

SUPPORTING ANALYSIS FOR CLASS 1 AND CLASS 32 EXEMPTION MILKEN EAST CAMPUS

I. Description of the Project

The Project consists of the relocation of the high school component of the Milken Community School (“MCS”)’s existing approved school use to the property commonly known as 15600 Mulholland Drive^{1,2} (the “Project Site”) in the City of Los Angeles (“City”), where it will make use of the existing facilities.

1. Project Site, Surrounding Uses, and Zoning

Pursuant to a Conditional Use Permit (Planning Case No. CPC-2006-1527-CU-ZAA), MCS currently operates a middle and high school on a site located to the west of the Project Site at 15900 Mulholland Drive (“MCS West Campus”).³ As originally approved on October 27, 2006 and as subsequently modified by Planning Case No. CPC-2006-1527-CU-ZAA-PA2 on October 7, 2022, MCS currently has a total permitted enrollment of 890 students in grades 6-12 at MCS West Campus.

The Project Site, which is currently occupied by the former campus of the American Jewish University (“AJU”), is a 21.7-acre (approximately 945,761 square feet) site and is developed with several buildings (approximately 193,323 square feet), including:

1. The Main Building (approximately 125,000 square feet), consisting of classrooms, a library, a performing arts center and auditorium, a kitchen and cafeteria, religious use areas, and administrative offices;
2. A Student Union (approximately 13,600 square feet) building, consisting of recreational facilities and administrative offices;
3. Four student residence buildings (total of approximately 56,000 square feet);
4. Athletic fields and ornamental landscaping;
5. Approximately 396 automobile parking spaces; and
6. Campus security fencing, gates, and associated security kiosk (approximately 123 square feet).

The Project Site is the former AJU Familian Campus, which included university, high school, and evening/weekend classes, as well as on-site student housing, pursuant to a Conditional Use Permit (“CUP”).⁴ All existing structures and facilities on the site were previously constructed pursuant to this CUP and subsequent approvals by the City.

¹ Also known as 2785, 2845, and 2791 N. Casiano Road.

² Los Angeles County Assessor Parcel Number 4378-001-041

³ Los Angeles County Assessor Parcel Number 4490-001-026

⁴ Zoning Administrator Case No. 18455, dated December 19, 1966, as modified by Board of Zoning Administration Case No. 1703, dated February 24, 1967.

The Project Site is located in the Bel-Air Beverly Crest Community Plan area⁵ of the City and is primarily designated Minimum Residential and zoned RE-40-1-H-HCR with the exception of one area designated Very Low II Residential and zoned RE-15-1-H-HCR. The Project Site is also located in the Mulholland Scenic Parkway Specific Plan (“MSPSP”), where it is located in the Outer Corridor, Inner Corridor, and Institutional Use Corridor. Uses adjacent to the Project Site consist of single family homes to the south and to the southeast across Casiano Road, the Stephen S. Wise Temple to the northeast across Casiano Road, Mulholland Drive and Interstate I-405 to the northwest, and open space to the southwest.

2. Project

The Project consists of the relocation of the high school component of MCS’s existing approved school use at MCS West Campus to the Project Site, where it will make use of the existing facilities on the Project Site. No construction or increase in floor area is proposed. The Project does not propose the removal of any protected or non-protected trees.

Upon approval of the Project, a total of up to 900 high school students will be permitted to be enrolled at the Project Site. Accordingly, the permitted enrollment at the Project Site will be less than the number of students permitted by the previous AJU CUP.

Approval of the Project is sought pursuant to Los Angeles Municipal Code (“LAMC”) Chapter 1, Sections 11.5.7.C, 16.50 E.3, and 12.24 U.24, as well as LAMC Chapter 1A, Sections 13B.4.3 and 13B.2.3. The applicant is requesting a Specific Plan Project Compliance (Design Review Board (“DRB”)) to demonstrate consistency with the MSPSP and a Class 3 CUP to permit the operation of a religious high school on the Project Site.

II. Evaluation of Class 1 and Class 32 Exemption Criteria

Generally, a discretionary action by the City requires environmental review pursuant to CEQA. The CEQA Guidelines (Sections 15300 to 15332) include a list of classes of projects that have been determined to not have a significant effect on the environment, also known as Categorical Exemptions. If a project falls within one of these classes, it is exempt from the provisions of CEQA, and no further environmental review is required.

A. Class 1 Exemption

The Class 1 “Existing Facilities” Categorical Exemption (CEQA Guidelines Section 15301), hereafter referred to as the “Class 1 Exemption,” exempts operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use.

The Project meets the intent of this exemption, as it consists of the relocation of the high school component of an existing approved school use at a nearby site to the existing educational

⁵ Bel-Air Beverly Crest Community Plan, adopted November 6, 1966, available at https://planning.lacity.gov/odocument/c3407fc5-6b2f-436a-a3fd-a58aabf74c09/Bel_Air-Beverly_Crest_Community_Plan.pdf

facilities on the Project Site. The Project involves no construction or increase in floor area and would not alter the existing exterior improvements, including landscaping and parking areas, on the Project Site. MCS already operates some components of its existing approved school use on the Project Site, as documented in the recent reduction of the site to permit a lot line adjustment in favor of a neighboring property in Planning Case No. ZA-1996-18445-PAD-PA4 on June 24, 2025. For this approval, which permitted the “continued operation of a private school”, the City approved a Class 1 Categorical Exemption as Planning Case No. ENV-2024-3536-CE.

Moreover, the Project would not result in an expansion in the total number of permitted students on campus compared to the previous approved AJU use. Therefore, and as further analyzed below, the Project would require no expansion of use compared to existing and former educational uses. As such, the Project is categorically exempt from the provisions of CEQA, and no further environmental review is required.

B. Class 32 Exemption

The Class 32 “Infill” Categorical Exemption (CEQA Guidelines Section 15332), hereafter referred to as the “Class 32 Exemption,” exempts infill development within urbanized areas if it meets certain criteria. The class consists of infill projects that are consistent with the local General Plan and zoning requirements and that will not result in significant air quality, noise, transportation, or water quality impacts. The Project meets the intent of this exemption by relocating the high school component of an existing school use to a site previously developed with educational uses. The relocated high school component is consistent with the Project Site’s zoning and General Plan designation in a developed, urbanized area.

A Class 32 Exemption applies to a project characterized as infill development meeting the conditions described below:

- (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
- (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
- (c) The project site has no value as habitat for endangered, rare or threatened species.
- (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
- (e) The site can be adequately served by all required utilities and public services.

The following is an analysis of each of the above criteria.

- 1. The Project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.**

1. General Plan and Specific Plan

As stated above, the Project Site is located in the Bel-Air Beverly Crest Community Plan area of the City and is primarily designated Minimum Residential with the exception of one area designated Very Low II Residential. The Project Site is also located in the Mulholland Scenic Parkway Specific Plan. The Project conforms to these designations and would serve the goals and objectives stated in the General Plan Land Use Element, including those listed below:

General Plan Framework Element

The General Plan Framework Element sets forth a City-wide comprehensive long-range growth strategy and defines City-wide policies that are implemented at the community level through community plans and specific plans. The Project is consistent with the Framework Element's goals, objectives and policies, including those listed below:

- Chapter 3 – Land Use
 - Goal 3A – A physically balanced distribution of land uses that contributes towards and facilitates:
 - Objective 3.1 – Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors. The Project will relocate the high school component of MCS's existing approved school use continuing the educational use the Project Site has provided for decades.
 - Goal 3B - Preservation of the City's stable single-family residential neighborhoods.
 - Objective 3.5 – Ensure that the character and scale of stable single-family residential neighborhoods is maintained, allowing for infill development provided that it is compatible with and maintains the scale and character of existing development. The reuse of the existing campus is a significant benefit to maintaining and preserving the community character and uses, compared to other changes or new development that could occur with the sale of the existing campus.
 - Policy 3.5.2: Require that new development in single-family neighborhoods maintains its predominant and distinguishing characteristics such as property setbacks and building scale. The proposed Project will reuse existing facilities on the Project Site; no new development will occur. The design, location, and size of the school will remain as it currently exists and is consistent with existing land uses in the vicinity in terms of aesthetics, character, scale and view protection. Therefore, the Project will not affect the neighborhood's predominant and distinguishing characteristics.

