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HUNTINGTON PARK HIGH SCHOOL COMPREHENSIVE MODERNIZATION

Los Angeles Unified School District

Prepared for:

Los Angeles Unified School District
Office of Environmental Health and Safety
Contact: Eimon Smith, CEQA Project Manager
333 South Beaudry Avenue, 21st Floor
Los Angeles, California 90017
213.241.3417

Prepared by:

PlaceWorks
Contact: Alice Houseworth, AICP, LEED AP, Senior Associate
3 MacArthur Place, Suite 1100
Santa Ana, California 92707
714.966.9220
info@placeworks.com
www.placeworks.com



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Abbreviations and Acronyms

ABBREVIATIONS AND ACRONYMS

AB	Assembly Bill
ADA	Americans with Disabilities Act
APN	Assessor's Parcel Number
BOE	Board of Education (LAUSD)
CALGreen	California Green Building Standards Code
CARB	California Air Resources Board
CCR	California Code of Regulations
CDE	California Department of Education
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CHBC	California Historical Building Code
CHPS	Collaborative for High Performance Schools
COC	chemical of concern
CRHR	California Register of Historical Resources
DSA	Division of the State Architect (under the California Department of General Services)
EIR	environmental impact report
EPA	US Environmental Protection Agency
FEIR	final environmental impact report
GHG	greenhouse gases
HPHS	Huntington Park High School
HVAC	heating, ventilation and air conditioning
kBtu	Kilo British Thermal Unit
LAUSD	Los Angeles Unified School District
MW	megawatts
NOP	Notice of Preparation
NRHP	National Register of Historic Places
OHP	Office of Historic Preservation
PRC	Public Resources Code
RAW	Removal Action Workplan
RPS	California Renewables Portfolio Standard
SB	Senate Bill

Abbreviations and Acronyms

SC	Standard Condition of Approval
SCE	Southern California Edison
SHPO	State Historic Preservation Officer
SHRC	State Historical Resources Commission
SoCalGas	Southern California Gas Company
SOI Standards	Secretary of the Interior Standards
SUP	School Upgrade Program
USC	United States Code

Abbreviations and Acronyms

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1. Executive Summary

1.1 INTRODUCTION

This draft environmental impact report (Draft EIR) addresses the environmental effects associated with the implementation of the proposed Huntington Park High School (HPHS) Comprehensive Modernization (Project). The California Environmental Quality Act (CEQA) requires that school districts consider the environmental consequences before taking action on projects over which they have discretionary approval authority. An environmental impact report (EIR) analyzes potential environmental consequences in order to inform the public and support informed decisions by local and state governmental agency decision makers. This document focuses on impacts determined to be potentially significant in the Initial Study completed for this Project (see Appendix A).

This Draft EIR has been prepared pursuant to the requirements of CEQA and the Los Angeles Unified School District (LAUSD or District) CEQA procedures. The LAUSD, as the lead agency, has reviewed and revised all submitted drafts, technical studies, and reports as necessary to reflect its own independent judgment, including reliance on District technical personnel and consultants and review of all technical data and reports.

Data in this Draft EIR is derived from onsite field observations, discussions with affected agencies, adopted plans and policies, review of available studies, reports, data and similar literature, and several specialized assessments (including, but not limited to, a Historic Resources Technical Report).

1.2 ENVIRONMENTAL PROCEDURES

This Draft EIR has been prepared pursuant to CEQA to assess the environmental effects associated with implementation of the proposed Project, as well as anticipated future discretionary actions and approvals. CEQA established six main objectives for an EIR:

1. Disclose to decision makers and the public the significant environmental effects of proposed activities.
2. Identify ways to avoid or reduce environmental damage.
3. Prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures.
4. Disclose to the public reasons for agency approval of projects with significant environmental effects.
5. Foster interagency coordination in the review of projects.
6. Enhance public participation in the planning process.

1. Executive Summary

An EIR is the most comprehensive form of environmental documentation in CEQA and the CEQA Guidelines; it is intended to provide an objective, factually supported analysis and full disclosure of the environmental consequences of a proposed Project with the potential to result in significant, adverse environmental impacts.

An EIR is one of various decision-making tools used by a lead agency to consider the merits and disadvantages of a project that is subject to its discretionary authority. Before approving a proposed Project, the lead agency must consider the information in the EIR; determine whether the EIR was prepared in accordance with CEQA and the CEQA Guidelines; determine that the EIR reflects the independent judgment of the lead agency; adopt findings concerning the project's significant environmental impacts and alternatives; and adopt a statement of overriding considerations if significant impacts cannot be avoided.

1.2.1 EIR Format

Chapter 1. Executive Summary: Summarizes the background and description of the proposed Project, the format of this EIR, Project alternatives, any critical issues remaining to be resolved, and the potential environmental impacts and LAUSD Standard Conditions of Approval, mitigation measures, if any, identified for the Project.

Chapter 2. Introduction: Describes the purpose of this EIR, background on the Project, the notice of preparation, and Final EIR certification.

Chapter 3. Environmental Setting: Provides a description of the physical environmental conditions in the vicinity of the Project as they existed at the time the notice of preparation was published, from regional and local perspectives. These perspectives provide the baseline physical conditions from which the lead agency determines the significance of the Project's environmental impacts.

Chapter 4. Project Description: Presents a detailed description of the Project, including its objectives, its area and location, approvals anticipated to be required as part of the Project, necessary environmental clearances, and the intended uses of this EIR.

Chapter 5. Environmental Analysis: Summarizes the environmental topics (cultural resources and energy) the analysis includes the existing environmental setting; a description of the thresholds used to determine if a significant impact would occur; the methodology to identify and evaluate the potential impacts of the Project; the potential adverse effects of the Project; the level of impact before mitigation; the mitigation measures, if required; the level of significance of the adverse impacts after compliance with jurisdictional regulations, LAUSD Standard Conditions of Approval, and any mitigation. Bibliographical references for information sources and technical data are footnoted. A stand-alone bibliography is not required.

Chapter 6. Significant Unavoidable Adverse Impacts: Describes the significant unavoidable adverse impacts of the proposed Project.

Chapter 7. Alternatives to the Proposed Project: Describes the alternatives and compares their impacts to the impacts of the proposed Project.

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Chapter 8. Impacts Found Not to Be Significant: Briefly describes the potential impacts of the Project that were determined not to be significant by the Initial Study and were, therefore, not discussed in detail in this EIR. An analysis of energy conservation is included in this chapter.

Chapter 9. Significant Irreversible Changes Due to the Proposed Project: Describes the significant irreversible environmental changes associated with the Project.

Chapter 10. Growth-Inducing Impacts of the Project: Describes the ways in which the proposed Project would cause increases in employment or population that could result in new physical or environmental impacts.

Chapter 11. Persons Preparing this EIR: Lists the people who prepared this EIR for the proposed Project.

Appendices: The appendices for this document (in PDF format on a CD attached to the back cover) comprise these supporting documents:

- Appendix A Initial Study and Notice of Preparation
- Appendix B Initial Study and Notice of Preparation Comments
- Appendix C-1 CEQA Historic Resources Technical Report
- Appendix C-2 Character-Defining Features Memorandum
- Appendix C-3 Historic Context Statement, 1870 to 1969
- Appendix C-4 Historic Resources Survey Report
- Appendix D Energy Calculation Worksheets
- Appendix E Standard Conditions of Approval
- Appendix F Mitigation Monitoring and Reporting Program

1.2.2 Type and Purpose of This Draft EIR

This Draft EIR has been prepared as a “Project EIR,” defined by Section 15161 of the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3). This type of EIR examines the environmental impacts of a specific development project and focuses primarily on the changes in the environment that would result from the development project. The EIR examines all phases of the Project including planning, construction, and operation.

This project EIR is tiered off the 2015 School Upgrade Program EIR. In compliance with CEQA Guidelines Section 15152, this EIR provides new Project-specific analysis for issue topics: (a) that were not addressed in sufficient detail in the 2015 SUP EIR to allow for an informed decision on the proposed Project; (b) for which there is new information that would assist in the decision-making process; and (c) for which substantial changes in circumstances involve new significant environmental effects, or a substantial increase in the severity of environmental effects.

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1.3 PROJECT LOCATION

The Project would occur on the 22.5-acre HPHS campus, located at 6020 Miles Avenue, Huntington Park, Los Angeles County, California (Assessor's Parcel Numbers [APNs] 6310-018-900 and 6310-019-904). The campus is on the southeast corner of the Slauson Avenue and Miles Avenue intersection.

1.4 STATEMENT OF OBJECTIVES

The following objectives have been established for the HPHS Comprehensive Modernization Project, and will aid decision makers in their review of the Project and Project alternatives:

- Objective #1: Increase the safety and security of the staff and students through the campus modifications and configuration
- Objective #2: Repair and seismically retrofit aging facilities while also bringing buildings to code to meet the Americans with Disabilities Act (ADA) programmatic access requirements
- Objective #3: Upgrade buildings to include modern classroom spaces that can accommodate the California Department of Education's and District's standard classroom space of 960 square feet and modern technology and efficiencies including HPHS's priority and specialty campus programs such as multimedia computer technology, culinary arts, video/sound, and digital imaging which are designed to meet educational needs of the students and campus
- Objective #4: Promote a healthier environment through the use of green technology
- Objective #5: Design buildings and facilities that align with the current programmatic and operational needs of the campus while retaining or enhancing opportunities for future planning
- Objective #6: Respect the history of the campus through the rehabilitation, retention and reuse of features that have been established as character-defining or otherwise relevant to the school community (i.e., current and former students, alumni, staff, etc.) to the extent feasible, while modernizing the campus to address the current needs of the campus
- Objective #7: Limit the disruption of the educational experience of students during construction of the Project by limiting the number and/or duration of phases.

1.5 PROJECT SUMMARY

The proposed Project would modernize HPHS to facilitate a safe and secure campus that better aligns with the current instructional program. The proposed Project consists of the demolition and removal of permanent and portable buildings, renovations and improvements to remaining buildings, construction of new buildings, and landscape and access improvements throughout the campus. The proposed Project would include the following changes to the campus:

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Demolition and Removal

- Home Economics Building (Building 4)
- 15 Classrooms in 8 Relocatable Buildings (31–36, 38, 41)
- Central Plant (Building 5)
- Annex Building (Building 8)
- Gymnasium Building (including the indoor pool; Building 13)

Remodel and Modernization

- Administration Building (Building 1): Improvements in this building would include: a new HVAC system, security improvements, voluntary programmatic access upgrades to comply with the ADA, and exterior painting.
- Science & Classroom Building (Building 30): Improvements in this building would include: a new HVAC system, voluntary programmatic access upgrades to comply with the ADA, and exterior painting.

New Construction¹

- Classroom Building A: This new 2-story building would have 15 classrooms. This building would be 26,292 square feet. Classroom Building A would be west of the site of the existing Annex Building (Building 8) so as to align with new Specialty Classroom Building B (Building B).
- Specialty Classroom Building B: This new 1-story building would have 6 classrooms and support and specialty spaces, including culinary arts, video production and digital imaging classrooms. This 14,696-square-foot building would be on the site of the existing Home Economics Building (Building 4).
- Gymnasium Building: The 2-story, 45,638-square-foot Gymnasium Building would have competition and practice gymnasium floors, locker rooms (restrooms, showers, and dressing area), coaches' offices, and physical education support spaces along with support spaces for athletic storage and mechanical equipment. The weight room equipment would be relocated from Shop Building 1 (Building 9) to the new Gymnasium Building. The gym would have bleacher seats. The Gymnasium Building would be constructed on the site of the existing Gymnasium Building. The Gymnasium Building would generally be constructed in a portion of the existing Gymnasium Building's footprint.
- Pool Support Building D: The 1-story 2,810 pool support building would be located immediately east of the new gym building. It would contain: field restrooms, pool equipment storage, chemical storage
- Outdoor pool: The 25-yard x 25-meter swimming pool would include decking, fencing, and bleacher seats.

¹ The new construction building square footage shown in this section are estimates that are subject to slight variations. The refined design drawings show the total new construction may be approximately 1,036 square-feet less than the original estimates that were used for the impact analysis.

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HPHS Campus Upgrades

- Infrastructure, including domestic water; irrigation; gas; sewer; fire alarm/fighting water supply, telephone, and data systems; electrical; and storm drainage.
- Voluntary programmatic access upgrades to comply with the ADA.
- Landscape, hardscape, and exterior paint.
- Parking area reconfiguration and additional on-site parking.

1.6 SUMMARY OF PROJECT ALTERNATIVES

1.6.1 Alternative 1. No Project Alternative

Under the No Project Alternative, the Project would not occur at Huntington Park HS. The proposed modernization activities and campus-wide improvements would not be completed and the campus would remain in its current state. No physical changes would occur on the campus. Students would continue to attend classes in outdated portable buildings (some dating from 1948). Additionally, students would continue to attend classes in undersized classrooms in Home Economics Building (Building 4) and Annex Building (Building 8) that do not accommodate the needs of the educational programs at the campus. All buildings and facilities including Central Plant (Building 5) and Gymnasium Building (Building 13) would remain in their current place on-site without any upgrades or modifications. Utilities and buildings would continue to operate in an inefficient manner. The modernization and retrofitting of some buildings would not be completed through this alternative, but retrofitting to address seismic stability and safety would continue to be required. This alternative would not incorporate any of the structural seismic strengthening, safety, utility infrastructure, or ADA improvements that are required for this campus.

1.6.2 Alternative 2. Retain 1 Historic Building

Under Alternative 2, the District would retain the Home Economics Building (Building 4); a primary significant character-defining building that significantly contributes to the eligibility of the campus as a historic district. Instead of demolition and removal, this alternative would modernize, seismically retrofit, and renovate this building. All work would be completed in compliance with the Secretary of the Interior Standards (SOI Standards) and the LAUSD Design Guidelines and Treatment Approaches for Historic Schools as required under Standard Conditions of Approval SC-CUL-1, -2, and -3. Because Home Economics Building (Building 4) would remain on the campus, space for a new building would not be available and the new classroom building, Building B would not be constructed. Students would continue to attend classes in undersized classrooms in Home Economics Building (Building 4) that do not accommodate the needs of the educational programs at the campus and do not meet the California Department of Education's or District's standard classroom space of 960 square feet. The existing structural system does not allow the enlargement or combining of undersized classrooms in this building. All other campus improvements would be the same as the proposed Project.

