

**LOS ANGELES SOUTHWEST COLLEGE
2022 FACILITIES MASTER PLAN UPDATE**

**ADDENDUM
TO THE LOS ANGELES SOUTHWEST COLLEGE
FACILITIES MASTER PLAN
ENVIRONMENTAL IMPACT REPORT**

Lead Agency:

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February 2022

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1.0 INTRODUCTION

This section provides information about the Los Angeles Southwest College (LASC) Facilities Master Plan (FMP) and the California Environmental Quality Act (CEQA) documents that have been prepared for updates to LASC's FMP in the past.

1.1 BACKGROUND

LASC is a public community college located at 1600 West Imperial Highway in the unincorporated area of southwest Los Angeles County. LASC is part of the Los Angeles Community College District (LACCD), and its service area generally includes Inglewood, Hawthorne, Gardena, Unincorporated Westmont, and West Athens. LASC's FMP is updated about every four years and establishes the near- and long-term vision for improvements to the campus consistent with the goals and academic mission of the college.

1.2 PRIOR ENVIRONMENTAL REVIEW

The LACCD Board of Trustees certified an Environmental Impact Report (EIR) for LASC's FMP on November 19, 2003 (2003 FMP EIR). The 2003 FMP EIR evaluated the addition of new buildings, renovations to buildings, and expansion of the athletic stadium to accommodate an increase in enrollment from 5,200 full-time equivalent (FTE) students to as high as 12,000 students.

In 2007, an Addendum to the 2003 FMP EIR was certified for an update to LASC's FMP to relocate LASC's shipping/receiving uses to a new building on the eastern portion of the campus and to install a new Central Plant in the exiting shipping/receiving on the western portion of the campus (2007 FMP Addendum).

In 2010, a Supplemental EIR to the 2003 FMP EIR was certified for the construction of additional buildings, modernizations of existing facilities, and infrastructure upgrades (2010 FMP Supplemental EIR). An Addendum to the 2003 FMP EIR was also certified in 2010 for the construction of a high school building (Middle College High School) on the campus (2010 FMP Addendum).

In 2017, a Categorical Exemption was approved to construct of the School of Science, develop permanent space for the nursing program, increase the capacity of the Central Plant, develop the Student Union Building, renovate the Technical Education Center building, increase signage, landscaping, and implement an Americans with Disabilities Act (ADA) project. Future building sites were also identified in the 2017 FMP Update (2017 FMP Categorical Exemption).

1.3 PURPOSE AND USE

This document is an Addendum to the EIR certified by the LACCD Board of Trustees in 2003 and the subsequent environmental documents that have certified for updates to LASC's FMP since 2003.

An Addendum to a previously certified EIR is permitted under the CEQA Guidelines Sections 15162 and 15164 when there are no substantial changes in the project or in circumstances surrounding the project, and when the project would not have new significant

impacts or more severe impacts than those previously disclosed in the certified EIR. Specifically, Section 15164 of the CEQA Guidelines states:

- (a) The lead agency or responsible agency shall prepare an addendum to a previously Certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a Subsequent EIR have occurred.
- (b) An Addendum to an adopted Negative Declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a Subsequent EIR or Negative Declaration have occurred.
- (c) An Addendum need not be circulated for public review but can be included in or attached to the Final EIR or adopted Negative Declaration.
- (d) The decision-making body shall consider the addendum with the Final EIR or adopted Negative Declaration prior to making a decision on the project.
- (e) A brief explanation of the decision not to prepare a Subsequent EIR pursuant to CEQA Guidelines Section 15162 should be included in an Addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

According to CEQA Guidelines Section 15162, once an EIR has been certified, a lead agency need not prepare a Subsequent EIR unless...*on the basis of substantial evidence in light of the whole record...*one or more of the following conditions occurs:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

1.4 LEAD AGENCY FOR THE PROPOSED PROJECT

The LASC campus operates under the auspices of the LACCD, and the LACCD is serving as Lead Agency in accordance with Section 15367 of the CEQA Guidelines, which defines the lead agency as “the public agency which has the principal responsibility for carrying out or approving the project.” The 2022 LASC Facilities Master Plan Update is proposed by:

LOS ANGELES COMMUNITY COLLEGE DISTRICT

Facilities Planning and Development
Los Angeles Community College District
770 Wilshire Boulevard
Los Angeles, CA 90017

2.0 PROJECT DESCRIPTION

This section identifies the location of the LASC campus (project site), describes the surrounding area, provides a description of the proposed project, and includes an estimated timeline for the construction of the proposed project.

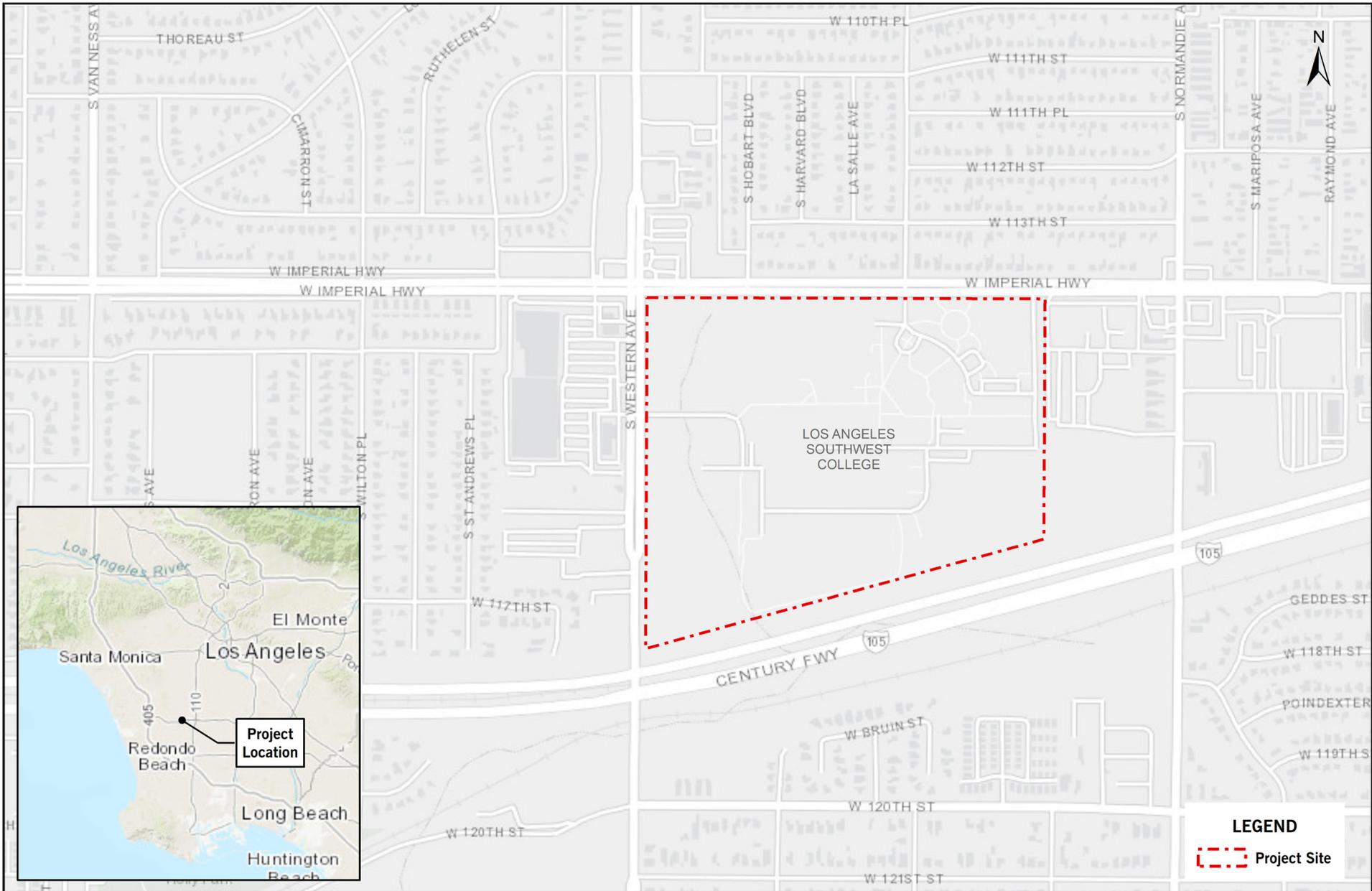
2.1 PROJECT LOCATION

The LASC campus is located at 1600 West Imperial Highway in unincorporated Los Angeles County. The approximately 63.7-acre campus is bound by Imperial Highway to the north, the Glen Anderson Freeway (I-105) to the south, Western Avenue to the west, and Normandie Avenue to the east. The location of the project site is shown in **Figure 2-1**. Regional access to the project site is provided by the I-105, adjacent to the south, the San Diego Freeway (I-405), located 3.5 miles to the west, and the Harbor Freeway (I-110), located one mile to the east. Access between the campus and the east/west oriented I-105 is obtained via off-ramps at Crenshaw Boulevard and Vermont Avenue. The major streets serving the campus are Western and Normandie Avenues in the north-south direction and Imperial Highway in the east-west direction. Metro C (Green) Line serves the area including the Vermont/Athens Station located 0.5 miles to the east and the Crenshaw Station located one mile west of the project.

An aerial photograph showing the campus and surrounding land uses is presented in the **Figure 2-2**. As shown, large commercial businesses are the predominant land use along Western Avenue, beginning north of the I-105 until Imperial Highway. Continuing north, the commercial uses begin to transition to smaller scale retail businesses through the Western Avenue/Imperial Highway intersection, and along the northern side of Imperial Highway to Hobart Boulevard. A buffer of trees and lawn line the northern boundary of the campus followed by single-family homes are located north of campus across Imperial Highway and east of Hobart Boulevard. Nearby residential uses are also directly behind the strip of businesses along Western Avenue. The property to the east of campus contains a church, a school and parking lot, and multi-family residential uses along Normandie Avenue. The eastern edge of campus is densely landscaped, creating a buffer between LASC and the church and school.