The Project is consistent with the Community Plan's goals, objectives and policies, as listed below:

- Purpose – Preserving and enhancing the positive characteristics of existing uses which provide the foundation for Community identity, such as scale, height, bulk, setbacks and appearance. The Project will preserve the exterior appearance of the AJU Familian Campus, thus preserving community identity for which the existing facilities are a part of.

Mulholland Scenic Parkway Specific Plan

The Project is consistent with the Specific Plan's goals, objectives, and policies, as listed below:

- Section 2 – Purposes
 - A. To assure maximum preservation and enhancement of the parkway's outstanding and unique scenic features and resources. The Project consists of the reuse of existing facilities on the Project Site, which will not impact the scenic features of Mulholland Drive, and does not affect the natural topography or landscaping on the Project Site. Therefore, the Project assures maximum preservation of the parkway's scenic features and resources.
 - C. To preserve and enhance land having exceptional recreational and/or educational value. The Project Site is in the Institutional Use Corridor, which specifically allows schools, and was previously occupied by the AJU Familian Campus. The Project, which will relocate the high school component of MCS's existing school use to the Project Site, will both preserve/maintain and enhance the educational value of the land.
 - E. To assure that the design and placement of buildings and other improvements preserve, complement, and/or enhance views from Mulholland Drive. The Project will consist of the reuse of existing facilities on the Project Site, which will preserve/maintain the current views from Mulholland Drive.
 - G. To minimize grading and assure that graded slopes have a natural appearance compatible with the characteristics of the Santa Monica Mountains. The Project will not include any grading or import or export of soil and will not result in the alteration of any ridgeline or other natural features. Therefore, the Project will ensure that the hillside maintains a natural appearance compatible with the characteristics of the Santa Monica Mountains.
 - I. To reduce the visual intrusion caused by excessive lighting. As a part of the reuse of the existing facilities on the Project Site, existing lighting will be maintained.
 - J. To minimize driveway and private street access into the right-of-way. The Project will not create any driveway or private street access off of Mulholland Drive and will not increase the number of driveways from the property onto Casiano Road.

2. Zoning

As discussed above, the Project Site is located in the RE40-1-H-HCR and RE15-1-H-HCR Zones and is located in the Outer Corridor, Inner Corridor, and Institutional Use Corridor of the Mulholland Scenic Parkway Specific Plan. The Project is consistent with the MSPSP regulations pursuant to the following:

Inner Corridor Regulations

A. Uses

The current campus consists of approximately 193,323 square feet of school facilities, including classrooms, offices, student services, and residential buildings. MCS intends to preserve and reuse the existing facilities on campus with no increase in building floor area.

Schools are discretionary uses within the Institutional Use Corridor of the MSPSP. The following findings necessary for approval of school use can be made:

- i. The use does not destroy or obstruct a scenic feature or resource, or view from Mulholland Drive. The Project involves the reuse of the existing facilities on the Project Site. Therefore, no improvements will occur that would alter existing views or obstruct existing view corridors.
- ii. The use preserves the residential character along the right-of-way. The Project will result in the relocation of an existing educational use already located within the MSPSP to the Project Site, which itself has an existing educational use. Therefore, the residential character along the right-of-way will not be affected.
- iii. The use is compatible with the scenic parkway environment. The existing educational character of the Project Site will be maintained, and the existing high school component of MCS's approved school use, which is also located in the MSPSP, will be relocated. The Project will only consist of the reuse of existing facilities, which will not alter existing views from Mulholland Drive. Therefore, the use remains compatible with the scenic parkway environment.
- iv. The use preserves and/or enhances land having exceptional recreational and/or educational value. The existing educational character of the Project Site will be maintained, and the relocation of the high school component of MCS's existing school use will both preserve and enhance the educational value of the land.
- v. Any grading is minimized. The Project will not require grading or soil import or export.
- vi. Any graded slopes have a natural appearance compatible with the characteristics of the Santa Monica Mountains. As stated above, the Project will not require grading and will not alter the existing slopes on the Project Site. Therefore, the Project will ensure

that the hillside maintains a natural appearance compatible with the characteristics of the Santa Monica Mountains.

- vii. The use preserves the natural topography, prevents erosion and protects native vegetation. As stated above, the Project will not require grading and will not alter the existing slopes on the Project Site. Furthermore, the Project will not alter the existing vegetation or landscaping on the Project Site. Therefore, the use will continue to preserve the natural topography, prevent erosion, and protect native vegetation.
- viii. The use preserves the ecological balance. The Project will not add to the existing building footprint and will not alter the existing topographical or vegetation features of the Project Site. Therefore, the use will continue to preserve the ecological balance.
- ix. The use protects the prominent ridges, streams and environmentally sensitive areas, and the aquatic, biologic and topographic features therein. As stated above, the Project consists of the reuse of existing facilities. Therefore, the Project will not alter any prominent ridges, streams, or environmentally sensitive areas or the aquatic, biologic, and topographic features therein.
- x. The use protects identified archaeological and paleontological sites. The Project Site does not contain any identified archaeological and/or paleontological sites. As the Project will not require grading, no unidentified archaeological and/or paleontological sites are anticipated to be discovered.
- xi. The use minimizes driveway and private street access into the right-of-way. The Project does not create any driveways off of Mulholland Drive and will maintain the usage of the existing driveways on Casiano Road without alteration.
- xii. The use minimizes the visual intrusion of lighting into the right-of-way. Existing lighting will be maintained. Therefore, the Project would minimize any visual intrusion of lighting into the right-of-way.

Because the Project is located in the Institutional Use Corridor and all applicable findings can be made, the proposed relocated school use is consistent with applicable MSPSP use regulations.

B. Environmental Protection Measures

1. Prominent Ridges

Pursuant to the MSPSP, prominent ridges shall not be graded, altered, or removed without the prior written approval of the Director and buildings and structures visible from Mulholland Drive shall not be constructed on the top of a prominent ridge or within 50 feet of a prominent ridge without written approval of the Director (MSPSP, Section 5.B.1). The Project does not include grading, and the existing buildings on the Project Site are not located on or within 50 feet of a

prominent ridge as depicted on the MSPSP maps.⁶ Therefore, the Project is consistent with the MSPSP Environmental Protection Measures regarding prominent ridges.

2. Streams

Pursuant to the MSPSP, no project shall be constructed and no more than 100 cubic yards of earth shall be moved within 100 feet of either stream bank without the prior written approval of the Director (MSPSP, Section 5.B.2). The Project does not include grading or construction, and the existing buildings on the Project Site are not located within 100 feet of a stream or watercourse as depicted on the MSPSP maps. Therefore, the Project is consistent with the MSPSP Environmental Protection Measures regarding streams.

3. Projects Near Parklands

Pursuant to the MSPSP, no project shall be erected and no earth shall be graded within 200 feet of the boundaries of any public parkland without the prior written approval of the Director (MSPSP, Section 5.B.3). The Project does not include grading or construction, and the existing buildings on the Project Site are not located within 200 feet of any public parkland as depicted on the MSPSP maps. Therefore, the Project is consistent with the MSPSP Environmental Protection Measures regarding projects near parklands.

4. Oak Trees

Pursuant to the MSPSP, no oak tree shall be removed, cut down or moved without the prior written approval of the Director (MSPSP, Section 5.B.4). The Project does not include the modification or removal of existing landscaping, nor does it include any existing oak tree. Therefore, the Project is consistent with the MSPSP Environmental Protection Measures regarding oak trees.