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1.6.3 Alternative 3. Retain 2 Historic Buildings

Under Alternative 3, the District would retain Annex Building (Building 8) and Home Economics Building (Building 4); both primary significant character-defining buildings that significantly contribute to the eligibility of the campus as a historic district. Instead of demolition and removal, this alternative would modernize, seismically retrofit, and renovate the buildings. All work would be completed in compliance with the SOI Standards and the LAUSD Design Guidelines and Treatment Approaches for Historic Schools as required under Standard Conditions of Approval SC-CUL-1, -2, and -3. Because Annex Building (Building 8) and Home Economics Building (Building 4) would remain on the campus, space for a new buildings would not be available and the new classroom buildings, Buildings A and B would not be constructed. Students would continue to attend classes in undersized classrooms in Home Economics Building (Building 4) and Annex Building (Building 8) that do not accommodate the needs of the educational programs at the campus and do not meet the California Department of Education's or District's standard classroom space of 960 square feet. The existing structural systems do not allow the enlargement or combining of undersized classrooms in these buildings. All other campus improvements would be the same as the proposed Project.

1.6.1 Alternative 4. Retain All Historic Buildings

Under Alternative 4, the District would retain Annex Building (Building 8), Home Economics Building (Building 4), and Gymnasium Building (Building 13); all three are primary significant character-defining buildings that significantly contribute to the eligibility of the campus as a historic district. Instead of demolition and removal, this alternative would modernize, seismically retrofit, and renovate the two classroom buildings. However, it is unlikely the Gymnasium Building could be seismically retrofitted, since it was constructed as three adjoining buildings without any seismic separation and cannot be updated in its current configuration. All work would be completed in compliance with the SOI Standards and the LAUSD Design Guidelines and Treatment Approaches for Historic Schools as required under Standard Conditions of Approval SC-CUL-1, -2, and -3. Because Annex Building (Building 8), Home Economics Building (Building 4), and Gymnasium Building (Building 13) would remain on the campus, space for new buildings would not be available and the new classroom buildings, Buildings A, B, and C would not be constructed. Students would continue to attend classes in undersized classrooms in Home Economics Buildings (Building 4) and Annex Building (Building 8) that do not accommodate the needs of the educational programs at the campus and do not meet the California Department of Education's or District's standard classroom space of 960 square feet. The existing structural systems do not allow the enlargement or combining of undersized classrooms in these buildings. All other campus improvements would be the same as the proposed Project.

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1.7 ISSUES TO BE RESOLVED

Section 15123(b)(3) of the CEQA Guidelines require that an EIR contain issues to be resolved, including the choice among alternatives and whether, or how, to mitigate significant impacts. The major issues to be resolved include decisions by LAUSD about:

1. Whether this Draft EIR adequately describes the environmental impacts of the Project.
2. Whether the benefits of the project override those environmental impacts which cannot be feasibly avoided or mitigated to a level of less than significant.
3. Whether there are mitigation measures that should be applied to the Project.
4. Whether there are any alternatives to the Project that would substantially lessen any of the significant impacts of the proposed Project and achieve most of the basic Project objectives.

1.8 AREAS OF CONTROVERSY

In accordance with the State CEQA Guidelines Section 15123(b)(2) the EIR summary must identify areas of controversy known to the lead agency, including issues raised by agencies and the public. The agencies and the public have submitted comments about Tribal cultural resources, utilities, air quality, historic buildings, parking, noise, traffic, trees, lighting, and building designs.

Prior to preparation of the EIR, the Notice of Preparation (NOP) was distributed for comment between August 23, 2017, and September 22, 2017. A summary of the NOP comment letters received are in Section 2.0, *Introduction* Table 2-1 and Table 2-2.

1. Executive Summary

1.9 SUMMARY OF ENVIRONMENTAL IMPACTS

Table 1-1 summarizes the conclusions of the environmental analysis contained in this EIR.

Table 1-1 Summary of Environmental Impacts, Mitigation Measure and Level of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.1 CULTURAL RESOURCES			
<p>Impact 5.1-1. Proposed Project would cause a substantial adverse change in the significance of a historic resource as defined in CEQA Guidelines Section 15064.5.</p>	Significant	<p>MM-CUL-1. To reduce the impact of the removal of character-defining buildings and disruption of the Huntington Park High School (HPHS) historic district, an interpretive exhibit shall be installed to provide historical and architectural information about the campus. The exhibit would permit staff, students, and the public to understand what was historically on the campus before the comprehensive modernization Project.</p> <p>The District shall prepare an interpretive exhibit for the HPHS campus as part of the Project. The interpretive exhibit about the history of HPHS during the period of significance (1923-1936) shall be placed within a publicly accessible area on campus (such as the school library) following construction of the Project. The exhibit shall interpret the history of the campus, through historical photographs, aerials, Sanborn maps, student photographs, yearbooks, newspapers, artifacts, and written narrative that visually demonstrates physical appearance, activities, and architecture including the Beaux Arts (pre-Long Beach earthquake) and PWA Moderne (post-Long Beach earthquake) styles. A qualified architectural historian or historic preservation professional shall provide input and oversight to the contents, design and installation of an interpretive exhibit.</p>	Significant and Unavoidable
5.2 ENERGY CONSERVATION			
<p>Impact 5.2-1. Proposed Project involves the wasteful, inefficient, and unnecessary consumption of energy, especially fossil fuels such as coal, natural gas, and petroleum, associated with Project design, Project location, the use of electricity and/or natural gas, and/or the use of fuel by vehicles anticipated to travel to and from the Project.</p>	Less Than Significant	No mitigation required.	Less than Significant

1. Executive Summary

Table 1-1 Summary of Environmental Impacts, Mitigation Measure and Level of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
TRIBAL CULTURAL RESOURCES			
<p>No impacts were identified in the Initial Study or discussed in this EIR.</p>	<p>Less Than Significant</p>	<p><i>No mitigation required. However, consistent with the District's SC-TCR-1 and following a conversation with the Gabrieleño Band of Mission Indians Kizh –Nation on September 28, 2017, the District decided to incorporate MM-TCR-1 to further protect potential unanticipated discoveries associated with Tribal cultural resources.</i></p> <p>MM-TCR-1. LAUSD shall have a Native American monitor on-call during construction-related ground disturbance activities. The Native American monitor selected by the District must have at least one or more of the following qualifications: at least one year of experience providing monitoring Native American support during similar construction activities; be designated by the Tribe as capable of providing Native American monitoring support; and/or have a combination of education and experience with Tribal cultural resources. Prior to the start of the construction, the monitor shall provide the construction crew(s) with a brief summary of the sensitivity of Tribal cultural resources, the rationale behind the need for protection of these resources, and information on the initial identification of Tribal cultural resources.</p> <p>Subsequently, the monitor shall remain on-site for the duration of the ground disturbances at the site to ensure the protection of any other resources that may be in the area.</p> <p>The Native American Monitor will complete monitoring logs on a daily basis. The logs will provide descriptions of the daily activities, including construction activities, locations, soil, and any Tribal cultural resources identified.</p>	<p>Less than Significant</p>

2. Introduction

2.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

The California Environmental Quality Act (CEQA) requires that all state and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority before taking action on those projects. This Draft EIR has been prepared to satisfy CEQA and the CEQA Guidelines. The EIR is the public document designed to provide decision makers and the public with an analysis of the environmental effects of the proposed Project, to indicate possible ways to reduce, or avoid, environmental damage and to identify alternatives to the Project. The EIR must also disclose significant environmental impacts that cannot be avoided; growth inducing impacts; effects not found to be significant; and significant cumulative impacts of all past, present, and reasonably foreseeable future projects.

The lead agency means “the public agency which has the principal responsibility for carrying out or approving a Project which may have a significant effect upon the environment” (CEQA Guidelines § 21067). The LAUSD has the principal responsibility for approval of the Huntington Park High School Comprehensive Modernization project. For this reason, the LAUSD is the CEQA lead agency for this Project.

The intent of the Draft EIR is to provide sufficient information on the potential environmental impacts of the proposed Project to allow the LAUSD Board of Education (BOE) to make an informed decision regarding the Project. Specific discretionary actions to be reviewed by the LAUSD are described in Section 3.4, *Intended Uses of the EIR*.

This Draft EIR has been prepared in accordance with requirements of the:

- California Environmental Quality Act (CEQA) of 1970, as amended (Public Resources Code, §§ 21000 et seq.)
- State Guidelines for the Implementation of the CEQA of 1970 (CEQA Guidelines), as amended (California Code of Regulations, §§ 15000 et seq.)

The overall purpose of this Draft EIR is to inform the lead agency, responsible agencies, decision makers, and the general public about the environmental effects of the development and operation of the proposed Project. This Draft EIR addresses effects that may be significant and adverse; evaluates alternatives to the Project; and identifies regulatory compliance and mitigation measures, where applicable.

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2.2 NOTICE OF PREPARATION AND INITIAL STUDY

Per the CEQA Guidelines Section 15082, the LAUSD determined that an EIR would be required for this Project and issued a Notice of Preparation (NOP) and Initial Study August 21, 2017 (see Appendix A). Comments received during the Initial Study's public review period, from August 23, 2017 to September 22, 2017, are in Appendix B.

The NOP process helps determine the scope of the environmental issues to be addressed in the Draft EIR. Based on this process and the Initial Study for the Project, cultural resources (specifically the discussion of historic resources) was identified as having the potential to result in significant impacts. Issues considered Potentially Significant are addressed in this Draft EIR, but issues identified as Less Than Significant or No Impact are not. Refer to the Initial Study in Appendix A for discussion of how these initial determinations were made. Public outreach for the NOP and Initial Study included the following.

The NOP was distributed using the following methods:

- Published on August 23, 2017, in the *Los Angeles Daily News* (English) and *La Opinion* (Spanish) newspapers
- Posted at the Los Angeles County Clerk/Recorder's office
- Direct mail to Parents/Guardians of current HPHS students (1,452 notices)
- Direct mail to all addresses within a 0.25 mile (1,320 feet) radius of HPHS (1,913 notices)
- Direct mail to 16 local agencies

The NOP and Initial Study were distributed using the following methods:

- Direct mail via USPS certified mail to 3 State and local agencies
- FedEx delivery to the Office of Planning and Research, State Clearinghouse for distribution to 15 State agencies

The NOP and Initial Study were also available for review at the following locations:

- LAUSD, Office of Environmental Health and Safety, 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
- Huntington Park High School, 6020 Miles Avenue, Huntington Park, CA 90255
- LAUSD, Local District- East, 2151 N. Soto Street, Los Angeles, CA 90032
- Huntington Park Library, 6518 Miles Avenue, Huntington Park, CA 90255

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- LAUSD Office of Environmental Health and Safety website at: <http://achieve.lausd.net/ceqa>

Comments received during the NOP public review period are in Appendix B. A total of five agencies submitted comments to the NOP. Table 2-1 summarizes the issues identified by the commenting agencies, along with a reference to the sections of this EIR where the issues are addressed.

Table 2-1 NOP Comment Summary

Commenting Agency	Comment Type	Comment Summary	Issue Addressed In:
Gabrieleño Band Of Mission Indians – Kizh Nation (08/30/2017)	Cultural Resources Tribal consultation	<ul style="list-style-type: none"> • Requested project-specific consultation¹ • Project lies within the tribe's ancestral tribal territory 	Tribal consultation and tribal cultural resources impacts addressed in Appendix A. Initial Study, Chapter 4, Section XVIII, <i>Tribal Cultural Resources</i> and EIR Chapters 1, Executive Summary and 2, Introduction
Native American Heritage Commission (09/15/2017)	Cultural Resources Tribal consultation	<ul style="list-style-type: none"> • Summarized Assembly Bill 52 (AB 52) and Senate Bill 18 (SB 18) • Notes take Tribal Cultural Resources should be taken into consideration with or without consultation occurring • Mitigation for archaeological resources is not always appropriate for Tribal Cultural Resources 	Tribal consultation and tribal cultural resources impacts addressed in Appendix A. Initial Study, Chapter 4, Section XVIII, <i>Tribal Cultural Resources</i> and EIR Chapters 1, Executive Summary and 2, Introduction
California Department of Transportation (Caltrans) (09/22/2017)	Traffic and parking	<ul style="list-style-type: none"> • Providing additional parking spaces will encourage more driving by people that might otherwise use different forms of transportation • Encouraged lead agency to include measures and site design elements to promote active transportation • Suggested transportation design elements follow initiatives from LAUSD Resolution 025-16/17 • Vehicles transporting construction materials require a permit and that the project needs to be designed to discharge clean run-off water 	Traffic impacts and parking addressed in Appendix A. Initial Study, Chapter 4, Section XVII, <i>Transportation and Circulation</i> and EIR Chapters 1, Executive Summary and Chapter 4, <i>Project Description</i> The Project includes the expansion of parking to accommodate the existing campus needs. Where feasible designs such as skateboard/bike racks, would also be provided for alternative modes of transportation
State Water Resources Control Board (09/25/2017)	Sewer	<ul style="list-style-type: none"> • Any new sewer or modifications to existing sewer utilities must meet California Waterworks and California Well Standards • Any sewer line must be 50 feet away, and any sewer manhole must be 100 feet away from the nearby groundwater well 	Sewer impacts addressed in Appendix A. Initial Study, Chapter 4, Section XIX, <i>Utilities and Service Systems</i>
South Coast Air Quality Management District (09/26/2017)	Air quality	<ul style="list-style-type: none"> • Requested a copy of the Draft EIR and all air quality modeling files. • Summarized general air quality regulations, methodology, guidance documents, and data sources for preparation of analysis 	Air quality analysis and all appendices were provided in Appendix A. Initial Study, Chapter 4 Section III, <i>Air Quality</i>

¹ No Native American Tribes have requested notification or consultation through the PRC Section 21080.3.1 process.