2.2 EXISTING CONDITIONS

A site plan depicting their location from the 2017 FMP is presented in **Figure 2-3**. As shown, the existing buildings are generally located in the center and northeast portion of the campus and are surrounded by parking and open space. The Cox Building, Technology Education Center (TEC), Thomas Lakin Fitness & Wellness Center (LFWC), Child Development Center, Student Services Building (SSB), Student Services Education Center (SSEC), Central Plant, Field House, Child Development Center and Maintenance and Operations Facility are the main buildings on campus. Existing outdoor athletic and recreational facilities, which include the football, soccer, track, and baseball and softball fields, are located on the southern half of the campus. The LASC campus is currently developed with a total of approximately 1,055,364 gross square feet of facilities. A breakdown of these facilities by building and use is presented in **Table 2-1**.



Source: TAHA, 2021.

FIGURE 2-1
PROJECT LOCATION



Source: TAHA, 2021.

2017 Facilities Master Plan

- 1 Student Services Building (SSB)
- 2 College Store
- 3 School of Career & Technical Education (SoCTE)
- 4 Odessa Cox Building & Library
- 5 Cox Annex
- 6 Little Theatre
- 7 Student Services Education Center (SSEC)
- 8 Technical Education Center (TEC)
- 9 School of Science (SOS)
- 10 Thomas Lakin Fitness & Wellness Center (LFWC)
- 11 Swimming Pool
- 12 Academic Village
- 13 Middle College High School (MCHS)
- 14 Child Development Center (CDC)
- 15 Athletic Field House
- 16 Cougar Stadium
- 17 Baseball Field
- 18 Campus Sheriff's Station
- 19 Central Plant
- 20 Build-LACCD
- 21 Maintenance & Operations (M & O)
- 22 East Pump House
- 23 West Campus
- 24 Student Union



Source: LACCD, 2021.

TABLE 2-1: EXISTING CAMPUS FACILITIES		
Building	Gross Square Feet (GSF)	Assignable Square Feet (ASF)
Student Services Building (SSB)	67,266	46,122
School of Career & Technical Education (SoCTE)	48,833	25,826
School of Science (SOS)	30,514	21,014
Cox Building	114,681	78,696
Student Services Education Center (SSEC)	63,020	37,153
Technical Education Center (TEC)	37,963	26,610
Thomas Lakin Fitness & Wellness Center (LFWC)	68,205	50,827
Subtotal Academic	430,482	286,248
Student Union	31,378	19,937
Child Development Center	33,306	22,030
Facilities Maintenance & Operations	25,575	16,159
Central Plant	4,800	4,420
Field House	19,640	11,747
Stadium Buildings	7,679	2105
Subtotal Support	122,378	76,398
Parking Lot P4	148,161	5,417
Parking Lot P8	232,896	0
Subtotal Parking Structures	381,057	5,417
TOTAL BUILDINGS	933,917	368,063
Temporary	11,352	8,688
Academic Village	33,865	24,968
West Campus	10,172	7,215
CPT (GSF/ASF approx.)	3,713	2,784
TOTAL TEMPORARY	59,102	43,655
Middle College High School	52,541	35,242
Sheriff Station	3,966	2,782
Baseball Field Buildings	1,820	1,779
Utility Buildings	4,018	3,669
Subtotal Non-College	62,345	43,472
CAMPUS TOTAL	1,055,364	455,190

SOURCE: LACCD, 2021.

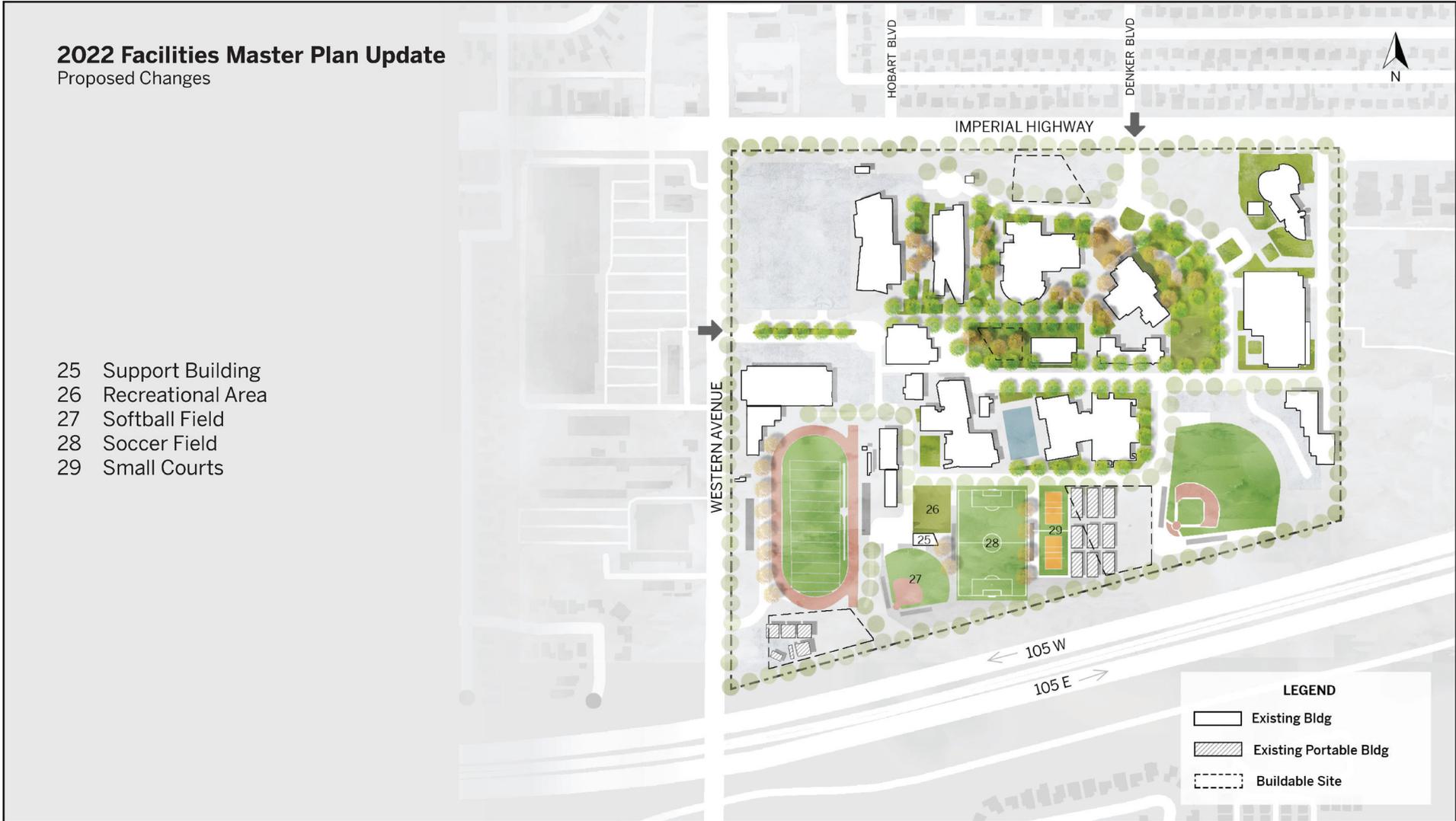
The 2003 FMP and subsequent FMP updates have assumed a maximum enrollment of 12,000 FTE students.¹ Student enrollment peaked to approximately 7,500 FTE students in 2015-2017; however, enrollment currently stands at only approximately 3,200 FTE students.

¹The FTE is obtained by dividing the total hours of class attendance over the academic year by 525, a number representing 15 hours of class attendance by one student over two standards semesters.

2.3 PROPOSED PROJECT

The proposed project includes partial building renovations to Building No. 1 School of Career & Technical Education (SoCTE), Building No. 7 Student Services Education Center (SSEC), and Building No. 8 Technical Education Center (TEC). The proposed project also includes the addition of athletic facilities on southern proportion of the campus. The locations of the proposed recreation area, soccer and softball fields, small courts and a support building are shown in **Figure 2-4**. Bleaches and other spectator amenities would be provided for new athletic facilities. The 2022 FMP site plan is presented in **Figure 2-5**. Future building sites are also identified in the 2022 FMP site plan; nonetheless, implementation of the proposed project would not exceed the total number students planned for in the 2003 FMP.

The proposed athletic fields would be equipped with permanent night-time sports lighting. The existing baseball field located in the southeast corner of the campus would also be equipped with night-time lighting. The number and height of the light standards (poles) has not been determined; however, the proposed lighting fixtures would be shielded and designed to control and direct light precisely toward the desired location. The height of the light poles would allow the luminaire assemblies to be aimed downward to focus the shaft of light toward the athletic fields, not outward, minimizing any light spillover.



Source: LACCD, 2021.

FIGURE 2-4
CHANGES TO THE FACILITIES MASTER PLAN

2022 Facilities Master Plan Update

- 1 Student Services Building (SSB)
- 2 College Store
- 3 School of Career & Technical Education (SoCTE)
- 4 Odessa Cox Building & Library
- 5 Cox Annex
- 6 Little Theatre
- 7 Student Services Education Center (SSEC)
- 8 Technical Education Center (TEC)
- 9 School of Science (SOS)
- 10 Thomas Lakin Fitness & Wellness Center (LFWC)
- 11 Swimming Pool
- 12 Academic Village
- 13 Middle College High School (MCHS)
- 14 Child Development Center (CDC)
- 15 Athletic Field House
- 16 Cougar Stadium
- 17 Baseball Field
- 18 Campus Sheriff's Station
- 19 Central Plant
- 21 Maintenance & Operations (M & O)
- 22 East Pump House
- 23 West Campus
- 24 Student Union (SU)
- 25 Support Building
- 26 Recreational Area
- 27 Softball Field
- 28 Soccer Field
- 29 Small Courts



Source: LACCD, 2021.