5. Archaeological and Paleontological Resources

Pursuant to the MSPSP, applicants which propose to grade more than 50 cubic yards per 5,000 square feet of lot area shall submit to the Director a preliminary archaeological and paleontological record search and shall file an environmental assessment if the records search reveals that archaeological or paleontological resources may be located on the subject property. (MSPSP, Section 5.B.5). The Project does not include grading or construction, and therefore is exempt from this requirement. Therefore, the Project is consistent with the MSPSP Environmental Protection Measures regarding archaeological and paleontological resources.

C. Grading

The Project consists of the reuse of existing facilities on the Project Site for the relocation of the high school component of an existing approved school use and does not propose any grading; therefore, the MSPSP's grading regulations do not apply.

D. Building Standards

⁶ Mulholland Scenic Parkway Specific Plan, Specific Plan Area Map 7 of 12

Pursuant to Section 5.A.3 of the MSPSP, “[b]uildings, structures, fences, gates, walls, recreation facilities and landscaping which are legally existing on or before the effective date of this Specific Plan are exempt from the regulations of this Specific Plan.” The MSPSP became effective pursuant to Ordinance No. 167,943 on May 13, 1992. All existing structures on the Project Site were legally constructed pursuant to the CUP originally obtained by AJU in 1966⁷ (i.e., prior to the effective date of the MSPSP) and subsequent Plan Approvals. Most of these structures, i.e., the Main Building, the student residence buildings, the athletic fields and ornamental landscaping, and automobile parking, were constructed between the mid-1970s and mid-1980s, predating the MSPSP. Subsequently constructed structures, such as the Student Union building and additional perimeter fencing, received all required approvals under the MSPSP.⁸

As the Project involves the reuse of existing facilities on the Project Site without alteration, these existing facilities either predate the establishment of the MSPSP and are exempt from its development standards, or have been constructed in conformity with prior approvals under the MSPSP. Nonetheless, for informational purposes, additional detail regarding these development standards is provided below.

1. Viewshed Protection

Pursuant to the MSPSP, “[n]o building or structure visible from Mulholland Drive on an upslope or downslope lot shall penetrate the viewshed without the prior written approval of the Director pursuant to Section 11.” (MSPSP, Section 5.D.1.) The Project consists of the reuse of existing facilities on the Project Site for the relocation of an existing approved school use. As such, the Project does not add new floor area or otherwise impact the existing viewshed area. Therefore, the Project is consistent with Inner Corridor viewshed protection regulations.

2. Building Heights

Building heights are limited to 15 feet in the first 100 feet from the Mulholland Drive right-of-way, and 30 feet in the first 100 to 500 feet from Mulholland Drive. (MSPSP, Section 5.D.2.) The Project consists of the reuse of existing facilities on the Project Site and will not increase the height of buildings that are exempt from or were previously approved pursuant to the MSPSP. Therefore, the Project is consistent with MSPSP Inner Corridor building height requirements.

3. Yard Requirements

The MSPSP requires that a front yard consisting of a minimum of 20% the depth of the lot, not needing to exceed 40 feet, and a side yard consisting of a minimum of 10% of the width of the lot, not needing to exceed 20 feet, be provided. (MSPSP, Section 5.D.3.) As noted above, the Project consists of the reuse of existing facilities on the Project Site and will not alter the yard area of buildings that are exempt from or were previously approved pursuant to the MSPSP. Therefore, the Project is consistent with Inner Corridor yard requirements.

⁷ Planning Case No. ZA-1966-18445

⁸ See Planning Case No. DIR-2001-1358-DRB and DIR-2002-2717-SPPA (for the Student Union building) and DIR-2018-0485-DRB-SPP-MSP (for the perimeter fencing).

4. Fences, Gates and Walls

MSPSP regulations state that “[a]ll fences, gates and walls visible from Mulholland Drive shall be constructed of the following materials: rough-cut, unfinished wood; native-type stone; splitface concrete block; textured plaster surface walls; black or dark green chain link or wrought iron; or a combination thereof.” (MSPSP, Section 5.D.4.) The Project does not propose any new fencing or walls, and existing fencing and walls are exempt from or were previously approved pursuant to the MSPSP. Therefore, the Project is consistent with Inner Corridor fencing regulations.

5. Drain Pipes

MSPSP regulations state that drain pipes visible from Mulholland Drive shall be black or earth tone brown. (MSPSP, Section 5.D.5.) The Project does not include installation of additional drain pipes and existing drain pipes, where present, are exempt from or were previously approved pursuant to the MSPSP. Therefore, the Project is consistent with this regulation.

6. Utilities

MSPSP regulations state that all utilities installed shall be placed underground. (MSPSP, Section 5.D.6.) The Project consists of the reuse of existing facilities on the Project Site and does not propose any new utility connections, while existing utilities are exempt from or were previously approved pursuant to the MSPSP. Therefore, the Project is consistent with the Inner Corridor utility regulations.

7. Roofs

MSPSP regulations state that “[a]ll roofs visible from Mulholland Drive shall be surfaced with non-glare materials and no equipment shall be placed thereon. This provision shall not apply to solar energy devices.” (MSPSP, Section 5.D.7.) The Project consists of the reuse of existing facilities on the Project Site for the relocation of an existing approved school use. Therefore, the Project is consistent with Inner Corridor roof regulations.

Outer Corridor Regulations

A. Uses

As noted above, the Project Site is located partially within the Inner Corridor (all areas of which are also in the Institutional Use Corridor) and partially in the Outer Corridor. Under the MSPSP, uses permitted on a discretionary basis in the Inner Corridor may be permitted in the Outer Corridor, provided that specific findings must be made (MSPSP Section 6.A). These findings are consistent with the findings required for such uses when located in the Inner Corridor. As discussed above, all such findings can be made for the Project, and the Project is consistent with applicable use regulations.

B. Environmental Protection Measures

Environmental Protection Measures under the Outer Corridor regulations are the same as those associated with the Inner Corridor. Therefore, as discussed above, the Project is consistent with applicable Environmental Protection Measures.

C. Grading

As discussed above, the Project, which consists of the reuse of existing facilities on the Project Site, does not propose any grading; therefore, the MSPSP's grading regulations do not apply.

D. Building Heights

Under the MSPSP, the height of buildings in the Outer Corridor shall not exceed 40 feet. The Project is not adding or otherwise modifying the height of the existing buildings, which are exempt from or were previously approved pursuant to the MSPSP. Therefore, the Project is consistent with the Outer Corridor building height regulation.

Landscaping

1. Graded Slopes. Graded slopes shall be landform graded in accordance with the provisions of the Landform Grading Manual, unless the Department of Building and Safety has determined that landform grading will conflict with the provisions of Divisions 29 and 70 of Article 1 of Chapter IX of the Code. Slopes which cannot be landform graded shall be landform planted in accordance with the provisions of the Landform Grading Manual. Landscaping shall be installed within six (6) months of the completion of any grading. The Project does not include any grading.
2. Location. Plant material in the inner corridor shall not obstruct the view from Mulholland Drive and the right-of-way. No new landscaping will be installed as a part of the Project, and existing landscaping does not obstruct the view from Mulholland Drive.
3. Type. Landscaping shall predominantly consist of native-type fire resistant plant materials. No new landscaping will be installed as a part of the Project, and existing landscaping, which is exempt from or was previously approved pursuant to the MSPSP, will be maintained.
4. Oak Trees. Oak trees shall not be removed except as set forth in Sections 5.B.4 or 7.B.9 of this Specific Plan. No landscaping will be removed as a part of the Project, and existing landscaping will be maintained.
5. Replacement Trees. Native trees, including oak trees, which are removed shall be replaced with the same type of tree according to the following replacement schedule. The Project will not remove any existing trees.

