative 1, the following impacts associated with the proposed Project would not occur: cultural resources and hazards and hazardous materials. The implementation of this alternative would result in fewer environmental impacts compared to the proposed Project. However, this alternative would result in greater impacts related to geology and soils (seismic risk) and would not meet any of the Project objectives.

5.7 ENVIRONMENTAL ANALYSIS OF ALTERNATIVE 2 (REDUCED FOOTPRINT MPB AND RETAIN BUILDING #20)

AIR QUALITY

Under Alternative 2, demolition, grading, and building construction would occur. Alternative 2 would result in the demolition of three permanent buildings and construction of one new structure that would result in a smaller construction footprint than the proposed Project. Alternative 2 would require less construction activity and, therefore, less regional construction emissions from construction equipment and employee vehicle trips than the proposed Project. Under Alternative 2, sensitive receptors would be exposed to reduced concentrations of toxic air contaminants and respirable particulate matter during construction activities due to reduced construction activity. Operational emission impacts to sensitive receptors under Alternative 2 would decrease due to the smaller construction footprint, which would result in less energy and mobile emissions. Similar to the proposed Project, Alternative 2 would not create objectionable odors.

CULTURAL RESOURCES

Under Alternative 2, three historic district contributor buildings would still be demolished (the existing MPB, Student Store, and Music/Chorale classroom building), and one new, reduced-footprint MPB would be constructed in the same location. Building #20 (a historic district contributor building) would remain and would continue to be used for classroom facilities. There would be no change in the square footage of portable buildings removed.

As compared to the proposed Project, this alternative would retain one additional historic 'contributor' building and would reduce some of the effects related to the size and massing of the proposed MPB. The smaller MPB would reduce encroachment into the remaining historic district contributors and character defining features, including original Campus buildings, the parking lot at Borden Avenue, site design, and landscaping. Because Alternative 2 still eliminates portions of the 'finger-plan' of the site design and involves new construction similar to the proposed Project, Alternative 2 would result in a substantial adverse change in the significance of the historic district, and would therefore still result in significant impact to the historic resource.[140] Implementation of standard conditions SC-CUL-1 through SC-CUL-11 and MM-CUL-1 would still be required under this alternative. The application of these SCs and mitigation would further reduce the impact.

GREENHOUSE GAS

Alternative 2 would result in a smaller construction footprint than the proposed Project, although demolition, grading, and building construction would still occur. Compared to existing conditions, the development of Alternative 2 would result in less than significant impacts. Therefore, Alternative 2 would require less construction activity and construction GHG emissions from construction equipment and employee vehicle trips compared to the proposed Project. During operation, no new vehicle trips are expected under Alternative 2. In relation to a conflict with an applicable plan, policy, or regulation to reduce GHG emissions, Alternative 2 would result in reduced impacts compared to the proposed Project, based on the increased remodeling area, thereby reducing energy-based GHG emissions during operation. Under Alternative 2, impacts to GHG emissions would be reduced compared to the proposed Project.

HAZARDS AND HAZARDOUS MATERIALS

Similar to the proposed Project, Alternative 2 would require the removal of affected soils within the Campus. However, construction work under Alternative 2 would result in less demolition square footage and potentially less soil removal than the proposed Project, therefore reducing the amount of hazardous materials exposure, transport, use, and disposal during construction. As with the proposed Project, Mitigation Measures MM-HAZ-1, MM-HAZ-2, and MM-HAZ-3 would be developed during preconstruction activities and implemented during construction activities. Impacts associated with the accidental release or exposure to hazardous materials would be less than significant, similar to the proposed Project.

NOISE

Under Alternative 2, similar to the proposed Project, the MPB, Student Store, and Music/Chorale classroom would be demolished, along with six portable classroom buildings. Parking improvements would also occur in Parking Lot No. 1 and Parking Lot No. 3. The construction equipment that is expected to generate the most

[140] ASM. 2025. Cultural Resources Technical Report for Sylmar Charter High School Major Modernization Project. May 2025.

noise is a concrete saw used during building demolition activities, which can reach 90 A-weighted decibels (dBA) at 50 feet from the equipment.