3.0 IMPACT ANALYSIS

This section discusses the proposed project's potential impacts on all of the environmental topic areas defined by the CEQA Guidelines Environmental Checklist Form (Appendix G). The findings of the previous environmental documents (i.e., 2003 FMP EIR, 2007 FMP Addendum, 2010 Supplemental EIR, and 2010 FMP Addendum) and any associated mitigation measures are presented to provide a basis of comparison for the proposed project.²

Since the environmental documents for the previous updates to LASC's FMP were certified, revisions to the CEQA Guidelines Appendix G have been adopted. The revisions to Appendix G were adopted largely to reduce redundancy, provide additional clarity, and to align Appendix G with recent California appellate court and Supreme Court decisions and changes to the Public Resources Code. Where appropriate, the revisions to the CEQA Guidelines that have occurred since the previous environmental documents were adopted are discussed.

3.1 AESTHETICS

Since the previous environmental documents were adopted, the Appendix G checklist questions related to aesthetics have been modified. The modifications clarify that the checklist questions regarding aesthetics do not apply to projects that are located in a transit priority area. The modifications also provide distinct checklist questions for public views and consistency with zoning regulations governing scenic views, depending upon whether the project is within a non-urbanized or urbanized area.

2003 FMP EIR. This EIR found that no significant and unavoidable impacts related to aesthetics would occur with implementation of Mitigation Measure **AE1** to address potential shadow impacts to residences along Imperial Highway.

AE1 Techniques to prevent shadows from new buildings being cast upon residential property along the north side of Imperial Highway, shall include, but are not limited to one of the following: the overall height of a building at the 50 feet setback line shall be limited to 35 feet; the buildings shall be set back farther than the recommended 50 feet; or the upper two stories of the buildings shall be stepped back to move the tallest part of the building farther away from the setback zone.

2007 FMP Addendum. This Addendum found that the no impacts related to aesthetics would occur.

2010 FMP Supplemental EIR. This Supplemental EIR found that all impacts related to aesthetics would be less than significant without the need for new project specific or modified mitigation measures.

2010 FMP Addendum. This Addendum found that impacts related to aesthetics would be less than significant without the implementation of new project specific or modified mitigation measures.

²The findings from the 2017 FMP Categorical Exemption are not presented as all impact categories were presumed to be less than significant.

Proposed Project. As discussed in the 2003 FMP EIR and subsequent environmental documents, there are no designated scenic highways in the vicinity of the proposed project. No scenic vistas are available on the project site or within the surrounding area, and the proposed project is not expected to degrade the existing visual character of the project site and its surrounding area. The proposed project only includes building renovations and the addition of new lighted athletic facilities and a support building on the southern portion of the campus. The existing baseball field located in the southeast corner of the campus would also be equipped with night-time lighting. While the number and height of the light standards (poles) has not been determined, the proposed lighting fixtures would be shielded and designed to control and direct light precisely toward the athletic fields and spectator facilities. The height of the light poles would allow the luminaire assemblies to be aimed downward to focus the shaft of light toward the athletic fields, not outward, minimizing any light spillover. Furthermore, the nearest off-site uses sensitive to light would be single-family residences located approximately 550 feet to the south, 700 feet to the west, and Saint Frances Cabrini Church located approximately 750 feet to the northeast. Therefore, because the lights would be aimed downward and the nearest residences are over 500 feet away, impacts related to aesthetics would be less than significant.

Project Specific or Modified Mitigation Measures. None required.

3.2 AGRICULTURE AND FORESTRY RESOURCES

Since the previous environmental documents were adopted, the Appendix G checklist questions related to agriculture and forestry resources have been modified. The title of this section was changed from “Agriculture Resources” to “Agriculture and Forestry Resources” and two questions pertaining to forest and timberland (Questions c and d) were added to Appendix G.

2003 FMP EIR. This EIR found that no impacts related to agricultural resources would occur. Impacts related to forestry resources were not discussed.

2007 FMP Addendum. This Addendum did not discuss impacts related agricultural or forestry resources.

2010 FMP Supplemental EIR. This Supplemental EIR found that no impacts related to agricultural resources would occur.

2010 FMP Addendum. This Addendum found that no impacts related to agricultural resources would occur.

Proposed Project. As discussed in the 2003 FMP EIR and subsequent environmental documents, LASC has occupied the project site since 1965. The campus is located in an urbanized and developed area in which no agricultural or forestland exists. LASC does not utilize the campus as farmland, or for any other agricultural or forestry uses. Conditions on the project site have not changed, and the proposed project only includes building renovations and the addition of new lighted athletic facilities and a support building on the southern portion of the campus. Therefore, no impacts related to agricultural and forestry resources would occur.

Project Specific or Modified Mitigation Measures. None required.

3.3 AIR QUALITY

Since the previous environmental documents were adopted, the Appendix G checklist questions related to air quality have been modified. The checklist questions were modified to delete Checklist Question III.b regarding violation of air quality standards and to modify the question regarding odors.

2003 FMP EIR. This EIR found that impacts related to air quality would be significant and unavoidable impacts after the implementation of the following mitigation measures:

- AQ1** The construction area and vicinity (500-foot radius) shall be swept and watered at least twice daily. Site-wetting shall occur often enough to maintain a ten percent surface soil moisture content throughout all earth-moving activities.
- AQ2** All unpaved parking or staging areas shall be watered at least once every two hours of active operations.
- AQ3** Site access points shall be swept/washed within thirty minutes of visible dirt deposition.
- AQ4** On-site stockpiles of debris, dirt or rusty material shall be covered or watered at least twice per hour.
- AQ5** All haul trucks shall either be covered or maintain two feet of freeboard.
- AQ6** All haul trucks shall have a capacity of no less than 14 cubic yards.
- AQ7** At least 80 percent of all inactive disturbed surface areas shall be watered on a daily basis when there is evidence of wind-driven fugitive dust.
- AQ8** Operations on any unpaved surfaces shall be suspended when winds exceed 25 mph.
- AQ9** If construction activities occur within 500 feet of the Child Development Center, the Child Development Center shall be temporarily relocated to an area that is 500 feet from any construction activities.

2007 FMP Addendum. This Addendum found that no impacts related to air quality would occur.

2010 FMP Supplemental EIR. This Supplemental EIR found that implementation of Mitigation Measures **S-AQ1** through **S-AQ16** would reduce emissions during construction and operation of the project. However, air quality impacts would be significant and unavoidable during construction after the implementation of the following mitigation measures:

- S-AQ1** Water or a stabilizing agent shall be applied to exposed surfaces at least two times per day to prevent generation of dust plumes.
- S-AQ2** The construction contractor shall utilize at least one of the following measures at each vehicle egress from the project site to a paved public road:
 - Install a pad consisting of washed gravel maintained in clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long;
 - Pave the surface extending at least 100 feet and at least 20 feet wide;

- Utilize a wheel shaker/wheel spreading device consisting of raised dividers at least 24 feet long and 10 feet wide to remove bulk material from tires and vehicle undercarriages; or
 - Install a wheel washing system to remove bulk material from tires and vehicle undercarriages.
- S-AQ3** All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).
- S-AQ4** Construction activity on unpaved surfaces shall be suspended when wind speed exceeds 25 miles per hour (such as instantaneous gusts).
- S-AQ5** Heavy-duty equipment operations shall be turned off while idling longer than five minutes. Contractor shall use electric or natural gas powered vehicles/equipment where practical.
- S-AQ6** Ground cover in disturbed areas shall be replaced as quickly as possible.
- S-AQ7** Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM₁₀ generation.
- S-AQ8** Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- S-AQ9** Traffic speeds on all unpaved roads to be reduced to 15 mph or less.
- S-AQ10** Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads. If feasible, use water sweepers with reclaimed water.
- S-AQ11** Contractors shall maintain equipment and vehicle engines in good condition and in proper tune per manufacturers' specifications.
- S-AQ12** Contractors shall utilize electricity from power poles rather than temporary diesel or gasoline generators, as feasible.
- S-AQ13** Heavy-duty trucks shall be prohibited from idling in excess of five minutes, both on- and offsite.
- S-AQ14** Construction parking shall be configured to minimize traffic interference.
- S-AQ15** Construction activity that affects traffic flow on the arterial system shall be limited to off peak hours, as feasible.
- S-AQ16** All diesel powered construction equipment in use shall require control equipment that meets at a minimum Tier III emissions requirements. In the event Tier III equipment is not available, diesel powered construction equipment in use shall require emissions control equipment with a minimum of Tier II diesel standards.
- S-AQ17** The construction contractor shall coordinate with Child Development Center staff to ensure that children present at the Center would be limited to indoor activities during periods when diesel equipment is operated at the parking structure construction site.
- S-AQ18** The construction contractor shall coordinate with Middle College High School during days of intense diesel equipment activity to minimize student exposure to air pollution.

- S-AQ19** During construction activity occurring on Caltrans Site #16, Caltrans and DTSC shall require the construction contractor to coordinate with LACCD and the St. Frances X. Cabrini School to minimize exposure to air pollution.
- S-AQ20** Staff and students shall be provided with information on public transportation options near Los Angeles Southwest College.
- S-AQ21** Preferred parking shall be established for alternatively-fueled vehicles.
- S-AQ22** Charging stations shall be supplied for electric vehicles.
- S-AQ23** A ride sharing program shall be implemented to increase carpooling opportunities.

2010 FMP Addendum. This Addendum found that impacts related to air quality would be less than significant without the implementation of new project specific or modified mitigation measures.