6. Maintenance. An automatic irrigation system shall be installed where necessary to sustain plants and trees and a fire-resistant corridor. The Project will maintain existing automatic irrigation systems.

3. Conclusion

As discussed in the preceding paragraphs, the Project would be consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations. Therefore, the Project satisfies the first criterion for a Class 32 Exemption.

- 2. The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.**

As shown in Figure 1, the Project Site Map, the Project Site is located on a developed property in an urbanized area of the City and is substantially surrounded by urban uses, including single-family homes, the Stephen S. Wise Temple, Mulholland Drive, and Interstate I-405. The relevant portions of the Project Site, consisting of the portions of the subject property to be occupied by the relocated high school uses, are the footprints of the Main Building and Student Union Building, or 1.55 acres (67,620 square feet).^{9, 10} No new construction or alterations would be made to these portions of the Project Site or to other areas of the subject property, including the other existing structures (e.g., the student residential buildings constructed for the former AJU campus) and the existing exterior improvements and landscaping. These uses and areas are part of the existing physical environment prior to the Project that will not change as result of the Project. Therefore, they comprise the environmental baseline and are not part of the Project.¹¹

Therefore, the Project satisfies the second criterion for a Class 32 Exemption.

- 3. The Project Site has no value as habitat for endangered, rare or threatened species.**

The Project Site is located in an urbanized area within the City. As shown in Figure 2, Aerial Photograph of the Project Site and Surrounding Land Uses, the Project Site and the surrounding area are primarily developed with urban uses and infrastructure and surrounded by suburban residential neighborhoods, the Stephen S. Wise Temple, and the Interstate I-405 transportation corridor.

⁹ The footprint of the Main Building is approximately 60,000 square feet, and the footprint of the Student Union Building is approximately 6,720 square feet.

¹⁰ CEQA Guidelines Section 15378(a) provides: “‘Project’ means the whole of an action, which has a potential for resulting in either a direct **physical change in the environment**, or a reasonably foreseeable indirect **physical change in the environment...**” (Emphasis added.) See *Protect Tustin Ranch v. City of Tustin*, 70 Cal.App.5th 951 (2021) (Upholding use of Class 32 CEQA exemption for 2.38-acre project site included within 12-acre existing shopping center as project site was below 5-acre maximum).

¹¹ CEQA Guidelines Section 15125(a) provides: “An EIR must include a description of the physical environmental conditions in the vicinity of the project ... at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.”

Biological resources on the site were surveyed and described in “Biological Analysis of Class 32 Categorical Exemption for the Milken Community School Project” by Glenn Lukos Associates dated September 25, 2025 (“Biological Resources Assessment”). The Biological Resources Assessment is included as Attachment 1 to this document.

As stated in the Biological Resources Assessment, no candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the California Department of Fish and Wildlife (“CDFW”) or the USFWS, have been recorded or exist on the Project Site, nor are any such species anticipated to occur. Areas immediately surrounding the Project Site include existing landscaping and ornamental trees. The Project will not alter the existing vegetation or landscaping on the Project Site. The Project will reuse the existing facilities and does not include any construction or increase in floor area. Therefore, no impacts to vegetation surrounding the Project site are anticipated. Accordingly, the Project has no impact on endangered, rare, or threatened species and the Project Site has no value as habitat.

Therefore, the Project satisfies the third criterion for a Class 32 Exemption.

4. Approval of the Project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

1. Traffic

The following traffic impact analysis summarizes and incorporates the information set forth in the technical memorandum “Transportation Analysis for Milken Community School” by Gibson Transportation Consulting, Inc., dated October 30, 2025 (“Transportation Study”). The Transportation Study is included as Attachment 2 to this document.

(a) Conflict with a program, plan, ordinance or policy addressing the circulation systems, including transit, roadway, bicycle, and pedestrian facilities.

As stated above, the Project would consist of the relocation of the high school component of an existing approved school use and the reuse of the existing facilities on the Project Site. The Project would not involve the construction of new floor area or the alteration of existing pedestrian or vehicular access to or within the Project Site.

MCS would also implement a comprehensive Transportation Demand Management (“TDM”) program, similar to and modeled on the existing TDM program for the existing campus, to manage traffic to/from the Project Site through the neighborhood, as well as on the adjacent street and freeway system. The TDM program encourages the use of carpooling and privately operated bus and shuttle services. The School’s current bus program provides seven routes to and from residential areas throughout the City, with considerations to expand to additional routes in the future. School-operated shuttles, which currently run between the two School campuses, would continue to do so. The TDM program also outlines communication with parents, as well as specific circulation routes to and from the School during the morning and afternoon peak periods to balance traffic within the immediate area and minimize the concentration of School-related traffic.

Therefore, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation systems, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant.

(b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

Per CEQA Guidelines Section 15064.3(b)(1), for land use projects, vehicle miles travelled (“VMT”) exceeding an applicable threshold of significance may indicate a significant impact. In order to implement this section, the City has adopted the Transportation Assessment Guidelines (“TAG”).¹² Section 2.2.2 of the TAG provides definitive guidance and direction regarding VMT screening criteria and analysis requirements for development projects. Projects that require a discretionary action but answer no to either of the two following questions do not require further analysis, and a “no impact” determination can be made:

- Would the land use project generate a net increase of 250 or more daily vehicle trips?
- Would the project generate a net increase in daily VMT?

The Project would generate a net reduction of 123 daily trips and a net reduction of 1,386 daily VMT. Therefore, the Project would not meet the threshold of 250 daily trips or a net increase in daily VMT that would require further analysis. Therefore, a “no VMT impact” determination can be made for the Project, and the Project would not conflict with or be inconsistent with CEQA Guidelines section 15064.3.

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

As previously stated, the Project would not alter existing pedestrian or vehicular access to the Project Site, and the Project would not alter the educational character of the Project Site. Vehicular queuing for pick-up and drop-off at peak morning and afternoon times can be accommodated within the existing parking areas on the Project Site, and will not spill over onto Casiano Road or otherwise restrict neighborhood access. As such, the Project would not create a substantial increase in hazards due to a design feature or incompatible uses, and impacts would be less than significant.

(d) Result in inadequate emergency access.

The Project would comply with all relevant City requirements regarding vehicular access and emergency access. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

MCS would retain existing fire access that connects Casiano Road to the Project Site’s sports field. The MCS has access to up to 12 buses for use in case of an emergency evacuation. Emergency pedestrian access is provided via a gate along Mulholland Drive, which would allow students to load onto buses directly from Mulholland Drive. MCS would implement the comprehensive

¹² Transportation Assessment Guidelines, Los Angeles Department of Transportation [LADOT], Updated August 2022.