The closest distance between a sensitive receptor and an area that would require building demolition is approximately 66 feet to homes along Borden Avenue and 77 feet to the homes along Astoria Street. Under both the proposed Project and Alternative 2, use of concrete saws be compliant with SC-N-8 and SC-N-9 requiring site-specific noise control measures to be implemented during construction, including use of sound barriers, impacts would be less than significant. Under both the proposed Project and Alternative 2, the groundborne vibration experienced from demolition activities at the closest sensitive receptor would be the same and would result in less than significant impacts. Under both the proposed Project and Alternative 2, no increase in operations such as vehicle trips, or use of the Campus for outdoor activities, would occur. Therefore, construction and operational impacts would be similar.

PEDESTRIAN SAFETY

Under Alternative 2, construction and changes to existing pedestrian safety conditions would occur similar to that of the proposed Project. Impacts under Alternative 2 would be reduced to a less than significant level with the incorporation of SCs, including SC-PED-1 through SC-PED-5, SC-T-3, and SC-T-4, which require contractors to submit a Construction Worksite Traffic Control Plan prior to construction. Therefore, construction and operational impacts would be similar.

TRANSPORTATION AND TRAFFIC

Under Alternative 2, there would be temporary changes to existing transportation and traffic conditions, such as would occur during construction activity associated with the proposed Project. Alternative 2 would require less construction activity and, therefore, less construction vehicle trips than the proposed Project. Impacts under Alternative 2 would be reduced to a less-than-significant level with the incorporation of SCs, including SC-PED-1 through SC-PED-5, SC-T-3, and SC-T-4.

CONCLUSION

The significant and unavoidable impact to cultural resources associated with development of the proposed Project would still occur under Alternative 2. Implementation of this alternative would result in fewer environmental impacts than the proposed Project; however, this alternative does not fully meet Project objectives as compared to the proposed Project (see Table 5-3, *Consistency with Project Objectives*).

5.8 COMPARATIVE SUMMARY OF ALTERNATIVES

Table 5-2, *Alternative Comparison*, presents the significance determinations for each environmental impact discussion for the proposed Project and each alternative, and how impacts of the alternatives compare to the proposed Project. The table provides a means for the reader to review and compare the alternatives to each other, and to the proposed Project. Table 5-3, *Consistency with Project Objectives*, demonstrates each alternative's consistency with the Project objectives.

Table 5-2 Alternative Comparison

Environmental Issue	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Footprint MPB and Retain Building #20
Air Quality			
Air Quality Plan	LS	NI (L)	LS (L)
Criteria Pollutant	LS	NI (L)	LS (L)
Sensitive Receptors	LS	NI (L)	LS (L)
Cultural Resources			
Historic Resources	SU	NI (L)	SU (L)
Greenhous Gas Emissions			
Emissions Generation	LS	NI (L)	LS (L)
GHG Reduction Plan, Policy Regulation	LS	NI (L)	LS (L)
Hazards and Hazardous Materials			
Transport, Use, or Disposal of Hazardous Materials	LSM	NI (L)	LSM (E)
Accidental Release of Hazardous Materials	LSM	NI (L)	LSM (E)
Hazardous Emissions Near a School	LSM	NI (L)	LSM (E)
Hazardous Materials Cleanup Site	LSM	NI (L)	LSM (E)
Noise			
Noise Levels in Excess of Standards	LS	NI (L)	LS (E)
Excessive Ground-Borne Vibration	LS	NI (L)	LS (E)
Pedestrian Safety			
Safey Hazards Due to Design Feature or Incompatible Uses	LS	NI (L)	LS (E)
Unsafe Routes to Schools	LS	NI (L)	LS (E)
Transportation and Traffic			
Circulation System Program, Plan, Ordinance, or Policy Conflicts	LS	NI (L)	LS (E)
Hazards Due to Geometric Design Feature	LS	NI (L)	LS (E)
Note: NI = No Impact; LS = Less Than Significant Impact; LSM = Less Than Significant with Mitigation. (L) = Less than Proposed Project; (G) = Greater than Proposed Project; (E) = Equivalent to Proposed Project; (SU) = Significant and Unavoidable			