Proposed Project. The proposed project includes building renovations and the addition of new lighted athletic facilities and a support building on the southern portion of the campus. Under CEQA, potential impacts to air quality are generally analyzed by the following criteria found in Appendix G of the State CEQA Statute & Guidelines: (a) consistency with the regional Air Quality Management Plan (AQMP); (b) controlling emissions of air pollutants for which the region has not attained the ambient air quality standards (State and federal); (c) the exposure of sensitive receptors to unhealthily substantial pollutant concentrations resulting from project emissions; and, (d) the potential for the occurrence of public nuisance conditions related to odors, dust, or other emissions resulting from implementation of the project. Previous CEQA analyses determined that construction of the FMP would result in significant regional emissions of NO_x and significant localized emissions of NO_x, PM₁₀, and PM_{2.5} for both on-site and off-site sensitive receptors (2010 FMP Supplemental EIR). The same analysis determined that operational air quality impacts would be less than significant.

Although construction of the proposed project would employ many of the same techniques and best management practices (BMPs) as previous construction activities in accordance with the SCAQMD Rule Book, it is likely that the magnitude of maximum daily air pollutant emissions would be lower due to improvements in on-road vehicle fuel efficiency and advancements in off-road internal combustion engine technologies. Construction of the proposed project would be required to comply with the provisions of all applicable SCAQMD regulations including, but not limited to:

- **Rule 401 – Visible Emissions:** This rule states that a person shall not discharge into the atmosphere from any single source of emission whatsoever 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 as that designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view.
- **Rule 402 – Nuisance:** This rule states that 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 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:** This rule 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 PM₁₀ emissions to less than 50 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule). Mitigation measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers and/or ceasing all activities. Finally, a contingency plan may be required if so determined by the USEPA.

- **Rule 1113 – Architectural Coatings:** This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce volatile organic compound (VOC) emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories. The current SCAQMD limit for Building Envelop coatings is 50 grams of VOC per Liter ($\text{g}_{\text{VOC}}/\text{L}$).
- **Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities:** This rule requires owners and operators of any demolition or renovation activity and the associated disturbance of asbestos-containing materials, any asbestos storage facility, or any active waste disposal site to implement work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials.

On average, the off-road equipment fleet used in construction of land use development projects within the SCAQMD jurisdiction does not produce as much emissions as those pieces of equipment that were used 10 to 20 years ago. Since the time that the 2010 FMP Supplemental EIR was published, the URBEMIS2007 model has been replaced with the California Emissions Estimator Model (CalEEMod). CalEEMod contains default emission factors for various types of construction equipment based on the horsepower rating and operational year of the fleet. As an example, the CalEEMod NO_x emission factor for equipment type “Tractors/Loaders/Backhoes” in the operational year 2022 is 2.65 grams per brake-horsepower-hour ($\text{g}/\text{bhp}\text{-hr.}$), while the NO_x emission factor in the operational year 2010 is 6.32 ($\text{g}/\text{bhp}\text{-hr.}$). The change in the fleet average NO_x emission factor represents a decrease of 58 percent between 2010 and 2022. Construction of the proposed project would likely use similar types of equipment as those that were analyzed in the 2010 FMP Supplemental EIR. There is no potential for construction of the proposed project to require twice as many daily off-road equipment operating hours as were analyzed in the 2010 FMP Supplemental EIR. Therefore, impacts related to air quality during construction of the proposed project would be consistent with or less significant than those previously analyzed, and no new or exacerbated impacts would occur.

Regarding long-term operations, the 2010 FMP Supplemental EIR analyzed potential impacts resulting from the forecasted 12,000 FTE student enrollment and found that impacts would be less than significant. The existing enrollment is approximately 3,200 FTE students, and implementation of the proposed project would not result in substantial enrollment increases that could approach the previously analyzed level. Aggregate fleet average mobile source emission factors have decreased substantially between the prior analysis and the preparation of this Addendum, and both existing and proposed project mobile source emissions would likely be substantially below levels previously disclosed in approved CEQA documents. Additionally, average natural gas consumption rates that produce area source emissions have been controlled and reduced on a per-square-foot average through the Title 24 energy efficiency standards and the 2019 CALGreen Code. There is no potential for energy source emissions from natural gas combustion to reach or exceed levels previously analyzed and disclosed in prior CEQA documents. Therefore, long-term operation of the proposed project would not result in new or exacerbated environmental impacts, and impacts would be less than significant.

Project Specific or Modified Mitigation Measures. None required.

3.5 CULTURAL RESOURCES

Since the previous environmental documents were adopted, the Appendix G checklist questions related to cultural resources have been modified. These modifications consist of a minor word change to Checklist Question V.a and moving Checklist Question V.c from the cultural resources subsection to the geological resources subsection of Appendix G.

2003 FMP EIR. This EIR found that no impacts related to cultural resources would occur.

2007 FMP Addendum. This Addendum found that no impacts related to cultural resources would occur.

2010 FMP Supplemental EIR. This Supplemental EIR found that impacts related to cultural resources would be less than significant after the implementation of the following mitigation measure:

S-CR1 In the event that archaeological resources (artifacts or features) are exposed during excavation of previously undisturbed soil, an archaeologist who meets the Secretary of the Interior's professional qualification standards shall be retained. Construction activities (e.g., grading, grubbing, vegetation clearing) in the immediate vicinity of the discovery shall be halted while the resources are evaluated for significance and a Native American Tribe or elder identified by the Native American Heritage Commission shall be consulted. Construction activities could continue in other areas. If the discovery proves to be significant, additional work, such as data recovery excavation, may be warranted and would be discussed in consultation with the lead agency.

The discovery of human remains is always a possibility during construction activities; State of California Health and Safety Code Section 7050.5 addresses these findings. This code section states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The County Coroner must be notified of the find immediately. If the human remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine and notify a Most Likely Descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

2010 FMP Addendum. This Addendum found that no impacts related to cultural resources would occur.

Proposed Project. As discussed in the 2003 FMP EIR and subsequent environmental documents, no known sites are located on the project site, and the potential of finding archaeological or paleontological resources was determined to be very low. In addition, due to the age of the campus, no historical resources are located on the campus. The proposed project only includes building renovations and the addition of new lighted athletic facilities and a support building on the southern portion of the campus. In the unlikely event that any undisturbed land containing potentially significant cultural or archaeological resources is encountered during project construction Mitigation Measure S-CR1 would require consultation and evaluation by a qualified Native American resource before further construction could continue. Therefore, a less-than-significant impact related to cultural resources is anticipated.

3.6 ENERGY

Since the previous environmental documents were adopted, the Appendix G checklist questions related to Energy have been modified. The modifications include energy as a separate subsection and incorporate language from Appendix F of the CEQA Guidelines. The new CEQA Guidelines treats “wasteful, inefficient, or unnecessary” energy consumption as a significant environmental impact.

2003 FMP EIR. While the Energy category was not specifically discussed, this EIR found that no impacts related to electricity and natural gas would occur.

2007 FMP Addendum. This Addendum found that no impacts related to energy would occur.

2010 FMP Supplemental EIR. While the Energy category was not specifically discussed, this Supplemental EIR found the impacts related to electricity and natural gas would be less than significant.

2010 FMP Addendum. This Addendum did not discuss impacts related to energy.

Proposed Project. The proposed project includes building renovations and the addition of new lighted athletic facilities and a support building on the southern portion of the campus. Construction of the proposed project would result the one-time expenditure of petroleum-based transportation fuels—motor gasoline and diesel fuel—via the internal combustion engines in off-road equipment and on-road vehicles. Future operation of the proposed project would require electricity and natural gas, and additional indirect electricity would be required for the provision and distribution of water throughout the campus.

The amount of motor gasoline and diesel fuel that would be required for off-road equipment and on-road vehicles involved in construction activities was not quantified in any of the previous CEQA documents. Over the past decade, substantial improvements in on-road vehicle fuel efficiency have materialized, resulting in per-mile reductions in motor gasoline and diesel fuel use for on-road vehicles. Therefore, equipment and vehicles employed to complete construction of the proposed project would require less motor gasoline and diesel fuel on average than equipment used to construct previous components of the campus. Construction of the proposed project would not require a disproportionate amount of petroleum-based transportation fuels relative to the size of the project, nor would it place an undue burden on existing commercially available reserves. All diesel-fueled equipment and vehicles used in construction activities would be subject to applicable CARB diesel regulations, such as the In-Use Off Road Diesel-Fueled Fleets Regulation and Airborne Toxic Control Measure 2485, respectively, which limit the maximum idling time to no more than five minutes at any one location. All vehicles non-diesel vehicles would be subject to the requirements of the CARB Light-Duty Vehicle Standards. Therefore, construction of the proposed project would not result in a significant impact related to energy resources.

Long-term operation of the proposed project would renovate existing building facilities on the campus and provide a new sports complex facility. New building construction would be required to meet the provisions of the 2019 CALGreen Code and the 2019 Title 24 energy efficiency standards. The renovations would enhance the energy efficiency of the structures relative to those currently on the project site. All new lighting fixtures would be required to comply with applicable Title 24 standards. Furthermore, implementation of the proposed project would not have the potential to reach or exceed the previously analyzed enrollment level of 12,000 FTE

students, and therefore operational on-road vehicle fuel consumption would not exceed levels previously accounted for in prior CEQA documents. Therefore, impacts related to energy would be less than significant.

Project Specific or Modified Mitigation Measures. None required.

3.7 GEOLOGY AND SOILS

Since the previous environmental documents were adopted, the Appendix G checklist questions related to geology and soils have been modified. These checklist questions have been modified to focus on both the direct and indirect impacts associated with geology and soils and to move the analysis of paleontological resources to this topic from the cultural resources' subsection.