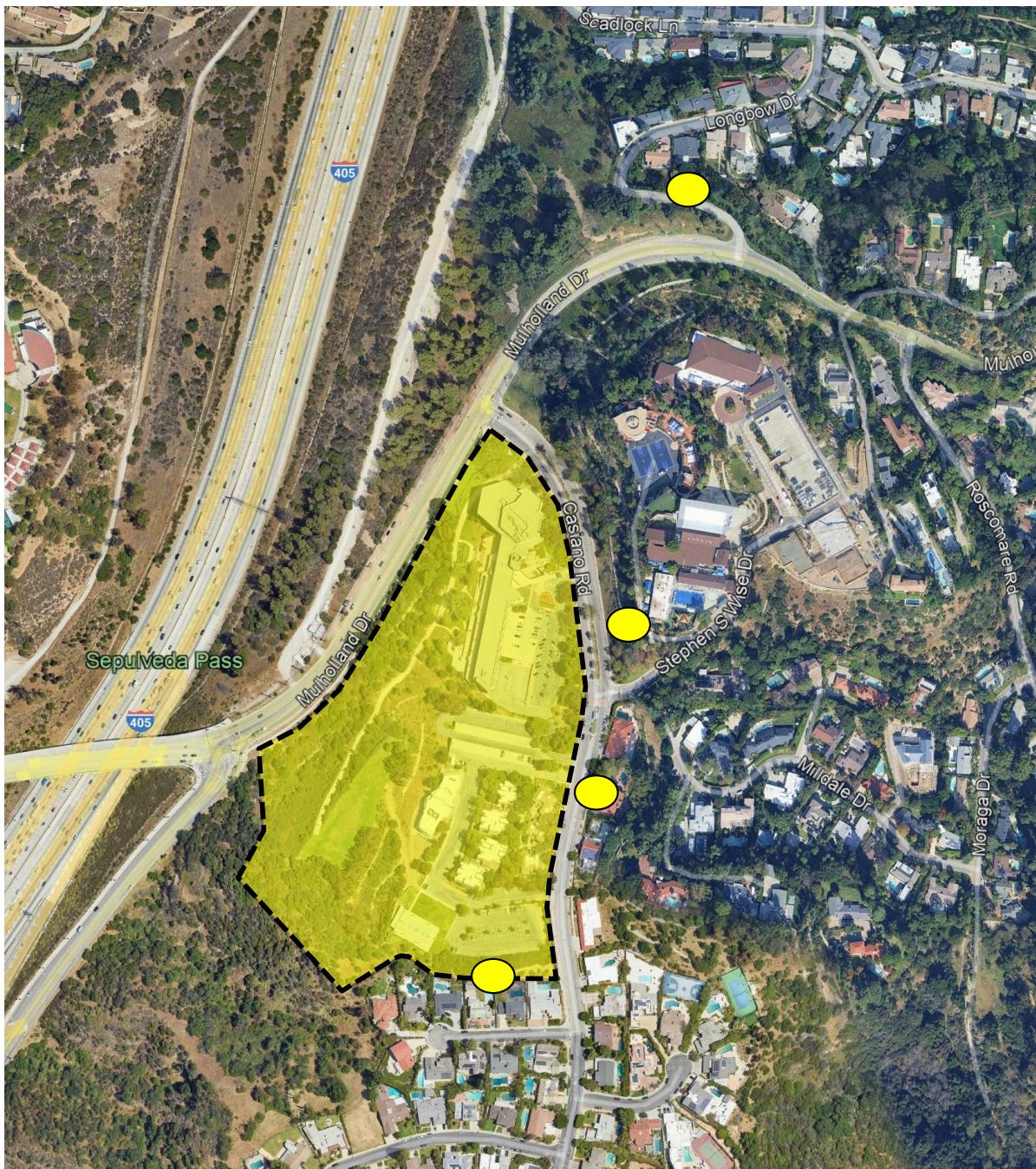
Emergency Operations Plan for the Project Site to ensure the safety of students, faculty/staff, and visitors in the event of a disaster such as a fire, earthquake, emergency evacuation, or campus lockdown. An analysis of the vehicular capacity of Casiano Road and surrounding roadways demonstrates that evacuation would be feasible even in the unlikely event of a worst-case emergency evacuation of the neighborhood when all residents are present along with students, faculty, and staff for MCS and Stephen S. Wise Temple. Moreover, such a scenario is unlikely, as peak campus occupancy will typically occur during the day on weekdays when most residents are not present.

Therefore, impacts of the Project with regards to emergency access would be less than significant.

2. Noise

The following summarizes the information set forth in the Noise Technical Report by Acoustical Engineering Services, Inc. dated November 2025 (“Noise Study”). The Noise Study is included as Attachment 3 to this document.

The Noise Study analyzed potential operational noise impacts on noise-sensitive receptors, including residences to the northeast, east, and southeast of the Project Site, respectively referred to as receptors R1, R3, and R4, and the Stephen S. Wise Temple, referred to as receptor R2, all in Figure 2 and Table 6 of the Noise Study and as shown below. Construction noise and construction and operational vibration were not analyzed, as the Project would not involve construction and would not result in substantial new sources of vibration (e.g., mechanical equipment) not already present on the Project Site.



SCALE: NOT TO SCALE



Figure 2, Noise Study: Noise Receptor Locations

Significant noise impacts would occur if any of the following occur:

- Off-site traffic from the Project causes the ambient noise levels measured at the property line of affected noise-sensitive uses to increase by 3 dBA in CNEL to or within the “normally unacceptable” or “clearly unacceptable” category; or
- Off-site traffic from the Project causes the ambient noise levels measured at the property line of affected noise-sensitive uses to increase by 5 dBA in CNEL or greater;
- The Project on-site operational (i.e., non-roadway) noise sources, such as outdoor mechanical equipment and outdoor activities, increase the ambient noise level (hourly L_{eq}) at noise-sensitive uses by 5 dBA.
- The Project on-site athletic activities noise levels, including the athletic practice field, basketball and volleyball courts, as measured in terms of L_{10} increase the ambient noise level (hourly L_{eq}) at noise-sensitive uses by 10 dBA.

As the Project would not alter existing mechanical equipment on the Project Site, the Project would not increase existing noise levels from stationary equipment.

The Project Site includes an existing outdoor athletic field, a basketball court, and a volleyball court. Concurrent activities from all outdoor athletic facilities (athletic field, basketball court, and volleyball court) were modeled to present a conservative noise analysis. Table 6 (on page 23 of the Noise Study) presents the estimated noise levels (in terms of L_{eq}) at the off-site sensitive receptors, resulting from use of Project outdoor athletic fields. As presented in Table 6, the estimated noise levels from the outdoor athletic activities would range from 34.6 dBA (L_{eq}) at receptor location R1 to 47.9 dBA (L_{eq}) at receptor location R4, which would be below the significance threshold of 5 dBA (L_{eq}) increase above the ambient noise levels.

In addition to the L_{eq} noise analysis (per the LAMC), noise impacts in terms of L_{10} impact noise metric were also evaluated representing the intermittent noise levels. Table 7 (on page 24 of the Noise Study) presents the estimated outdoor athletic activities noise levels (in terms of L_{10}) at the off-site sensitive receptors. As indicated in Table 7, the estimated noise levels from the outdoor athletic activities would range from 37.6 dBA (L_{10}) at receptor location R1 to 50.9 dBA (L_{10}) at receptor location R4, which would be below the significance threshold of a 10 dBA increase above ambient noise levels. Therefore, noise impacts from outdoor athletic activities would be less than significant.

Project-generated traffic noise impacts were evaluated by comparing the increase in noise levels from the “existing without project” condition to the “existing with-project” condition and the “future without project” condition to the “future with project” condition relative to the Project’s significance threshold. Table 8 (on page 26 of the Noise Study) provides a summary of the off-site traffic noise analysis under the “existing plus project” condition. As shown in Table 8, traffic from the Project would result in a maximum noise increase of 3.3 dBA and 1.1 dBA along Casiano Drive (between Stephen Wise Drive and Casiano Court), during the A.M. and P.M. peak hour, respectively. Table 9 (on page 26 of the Noise Study) provides a summary of the off-site traffic noise analysis under the “future (2026) plus project” condition. As shown in Table 9, traffic from the Project would result in a maximum noise increase of 3.5 dBA and 1.7 dBA along Casiano Drive (between Stephen Wise Drive and Casiano Court), during the A.M. and P.M. peak hour,

respectively. The estimated noise increases would be below the 5 dBA significance threshold. Therefore, off-site traffic noise impacts associated with the Project would be less than significant.