Table 5-3 Consistency with Project Objectives

Objective	Proposed Project	Alternative 1: No Project/No Build	Alternative 2: Reduced Footprint MPB and Retain Building #20
#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.	The proposed Project would replace one building meeting AB 300 criteria for seismic evaluation: Multipurpose Building	**Inconsistent**: Seismic vulnerability of the Multipurpose Building would not be addressed.	**Consistent**: This alternative would be consistent with AB 300 by removal of a highly seismic vulnerable building (the existing Multipurpose Building).
#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.	The proposed Project would reduce health and safety risks with building replacement and retrofit.	**Inconsistent:** Seismic vulnerability of the Multipurpose Building would not be addressed.	**Partially Consistent**: Seismic vulnerability of the Multipurpose Building would be addressed. However, the program would continue to rely on undersized classroom facilities (Building #20) and would not meet the school's ability to deliver the number of classrooms required for the instructional program. Further, the safety issues relating to lack of fire suppression system in Building #20 would not be addressed.
#3: The District reliance on relocatable buildings, especially for K–12 instruction, should be reduced.	The proposed Project would replace 6 relocatable buildings with permanent classroom buildings.	**Inconsistent**: Six existing relocatable buildings for instruction would be retained.	**Partially Consistent:** Six relocatable classroom buildings would be removed, but the program would continue to rely on the undersized classroom facilities of Building #20. The overall building volume of the smaller-footprint Multipurpose Building would have to be higher to accommodate the school's capacity standard classroom count, otherwise more portable classrooms would need to remain on Campus.
#4: Necessary and prioritized upgrades must be made throughout the school site in order to comply with the program accessibility requirements of the Americans with Disabilities Act (ADA) Title II Regulations, and the District's Self-Evaluation and Transition Plan under Title II of the ADA.	The proposed Project would include necessary ADA upgrades.	**Inconsistent**: No ADA upgrades would be made	**Consistent:** ADA upgrades would be made.
#5: The exterior conditions of the school site will be enhanced around new buildings and/or areas impacted by construction to improve the visual appearance including landscape and hardscape.	The proposed Project would include landscape and hardscape enhancements.	**Inconsistent**: No enhancement of exterior conditions of the school site to improve the visual appearance of the landscape and hardscape would be made.	**Consistent:** Landscape and hardscape enhancements would be made.
#6: Outdoor learning environments will be developed where the site layout and project planning provide the opportunity.	The proposed Project would provide additional outdoor learning and gathering spaces for its students.	**Inconsistent:** No outdoor learning environments would be developed.	**Consistent**: Outdoor learning environments would be developed.

5.9 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

An EIR must identify the environmentally superior alternative. The No Project/No Build Alternative (Alternative 1) would reduce, or eliminate, all proposed Project impacts. However, Alternative 1 does not meet any of the Project objectives. In addition, CEQA Guidelines Section 15126.6(c) requires that, if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

As such, Alternative 2 would be the environmentally superior alternative as it would result in the greatest reduction in air quality, cultural resources, and greenhouse gas emissions impacts when compared to the proposed Project. Under Alternative 2, cultural resources impacts would be significant, but to a lesser degree than the proposed Project. Alternative 2 meets Project objectives with exception of Objective #2 and Objective #3, which would not be entirely met (refer to Table 5-3). The intent of the objectives is to increase safety for staff and students by providing upgraded buildings and to reduce the reliance on portable buildings. Further, the objectives aim to provide larger and safer classroom spaces that could accommodate modern and efficient technology, which would not be entirely met with Alternative 2. Therefore, this alternative would meet some of the objectives but to a lesser degree as the proposed Project.

6. List of Preparers

6.1 LEAD AGENCY

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6.2 CEQA CONSULTANT

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ASM Affiliates, Inc. (ASM)

Linscott, Law and Greenspan, Engineers (LLG)

Appendices are on USB Drive

1. Initial Study, WSP
    A. Historic Resources Evaluation Report, HRG
    B. Geotechnical and Geologic Investigation Report, Proposed Major Modernization and Seismic Retrofit Sylmar High School, TGR
    C. Phase I Environmental Site Assessment, Geosyntec
    D. Preliminary Environmental Assessment Equivalent - Work Plan, Geosyntec
    E. Arborist Tree Survey Report, Arborgate Consulting Inc.
2. Notice of Preparation
3. Scoping Comments
4. Preliminary Environmental Assessment – Equivalent Report, CES
5. Cultural Resources Technical Report, ASM
6. Air Quality Report and Emissions Calculations, WSP
7. Noise Background and Modeling Data, WSP
8. Pedestrian and Safety Study, LLG