2003 FMP EIR. This EIR found that impacts related to geology and soils would be less than significant after the implementation of the following mitigation measures:

- GS1** Soils shall be evaluated on a project-by-project basis to determine the types of soil present in a proposed building location and the integrity of the soil to withstand ground shaking. Based on results of the evaluation, appropriate design and engineering features will be used in building construction. The criteria for leaving surficial soils in place should be consistent with the grading specifications approved by the Division of the State Architect.
- GS2** Establish a minimal 50-foot "no-build" setback zone from the surface projection of known fault zones within the campus. No structure designed for human occupancy will be constructed within the "no build" setback zones defined within the campus boundary.
- GS3** No structures designed for human occupancy shall be constructed in areas identified as "unevaluated". Unevaluated areas shall be subject to site-specific geotechnical analysis by a State certified geologist prior to architectural design and construction as required by the Division of the State Architect.
- GS4** All construction shall conform to the requirements of the Division of the State Architect and the Standards of the current Uniform Building Code.

2007 FMP Addendum. This Addendum found that no impacts related to geology and soils (Earth Resources) would occur.

2010 FMP Supplemental EIR. This Supplemental EIR found that no impacts related to geology and soils would occur.

2010 FMP Addendum. This Addendum found that impacts related to geology and soils would be less than significant without the implementation of new project specific or modified mitigation measures.

Proposed Project. As discussed in the 2003 FMP EIR and subsequent environmental documents, soils on the project site were found to contain artificial fill which can be prone to shrinking and swelling. Mitigation measures require site specific soil investigation to determine the appropriate design standards to eliminate the risk from expansive soils and ensure that all structures built within the campus are comply with the most current seismic building code standards. In addition, the campus was identified to be dissected by two main fault zones and

several associated secondary faults of the Newport-Inglewood fault zone. Based on the location, orientation, and width of faulting, mitigation measures were identified to ensure that no buildings would be located within the setback zone, or in areas that were unevaluated. Geologic conditions have not changed on-site, and the proposed project, which only includes building renovations and the addition of new lighted athletic facilities and a support building on the southern portion of the campus, would be subject to the same mitigation measures and would comply with all applicable construction standards and building codes. Therefore, impacts related to geology and soils would be less than significant.

Project Specific or Modified Mitigation Measures. None required.

3.8 GREENHOUSE GAS EMISSIONS

Since the previous environmental documents were adopted, the Appendix G checklist questions related to greenhouse gas (GHG) emissions have been modified. The CEQA Guidelines have been revised to provide more detailed guidance on assessing the significance of GHG emissions, analyzing energy impacts and efficiency, estimating vehicle emissions, and evaluating environmental risks in light of a changing and uncertain baseline. These revisions flesh out many of the provisions on climate change and energy that were first added to the CEQA Guidelines in 2010.

2003 FMP EIR. This EIR did not discuss impacts related GHG emissions. The 2003 FMP EIR determined that implementation of the proposed project would result in the following parameters that would either directly or indirectly generate GHG emissions:

- Total campus building space gross square feet (gsf) of 689,978 gsf
- Total campus enrollment of 12,000 FTE students
- Total campus water consumption of 212,400 gallons per day (gpd), of which 56,239 gpd would be recycled water
- Total campus electricity consumption of 7.7 million kilowatt-hours (kWh) per year.
- Total natural gas usage of 289,791 therms per year.

2007 FMP Addendum. This Addendum did not discuss impacts related GHG emissions.

2010 FMP Addendum. This Addendum did not discuss impacts related GHG emissions.

2010 FMP Supplemental EIR. This Supplemental EIR quantified the total GHG emissions that would be generated by construction activities and annual operating emissions associated with the proposed campus expansion and determined that impacts related to GHG Emissions and Global Climate Change would be less-than-significant. The analysis accounted for GHG emissions from equipment and vehicles that would be employed in construction activities and long-term operational sources including vehicle trips, natural gas usage, and electricity demand. The incremental increase in annual projected operating GHG emissions in 2016 was estimated to be approximately 29,601 tons per year of carbon dioxide equivalents (CO₂e). This estimate was calculated using the project's traffic report concluding that operations would generate 4,466 net daily vehicle trips and require additional natural gas (1,740,000 cubic feet per month) and electricity (8,465,277 kilowatt-hours per year) demand. The land use emissions model URBEMIS2007 was used to prepare the quantitative analysis with mobile source emission factors from EMFAC2007 and GHG emission factors from the California Climate Action Registry (CCAR) General Reporting Protocol (January 2009). The total campus-wide trips with

implementation of the 2010 FMP were estimated to be approximately 18,480 trips per day for a 12,000 FTE student population.

Proposed Project. The proposed project includes building renovations and the addition of new lighted athletic facilities and a support building on the southern portion of the campus. Since the publication and approval of the 2010 FMP Supplemental EIR, substantial enhancements have been made to the codified energy efficiency requirements for end uses associated with facility operations. All new facilities under the proposed project would be subject to the provisions of the 2019 California Green Building Code (CALGreen), as applicable. Also applicable are the 2019 Title 24 standards for non-residential buildings. The advancement of these regulations has resulted in significant decreases to average electricity, natural gas, and water use on a per-square-foot basis since the publication of the 2010 FMP Supplemental EIR. Implementation of the proposed project would partially renovate Building No. 1 SoCTE, Building No. 7 SSEC, and Building No. 8 TEC. The renovated structures would be designed to meet the contemporary CALGreen and Title 24 standards for energy efficiency, water conservation, lighting efficiency, and other end uses. The renovations would not increase the annual operating GHG emissions and would likely result in a reduction to the campus's energy consumption. Implementation of the proposed project would provide building facilities of superior quality that require less energy to operate, and area and energy source GHG emissions would not be greater than those disclosed and analyzed in the 2010 FMP Supplemental EIR or the 2003 FMP EIR.

Regarding mobile source emissions, the 2010 FMP Supplemental EIR estimated that campus operations in 2016 would generate approximately 18,480 daily vehicle trips at an enrollment of 12,000 FTE students. In reality, student enrollment peaked to approximately 7,500 FTE students in 2015-2017; however, enrollment currently stands at only approximately 3,200 FTE students. Therefore, existing student enrollment is approximately 27 percent of the forecasted enrollment from the 2003 FMP EIR. Applying a 30 percent ratio to the daily vehicle trips evaluated in the 2010 FMP Supplemental EIR, existing campus operations would generate approximately 5,544 daily vehicle trips. Implementation of the proposed project would not have the potential to result in daily vehicle trips more than tripling, which is what would have to occur to exceed the mobile source emissions analyzed and disclosed in the approved 2010 FMP Supplemental EIR. Furthermore, substantial improvements have materialized in average vehicle fuel efficiency since the publication of the 2010 FMP Supplemental EIR resulting from the successful implementation of more stringent fuel economy standards promulgated by the CARB. Therefore, GHG emissions would also be substantially lower on a per-VMT basis than those emissions that were disclosed in the 2010 FMP Supplemental EIR. There is no potential for annual GHG emissions associated with mobile sources to exceed the quantity disclosed in previously approved CEQA documents. Therefore, impacts related to GHG emissions would be less than significant.

Project Specific or Modified Mitigation Measures. None required.

3.9 HAZARDS AND HAZARDOUS MATERIALS

Since the previous environmental documents were adopted, the Appendix G checklist questions related to hazards and hazardous materials have been modified. These checklist questions were revised to delete Checklist Question VIII.f regarding safety hazards associated with proximity to a private airstrip and to clarify that Checklist Question VIII.g (formerly Checklist Question VIII.h) includes both direct and indirect impacts associated with wildland fires.

2003 FMP EIR. The EIR found that no significant impacts related to hazards and hazardous materials would occur with implementation of the following mitigation measures:

- HHM1** If during construction previously unidentified abandoned oil wells are found, construction will be halted until the wells are properly abandoned according to current standards.
- HHM2** If during construction of the project, soil contamination is suspected, construction in the area should stop, and appropriate health and safety procedures should be implemented. Construction will be halted until a Phase Two Environmental Site Assessment is completed to characterize the nature and extent of the contamination. If contamination is found, remediation will be required in accordance with State and local laws.
- HHM3** For those campus facilities affected by the Master Plan, lead-based paint testing should be conducted due to the deteriorating condition of many painted surfaces. All materials identified as containing lead shall be removed by a licensed lead-based paint/materials abatement contractor.
- HHM4** For those campus facilities affected by the Master Plan, asbestos sampling should be conducted to determine if building materials used in the construction of the structures in question have an asbestos fiber content. All material identified as containing asbestos shall be removed and/or encapsulated by a licensed asbestos abatement contractor as provided by the provisions of Rule 1403 of the South Coast Air Quality Management District (SCAQMD) Rules and Regulations.

2007 FMP Addendum. This Addendum found that no impacts hazards and hazardous materials (Risk of Upset and Human Health) would occur.

2010 FMP Supplemental EIR. This Supplemental EIR found that impacts related to hazards and hazardous materials would be less than significant with the implementation of the following mitigation measures:

- S-HHM1** Prior to construction of new facilities on campus, LACCD shall collect soil vapor samples from proposed building sites to determine if elevated methane levels exist. Should testing reveal that methane levels exceed the California Health and Safety Screening Levels, a DTSC-approved mitigation system shall be required.
- S-HHM2** Consistent with the 1994 Federal Occupational Exposure to Asbestos Standards, LACCD shall retain a Licensed Asbestos Inspector to determine the presence of asbestos and asbestos containing materials (ACM) within buildings to be re-used and/or demolished. If asbestos is discovered, a Licensed Asbestos Abatement Contractor shall be retained to safely remove all asbestos from the site.
- S-HHM3** For all buildings (whether to be re-used or demolished), lead-based paint testing shall be conducted. All materials identified as containing lead shall be removed by a licensed lead-based paint/materials abatement contractor.
- S-HHM4** Upon written approval from the DTSC, an indemnity agreement stipulating the responsibilities for the design, construction, and operation of the site for its use as a campus entrance and renewable energy production site should be agreed upon by LACCD, Caltrans, and the DTSC. Should the intended uses of the proposed project require the removal or reconfiguration of the cap, responsibility and procedures shall

be determined as part of this agreement and subject to the oversight of the DTSC. Responsibilities for the maintenance and monitoring of the contaminated site shall also be part of the indemnity agreement. Responsibilities for maintenance and monitoring would first involve an evaluation and remediation of the cap to maintain an appropriate seal to prevent the unmitigated release of vapors and to prevent the infiltration of groundwater and repair of the existing monitoring wells.