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Written and verbal comments received during the September 6, 2017 scoping meeting are provided in Appendix B. A total of 22 individuals submitted comments, both written and verbally, during the scoping meeting. Table 2-2 summarizes the issues identified by individuals, along with a reference to the sections of this EIR where the issues are addressed.

Table 2-2 Scoping Meeting Comment Summary

Name	Comment Type	Comment Summary ²	Issue Addressed In:
Written Comments (comment cards)			
Maria Moma	-Project description	<ul style="list-style-type: none"> Suggested that security cameras be considered for protection of the school and students 	Comment noted. This and all of the comments provided will be included as part of the record and made available to the decision makers prior to a final decision on the Project
Ricardo Gastelum	-Air quality -Project changes -Parking	<ul style="list-style-type: none"> Concerned about use of machinery emissions 	Emissions addressed in Appendix A. Initial Study, Chapter 4 Section III, <i>Air Quality</i> , and Chapter 4 Section VII, <i>Greenhouse Gas Emissions</i>
		<ul style="list-style-type: none"> Requested water, gas, and electricity lines to be modernized 	Utility lines addressed in Appendix A. Initial Study, Chapter 3, Project Description and Chapter 4, Section XIX, <i>Utilities and Service Systems</i>
		<ul style="list-style-type: none"> Requested installation of solar panels and energy-efficient lamps Suggested to eliminate the bungalows and construct a new three-story building Suggested electronic gates for parking areas to be changed Suggested a 500-car minimum parking area and a baseball field be added 	Comments addressed at public meeting (see pages 68-70 of the meeting transcript in Appendix B)
Rebecca Avila	-Population -Hazardous materials	<ul style="list-style-type: none"> Requested that building construction consider alumnae overpopulation 	Population impacts addressed in Appendix A. Initial Study, Chapter 4, Section XIV, <i>Population and Housing</i>
		<ul style="list-style-type: none"> Land contamination 	The Project is designed to provide adequate administrative, classroom, academic and programmatic space for the student population. Hazards addressed in Appendix A. Initial Study, Chapter 4, Section VIII, <i>Hazards and Hazardous Materials</i>
Sandra Sifuentes	-General	<ul style="list-style-type: none"> Support of various project details 	Comment noted.
Sal Hernandez	-Project description	<ul style="list-style-type: none"> Questions about project design 	Addressed at public meeting (see page 81 of the meeting transcript in Appendix B)
Karina Macias	-CEQA process	<ul style="list-style-type: none"> Requested for extension of the EIR review period Requested more presentations during the review period 	Addressed at public meeting (see pages 31-32 of the meeting transcript in Appendix B). The District also presented at the City of Huntington Park City council meeting on October 17, 2017

² All agency and public comments will be included as part of the administrative record and made available to the decision makers prior to certification of the EIR and a final decision on the Project.

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Table 2-2 Scoping Meeting Comment Summary

Name	Comment Type	Comment Summary ²	Issue Addressed In:
Maria Rodriguez	-Project description	<ul style="list-style-type: none"> Student relocation during construction 	Student relocation addressed in Appendix A. Initial Study, Chapter 3.2, <i>Construction Schedule</i> , and EIR Chapter 4.
Jose Luis Silva	-Project description	<ul style="list-style-type: none"> Suggested sending students to other schools during construction and other project-related suggestions 	Student relocation addressed in Appendix A. Initial Study, Chapter 3.2, <i>Construction Schedule</i> and EIR Chapter 4
		<ul style="list-style-type: none"> Suggested inclusion of solar panels 	Comment was addressed at public meeting (see page 68 of the meeting transcript in Appendix B)
Beatriz Martinez	-Access and parking	<ul style="list-style-type: none"> Asked for additional parking and a drop-off and pick-up area for students 	Additional parking addressed in Appendix A. Initial Study, Chapter 3, <i>Project Description</i> Also addressed at public meeting (see page 74 of the meeting transcript in Appendix B)
Lilia S. Delgado	-Project description -Parking	<ul style="list-style-type: none"> Requests that the project not impact parking in the area 	Parking addressed in Appendix A. Initial Study, Chapter 4, Section XVII, <i>Transportation and Circulation</i>
		<ul style="list-style-type: none"> Requests that the project include residential uses 	Project background and description provided in Appendix A. Initial Study, Chapter 3, Project Description, and EIR Chapter 4
		<ul style="list-style-type: none"> Suggested inclusion of solar panels 	Comment was addressed at public meeting (see page 68 of the meeting transcript in Appendix B)
Verbal Comments (Court Reporter Transcript)			
Unidentified speaker	-Noise -Geology and soils -Transportation and parking -Hazardous materials	<ul style="list-style-type: none"> Noise levels 	Noise levels addressed in Appendix A. Initial Study, Chapter 4, Section XII, <i>Noise</i>
		<ul style="list-style-type: none"> Lead in soils and dust from project construction; soil testing methods 	Lead exposure addressed in Appendix A. Initial Study, Chapter 4, Section VIII, <i>Hazards and Hazardous Materials</i>
		<ul style="list-style-type: none"> Traffic and parking due to possible expansion of the West Santa Ana Corridor 	Traffic impacts and parking addressed in Appendix A. Initial Study, Chapter 4, Section XVII, <i>Transportation and Circulation</i> ³
		<ul style="list-style-type: none"> Asked for community involvement to determine which buildings are demolished 	Comment addressed at public meeting (see pages 13, and 74-76 of the meeting transcript in Appendix B)
Graciela Ortiz	-CEQA process	<ul style="list-style-type: none"> Huntington Park Community Development Department did not receive CEQA notification 	Notification process outlined in EIR Chapter 2, Section 2.2. Comments also addressed at public meeting (see pages 37-40 of the meeting transcript in Appendix B).
		<ul style="list-style-type: none"> Asked about the cultural and historical significance of the existing gymnasium 	Historical information in EIR Chapter 5.1, <i>Cultural Resources</i> , and technical studies in Appendix C.

³ If necessary, the District may coordinate with Metro regarding its anticipated projects such as the West Santa Ana Corridor (which is expected to break ground in 2022 – during the final three phases of the Project).

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Table 2-2 Scoping Meeting Comment Summary

Name	Comment Type	Comment Summary ²	Issue Addressed In:
Ricardo Acelo	-Project description -Access and parking	<ul style="list-style-type: none"> Requests additional parking spaces, a baseball field, a gazebo, a drop-off area, a light system, restrooms, and a copy of the design plans 	<p>Parking addressed in Appendix A. Initial Study, Chapter 4, Section XVII, <i>Transportation and Circulation</i></p> <p>Comment also addressed at public meeting (see page 37 of the meeting transcript in Appendix B)</p>
Carlos Luis	-CEQA process -Project description -Noise -Traffic	<ul style="list-style-type: none"> Designates himself and Sergio Panzon, Director of Community Development as the contact for CEQA-related documents for the City of Huntington Park 	Noise levels addressed in Appendix A. Initial Study, Chapter 4, Section XII, <i>Noise</i>
		<ul style="list-style-type: none"> Requests copies of technical studies to the EIR 	Notification process outlined in EIR Chapter 2, Section 2.2
		<ul style="list-style-type: none"> Noise and traffic are not being analyzed in the EIR 	Traffic impacts addressed in Appendix A. Initial Study, Chapter 4, Section XVII, <i>Transportation and Circulation</i>
		<ul style="list-style-type: none"> Child safety and construction storage measures during project buildout 	Comment addressed at public meeting (see pages 45-47 of the meeting transcript in Appendix B)
Sergio Panzon	-CEQA process -Historic resources	<ul style="list-style-type: none"> Suggested ways to improve future meetings What criteria was used to decide what resources were historic Requested further discussion and a possible monument for historical resources 	<p>Historical information in EIR Chapter 5.1, <i>Cultural Resources</i>, and technical studies in Appendix C</p> <p>Comment also addressed at public meeting (see pages 49-51 of the meeting transcript in Appendix B)</p>
Unidentified speaker	-CEQA process -Access and parking	<ul style="list-style-type: none"> Community outreach for the project was not thorough enough 	Notification process outlined in EIR Chapter 2, Section 2.2
		<ul style="list-style-type: none"> Construction will further impact student drop-off and parking issues 	<p>Parking addressed in Appendix A. Initial Study, Chapter 4, Section XVII, <i>Transportation and Circulation</i></p> <p>Comment also addressed at public meeting (see pages 59-60 of the meeting transcript in Appendix B)</p>
Unidentified student speaker	-Historic resources	<ul style="list-style-type: none"> No one from the City is working on the report to determine if the gymnasium bleachers are historically significant 	Historical information in EIR Chapter 5.1, <i>Cultural Resources</i> , and technical studies in Appendix C
Duarte Martinez	-Parking -Air quality -Hazardous materials	<ul style="list-style-type: none"> Community is already overpopulated and the project will cause parking problems to get worse 	Parking addressed in Appendix A. Initial Study, Chapter 4, Section XVII, <i>Transportation and Circulation</i>
		<ul style="list-style-type: none"> Lead exposure during building demolition 	<p>Lead exposure addressed in Appendix A. Initial Study, Chapter 4, Section VIII, <i>Hazards and Hazardous Materials</i></p> <p>Comment also addressed at public meeting (see pages 63-64 of the meeting transcript in Appendix B)</p>

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Table 2-2 Scoping Meeting Comment Summary

Name	Comment Type	Comment Summary ²	Issue Addressed In:
Guillermo Molina	-Project description	<ul style="list-style-type: none"> Requested solar panels on new buildings 	Comment addressed at public meeting (see page 68 of the meeting transcript in Appendix B)
Wally Schneider	-Project description	<ul style="list-style-type: none"> Why don't children walk to school Requested that the new pool be enclosed 	Comments addressed at public meeting (see pages 73-74 of the meeting transcript in Appendix B)
Unidentified speaker	-Project description	<ul style="list-style-type: none"> Will there be all-gender restrooms, the skylights of the 200 building, the bleachers, and the indoor pool 	Comments addressed at public meeting (see pages 78-79 of the meeting transcript in Appendix B)
Mr. Hernandez	-Project description	<ul style="list-style-type: none"> Will there will be enough fountains; would fountains have filters and a maintenance schedule Would lighting system be different; is there enough trees in the parking lot; will there be an opportunity for community involvement in the future 	Comments addressed at public meeting (see pages 81-82 of the meeting transcript in Appendix B)

2.3 SCOPE OF THIS DRAFT EIR

The scope of the Draft EIR was determined based on the LAUSD's Initial Study, comments received in response to the NOP, and comments received at the September 6, 2017 scoping meeting conducted by the LAUSD. The information in Chapter 3, *Environmental Setting*, establishes the baseline for analyzing future, project-related environmental impacts. Pursuant to Sections 15126.2 and 15126.4 of the CEQA Guidelines, this Draft EIR identifies potentially significant adverse impacts and measures that would reduce or eliminate these impacts.

2.3.1 Impacts Considered Less Than Significant

During preparation of the Initial Study, LAUSD determined that 17 environmental impact categories were not significantly affected by the proposed Project. These categories are not discussed in detail in this Draft EIR.

- Aesthetics
- Agriculture & Forestry Resources
- Air Quality
- Biological Resources
- Geology & Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology & Water Quality
- Land Use & Planning
- Mineral Resources
- Noise
- Pedestrian Safety
- Population & Housing
- Public Services
- Recreation
- Transportation & Traffic
- Tribal Cultural Resources
- Utilities & Service Systems

While impacts to Tribal cultural resources were determined to be less than significant in the Initial Study, the following mitigation measure is provided to supplement the District's implementation of SC-TCR-1, Government Code Sections 27460 et seq., and California Health and Safety Code Section 7050.5 for the

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Project. Although discoveries during construction are not anticipated because the site was extensively disturbed for construction of the existing campus, in order to further protect potential unanticipated discoveries associated with Tribal cultural resources, the District will incorporate mitigation measure (MM-TCR-1).

MM-TCR-1 LAUSD shall have a Native American monitor on-call during construction-related ground disturbance activities. The Native American monitor selected by the District must have at least one or more of the following qualifications: at least one year of experience providing monitoring Native American support during similar construction activities; be designated by the Tribe as capable of providing Native American monitoring support; and/or have a combination of education and experience with Tribal cultural resources. Prior to the start of the construction, the monitor shall provide the construction crew(s) with a brief summary of the sensitivity of Tribal cultural resources, the rationale behind the need for protection of these resources, and information on the initial identification of Tribal cultural resources.

Unanticipated Discovery of Tribal Cultural Resources: If unanticipated Tribal cultural resources are uncovered during construction, the on-call Native American monitor shall be notified to analyze the find(s). If the resources are Native American in origin, the District shall coordinate with the appropriate Tribal representative regarding the treatment and curation of these resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, a treatment plan shall be established by the District for the resources in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources.

Subsequently, the monitor shall remain on-site for the duration of the ground disturbances at the site to ensure the protection of any other resources that may be in the area.

The Native American Monitor will complete monitoring logs on a daily basis. The logs will provide descriptions of the daily activities, including construction activities, locations, soil, and any Tribal cultural resources identified.

2.3.2 Potentially Significant Adverse Impacts

The LAUSD determined that one environmental topic has the potential for significant impacts if the proposed Project is implemented: Cultural Resources (specifically historic resources as defined in CEQA Guidelines Section 15064.5).

2.3.3 Unavoidable Significant Adverse Impacts

This Draft EIR identifies one significant and unavoidable adverse impact that would result from implementation of the proposed Project: historic resources. Unavoidable adverse impacts may be considered significant on a project-specific basis and/or cumulatively. The LAUSD must prepare a “statement of overriding considerations” before it can approve the Project, attesting that the Board of Education, as the decision-making body, has balanced the benefits of the proposed Project against its unavoidable significant

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environmental effects and has determined that the benefits outweigh the adverse effects, and therefore the adverse effects are considered acceptable.