A composite operational noise analysis was performed to evaluate the noise impacts all Project-related noise sources plus existing ambient noise levels to identify the potential maximum Project-related noise level increase that may occur at the noise-sensitive receptor locations. Table 10 (on page 28 of the Noise Study) presents the estimated noise from Project-related noise sources in terms of CNEL. As indicated in Table 10, the Project would result in a maximum increase of 0.6 dBA CNEL at receptor R1 to 0.8 dBA CNEL at receptor R3. The increases in noise levels due to Project operations at all off-site receptors would be below the 5 dBA CNEL significance threshold and the estimated noise levels would fall within the conditionally acceptable (60 to 70 CNEL) land use category for residential and school uses. Therefore, the composite noise level impacts due to Project operation would be less than significant.

3. Air Quality

The following air quality impact analysis summarizes and incorporates the information set forth in the Air Quality Technical Report by Ramboll dated November 2025 (“AQ Report”). The AQ Report is included as Attachment 4 to this document.

The AQ Analysis provides an air quality assessment of the Project in compliance with CEQA. Specifically, emissions of criteria air pollutants (“CAP”) associated with operation of the Project were estimated in order to evaluate if the Project would cause significant impact based on the significance thresholds established by the South Coast Air Quality Management District (“SCAQMD”). Operational emissions were modeled using the California Emission Estimator Model version 2022.1 (“CalEEMod”), including area sources (consumer products, architectural coatings, and landscaping equipment), natural gas combustion related to energy use, and on-road mobile sources. Assumptions for trip rates and trip lengths were based on the Traffic Study.

(a) Criteria Air Pollutant Emissions

(i) *Mass Daily Emissions*

Table 1 of the AQ Report presents the maximum daily CAP emission estimates from Project operation. As shown in the table, the operational emissions for the Project are less than the SCAQMD mass daily significance thresholds for all pollutants. Therefore, impacts would be less than significant.

(ii) *Localized Ambient Air Quality*

Ramboll evaluated the localized ambient air quality impacts from on-site operational activities for carbon monoxide (CO), nitrogen dioxide (NO₂), particulate matter less than 10 microns (PM₁₀), and particulate matter less than 2.5 micron (PM_{2.5}) using SCAQMD’s localized significance thresholds (“LSTs”) methodology. As shown in Table 1 of the AQ Report, the Project’s localized emissions would not result in an exceedance of SCAQMD’s LSTs. Therefore, the Project’s operational activities would not result in a significant localized impact.

(b) Consistency with SCAQMD's 2022 Air Quality Management Plan ("2022 AQMP")

The Project would not create any overall population growth; therefore, it would have no effect on the growth assumptions used in the 2022 AQMP and 2024-2050 Regional Transportation Plan /Sustainable Communities Strategy ("Connect SoCal"). As a result, the Project would be consistent with the growth assumptions of the 2022 AQMP and Connect SoCal and would not impair the region's ability to achieve the SCAQMD's goals for attainment of air quality standards; thus, the project would not conflict with or obstruct implementation of the SCAQMD 2022 AQMP or Connect SoCal.

(c) Odors

According to the SCAQMD, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project does not include any uses identified by the SCAQMD as being associated with odors, and thus the Project would not result in odors adversely affecting a substantial number of people.

4. Water Quality

The following summarizes and incorporates the information set forth in the Hydrology and Water Resources Technical Report by KPFF Consulting Engineers dated November 19, 2025 ("Hydrology Report"). The Hydrology Report is included as Attachment 5 to this memorandum.

As stated in the Hydrology Report, the Project would not involve construction or otherwise disturb soil and therefore would not substantially alter the Project Site drainage patterns or result in a permanent adverse change to the movement of surface water. Therefore, construction-related impacts to surface water hydrology would be less than significant. Similarly, the Project will not disturb the grades on site and accordingly will not result in an incremental increase in the imperviousness of the Project Site. Therefore, peak flow rates of stormwater would not increase and the runoff volumes into the existing storm drain system would remain the same. Consequently, the Project would not cause flooding during the 50-year developed storm event, would not create runoff which would exceed the capacity of existing or planned drainage systems, would not require construction of new stormwater drainage facilities or expansion of existing facilities, would not substantially reduce or increase the amount of surface water in a water body, or result in a permanent adverse change to the movement of surface water. The Project Site will not increase concentrations of pollutants listed as constituents of concern for the Ballona Creek watershed. As such, operation of the Project would result in a less than significant impact on surface water hydrology and water quality. With regards to groundwater, the Project Site does not overlay a groundwater basin and would not involve installation of any improvements that would impact groundwater supplies or the introduction of any contaminants that could reach groundwater supplies. Therefore, the Project would not result in a significant impact to groundwater resources or groundwater quality.

5. Conclusion

For the reasons set forth above, the Project would not result in significant traffic, noise, air quality, or water quality impacts and satisfies the fourth criterion for a Class 32 Exemption.

5. The Project Site can be adequately served by all required utilities and public services.

The Project Site is located in an urbanized area on property developed with an existing educational campus. The Project consists of the relocation of the high school component of MCS's existing approved school use to the Project Site, where it will make use of the existing facilities on the Project Site. No construction or increase in floor area is proposed. In addition, the infrastructure for the utilities required to serve the Project is already in place and serves the existing educational buildings on the Project Site.

Impacts of the Project on water and wastewater systems were analyzed in the "Utility Infrastructure Technical Report: Water and Wastewater" by KPFF Consulting Engineers dated November 13, 2025 ("Utility Report"). The Utility Report is included as Attachment 6. Impacts of the Project on fire protection services were analyzed in the "Fire Protection Report" by KPFF Consulting Engineers dated November 13, 2025 ("Fire Report"). The Fire Report is included as Attachment 7.

As stated in the Utility Report, water is supplied to the Project Site by the Los Angeles Department of Water and Power ("LADWP"). When analyzing the Project for water infrastructure capacity, the projected demands for both fire suppression and domestic water are considered. Although domestic water demand is the Project's main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure, and therefore are the primary means for analyzing infrastructure capacity. A completed Information of Fire Flow Availability Request ("IFFAR") shows four nearby hydrants flowing simultaneously for a combined 4,000 gallons per minute with a residual pressure of over 20 psi. Thus, as shown by the IFFAR, the Project Site has adequate fire flow available to demonstrate compliance with Section 57.507.3 of the LAMC. For domestic water, water consumption estimates based on 100 percent of City of Los Angeles Bureau of Sanitation ("LASAN") sewerage generation factors demonstrate that total water usage for the Project will be less than estimated water usage for uses previously permitted on the Project Site pursuant to the former AJU CUP. Therefore, the Project's impacts on water supply would be less than significant.

As stated in the Utility Report, sewer infrastructure is provided to the Project Site by LASAN. Wastewater generation estimates, based on 100 percent of LASAN sewage generation factors, demonstrate that total wastewater generation for the Project will be less than estimated wastewater generation for uses previously permitted on the Project Site pursuant to the former AJU CUP. Therefore, the Project's impacts on wastewater demand would be less than significant.

As stated in the Fire Report and as previously described above, a completed IFFAR shows four nearby hydrants flowering simultaneously for a combined 4,000 gpm with a residual pressure of over 20 psi, which is adequate to demonstrate compliance with Section 57.507.3 of the LAMC. Fire stations are also present at distances of 1.5 miles, 2.2 miles, 4.6 miles, and 5.9 miles from the Project Site, and the existing buildings on the Project Site are equipped with an automatic fire sprinkler system. Therefore, the Project's impacts on demand for fire protection services would be less than significant.

Therefore, the Project can be adequately served by all required utilities and public services and satisfies the fifth criteria for a Class 32 Exemption.

III. Exceptions to Categorical Exemptions

Section 15300.2 of the State CEQA Guidelines provides exceptions to categorical exemptions due to the nature or location of a project, including the following¹³:

1. The project and successive projects of the same type in the same place will result in cumulative impacts;
2. There are unusual circumstances creating the reasonable possibility of significant effects;
3. The project may result in damage to scenic resources, including, but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within an officially designated scenic highway;
4. The project is located on a site that the Department of Toxic Substances Control and the Secretary of the Environmental Protection have identified, pursuant to Government code section 65962.5, as being affected by hazardous wastes or clean-up problems; or
5. The project may cause a substantial adverse change in the significance of a historical resource.