2010 FMP Addendum. This Addendum found that impacts related to hazards and hazardous materials would be less than significant with the implementation of the following mitigation measures:

HMM5 A Supplemental Site Investigation (SSI) shall be completed to DTSC specifications to determine the potential risk associated with elevated concentrations of chloroform. This scope and procedures carried out in the SSI shall be subject to all DTSC requirements.

HMM6 New building construction shall contain an air filtration system to reduce the indoor air concentration of PM₁₀ by 50 percent as compared to the outside air.

Proposed Project. As discussed in the 2003 FMP EIR and subsequent environmental documents, no significant impacts from subsidence/methane gas, soil and/or groundwater contamination, asbestos materials, lead-based paint or poly-chlorinated biphenyls would occur with implementation of mitigation measures. Construction of the proposed project would involve the temporary use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. Similarly, operations of the proposed project would involve the limited use and storage of common hazardous substances, such as cleaning supplies, pesticides, and other landscaping supplies. The proposed project only includes building renovations and the addition of new lighted athletic facilities and a support building on the southern portion of the campus does not involve any industrial uses or activities that would result in the use or discharge of unregulated hazardous materials and/or substances, or create a public hazard through the transport, use, or disposal of hazardous materials. All hazardous materials used during construction and operational activities would be handled in compliance with applicable standards and regulations. Therefore, impacts related to hazards and hazardous materials would be less than significant.

Project Specific or Modified Mitigation Measures. None required.

3.10 HYDROLOGY AND WATER QUALITY

Since the previous environmental documents were adopted, the Appendix G checklist questions related to hydrology and water quality have been modified to provide clarification and eliminate redundancy.

2003 FMP EIR. This EIR found that no impacts related to hydrology and water quality would occur.

2007 FMP Addendum. This Addendum found that no impacts related to hydrology and water quality (Water) would occur.

2010 FMP Supplemental EIR. This Supplemental EIR found that no impacts related to hydrology and water quality would occur.

2010 FMP Addendum. This Addendum found that no impacts related to hydrology and water quality would occur.

Proposed Project. As discussed in the 2003 FMP EIR and subsequent environmental documents, there are no surface water bodies on or adjacent to the campus and the proposed project would not cause changes in direction of water movement or effect groundwater or water quality. Conditions on the project site have not changed, and the proposed project only includes building renovations and the addition of new lighted athletic facilities and a support building on the southern portion of the campus. Implementation of the proposed project would be required to comply with all regulations related to water quality standards and wastewater discharge. Compliance with applicable regulations would ensure impacts related to hydrology and water quality would be less than significant.

Project Specific or Modified Mitigation Measures. None required.

3.11 LAND USE AND PLANNING

Since the previous environmental documents were adopted, the Appendix G checklist questions related to land use and planning have been modified. Checklist Question X.b has been revised to focus on conflicts with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Checklist Question X.c has been deleted, as it addressed habitat conservation plans, which are already addressed in the biological resources checklist questions.

2003 FMP EIR. This EIR found impacts related to land use and planning would be less than significant with the implementation of the following mitigation measure:

LUP1 In order to mitigate the zoning inconsistency, the LACCD Board shall undertake and accomplish one of the following: 1) Exempt LASC from the Los Angeles County Zoning Map and Code provisions for an Agricultural Zone that are inconsistent or in conflict with the continued use of the LASC campus as a college. 2) Apply for a zone change to be considered by the Los Angeles County Planning Commission to bring the zoning for the site into consistency with the West Athens/Westmont Community Plan. 3) Pursue a CUP which would put LASC into conformity with the conditions outlined in the zoning code for colleges and universities.

2007 FMP Addendum. This Addendum found that no impacts related to land use and planning (Land Use) would occur.

2010 FMP Supplemental EIR. This Supplemental EIR found that impacts related to land use and planning would be less than significant with the implementation of the following mitigation measures:

S-LU1 LACCD shall meet the County of Los Angeles requirements to obtain a conditional use permit for use of the Caltrans Site #16 as a renewable energy production facility and campus entrance.

2010 FMP Addendum. This Addendum found that impacts related to land use and planning would be less than significant without the implementation of new project specific or modified mitigation measures.

Proposed Project. As discussed in the 2003 FMP EIR, a mitigation measure was identified to bring LASC into conformity with the County of Los Angeles Zoning Map and West Athens/Westmont Community Plan. A significant impact would occur if the proposed project conflict with applicable land use plans, policies, or regulations. The proposed project only includes building renovations and the addition of new lighted athletic facilities and a support building on the southern portion of the campus. The proposed project would be in keeping with the general campus aesthetic and would not affect the previous environmental documents findings related to land use and planning. Therefore, impacts related to land use and planning would be less than significant.

Project Specific or Modified Mitigation Measures. None required.

3.12 MINERAL RESOURCES

2003 FMP EIR. This EIR found that no impacts related to mineral resources would occur.

2007 FMP Addendum. This Addendum found that no impacts related to mineral resources (Natural Resources) would occur.

2010 FMP Supplemental EIR. This Supplemental EIR found that no impacts related to mineral resources would occur.

2010 FMP Addendum. This Addendum found that no impacts related to mineral resources would occur.

Proposed Project. As discussed in the 2003 FMP EIR and subsequent environmental documents, one oil well was in use on the site previous to the construction of the college campus. This well was appropriately abandoned several years ago. No other mineral resources have been identified in the project site. Conditions on the project site have not changed, and the proposed project would not result in the loss of opportunity to utilize a known mineral resources. The proposed project only includes building renovations and the addition of new lighted athletic facilities and a support building on the southern portion of the campus. Therefore, no impacts related to mineral resources would occur.

Project Specific or Modified Mitigation Measures. None required.

3.13 NOISE

Since the previous environmental documents were adopted, the Appendix G checklist questions related to noise have been modified. Checklist Questions XII.a and XII.b were revised to focus on impacts associated with the generation of noise and vibration noise levels. In addition, Checklist Questions XII.c, XII.d, and XII.f were deleted, as they were redundant, and Checklist Question XII.e was revised accordingly.

2003 FMP EIR. This EIR found impacts related to noise would be less than significant with the implementation of the following mitigation measures:

- N1** Construction contracts shall specify that all construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.
- N2** Construction operations shall be staged as far from noise sensitive land uses as possible.

- N3** All sound-reducing devices and restrictions shall be maintained throughout the construction period.
- N4** When feasible, replace noise equipment with quieter equipment (for example, a vibratory pile driver instead of a conventional pile driver and rubber-tired equipment rather than track equipment).
- N5** Construction equipment shall be located as far as possible from noise sensitive areas.
- N6** Southwest College shall coordinate construction activities with St. Francis X Cabrini School and Southwest College Child Care Center to minimize the impacts of construction activities.
- N7** All residential units located within 450 feet of the construction site shall be sent a notice regarding the construction schedule of the proposed project. A sign, legible at a distance of 50 feet, shall also be posted at the construction site. All notices and the signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can inquire about the construction process and register complaints.
- N8** A “noise disturbance coordinator” shall be established for the construction of the proposed project. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and would be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 450 feet of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.

2007 FMP Addendum. This Addendum found that no impacts related to noise would occur.

2010 FMP Supplemental EIR. This Supplemental EIR found that impacts related to noise would be less than significant with the implementation of the following mitigation measures:

- S-N1** All construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.
- S-N2** To the extent feasible, a temporary six-foot solid wall (e.g., wood) shall be erected during parking structure construction. The wall shall be placed such that line-of-sight between ground-level construction activity and the St. Frances X. Cabrini School and Child Development Center would be blocked.
- S-N3** Prior to initiating construction, the construction contractor shall coordinate with the site administrator for the St. Frances X. Cabrini School, the Child Development Center, and Middle College High School to discuss construction activities that generate high noise levels. Coordination between the site administrator and the construction contractor shall continue on an as-needed basis throughout the construction phase of the project to mitigate potential disruption of classroom activities.

- S-N4** All residential units located within 500 feet of any construction site shall be sent a notice regarding the construction schedule of the proposed project. All notices shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can inquire about the construction process and register complaints.
- S-N5** A “noise disturbance coordinator” shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.
- S-N6** The Child Development Center shall prohibit outdoor activity at the southern outdoor play area when mobile diesel equipment is being actively utilized to construct the parking structure.
- S-N7** To the extent feasible, a temporary six-foot solid wall (e.g., wood) shall be erected during construction activity occurring on Caltrans Site #16. The wall shall be placed such that line-of-sight between ground-level construction activity and the St. Frances X. Cabrini School would be blocked.
- S-N8** Prior to initiating construction on Caltrans Site #16, Caltrans and DTSC shall require the construction contractor to coordinate with LACCD and the St. Frances X. Cabrini School to minimize potential disruption of classroom activities.

2010 FMP Addendum. This Addendum found that impacts related to noise would be less than significant with the implementation of the following mitigation measures:

- N9** The parking structure proposed on the west side of the campus shall be constructed in an open design on the south wall to avoid reflection of noise during large events onto residential properties south of the 105 Freeway.
- N10** The speaker configuration used for the public address system shall focus on and target the seating areas of the stadium. The speakers shall be oriented in a downward facing position into the seating areas.
- N11** Windows that reduce exterior to interior noise by at least 23 dBA shall be required on the walls of classroom buildings (new and existing) with a direct line-of-site to the stadium.