2.4 FINAL EIR CERTIFICATION

This Draft EIR is being circulated for public review for 45 days. Interested agencies and members of the public are invited to provide written comments on the Draft EIR to the LAUSD address shown on the title page of this document and on the Notice of Availability (NOA) of a Draft EIR. Upon completion of the 45-day review period, the LAUSD will review all written comments received and prepare written responses for each. A Final EIR will incorporate the received comments, responses to the comments, and any changes to the Draft EIR that result from comments. The Final EIR will be reviewed by the LAUSD Board of Education. All persons who comment on the Draft EIR will be notified of the availability of the Final EIR and the date of the public hearing before the LAUSD Board of Education. The Draft EIR is available to the general public for review at the following locations:

- LAUSD, Office of Environmental Health and Safety, 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017 (by appointment)
- LAUSD, Local District - East, 2151 N. Soto Street, Los Angeles, CA 90032
- Huntington Park Library, 6518 Miles Avenue, Huntington Park, CA 90255
- Huntington Park High School, 6020 Miles Avenue, Huntington Park, CA 90255
- LAUSD Office of Environmental Health and Safety website at: <http://achieve.lausd.net/ceqa>

LAUSD Standard Conditions of Approval have been incorporated into the proposed Project along with two mitigation measures. Compliance with the Standard Conditions of Approval and Mitigation Monitoring and Reporting Program commit the District to compliance tracking and follow-up on this Project. The LAUSD Standard Conditions of Approval are provided in Appendix E and the Mitigation Monitoring and Reporting Program is provided in Appendix F.

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3. Environmental Setting

3.1 INTRODUCTION

In compliance with CEQA Guidelines § 15125(a), this section provides a description of the physical environmental conditions at the campus and in the vicinity as they exist at the time the NOP was published. The environmental setting provides the baseline physical conditions from which the lead agency determines the significance of environmental impacts resulting from the proposed Project.

3.2 REGIONAL SETTING

The HPHS campus is located in the City of Huntington Park, Los Angeles County, California. Huntington Park is in south central Los Angeles County, and is surrounded by the densely urban Vernon, Maywood, Bell, Cudahy, South Gate and South Los Angeles. Regional access to the school is from the Long Beach Freeway (Interstate 710) to Florence Avenue west or from Harbor Freeway (I-110) to Florence Avenue east (see Figure 3-1, *Regional Location*).

3.3 LOCAL SETTING

3.3.1 Location

The 22.5-acre HPHS campus is located at 6020 Miles Avenue, Huntington Park (APNs 6310-018-900 and 6310-019-904). The campus is on the southeast corner of the Slauson Avenue and Miles Avenue intersection (see Figure 3-2, *Local Vicinity*).

3.3.2 Surrounding Land Use

The L-shaped HPHS campus is in an urbanized area surrounded by residential and commercial uses (see Figure 3-3, *Existing Conditions*). The campus is bordered by the following land uses:

- **Northwest corner:** Huntington Park municipal water reservoir, tower, and pumping station and a fast-food restaurant.
- **North:** Slauson Avenue, strip commercial, scrap iron and metal collection facility, truck driving school, large vacant building and parking lot, and a warehouse.
- **South:** Randolph Street and railroad tracks, residential, small neighborhood variety market (La Fortuna Discount), and a grocery market (La Pasadita).

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- **Southeast corner:** Oak Avenue and Belgrave Avenue, and residential development.
- **East:** home improvement store (Home Depot) and strip commercial, Boyle Avenue, and a large trucking distribution center (Slauson Distribution Center).
- **West:** Miles Avenue, fast-food restaurant, residential development, a church.

The concrete-lined Los Angeles River flood control channel is approximately 1.5 miles north of the campus. The Long Beach Freeway (Interstate 710 [I-710]) is approximately 3 miles east and the freeway interchange of the Santa Ana Freeway (I-5), Santa Monica Freeway (I-10), Hollywood Freeway (U.S. 101), and Pomona Freeway (SR-60) is approximately 3 miles north. The Harbor Freeway (I-110) is approximately 3.5 miles west.

3.4 CAMPUS HISTORY

HPHS was founded in 1909, but the earliest extant buildings on the campus were constructed in the 1920s.¹ The early campus development encompassed much of the current-day campus property, with the exception of a section in the southeast corner along Oak Avenue. This was a residential property until the mid-1920s, when it was incorporated into the school campus.²

Following the 6.4-magnitude 1933 Long Beach Earthquake, school buildings that either were destroyed or suffered major damage were removed or completely reconstructed, while a few buildings were only partially reconstructed. Buildings were reconstructed in a PWA Moderne style.³ HPHS was evaluated as part of a historic resources survey.⁴ The campus was assigned a California Historical Resources Status Code of '3S', which indicates that the campus "appears eligible for the National Register of Historic Places or California Register of Historic Resources through survey evaluation."⁵

3.5 EXISTING CONDITIONS

The proposed Project would occur on and within the spaces that are exclusively within the HPHS campus. Student enrollment fluctuates,⁶ however the school capacity is 1,800 students. There are currently approximately 1,611 students enrolled in grades 9 through 12 at HPHS. The 22.5-acre site also shares space

¹ PCR Services Corporation ("PCR") July 30, 2015. Character-Defining Features Memorandum (CDFM) for Huntington Park High School, 6020 Miles Avenue, Huntington Park, California 90255

² Alta Environmental. Phase I Environmental Site Assessment. Huntington Park High School, 6020 Miles Avenue, Huntington Park, California 90255. Prepared for Los Angeles Unified School District. May 16, 2016.

³ PWA Moderne is an architectural style of many buildings in the United States completed between 1933 and 1944, during and shortly after the Great Depression as part of relief projects sponsored by the Public Works Administration (PWA) and the Works Progress Administration (WPA).

⁴ PCR Services Corporation ("PCR") July 30, 2015. Character-Defining Features Memorandum (CDFM) for Huntington Park High School, 6020 Miles Avenue, Huntington Park, California 90255.

⁵ Science Applications International Corporation (SAIC). Historic Schools of the Los Angeles Unified School District. The Getty Grant Program. March 2002. (Appendix C-5)

⁶ Enrollment at the campus was approximately 1,890 students in the 2015-2016 school year and the current enrollment is approximately 1,611 students.

3. Environmental Setting

with the Huntington Park Adult School, City of Angels School, and San Antonio High School.^{7,8} Figure 3-3, *Existing Conditions*, shows the location of the other school facilities along with the layout of the high school.

The core high school portion of the campus includes the Administrative Building (Building 1), Auditorium Building (Building 2), Cafeteria Building (Building 3), Home Economics Building (Building 4), Annex Building (Building 8), Shop Building #1 (Building 9), Shop Building #2 (Building 11), Social Arts Building (Building 12), Gymnasium Building (Building 13), Music Building (Building 18), Classroom Building 1 (Building 25), and Science & Classroom Building (Building 30) and appurtenant buildings and facilities. The campus also contains relocatable buildings that are concentrated near the northern and southern portions of the campus with several dispersed throughout the campus. In addition to a collection of the relocatable buildings, the northern portion of the campus contains a football field, softball field, tennis, basketball courts. All of the academic buildings and a collection of portable buildings are situated on the southern portion of the campus. The campus also contains several outdoor open space areas for students including lawns, a courtyard, a fountain area, and a palm tree lined open space area between the Cafeteria Building (Building 3) and Gymnasium Building (Building 13).

The campus elevation is between 177 feet above mean sea level.⁹ The site and surrounding vicinity is relatively flat to gently sloping to the south.¹⁰

3.5.1 Existing Facilities

Table 3-1 and Figure 3-4, *Existing Campus Plan*, show existing campus facilities. Figure 3-5, *Photo Location Key*, shows the location of site photographs and Figures 3-5a through 3-5d, *Site Photographs*, shows the existing conditions on the campus.

Table 3-1 Existing Facilities

Building ID*	Building Number	Building Name	Building Square Footage	Building Type	Year Built
22869	1	Administrative Building	39,375	permanent	1936
21385	2	Auditorium Building	17,927	permanent	1937
21465	3	Cafeteria Building	17,949	permanent	1936
21379	4	Home Economics Building	19,479	permanent	1924
20476	5	Central Plant	2,807	permanent	1923
20494	6	Mechanical Drawing Building	2,506	permanent	1937
21038	8	Annex Building	20,946	permanent	1925
20797	9	Shop Building #1	14,749	permanent	1960

⁷ <http://www.laadulted.com/>. Also referred to as Huntington Park Community Adult School or Belgrave Community Day/Adult School).

⁸ <https://schooldirectory.lausd.net/schooldirectory/SchoolPage?locationId=8702>. Also referred to as San Antonio Continuation High.

⁹ Alta Environmental. Phase I Environmental Site Assessment. Huntington Park High School, 6020 Miles Avenue, Huntington Park, California 90255. Prepared for Los Angeles unified School District. May 16, 2016.

¹⁰ Alta Environmental. Phase I Environmental Site Assessment. Huntington Park High School, 6020 Miles Avenue, Huntington Park, California 90255. Prepared for Los Angeles unified School District. May 16, 2016.

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Table 3-1 Existing Facilities

Building ID*	Building Number	Building Name	Building Square Footage	Building Type	Year Built
20771	11	Shop Building #2	15,328	permanent	1960
22394	12	Social Arts/Parent and Family Center	1,722	permanent	1939
20526	13	Gymnasium Building	55,750	permanent	1923
22402	14	Sanitary Building	976	permanent	1958
20692	15	Announcers Booth	85	permanent	1958
22923	16	Bleachers 2 – South	3,015	permanent	1957
25774	17	Food Services Building 1	739	permanent	1963
22611	18	Music Building	3,468	permanent	1963
22922	19	Bleachers 1 – Southwest	3,015	permanent	1957
21441	20	Bleachers 3 – Southeast	3,015	permanent	1957
21538	21	Utility Building	112	permanent	1970
22921	22	Bleachers 4 – North	4,623	permanent	1969
26289	23	Food Services Building 2	182	permanent	1974
20675	25	Classroom Building 1	10,708	permanent	1957
30262	26	Gazebo	40	permanent	1974
21233	27	Storage Unit 1	360	permanent	1970
25966	28	Boiler Vault Building 2	411	permanent	1987
22889	30	Science and Classroom Building	50,496	permanent	1991
22920	31	Two-Story Relocatable	4,173	portable	1977
21991	32	Two-Story Relocatable	3,856	portable	1971
22225	33	Single-Unit Relocatable	854	portable	1950
20326	34	Single-Unit Relocatable	902	portable	1949
23135	35	Single-Unit Relocatable	902	portable	1948
22051	36	Sanitary Relocatable	901	portable	1950
20188	37	Single-Unit Relocatable	902	portable	1949
22608	38	Two/Three Unit Relocatable	1,712	portable	1949
20666	41	Two/Three Unit Relocatable	1,974	portable	1950
22723	42	Storage Unit Relocatable	1,344	portable	1975
Approximate total HPHS campus building space			307,303	—	—

3.5.2 Site Access and Circulation

As shown in Figure 3-3, the main entrance to the campus is along Miles Avenue. A second student entrance is on Oak Street. Student drop-off and pick-up takes place along two streets: Miles Avenue and Oak Street. ‘No Stopping’ and ‘Passenger Loading’ signs limit the location and amount of time cars are allowed to park alongside the curb. Student drop-off and pick-up from buses takes place along Miles Avenue south of the Administrative Building (Building 1).

3. Environmental Setting

3.5.3 Parking

The school has 164 parking spaces in three on-site parking lots: 22 spaces along Randolph Street adjacent to the Classroom Building 1 (Building 25), 73 spaces adjacent to Science and Classroom Building (Building 30), and 69 spaces between the San Antonio High School and the Huntington Park Adult School. Curbside parking is available along the surrounding streets.

3.5.4 Operation

School Operations. HPHS is a two-semester, single-track school that serves 9th through 12th grades. Students attend classes from August through June. School hours are 8:00 AM to 3:00 PM.^{11,12,13}

School-Related Events. The school has after-school programs for the students, such as special-interest clubs, and extracurricular activities that begin and end later than 3:00 PM. There are also occasional nighttime and weekend events during the school year. Some of these events are campus wide, such as school plays and open houses, while others are grade specific, such as commencement.

Community Use. In compliance with the Civic Center Act, (CA Education Code Sections 38130-38139) the campus is available for community use at selected times when not in use by LAUSD.¹⁴

3.6 GENERAL PLAN AND ZONING

The zoning for the school property is PF (Public Facilities), which is for the use and development of publicly owned land, including public schools.¹⁵ The General Plan Land Use designation is assumed to be Public Facilities.¹⁶

3.7 ASSUMPTIONS REGARDING CUMULATIVE IMPACTS

Cumulative impacts are defined as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.”¹⁷ Cumulative impacts are the change caused by the incremental impact of the Project evaluated in the EIR together with the incremental impacts from closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

¹¹ The regular school day ends at 2:47 PM, However, 3:00 PM was conservatively used for this report.

¹² Huntington Park Adult School and San Antonio High School generally operate during the same hours on the northeastern and southern most portions of the site respectively although Huntington Park Adult School offers courses throughout the day as well as evening courses that end as late as 9:00 PM. <http://www.laadulted.com/>. Also referred to as Huntington Park Community Adult School, Huntington Park-Bell Community Adult School, and/or Belgrave Community Day/Adult School).

¹³ <https://schooldirectory.lausd.net/schooldirectory/SchoolPage?locationId=8702>.

¹⁴ CA Education Code Sections 38130–38139.

¹⁵ City of Huntington Park zoning map. <http://www.hpca.gov/DocumentCenter/View/3772>

¹⁶ City of Huntington Park General Plan. 1991. <http://www.hpca.gov/DocumentCenter/View/407>.

¹⁷ CEQA Guidelines Section 15355.

3. Environmental Setting

Section 15130 of the CEQA Guidelines states that cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable. It further states that this discussion shall reflect the level and severity of the impact and the likelihood of occurrence, but not in as great a level of detail as that necessary for the project alone.