1. Cumulative Impacts

The Project and successive projects of the same type in the same place would not result in cumulative impacts.

1. Traffic

As noted above, development of the Project would not result in any significant traffic impacts, including VMT. Moreover, as the Project consists of the reuse of an existing educational campus on the Project Site for a similar educational use, the Project is consistent with SCAG's 2024-2050 RTP/SCS. Moreover, pursuant to the VMT screening criteria contained in the TAG, the Project is screened from further VMT analysis as a project that generates less than 250 daily trips and a net reduction in VMT. Further, as the Project would maintain adequate emergency access during operations, it would not result in a significant cumulative impact to emergency access. Therefore, the Project's cumulative traffic impacts would be less than significant.

2. Noise

Noise from the construction of development related projects is typically localized and has the potential to affect noise-sensitive uses within 500 feet from the construction site. The Project does not involve new construction or additions to the existing structures on the Project Site, and there are no approved or in-process developments (related projects) in the vicinity of the Project Site.

¹³ An additional exception, applicable to certain types of Categorical Exemptions based on the location of a project, does not apply to a Class 1 or Class 32 Categorical Exemption and is therefore not discussed herein.

Therefore, there would be no potential significant cumulative operational impacts from the Project and the related projects. Moreover, it is anticipated that, as with the Project, any related projects would also be required to comply with the City's noise regulations, the General Plan Noise Element, the MSPSP, and (if necessary) any conditions of approval by the City. As a result, regulatory compliance measures will ensure that the Project's potential to contribute to substantial cumulative noise levels from operational sources would be less than significant.

The off-site traffic noise is dependent on the overall traffic volumes on adjacent roadways. Traffic volumes would need to double in order to result in a 3 dBA noise increase (just perceptible level). Based on the fact that the Project will result in a net reduction in external trips relative to the existing volumes of trips on most directly impacted adjacent roadway (Casiano Road), the Project and any related projects would not double the traffic volumes on the roadways in the vicinity of the Project Site. Therefore, cumulative off-site traffic noise impacts would be less than significant.

3. Air Quality

Cumulative air quality impacts from operation of the Project, based on SCAQMD guidelines, are analyzed in a manner similar to project-specific air quality impacts. The SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, individual development projects that do not generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would not result in a cumulatively considerable increase in emissions. As noted above, the Project does not involve any construction.

Thus, as discussed above, because the operational daily emissions associated with Project would not exceed the SCAQMD's recommended thresholds, these emissions would not be cumulatively considerable. Therefore, cumulative air quality impacts would be less than significant.

4. Water Quality

As discussed above, the Project, which consists of the reuse of existing facilities without new construction or ground disturbance, would not result in any impacts to surface or groundwater resources or quality. Therefore, cumulative water quality impacts would be less than significant.

5. Utilities and Public Services

As noted above, the Project consists of the reuse of existing educational facilities on the Project Site, which are currently served by existing utilities infrastructure, and the Project will result in a net reduction in water use and wastewater generation compared to previously permitted uses. The Project would also meet City requirements related to fire flow from adjacent hydrants. Therefore, the Project is not anticipated to result in significant new demand for utilities or public services. Adequate capacity exists to serve the Project, and it would not result in any significant cumulative impacts associated with utilities or public services.

2. Unusual Circumstances

There are no unusual circumstances that exist in connection with the Project or surrounding environmental conditions that have the potential to result in significant environmental impacts.

The Project consists of reuse of an existing educational facility for the relocation of an existing approved school use. Since the Project would not result in any increase in the floor area of the existing buildings and would not alter the overall impacts of educational uses in the vicinity of the Project Site, no additional environmental impacts would result from the Project. There are no features of the Project's proposed reuse of existing educational facilities that distinguish it from others in the exempt class.

Therefore, no unique or unusual circumstances exist with respect to the Project that would give rise to a reasonable possibility of a significant effect upon the environment. Thus, this exception does not apply to the Project.

3. Scenic Highways

The Project Site is not bordered by or within the viewshed of any designated state scenic highway¹⁴. While the Project is located adjacent to Mulholland Drive, the Project consists solely of the reuse of existing facilities on the Project Site, and therefore will not alter the viewshed of Mulholland Drive and will comply with all provisions of the Mulholland Scenic Parkway Specific Plan. Further, the Project will not alter the existing exterior features, including landscaping and topography, of the Project Site. Therefore, the Project would not damage any scenic resources within an officially designated scenic highway. Thus, this exception does not apply to the Project.

4. Hazardous Materials

Pursuant to Government Code Section 65962.5(a), the Department of Toxic Substances Control (“DTSC”) shall compile and update as appropriate, at least annually, a list of all hazardous waste facilities subject to corrective action (pursuant to Section 25187.5 of the Health and Safety Code), all land designated as hazardous waste property or border zone property (pursuant to Section 25220 of the Health and Safety Code), all information received by the DTSC on hazardous waste disposals on public land (pursuant to Section 25242 of the Health and Safety Code), and all sites listed pursuant to Section 25356 of the Health and Safety Code.

Pursuant to Government Code Section 65962.5(b), the Department of Health Services (“DHS”) shall compile and update, at least annually, a list of all public drinking water wells that contain detectable levels of organic contaminants and that are subject to water analysis pursuant to Section 116395 of the Health and Safety Code.

Pursuant to Government Code Section 65962.5(c), the State Water Resources Control Board shall compile and update, at least annually, a list of all underground storage tanks for which an unauthorized release report is filed pursuant to Section 25295 of the Health and Safety Code, a list of all solid waste disposal facilities from which there is a migration of hazardous waste and for which a California regional water quality control board has notified the DTSC pursuant to subdivision (e) of Section 13273 of the Water Code, and a list of all cease and desist orders issued after January 1, 1986, pursuant to Section 13301 of the Water Code, and all cleanup or abatement orders issued after January 1, 1986, pursuant to Section 13304 of the Water Code, that concern the discharge of wastes that are hazardous materials.

¹⁴ California State Scenic Highway Map, available at <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways> accessed November 11, 2025.

Pursuant to Government Code Section 65962.5(d), the local enforcement agency shall compile, at least annually, a list of all solid waste disposal facilities from which there is a known migration of hazardous waste. The California Integrated Waste Management Board shall compile the local lists into a statewide list, which shall be submitted to the Secretary for Environmental Protection and shall be available to any person who requests the information.

The Project Site is not listed in the EnviroStor database.¹⁵ In addition, the Project Site is not listed on any of the lists published pursuant to Government Code Section 65962.5, including the Regional Water Quality Control Boards' GeoTracker database.¹⁶ Therefore, the Project Site is not located on a site that the DTSC and the Secretary of the Environmental Protection have identified as being affected by hazardous wastes or clean-up problems. Therefore, impacts would be less than significant.

5. Historical Resources

The Project Site is currently developed with the existing AJU Familian Campus, which was constructed in stages beginning in 1976. AJU has been identified as a "significant institution for higher Jewish education in Los Angeles" in the Los Angeles Citywide Historic Context Statement.¹⁷ However, no specific buildings or structures on the Project Site were identified as historic in the Historic Context Statement, nor have any buildings or structures been included on a federal, state, or local register of historic resources. Accordingly, there are no identified historical resources on the Project Site.