Proposed Project. The proposed project includes building renovations and the addition of new lighted athletic facilities and a support building on the southern portion of the campus. Construction intensity and noise sources would be similar to or less than what was assumed in the previous environmental documents. Construction activity disclosed within the 2003 FMP EIR was noted to typically generate an equivalent noise level (L_{eq}) of 89 decibels (dBA) at a distance of 50 feet. The intensity of construction associated with the building renovations and athletic facilities is anticipated to be reduced.

Building renovations would likely utilize equipment such as a man lift or air compressor and athletic facility improvements would likely utilize equipment such as a crane or backhoe. As shown in **Table 3-1**, equipment noise levels would range from approximately 67.7 dBA, L_{eq} to 73.7 dBA, L_{eq} . It is not anticipated that heavy construction equipment, which generates the majority of construction noise, would be a regular part of building renovations or the athletic facility improvements. Furthermore, the building renovations would occur interior to the site. The nearest sensitive receptors would be located approximately 300 feet north of renovations that would occur at Building No. 1 SoCTE. An air compressor at 300 feet would generate a noise level of approximately 58.1 dBA, L_{eq} . Noise levels along imperial highways were recorded to be approximately 68.5 dBA, L_{eq} and building renovation noise would not be noticeable above existing traffic noise. The nearest sensitive receptors to athletic field construction would be located more than 500 feet away. At 500 feet a backhoe would generate a noise level of approximately 53.6 dBA, L_{eq} . The I-105 Freeway and Western Avenue located between the sensitive receptors and the project site and traffic noise would overshadow construction noise related to the proposed project.

TABLE 3-1: OUTDOOR CONSTRUCTION NOISE LEVELS			
Equipment	Reference Noise Level (dBA, L_{eq}) At 50 Feet	Noise Level (dBA, L_{eq}) At Receptor 300 Feet Away	Noise Level (dBA, L_{eq}) At Receptor 500 Feet Away
Compressor (Air)	73.7	58.1	53.7
Man Lift	67.7	52.1	47.7
Crane	72.6	57.0	52.6
Backhoe	73.6	58.0	53.6
SOURCE: Federal Highway Administration, Roadway Construction Noise Model, 2008.			

The County's Noise Control Ordinance includes construction noise restrictions that apply to residential and commercial properties. The maximum noise level limits for construction activity occurring for a period of ten days or more between the hours of 7:00 a.m. and 8:00 p.m. are 60 dBA at the property line of single-family residential areas, 65 dBA at multi-family residential areas, and 70 dBA at semi-residential and commercial areas. Construction noise levels would be less than the 60 dBA County threshold at off-site sensitive receptors. The proposed project would apply construction noise mitigation measures described in previous environmental documents to further reduce noise levels. Therefore, the proposed project would result in a less-than significant impact related to construction noise.

Impacts related to construction vibration would not occur at off-site uses. According to the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Guidance, damage to non-engineered timber and masonry buildings (typical residential structures) could occur at a PPV vibration levels of approximately 0.2 inches per second. The nearest sensitive receptors are located approximately 300 feet to the north along Imperial Highway. The types of construction equipment that would be utilized for the building renovations and athletic facilities construction would generate a peak particle velocity (PPV) vibration level of approximately 0.003 inches per second at 25 feet, which would be below the FTA vibration damage threshold.³ A construction vibration annoyance impact would result if sensitive receptors would be exposed

³Federal Transit Administration, *Transit Noise and Vibration Impact Assessment, Table 7-4 Vibration Source Levels for Construction Equipment: Small Bulldozer*, September 2018.

to vibration velocity level in decibels (VdB) of 75 or greater. A small bulldozer would generate a VdB at 25 feet, which would be less than the vibration annoyance threshold. The proposed project would not include significant sources of operational vibration. Construction vibration impacts would be less than significant.

Operational noise levels would be similar to the existing condition. The 2003 FMP and subsequent FMP updates have assumed a maximum enrollment of 12,000 FTE students; however, enrollment currently stands at only approximately 3,200 FTE students. Vehicle trips and therefore mobile source noise levels would not increase. The building renovations would not include new stationary sources of noise that would result in an increase in ambient noise levels. The new athletic facilities would include a recreation area, soccer and softball fields, small courts, bleachers and other spectator amenities. A typical person shouting during a sporting event generates a noise levels of approximately 72.8 dBA at 3 feet or 48.3 dBA at 50 feet.⁴ The proposed project would not introduce a new noise source to the project area, and noise levels would similar to existing conditions. If a public address system will be included as part of the new athletics facilities it would be oriented towards the interior of the campus or a downward facing position directed into the seating areas. Therefore, impacts related to operational noise would be less than significant.

Project Specific or Modified Mitigation Measures. None required.

3.14 POPULATION AND HOUSING

Since the previous environmental documents were adopted, the Appendix G checklist questions related to population and housing have been modified. Checklist Question XIII.a was clarified to focus on potential impacts associated with unplanned growth, and Checklist Questions XIII.b and XIII.c were combined.

2003 FMP EIR. This EIR found that no impacts related to population and housing would occur.

2007 FMP Addendum. This Addendum found that no impacts related to population and housing (Population) would occur.

2010 FMP Supplemental EIR. This Supplemental EIR found that no impacts related to population and housing would occur.

2010 FMP Addendum. This Addendum found that no impacts related to population and housing would occur.

Proposed Project. As discussed in the 2003 FMP EIR and subsequent environmental documents, because no housing component was proposed and no housing stock would be removed, no impacts related to population housing would occur. The proposed project also does not propose housing and would not remove any portion of the existing housing stock in the area. The proposed project only includes building renovations and the addition of new lighted athletic facilities and a support building on the southern portion of the campus. Therefore, no impacts related to population and housing would occur.

Project Specific or Modified Mitigation Measures. None required.

⁴Soundplan Essential Version 4.1, *Shouting Normal Noise Level*.

3.15 PUBLIC SERVICES

2003 FMP EIR. This EIR found that impacts related to public services would be less than significant with the implementation of the following mitigation measures:

PS1 The Community College Sheriff's Bureau and LACCD in coordination with LASC shall increase the number of security personnel serving the LASC campus according to any increase in the level of criminal activity, current student enrollment, and particular requests from the LASC administration.

PS2 If the contractor does not provide construction site security, then the Community College Sheriff's Bureau shall assign additional personnel to the LASC campus station as needed to assist in construction site security.

2007 FMP Addendum. This Addendum found that no impacts related to public services would occur.

2010 FMP Supplemental EIR. This Supplemental EIR found that no impacts related to public services would occur.

2010 FMP Addendum. This Addendum found that no impacts related to public services would occur.

Proposed Project. The projected student population would not exceed the 12,000 FTE students evaluated in the 2003 FMP EIR and subsequent environmental documents. Student enrollment currently stands at only approximately 3,200 FTE students. The proposed project only includes building renovations and the addition of new lighted athletic facilities and a support building on the southern portion of the campus. Therefore, the proposed is not expected to result in an increased demand for fire, police protection and emergency services beyond what was originally evaluated. Compliance Mitigation Measures **PS1** and **PS2** would ensure that impacts related to public services would be less than significant.

Project Specific or Modified Mitigation Measures. None required.

3.16 RECREATION

2003 FMP EIR. This EIR found that no impacts related to recreation would occur.

2007 FMP Addendum. This Addendum found that no impacts related to parks or other recreational facilities would occur.

2010 FMP Supplemental EIR. This Supplemental EIR found that no impacts related to recreation would occur.

2010 FMP Addendum. This Addendum found that no impacts related to recreation would occur.

Proposed Project. The proposed project does not contain a residential component and would not result in an increase in population on campus. The projected student population would not exceed the 12,000 FTE students evaluated in the 2003 FMP EIR and subsequent environmental documents. Student enrollment currently stands at only approximately 3,200 FTE students. Furthermore, the proposed project only includes building renovations and the addition

of new lighted athletic facilities and a support building on the southern portion of the campus. The proposed project would not be expected to result in an increased demand for recreation facilities, and impacts related to recreation would be less than significant.

Project Specific or Modified Mitigation Measures. None required.

3.17 TRANSPORTATION

Since the previous environmental documents were adopted, the Appendix G checklist questions related to transportation have been modified. Checklist Questions XVI.a and XVI.f were combined and clarified to focus on conflicts with a program, plan, ordinance, or policy addressing the circulation system. Checklist Question XVI.b was revised to address consistency with CEQA Guidelines Section 15064.3(b), which relates to use of vehicle miles traveled (VMT) as the measure for evaluating traffic impacts. Checklist Question XVI.c regarding airport traffic safety was eliminated, as airport traffic safety is already addressed in the hazards checklist questions. Former Checklist Question XVI.ct (now Checklist Question XVI.c) was revised to add "geometric" for clarity.

2003 FMP EIR. This EIR found that impacts related to transportation would be less than significant with the implementation of the following mitigation measures:

TT1-TT9 Fund a proportionate share of the cost of the design and construction of the Adaptive Traffic Control System (ATCS) upgrade to the existing ATSAC system for the following intersections:

- Imperial Highway and Crenshaw Boulevard
- Imperial Highway and Van Ness Boulevard
- Century Boulevard and Western Avenue
- Century Boulevard and Normandie Avenue
- Imperial Highway and Normandie Avenue
- Imperial Highway and Vermont Avenue
- Imperial Highway and Western Avenue
- Western Avenue and the Campus Entrance
- Imperial Highway and Denker Avenue

TT10 A campus traffic management plan should be developed that considers the impacts for each development milestone and the relative proportion of the full mitigation program that should be implemented at that stage of the Master Plan development.

TT11 To address the College's parking needs during the interim years until the completion of the Master Plan, the College's construction staging plans will evaluate parking demand and recommend appropriate changes to the parking system to accommodate proposed interim development. Changes to the parking system shall be undertaken as recommended to fully mitigate project parking impacts.

TT12 Upon completion of stadium improvements, provisions shall be made for off-site parking and shuttle service as needed to handle parking overflow in the event of conflicting activities (i.e., other campus events).