The information used in an analysis of cumulative impacts is to come from one of two sources:¹⁸

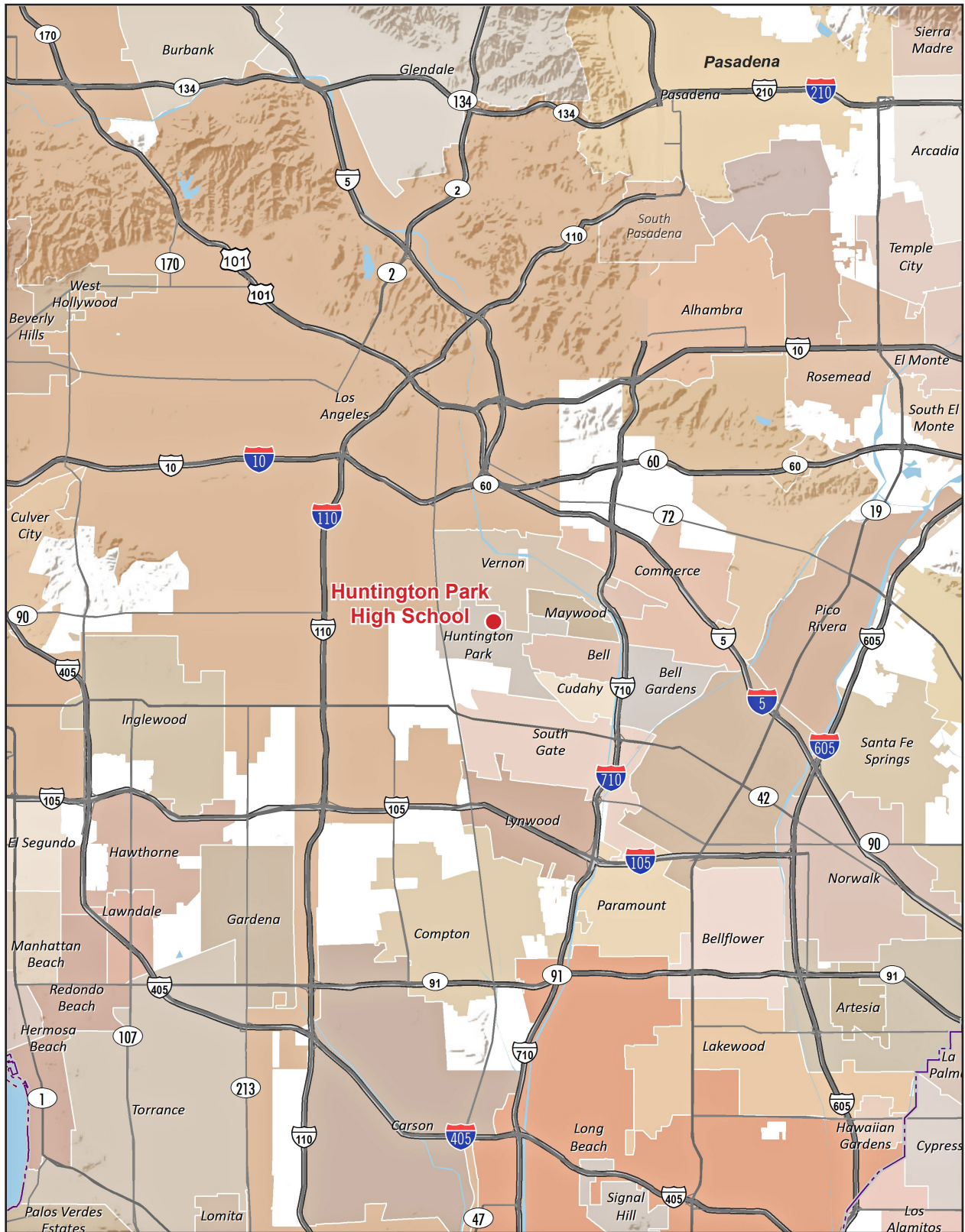
- A. A list of past, present, and probable future projects producing related cumulative impacts, including, if necessary, those projects outside the control of the agency.
- B. A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

Following this Project, there are no known or reasonably foreseeable projects identified for this campus. It would be anticipated that minor maintenance activities may occur on the campus following construction however, no other projects of the same type or scale are planned for the campus at this time. As such, the cumulative impact analysis for historic resources in this EIR uses source B. Historic resources are generally site specific by definition and are unique in that impacts at another location within a jurisdiction may not broadly be assumed to contribute to, or alter to, the impacts associated with the HPHS campus. Historic resources for LAUSD were analyzed in a prior environmental document which has been certified. The HPHS Comprehensive Modernization Project is one of many projects that are part of the LAUSD SUP. The SUP was analyzed in a program EIR. On November 10, 2015, the BOE certified the Final SUP EIR.¹⁹

¹⁸ CEQA Guidelines Section 15130(b)(1)(A) and (B)

¹⁹ LAUSD Regular Meeting Stamped Order Of Business. 333 South Beaudry Avenue, Board Room, 1 p.m., Tuesday, November 10, 2015 (Board of Education Report No. 159 – 15/16).

Figure 3-1 - Regional Location
3. Environmental Setting



Note: Unincorporated county areas are shown in white.

0 3
Scale (Miles)

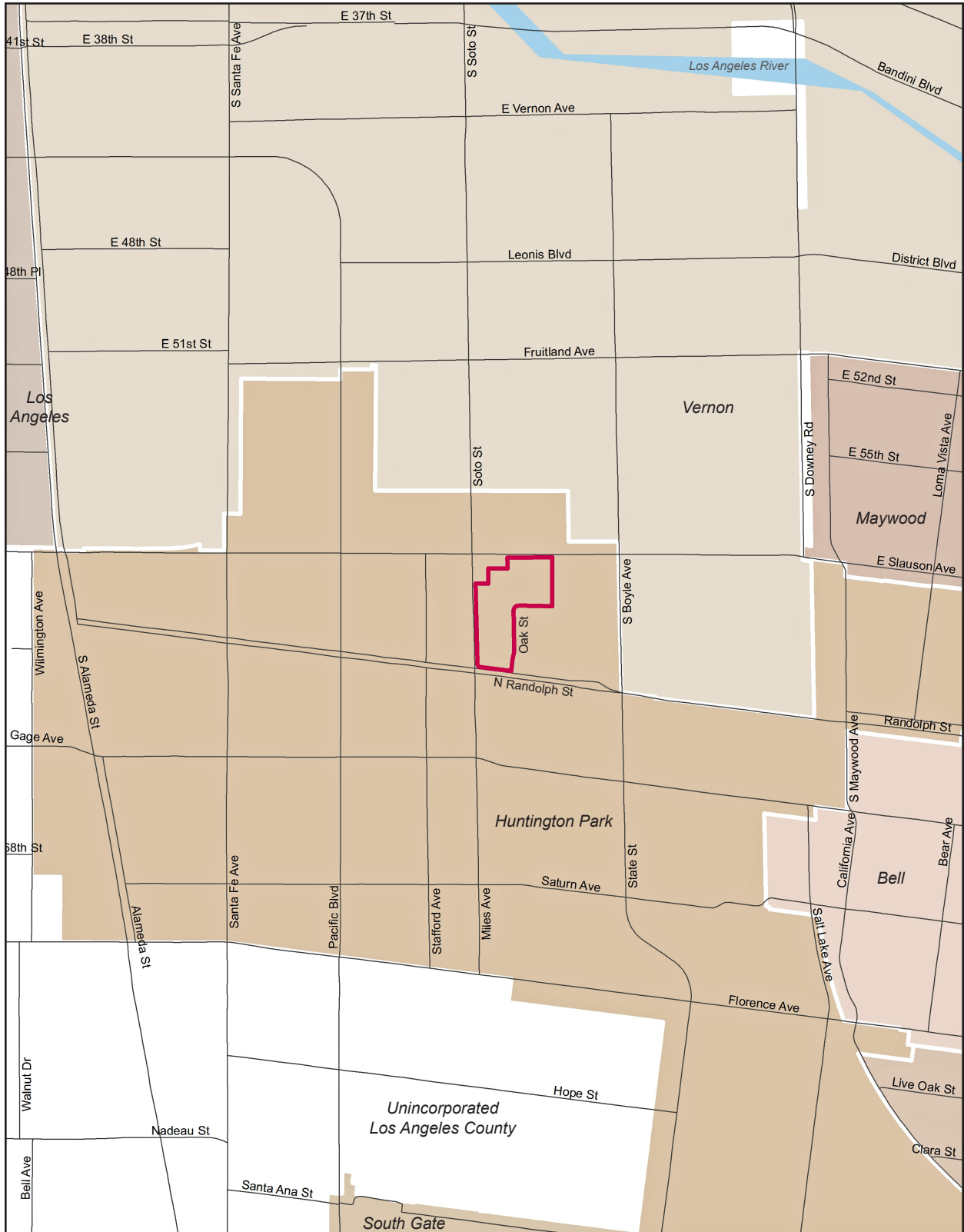


Base Map Source: ESRI, 2017

3. Environmental Setting

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Figure 3-2 - Local Vicinity
3. Environmental Setting



Note: Unincorporated county areas are shown in white.

— School Boundary

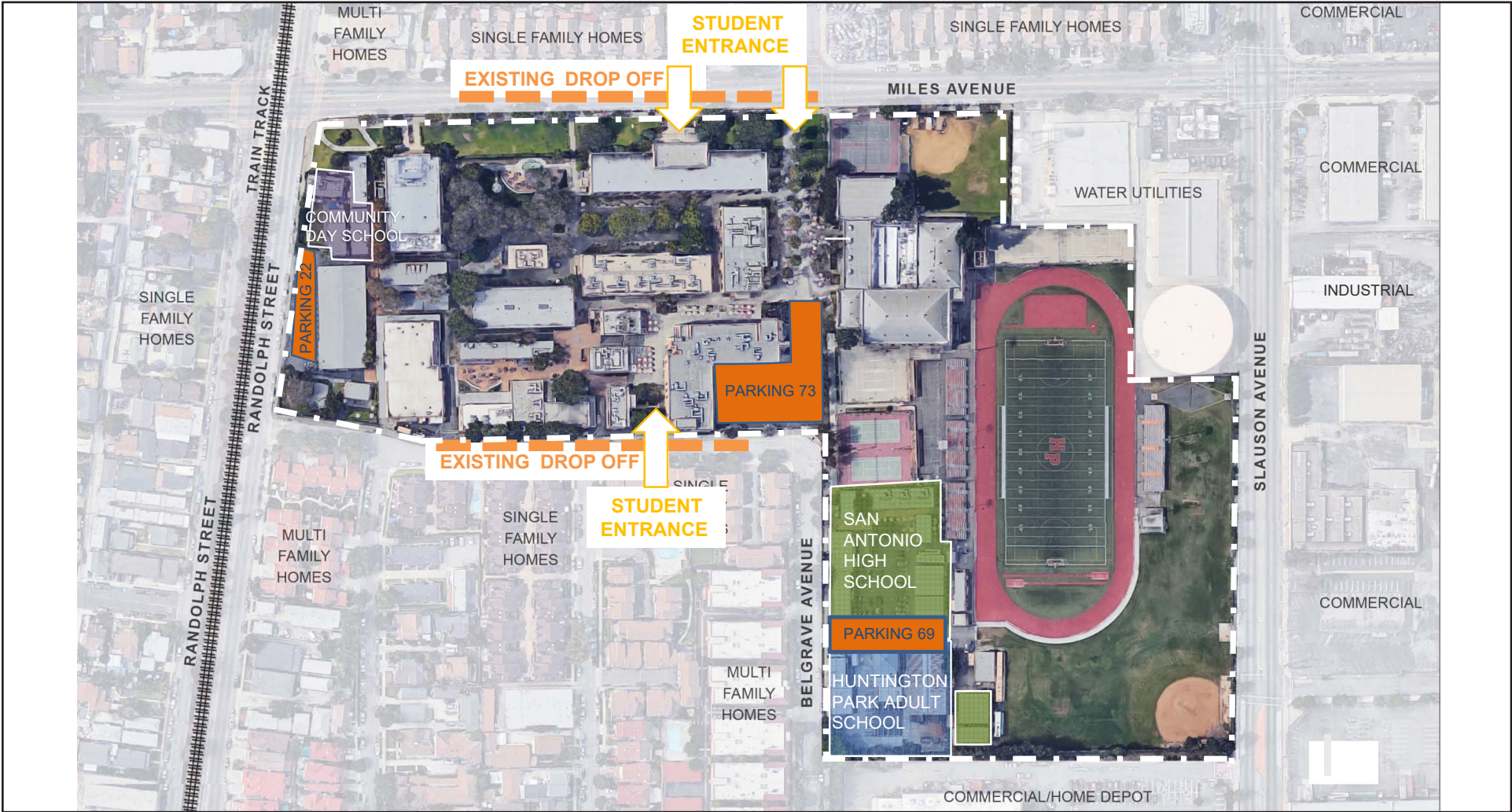


Base Map Source: ESRI, 2017

3. Environmental Setting

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Figure 3-3 - Existing Conditions
3. Environmental Setting