Moreover, the AJU campus on the Project Site has been continuously expanded and altered since 1976, including via the addition of dormitories in 1985,¹⁸ the addition of the Student Union Building in 2004,¹⁹ and the conversion of a portion of the parking area adjacent to the Main Building to a library in tandem with substantial interior renovations in 2012-2013.²⁰ As such, insofar as the Project contains any historic resources, the Project's proposed reuse of existing facilities on the Project Site, which would not alter the footprints or floor areas of the existing buildings on site, would be in keeping with the previous continuous evolution of the Project Site. As such, the Project will not result in a substantial adverse change to the historic significance, if any, of the existing buildings on the Project Site.

The immediate vicinity of the Project Site is developed with other institutional uses and single-family residential uses. As the Project consists solely of the reuse of existing structures, the Project

¹⁵ <https://www.envirostor.dtsc.ca.gov/public/> accessed November 11, 2025

¹⁶ <http://geotracker.waterboards.ca.gov/map/>, accessed November 11, 2025

¹⁷ *SurveyLA Los Angeles Citywide Historic Context Statement, Context: Jewish History*, City of Los Angeles, December 2016, available at <https://planning.lacity.gov/odocument/cb3a43ec-8138-4517-95e1-3a1cf0947309/LosAngelesJewishHistoryContext.pdf>

¹⁸ See Planning Case No. ZA-18845 (dated April 21, 1981), Planning Case No. BZA-2892 (dated July 22, 1981), and Certificates of Occupancy Nos. LA89149, LA89152, LA89188, and LA89189, all dated October 21, 1985.

¹⁹ See Planning Case No. DIR-2001-1363-DRB-MSP-SPP (dated May 9, 2001), Planning Case No. DIR-2002-2712-SPPM-SPPA (dated May 30, 2002), and Certificate of Occupancy No. 02010-10000-00590 (dated October 21, 2004).

²⁰ See Planning Case No. ZA-1996-18455-PAD-PA3 (dated March 22, 2012) and Certificate of Occupancy No. 73194 (dated September 27, 2013).

would not directly or indirectly result in a substantive adverse change to the historic significance, if any, of off-site properties.

Therefore, the Project would not cause a substantial adverse change in the significance of a historical resource. Thus, this exception does not apply to the Project.

Figures:

- 1 *Project Site Map*
- 2 *Aerial Photograph of the Project Site and Surrounding Land Uses*

Attachments:

- 1 *Biological Analysis of Class 32 Categorical Exemption for the Milken Community School Project* by Glenn Lukos Associates dated September 25, 2025
- 2 *Transportation Analysis for Milken Community School* by Gibson Transportation Consulting, Inc., dated October 30, 2025
- 3 *Noise Technical Report* by Acoustical Engineering Services, Inc. dated November 2025
- 4 *Air Quality Technical Report* by Ramboll dated November 2025.
- 5 *Hydrology and Water Resources Technical Report* by KPFF Consulting Engineers dated November 19, 2025.
- 6 *Utility Infrastructure Technical Report: Water and Wastewater* by KPFF Consulting Engineers dated November 13, 2025
- 7 *Fire Protection Report* by KPFF Consulting Engineers dated November 13, 2025

Figure 1

Project Site Map

(Attached)

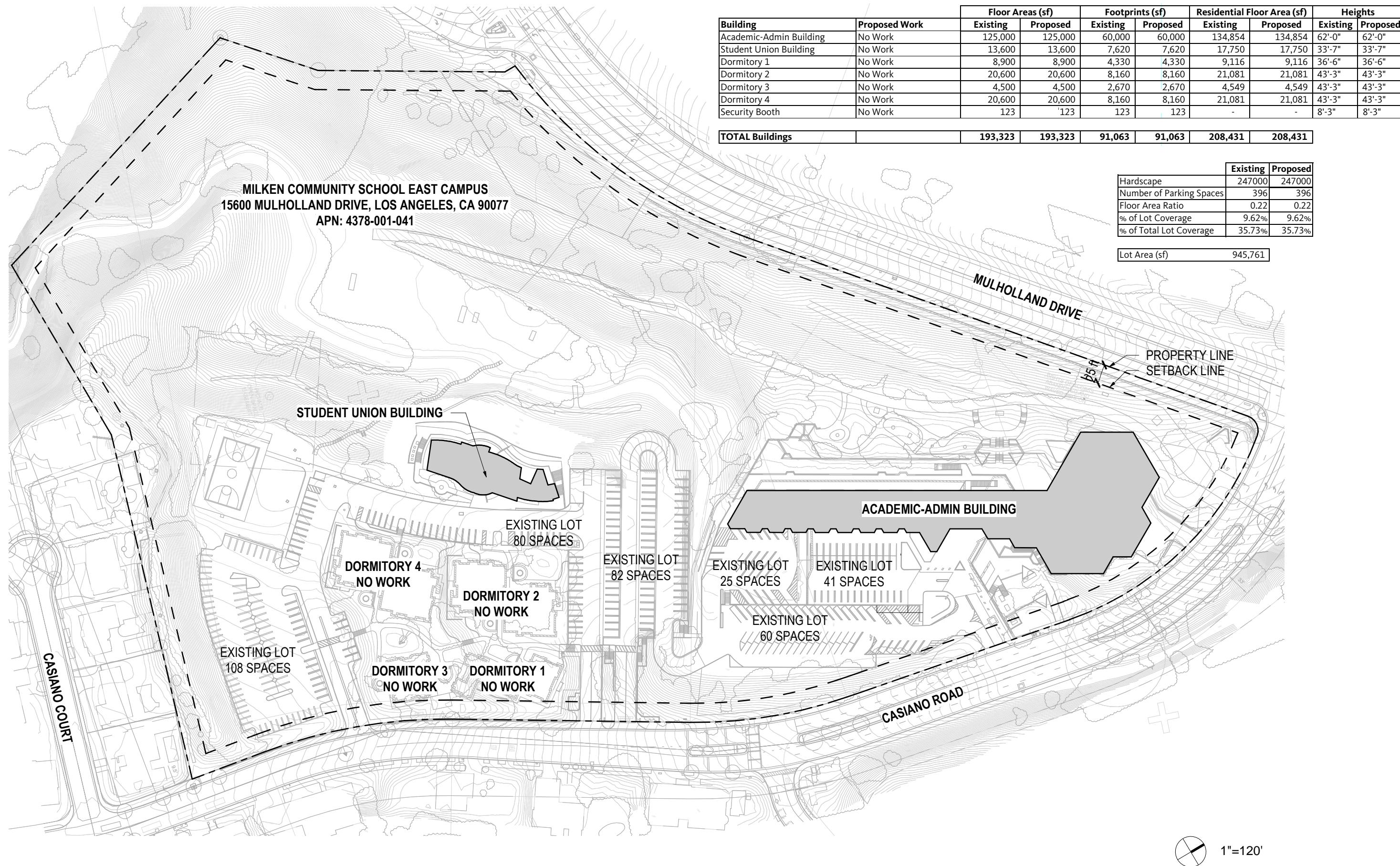


Figure 2



Aerial Photograph of the Project Site and Surrounding Land Uses

Attachment 1

Biological Analysis of Class 32 Categorical Exemption for the Milken Community School
Project by Glenn Lukos Associates dated September 25, 2025

(Attached)

Attachment 2

Transportation Analysis for Milken Community School by Gibson Transportation Consulting,
Inc., dated October 30, 2025

(Attached)

Attachment 3

Noise Technical Report by Acoustical Engineering Services, Inc. dated November 2025

(Attached)

Attachment 4

Air Quality Technical Report by Ramboll dated November 2025.

(Attached)

Attachment 5

Hydrology and Water Resources Technical Report by KPFF Consulting Engineers dated November 19, 2025.

(Attached)

Attachment 6

Utility Infrastructure Technical Report: Water and Wastewater by KPFF Consulting Engineers
dated November 13, 2025.

(Attached)

Attachment 7

Fire Protection Report by KPFF Consulting Engineers dated November 13, 2025

(Attached)