2006 FMP Addendum. The Addendum found that no impacts related to transportation (Transportation/Circulation) would occur.

2010 FMP Supplemental EIR. This Supplemental EIR found that impacts related to transportation would be less than significant with the implementation of the following mitigation measures:

- S-T1** Eliminate the protected left-turn phasing on the southbound and westbound approaches in favor of permitted left turns at the Imperial Highway/Western Avenue intersection.
- S-T2** Upgrade the Century Boulevard/Normandie Avenue intersection into the City of Los Angeles Automated Traffic Surveillance and Control System (ATSAC).
- S-T3** Eliminate the protected left-turn phasing on the northbound and westbound approaches in favor of permitted left turns at the Century Boulevard/Van Ness Avenue intersection.
- S-T4** Eliminate the protected left-turn phasing on the southbound and westbound approaches in favor of permitted left turns at the Imperial Highway/Western Avenue and Imperial Highway/Vermont Avenue intersections.
- S-T5** Eliminate the protected left-turn phasing on the northbound and eastbound approaches in favor of permitted left turns at the Imperial Highway/Normandie Avenue intersection.
- S-T6** Eliminate the protected left-turn phasing on the eastbound approach in favor of permitted left turns at the Imperial Highway/I-110 NB Ramps intersection.

2010 FMP Addendum. This EIR found that no impacts related to transportation would occur.

Proposed Project. The proposed project includes building renovations and the addition of new lighted athletic facilities and a support building on the southern portion of the campus. The projected student population would not exceed the 12,000 FTE students evaluated in the 2003 FMP EIR and subsequent environmental documents. Student enrollment currently stands at only approximately 3,200 FTE students. Since the proposed project would not result in an increase in enrollment than what was previously evaluated, the corresponding number of vehicle trips and VMT would remain the same or less. Furthermore, the proposed project does not introduce design features or incompatible uses that would increase transportation hazards or impede emergency access. Therefore, impacts related to transportation would be less than significant.

Project Specific or Modified Mitigation Measures. None required.

3.18 TRIBAL CULTURAL RESOURCES

In 2015, the tribal cultural resources category was added as a new topic in Appendix G. Such resources that require analysis under CEQA include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical resources or included in a local register of historical resources.

2003 FMP EIR. While the Tribal Cultural Resources category was not specifically discussed, this EIR found that no impacts related to cultural resources would occur.

2007 FMP Addendum. While the Tribal Cultural Resources category was not specifically discussed, this Addendum found that no impacts related to cultural resources would occur.

2010 FMP Supplemental EIR. While the Tribal Cultural Resources category was not specifically discussed, this IR found that impacts related to cultural resources would be less than significant after the implementation of the following mitigation measure:

S-CR1 In the event that archaeological resources (artifacts or features) are exposed during excavation of previously undisturbed soil, an archaeologist who meets the Secretary of the Interior's professional qualification standards shall be retained. Construction activities (e.g., grading, grubbing, vegetation clearing) in the immediate vicinity of the discovery shall be halted while the resources are evaluated for significance and a Native American Tribe or elder identified by the Native American Heritage Commission shall be consulted. Construction activities could continue in other areas. If the discovery proves to be significant, additional work, such as data recovery excavation, may be warranted and would be discussed in consultation with the lead agency.

The discovery of human remains is always a possibility during construction activities; State of California Health and Safety Code Section 7050.5 addresses these findings. This code section states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The County Coroner must be notified of the find immediately. If the human remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine and notify a Most Likely Descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

2010 FMP Addendum. While the Tribal Cultural Resources category was not specifically discussed, this Addendum found that no impacts related to cultural resources would occur.

Proposed Project. The project site has been previously developed with college-related uses, and no known tribal cultural resources have been previously discovered on the campus. LASC has occupied the project site since 1965. The proposed project only includes building renovations and the addition of new lighted athletic facilities and a support building on the southern portion of the campus. Nonetheless, to ensure that any inadvertent discovery of tribal cultural resources encountered during ground-disturbing activities are protected and preserved, Mitigation Measure S-CR1 would be required. If human remains of Native American origin are discovered during construction, the proposed project would also be required to comply with applicable regulations related to the handling of Native American human remains, including Public Resources Code Section 5097. With implementation of Mitigation Measure S-CR1, impacts related to the tribal cultural resources would be less than significant.

Project Specific or Modified Mitigation Measures. None required.

3.19 UTILITIES AND SERVICE SYSTEMS

Since the previous environmental documents were adopted, the Appendix G checklist questions related to utilities and service systems have been modified to reduce redundancy. Checklist Question XVIII.a was eliminated, as wastewater treatment was already addressed in former Checklist Question XVIII.e (now Checklist Question XVIII.c). In addition, former Checklist

Questions XVIII.b and XVIII.c were combined to address all infrastructure types in one question (now Checklist Question XVIII.a) and to include the addition of telecommunications. Former Checklist Question XVIII.d regarding water supply was also updated to clarify that the analysis of water supply should include reasonably foreseeable future development during normal, dry, and multiple dry years. Former Checklist Questions XVIII.f and XVIII.g regarding solid waste impacts were also clarified.

2003 FMP EIR. This EIR found that impacts related to utilities and service systems would be less than significant with the implementation of the following mitigation measures:

- USS1** Water efficient landscaping and native and drought tolerant plants shall be used wherever possible.
- USS2** Landscaping design shall incorporate the use of high efficiency irrigation systems.
- USS3** Proposed projects shall be equipped with wastewater conservation fixtures including low flow toilets.
- USS4** The projects shall exceed local building codes in water reduction.
- USS5** LASC shall facilitate the construction of a water reclamation system to supplement its water supply.
- USS6** Exceed the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) 1999 energy performance requirements by 15 percent for new construction and 10 percent for major renovation projects.
- USS7** Select buildings' orientation optimize the use of natural light.
- USS8** Optimize buildings' energy performance by using features such as cool roofs (light colored roofs to reflect heat), high thermal insulation to help maintain constant indoor temperatures, and operable windows.
- USS9** Utilize solar power to supplement energy needs with renewable sources.

2007 FMP Addendum. This Addendum found that no impacts related to utilities and service systems (Utilities) would occur.

2010 FMP Supplemental EIR. This Supplemental EIR found that impacts related to utilities and service systems would be less than significant.

2010 FMP Addendum. This Addendum found that impacts related to utilities and service systems would be less than significant.

Proposed Project. The proposed project includes building renovations and the addition of new lighted athletic facilities and a support building on the southern portion of the campus. The projected student population would not exceed the 12,000 FTE students evaluated in the 2003 FMP EIR and subsequent environmental documents. Student enrollment currently stands at only approximately 3,200 FTE students. As such, the proposed project is not anticipated to have an increased demand for utilities beyond what was previously evaluated. Therefore, impacts related to utilities and service systems would be less than significant.

Project Specific or Modified Mitigation Measures. None required.

3.20 WILDFIRE

Since the previous environmental documents were adopted, the Appendix G checklist questions related to wildfire have been added as a new topic and directs agencies to consider questions such as whether the proposal might “substantially impair” an adopted emergency response plan or evacuation plan and whether the proposal might exacerbate wildfire risk due to slope, prevailing winds, and other factors.

2003 FMP EIR. This EIR did not discuss impacts related wildfire.

2006 FMP Addendum. This Addendum did not discuss impacts related wildfire.

2010 FMP Supplemental EIR. This Supplemental EIR did not discuss impacts related wildfire.

2010 FMP Addendum. This Addendum did not discuss impacts related wildfire.

Proposed Project. The project site is not located in or near a state responsibility area or on land classified as a very high fire hazard severity zone (VHFHSZ). The project site and surrounding area is located within urbanized area of Los Angeles County. As a result, it is unlikely that the proposed project would expose project occupants to uncontrolled spread of a wildfire or pollutant concentrations from wildfire. The proposed project only includes building renovations and the addition of new lighted athletic facilities and a support building on the southern portion of the campus. The proposed project would adhere to relevant building design codes, including the Fire Code requirements. Therefore, no impacts related to wildfire would occur as a result of the proposed project.

Project Specific or Modified Mitigation Measures. None required.

4.0 CONCLUSION

As detailed in this Addendum, the proposed project would not fulfill any of the conditions outlined in CEQA Guidelines Section 15162(a) that would require a Subsequent EIR. This Addendum provides the substantial evidence required by CEQA Guidelines Section 15164(e) to support the finding that a Subsequent EIR is not required and that an Addendum to the EIR certified by the LACCD Board of Trustees in 2003 (2003 FMP EIR) and the subsequent environmental documents (2007 FMP Addendum, 2010 FMP Supplemental EIR, 2010 FMP Addendum, 2010), certified for updates to LASC's FMP since 2003 is the appropriate environmental document. The findings in the 2003 FMP EIR and the subsequent environmental documents would be applicable to the proposed project, and the proposed project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

The 2003 FMP EIR and the subsequent environmental documents, as modified by this Addendum, may be used by LACCD, acting as the Lead Agency under CEQA, in their consideration of the proposed project because:

1. The implementation of the proposed project would not result in new significant environmental effects from those depicted in the 2003 FMP EIR and subsequent environmental documents. The implementation of the proposed project does not constitute a "substantial change" to the project that would require "major revisions" to the EIR due to new or greater impacts not previously disclosed.
2. The circumstances and existing conditions on and surrounding the project site have generally not changed from those depicted in the 2003 FMP EIR and subsequent environmental documents.
3. There is no substantial new information that would render the 2003 FMP EIR and subsequent environmental documents inadequate. The proposed project does not constitute substantial new information as defined in the CEQA Guidelines. Implementation of the proposed project would not result in additional significant impacts that were not discussed in the previous environmental documents. Rather, all significant impacts that were disclosed in the 2003 FMP EIR and subsequent environmental documents remain the same or will be mitigated.