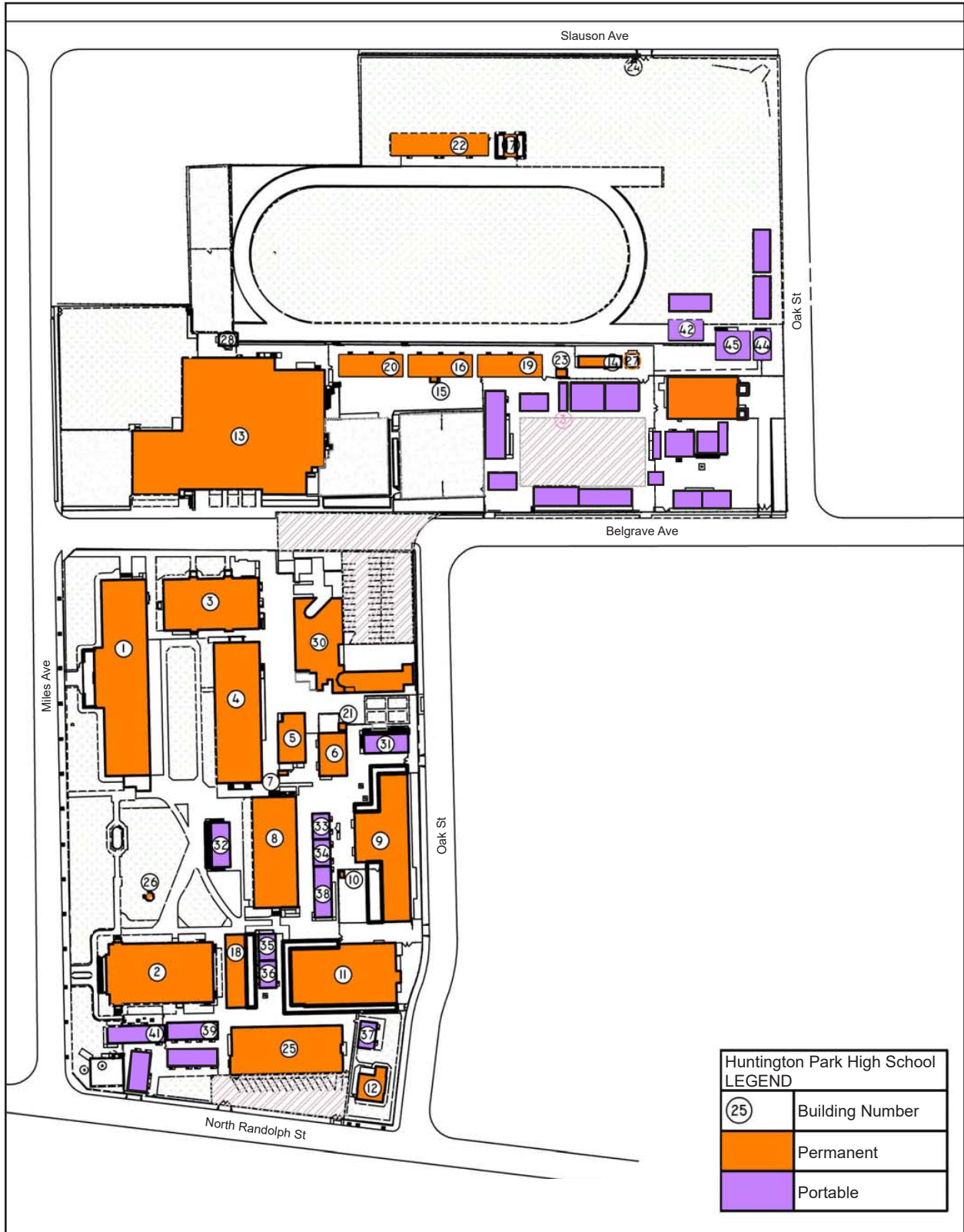


Source: Gonzalez Goodale Architects, 2017

3. Environmental Setting

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Figure 3-4 - Existing Campus Plan
 3. Environmental Setting



Note: Refer to Table 1 for building information.

0 200
 Scale (Feet)

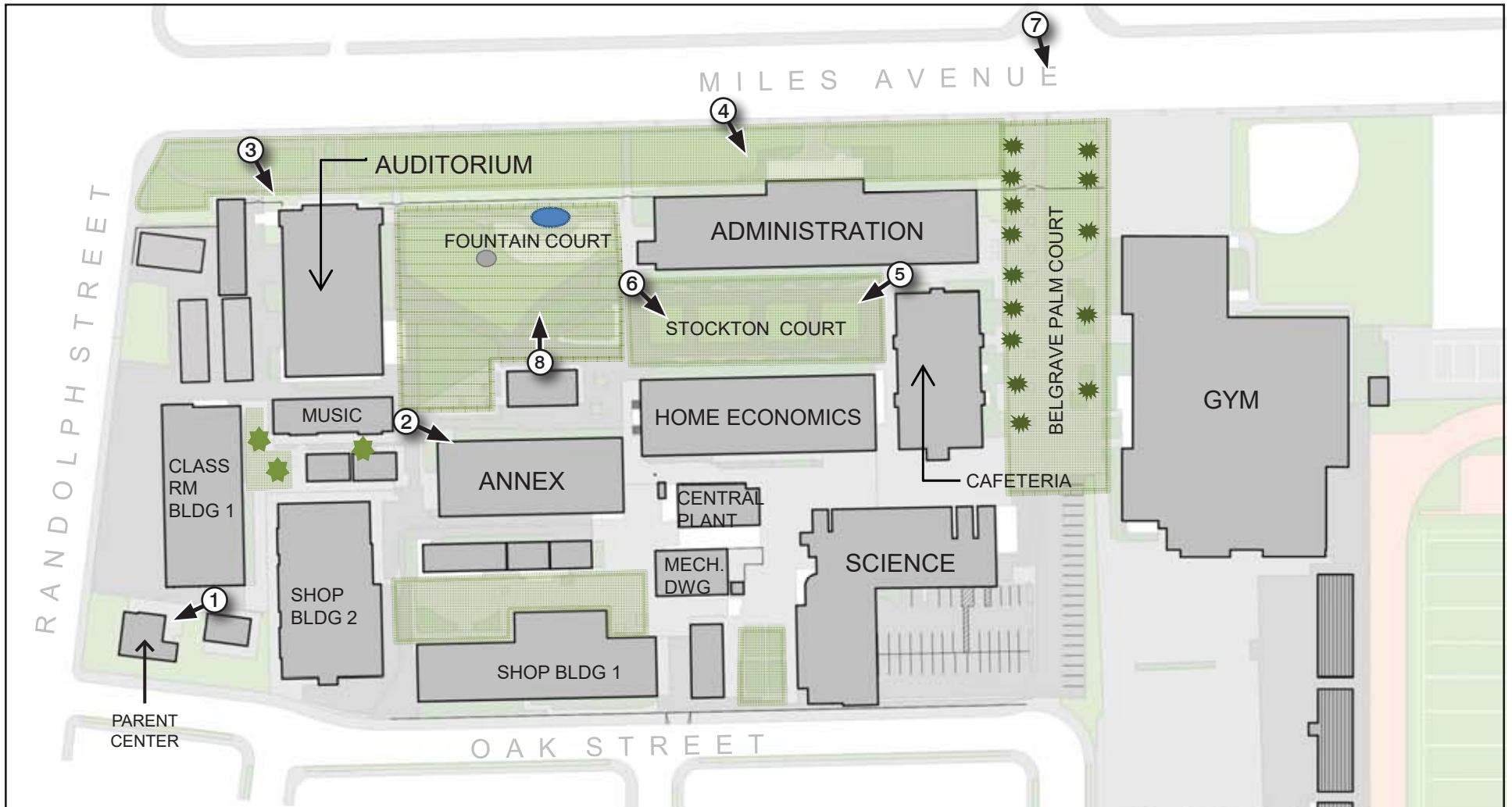


Source: Hibser Yamauchi Architects, Inc., 2011

3. Environmental Setting

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Figure 3-5 - Photo Location Key
3. Environmental Setting



LEGEND

 Photo Location and Direction

Base Map Source: Gonzalez Goodale Architects, 2017

0 125
Scale (Feet)



3. Environmental Setting

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Figure 3-5a - Site Photographs
3. Environmental Setting



Photo 1. View looking southeast toward Parent and Family Center (Building 12).



Photo 2. View looking northeast toward Annex (Building 8) from Music (Building 18).

3. Environmental Setting

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Figure 3-5b - Site Photographs
3. Environmental Setting



Photo 3. View looking northeast toward Westover Hall (Auditorium), (Building 2) from sidewalk on Miles Avenue.



Photo 4. View looking northeast toward Administration (Building 1) from sidewalk on Miles Avenue.

3. Environmental Setting

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Figure 3-5c - Site Photographs
3. Environmental Setting



Photo 5. View looking southeast toward Stockton Court from the Cafeteria (Building 3). Home Economics (Building 4) is on the left.



Photo 6. View looking northeast toward Stockton Court from corner of Administration (Building 1) shown on left. Cafeteria (Building 3) is in background center and Home Economics (Building 4) is on the right.

3. Environmental Setting

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Figure 3-5d - Site Photographs
3. Environmental Setting



Photo 7. View looking north toward Gymnasium (Building 13) from Belgrave Palm Court.



Photo 8. View looking west toward Fountain Court from Portable Building #32.

3. Environmental Setting

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4. Project Description

4.1 BACKGROUND

On July 31, 2008, the BOE adopted a Resolution Ordering an Election and Establishing Specifications of the Election Order for the purpose of placing Bond Measure Q, a \$7 billion bond measure, on the November election ballot to fund the renovation, modernization, construction, and expansion of school facilities. On November 4, 2008, the bond passed. The nationwide economic downturn in 2009 resulted in a decline in assessed valuation of real property, which restricted the District's ability to issue Measure Q bonds and the remaining unissued Measures R and Y funds. Once assessed valuation improved, the BOE authorized the issuance of bond funds.¹

On December 10, 2013, the District refined their School Upgrade Program (SUP) to reflect the intent and objectives of Measure Q as well as the updated needs of District school facilities and educational goals.² Between July 2013 and November 2015, the SUP was analyzed under CEQA criteria in an EIR.³ On November 10, 2015, the BOE certified the Final SUP Program EIR.⁴

On March 10, 2015, the BOE approved pre-design and due diligence activities necessary to develop a project definition for the HPHS proposed Project.⁵ On December 8, 2015, the BOE approved the project definition for the proposed Project. The proposed Project is designed to address the most critical physical concerns of the building and grounds at the campus while upgrading, renovating, modernizing, and reconfiguring the campus to provide facilities that are safe, secure, and better aligned with the current instructional program.⁶

4.2 PROJECT LOCATION

The 22.5-acre HPHS campus is located at 6020 Miles Avenue, Huntington Park, Los Angeles County, California (APNs 6310-018-900 and 6310-019-904). The campus is on the southeast corner of the Slauson Avenue and Miles Avenue intersection. Regional access to the campus is from the Long Beach Freeway (Interstate 710) to Florence Avenue west (see Figure 3-1, *Regional Location*). The 22.5-acre site also shares space with the Huntington Park Adult School, City of Angels School, and San Antonio High School.

¹ LAUSD Board of Education Report. December 10, 2013. Report Number 143 – 13/14. Subject: School Upgrade Program.

² LAUSD Board of Education Report. December 10, 2013. Report Number 143 – 13/14. Subject: School Upgrade Program.

³ LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.

⁴ LAUSD Regular Meeting Stamped Order of Business. 333 South Beaudry Avenue, Board Room, 1 p.m., Tuesday, November 10, 2015 (Board of Education Report No. 159 – 15/16).

⁵ LAUSD Board of Education Report. March 10, 2015. Report Number 373 – 14/15. Subject: Identification of 11 School Sites for the Development of Comprehensive Modernization Projects.

⁶ LAUSD Board of Education Report. December 8, 2015. Report Number 182-15/16. Subject: Amendment to the Facilities Services Division Strategic Execution Plan to Approve Project Definitions for Six Comprehensive Modernization Projects and Cancel Two Critical School Repair and Safety Projects.

4. Project Description

However, the Project would occur within the core campus spaces that are designated for the traditional grades 9-12 high school.

4.3 STATEMENT OF OBJECTIVES

The following objectives have been established for the Project and will aid decision makers in their review of the Project and Project alternatives.

- Objective #1: Increase the safety and security of the staff and students through the campus modifications and configuration
- Objective #2: Repair and seismically retrofit aging facilities while also bringing buildings to code to meet the Americans with Disabilities Act (ADA) programmatic access requirements
- Objective #3: Upgrade buildings to include modern classroom spaces that can accommodate the California Department of Education's and District's standard classroom space of 960 square feet and modern technology and efficiencies including HPHS's priority and specialty campus programs such as multimedia computer technology, culinary arts, video/sound, and digital imaging which are designed to meet educational needs of the students and campus
- Objective #4: Promote a healthier environment through the use of green technology
- Objective #5: Design buildings and facilities that align with the current programmatic and operational needs of the campus while retaining or enhancing opportunities for future planning
- Objective #6: Respect the history of the campus through the rehabilitation, retention and reuse of features that have been established as character-defining or otherwise relevant to the school community (i.e., current and former students, alumni, staff, etc.) to the extent feasible, while modernizing the campus to address the current needs of the campus
- Objective #7: Limit the disruption of the educational experience of students during construction of the Project by limiting the number and/or duration of phases.

4.4 PROJECT CHARACTERISTICS

“Project,” as defined by the CEQA Guidelines, 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, and that is any of the following: (1)...enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100–65700. (14 Cal. Code of Reg. § 15378[a])

4. Project Description

4.4.1 Description of the Project

4.4.1.1 CAMPUS IMPROVEMENTS

The proposed Project would modernize HPHS to facilitate a safe and secure campus that better aligns with the current instructional program. The proposed Project consists of the demolition and removal of four permanent buildings and eight portable buildings; renovations and improvements to two buildings; construction of three new buildings; and remodeling and improvements to two buildings, landscape and access throughout the campus.

Specifically, the proposed Project would include the following changes to the campus, as shown in Table 4-1 and Figure 4-1, *Proposed Campus Improvements*.

Demolition and Removal

- Home Economics Building (Building 4)
- 15 Classrooms in 8 Relocatable Buildings (31–36, 38, 41)
- Power Plant (Building 5)
- Annex Building (Building 8)
- Gymnasium Building (including the indoor pool; Building 13)

Remodel and Modernization

- Administrative Building (Building 1): Improvements in this building would include: a new HVAC system, security improvements, voluntary programmatic access upgrades to comply with the ADA, and exterior painting.
- Science & Classroom Building (Building 30): Improvements in this building would include: a new HVAC system, voluntary programmatic access upgrades to comply with the ADA, and exterior painting.

New Construction⁷

- Classroom Building A: This new 2-story building would have 15 classrooms. This 26,292-square-foot building would replace the existing Annex Building (Building 8).
- Specialty Classroom Building B: This new 1-story building would have six classrooms and support and specialty spaces for classes in culinary arts, video production and digital imaging. This 14,696-square-foot building would replace the existing Home Economics Building (Building 4).
- Gymnasium Building: The 2-story, 45,638-square-foot building would have competition and practice gymnasium floors; bleachers; locker rooms with restrooms, showers, and dressing areas; coaches' offices, and physical education support spaces; athletic equipment storage space; and mechanical equipment room. The weight room would be relocated from Shop Building 1 (Building 9) to the new

⁷ The new construction building square footages shown in this section are estimates that are subject to slight variations as the project design is refined. As of December 2017, the refined design drawings show the total new construction may be approximately 1,036 square-feet less than the original estimates that were used for the impact analysis in this DEIR.

4. Project Description

gym. The Gymnasium Building, would be constructed in the same location as the existing Gymnasium.

- Pool Support Building D: The 1-story 2,810-square-foot pool support building would be located immediately north of the new Gymnasium Building, and would have restrooms, pool equipment and chemical storage.
- Outdoor pool: The 25-yard x 25-meter swimming pool would include a surrounding deck and fence, and one set of bleachers.

HPHS Campus Upgrades

- Infrastructure, including domestic water; irrigation; gas; sewer; fire, telephone, and data systems; electrical; storm drainage.
- Voluntary programmatic access upgrades to comply with the ADA.
- Landscape, hardscape, and exterior paint.
- Parking area reconfiguration and the additional on-site parking.

Table 4-1 Proposed Project (Demolition, Remodel, and Construction)

Building ID*	Building No.	Building Name	Class-rooms	Demolition/ Removal (sf)	Remodel (sf)	New Construction (sf)	Existing to Remain (sf)	Campus Total (sf)
22869	1	Administrative Building	11	—	974	—	—	39,375
21385	2	Auditorium Building	0	—	—	—	17,927	17,927
21465	3	Cafeteria Building	0	—	—	—	17,949	17,949
21379	4	Home Economics Building	-5	19,479	—	—	—	0
N/A	B	1-story Specialty Classroom Building B (replace Building. 4)	6	—	—	14,696	—	14,696
20476	5	Central Plant (Power Plant/Boiler Vault Building. 1)	0	2,807	—	—	—	0
20494	6	Mechanical Drawing Building	2	—	—	—	2,506	2,506
20396	7	Flammable Storage Unit 2	0	—	—	—	90	90
21038	8	Annex Building	-12	20,946	—	—	—	0
N/A	A	2-story Classroom Building A (replace Building 8)	15	—	—	26,292	—	26,292
20797	9	Shop Building #1	6	—	—	—	14,749	14,749
20771	11	Shop Building #2	5	—	—	—	15,328	15,328
22394	12	Social Arts/Parent and Family Center	0	—	—	—	1,722	1,722
20526	13	Gymnasium Building	-3	55,750	—	—	—	0
N/A	C	Gymnasium Building (replace Building. 13)	0	—	—	45,638	—	45,638
N/A	D	Pool Support (Building D)	0	—	—	2,810	—	2,810
22402	14	Sanitary Building	0	—	—	—	976	976
20692	15	Announcers Booth	0	—	—	—	85	85

4. Project Description

Table 4-1 Proposed Project (Demolition, Remodel, and Construction)

Building ID*	Building No.	Building Name	Class-rooms	Demolition/Removal (sf)	Remodel (sf)	New Construction (sf)	Existing to Remain (sf)	Campus Total (sf)
22923	16	Bleachers 2 - South	0	—	—	—	3,015	3,015
25774	17	Food Services Building 1	0	—	—	—	739	739
22611	18	Music Building	2	—	—	—	3,468	3,468
22922	19	Bleachers 1 - Southwest	0	—	—	—	3,015	3,015
21441	20	Bleachers 3 - Southeast	0	—	—	—	3,015	3,015
21538	21	Utility Building	0	—	—	—	112	112
22921	22	Bleachers 4 - North	0	—	—	—	4,623	4,623
26289	23	Food Services Building 2	0	—	—	—	182	182
20675	25	Classroom Building 1	8	—	—	—	—	10,708
30262	26	Gazebo	0	—	—	—	40	40
21233	27	Storage Unit 1	0	—	—	—	360	360
25966	28	Boiler Vault Building 2	0	411	—	—	—	0
22889	30	Science Building	21	—	—	—	—	50,496
22920	31	Two-Story Relocatable	-4	4,173	—	—	—	0
21991	32	Two-Story Relocatable	-4	3,856	—	—	—	0
22225	33	Single-Unit Relocatable	-1	854	—	—	—	0
20326	34	Single-Unit Relocatable	-1	902	—	—	—	0
23135	35	Single-Unit Relocatable	-1	902	—	—	—	0
22051	36	Sanitary Relocatable	0	901	—	—	—	0
20188	37	Single-Unit Relocatable	0	—	—	—	902	902
22608	38	Two/Three Unit Relocatable	-2	1,712	—	—	—	0
20666	41	Two/Three Unit Relocatable	-2	1,974	—	—	—	0
22723	42	Storage Unit Relocatable	0	—	—	—	1,344	1,344
N/A	N/A	Outdoor Swimming Pool	0	—	—	25 yards x 25 meters (~12,884 new exterior space)	—	12,884
Approximate total campus building space			-14	114,667	974	102,320*	92,147	295,046

Notes:

sf = Square footage

N/A = Not included in the total existing campus sf count

* The new construction square footage includes 12,884 sf of new building and facility related construction including the pool. Up to 84,500 of the existing outdoor sf (containing tennis courts, basketball courts, a softball practice field, and 3,116 sf of existing pool related storage) would be reconfigured as a part of the project.

The new construction building square footage shown in this section are estimates that are subject to slight variations. The refined design drawings show the total new construction may be approximately 1,036 square-feet less than the original estimates that were used for the impact analysis

The Project on the campus would entail construction of up to 102,320 square feet of new buildings and facilities, and would remove 35 of the existing 55 classrooms and construct 21 classrooms for a reduction of 14. The architectural style of the new classroom buildings and gymnasium building would have elements of “PWA Moderne style” that would complement the original architecture of the campus (see Figure 4-2, *Conceptual Site Plan*; Figure 4-3, *Conceptual Illustration: Aerial View*; Figure 4-4, *Conceptual Illustration: Gymnasium*;

4. Project Description

Figure 4-5, *Conceptual Illustration: Classroom Building*). These illustrations show scale and mass. Security lighting would be provided using lighting fixtures that are designed to reduce glare, light trespass, and sky glow.

The proposed Project would not change the current capacity of the school or affect student enrollment. No changes to traditional school operations, school-related events, or community use would occur as the result of this Project. At Project completion, campus access, traffic circulation, and drop-off and pick-up locations would remain the same as the existing campus.

Parking: As part of the original project, 26 parking spaces would be added to the existing 159 on-site spaces. In response to the current campus-wide need and public comment, an additional 25 parking spaces would be added off Belgrave Avenue. In total, 210 spaces would be provided on campus. The proposed parking area reconfiguration and additions have been designed to accommodate the existing campus-wide parking demand; reduce parking-related congestion in the immediate area surrounding the campus; to increase safety; and to meet the District's required ratio of 2.50 spaces per classroom, to the extent feasible. While no changes to the portable buildings used by programs outside of the high school are associated with the Project; the parking improvements would respond to the campus-wide needs of all programs currently on the campus.⁸

Temporary Student Housing: Prior to the start of demolition and construction interim student housing would be installed on the campus away from the construction zone. The District would install new temporary portable classrooms and facilities. Classes in temporary facilities are anticipated to begin in March 2020. As buildings are completed and ready for occupancy, the portables would be removed from the campus.

4.4.1.2 CONSTRUCTION PHASE

Excavation and Off-Site Disposal

As a part of the Project-related construction activities, the District would implement a Removal Action Workplan (RAW).⁹ Approximately 117 cubic yards of soil containing the chemicals of concern (COCs), lead, chlordane and/or arsenic at levels that exceed the District's thresholds, would be removed from areas located throughout the construction area.

The excavation would be performed using heavy equipment consisting of, but not limited to, an excavator, backhoe, loader, dump truck, and wastewater holding tanks. Excavation operations may generate fugitive dust emissions. Suppressant foam, water spray, and other forms of vapor and dust control may be required during excavation, and workers may be required to use personal protective equipment to reduce exposure to the COCs.

The depth of excavations may be limited due to physical constraints on the site. Sloping excavation sidewalls and slot-cutting may result in increased volume of soil requiring excavation. Confirmation soil sampling and analysis would be conducted to verify soil impact concentrations at the excavation bottom and sidewalls.

⁸ The parking counts are approximates and are subject to modifications as the Project design is refined.

⁹ Alta Environmental. Removal Action Workplan for Soil. May 3, 2017.

4. Project Description

Excavated soil would be either directly-loaded into waiting dump trucks or temporarily stockpiled within an on-site “holding area” using a rubber-tire backhoe or similar equipment (such as wheel loader). Any temporary soil stockpiles would be properly secured and protected until ready for loading for off-site transportation and disposal to an appropriate facility.

Clean, imported soil and/or other fill material would be brought to the site to backfill areas where impacted soil was removed. Imported soil and/or other fill material would be accompanied by certificates, analytical data, and/or other supporting documents that indicate the import material is in conformance with cleanup criteria. Construction contractors are required to comply with LAUSD standard specifications for proper packaging, transportation, and disposal of any discovered hazardous materials before building construction starts. Specifically, construction contractors are required comply with worker training, health and safety, hazardous material containment, and off-site transport and disposal of contaminated soil as detailed in the plans and procedures included in the RAW for the Project.¹⁰

Construction Schedule

Pre-construction and design activities began in the fourth quarter of 2015 (Q4-2015) and are anticipated to be completed in Q3-2019 (including DSA review). Construction activities are anticipated to begin in Q1-2020 and be completed in Q1-2023.

Demolition, construction, and modernization activities are expected to take approximately 36 months. The campus would remain active during Project implementation so it is anticipated that less than five acres (contiguous) on campus is likely to be disturbed at any one time.

To complete the campus-wide modernization while school is in session, the process must be broken into several phases so the school can continue operating, as summarized in Table 4-2.

Table 4-2 Construction Phasing and Equipment¹¹

Construction Phase	Project Task	Schedule*	Equipment	Maximum Number per Day
Phase 1 - Interim Housing	Interim Housing Classrooms: Interim Housing (Temporary Facilities): Clear, grade, and install utilities for portables. Relocate existing portables; install new classroom portables and temporary facilities. Classes in temporary facilities would begin in March 2020. January 2020 – March 2020	1.5 months	Excavator	1
			Grader	1
			Rubber Tired Dozer	1
			Tractors/Loaders/Backhoes	3
			Crane	1
			Water Truck	1
	Portable building haul trips	16		
Phase 2 - Renovations	• Administrative Building Library Computer Lab Renovation	8 months	Forklift	1
			Aerial Lift	1

¹⁰ Alta Environmental. Removal Action Workplan for Soil. May 3, 2017.

¹¹ Dates shown are approximates.

4. Project Description

Table 4-2 Construction Phasing and Equipment¹¹

Construction Phase	Project Task	Schedule*	Equipment	Maximum Number per Day
	<ul style="list-style-type: none"> Administrative Building HVAC Replacement - Phased Administrative Building Office/Entry Renovation - Summer Science Building HVAC Replacement - Summer <p>January 2020 – August 2020</p>		Building debris haul trips; average 16 CY end-dump trucks	3
Phase 3 - Demolition	<ul style="list-style-type: none"> Install Interim Housing Lockers - Summer Install Interim Culinary Arts - Summer Partial Demolition of Gym (Pool, Lockers, Practice Gym) - Summer Annex Building Demolition - Summer Home Economics Building Demolition - Summer Central Plant Demolition Modify Main Gym Court for partial occupancy - Summer Relocate Softball Field – Summer 2-story Relocatable Demolition <p>June 2020 – September 2020</p>	3 months	Concrete/Industrial Saw	1
			Excavators	3
			Rubber Tired Dozers	2
			Crane	1
			Water Truck	1
			Building debris haul trips; average 16 CY end-dump trucks	7
			Asphalt/Concrete debris haul trips; average 16 CY end-dump trucks	4
			Portable building haul trips	4
Phase 4 - Building Construction	<ul style="list-style-type: none"> Construct New Gym Complex Construct New Classroom Building A Construct New Classroom Building B Renovate Bleachers for Accessibility - Summer Renovate Auditorium for Accessibility - Summer Renovate Parent and Family Center for Accessibility - Summer <p>August 2020 – May 2022</p>	21 months	Crane	1
			Forklifts	3
			Generator Set	1
			Tractors/Loaders/Backhoes	3
			Welders	1
			Air Compressor	1
Phase 5 - Building Construction (Site Work)	<ul style="list-style-type: none"> Occupy New Gym Complex - Winter Break Remove Interim Housing Lockers Main Gym Court Demolition - Not Summer Construct Pool Construct Pool Building Construct New PE Courts - Summer Construct East Courtyard <p>November 2021– October 2022</p>	Phased over 11 months	Cement and Mortar Mixers	2
			Paver	1
			Paving Equipment	2
			Rollers	2
			Tractor/Loader/Backhoe	1
			Crane	1
			Asphalt/Concrete Debris haul trips; average 16 CY end-dump trucks	10
			Portables haul trips	2

4. Project Description

Table 4-2 Construction Phasing and Equipment¹¹

Construction Phase	Project Task	Schedule*	Equipment	Maximum Number per Day
Phase 6 - Occupancy Completion	<ul style="list-style-type: none"> • Occupy New Classroom Building A • Occupy New Classroom Building B • Occupy New Pool • Remove Interim Housing Classrooms • Remove Interim Culinary Arts • Remove Original Portable Classrooms • Install Batting Cages 	Phased over 6 months	Crane	1
			Portables haul trips	3
September 2022 – February 2023				

* Approximate dates provide the most conservative schedule. These dates are subject to change at LAUSD's discretion or as a result of unforeseen circumstances.

** Interior upgrades would be completed over summer recess and when students are not on campus.

4.5 INTENDED USES OF THE EIR

It is the intent of this Draft EIR to evaluate the environmental impacts of the proposed Project, thereby enabling the District, other responsible agencies, and interested parties to make informed decisions with respect to the requested actions. The anticipated approvals and reviewing agencies¹² required for this Project are:

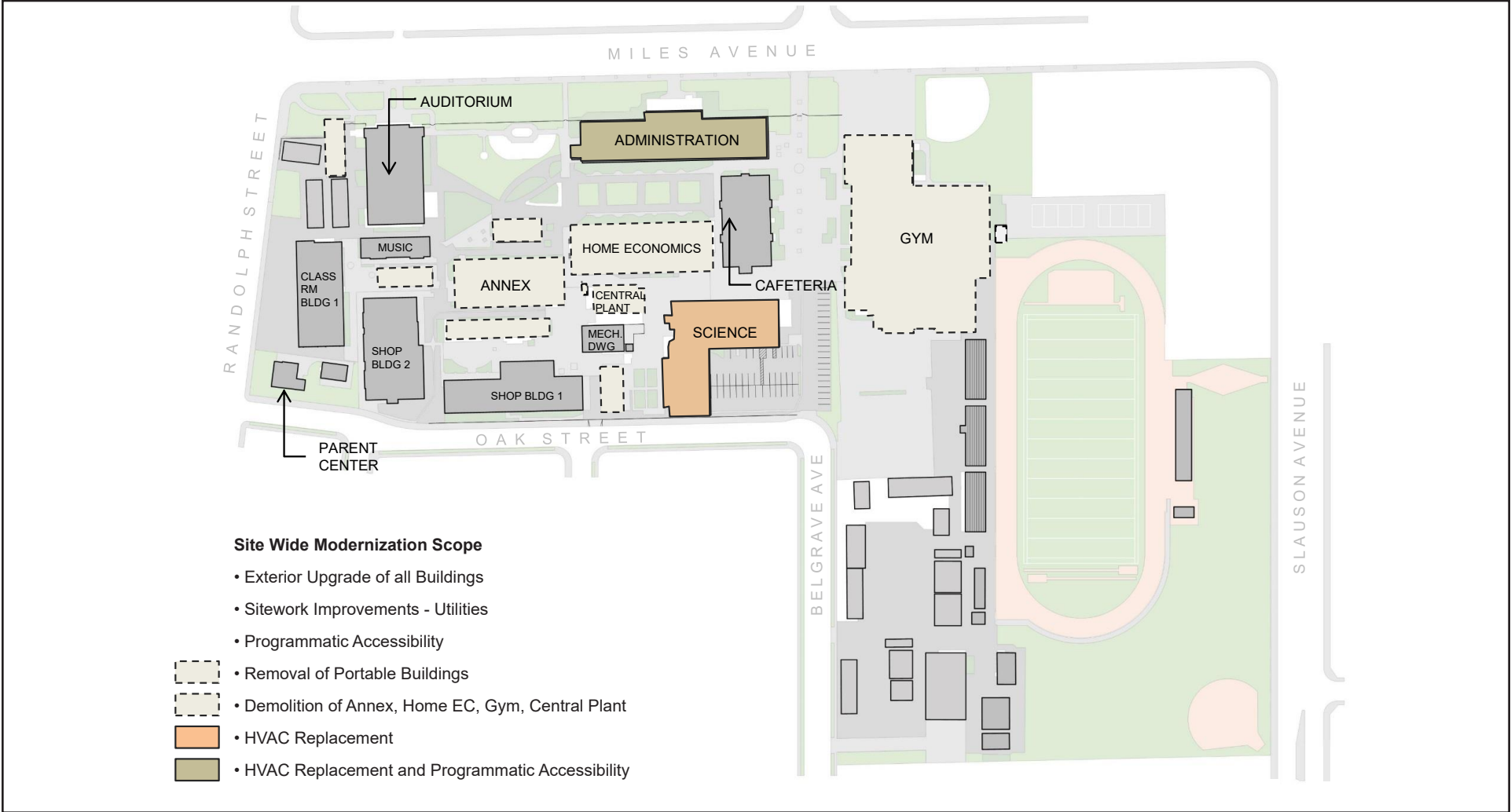
Lead Agency	Discretionary Action
LAUSD Board of Education	Certification of the EIR
	Adoption of Mitigation Monitoring and Reporting Program
	Adoption of the Findings of Fact and Statement of Overriding Considerations
	Approval of the Project
Reviewing Agency	Action
California Department of General Services, Division of State Architect (DSA)	Plan review and construction oversight, including structural safety, fire and life safety, and access compliance
State Water Resources Control Board	Review of Notice of Intent (NOI) to obtain permit coverage; issuance of general permit for discharges of stormwater associated with construction activity; review of Storm Water Pollution Prevention Plan (SWPPP)
Los Angeles Regional Water Quality Control Board (RWQCB)	NPDES permit; issuance of waste discharge requirement (Dewater Permit); Clean Water Act, Section 401 Water Quality Certification
South Coast Air Quality Management District (SCAQMD)	Review and file submittals for Rule 403-Fugitive Dust; Rule 1403-Asbestos Emissions from Demolition/Renovation Activities; Rule 1166-Volatile Organic Compound Emissions from Decontamination of Soil; Rule 1401-Toxic Emissions from Equipment Used for On-Site Remediation; Rule 1466-Control of Toxic Air Contaminant Emissions from Soil
City of Huntington Park, Public Works Department	Permit for curb, gutter, and similar offsite improvements (only as required)

¹² Reviewing agencies include those agencies that do not have discretionary powers over the proposed Project, but that may 1) review the EIR for adequacy and accuracy; 2) issue ministerial approvals or permits.

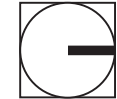
4. Project Description

Reviewing Agency	Action
Huntington Park Fire Department	Approval of Site Plan for emergency access; fire hydrant placement; fire flow upgrades
Huntington Park Department of Transportation	Approval of haul route
State Office of Historic Preservation (OHP)	May review of the EIR and Historic Resources Technical Report
California Department of Transportation (Caltrans)	Transportation permit for oversized vehicles on State highways

Figure 4-1 - Proposed Campus Improvements
4. Project Description



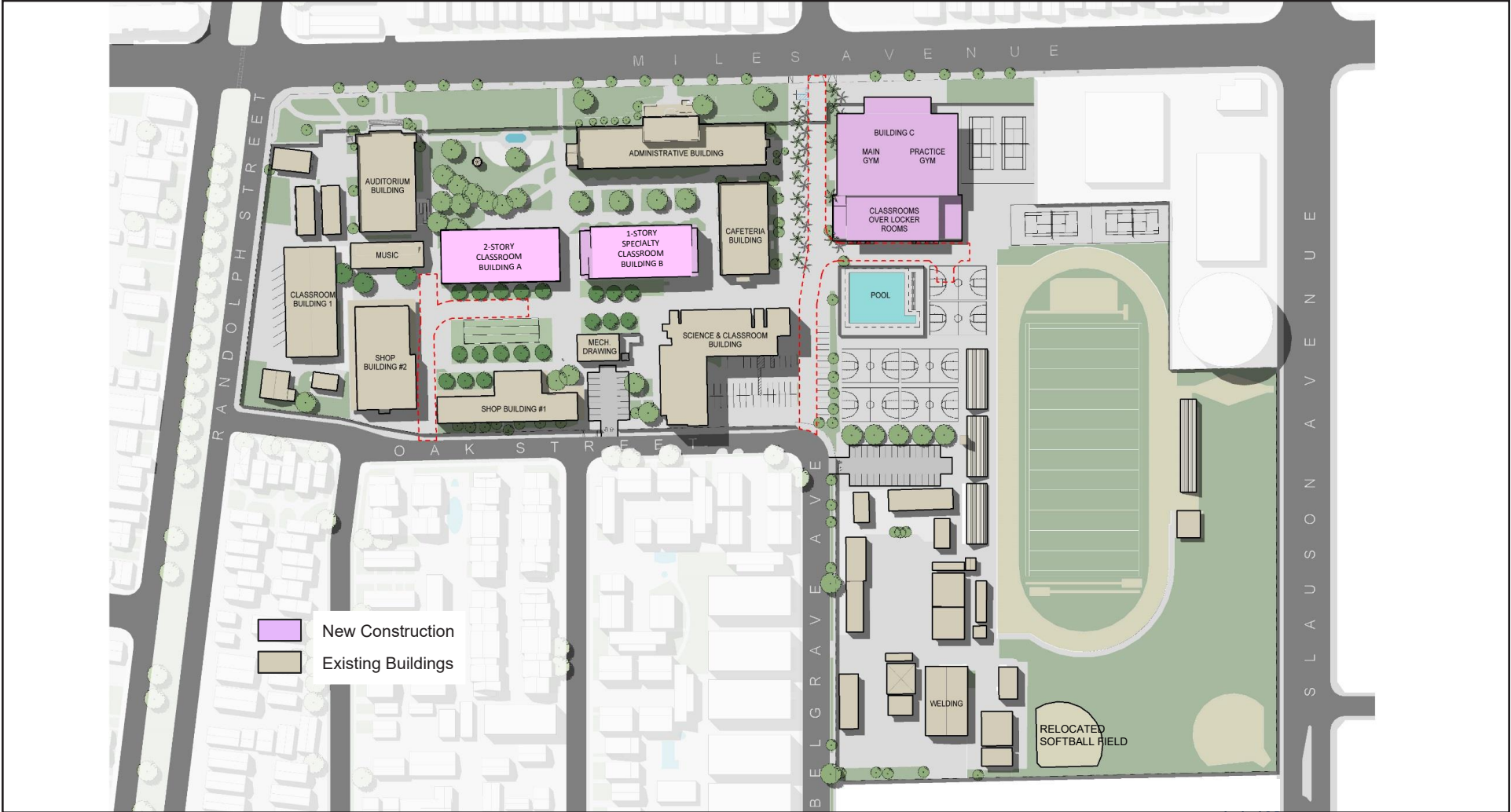
Source: Gonzalez Goodale Architects, 2017



4. Project Description

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Figure 4-2 - Conceptual Site Plan
4. Project Description

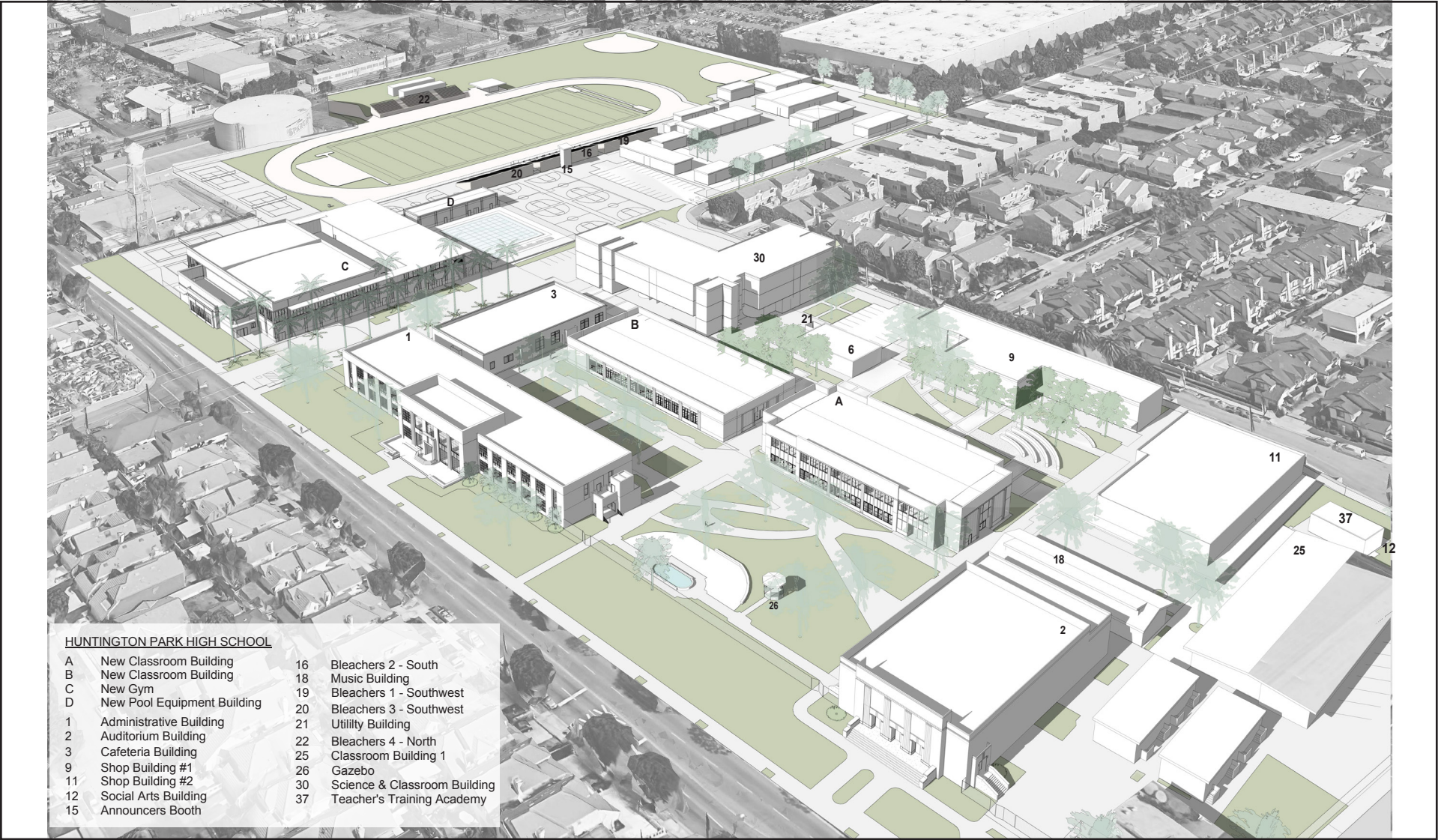


Base Map Source: Gonzalez Goodale Architects, 2017

4. Project Description

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Figure 4-3 - Conceptual Illustration: Aerial View
 4. Project Description



Source: Gonzalez Goodale Architects, 2017

4. Project Description

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Figure 4-4 - Conceptual Illustration: Gymnasium
4. Project Description



Source: Gonzalez Goodale Architects, 2017

4. Project Description

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Figure 4-5 - Conceptual Illustration: Classroom Building
4. Project Description



Source: Gonzalez Goodale Architects, 2017

4. Project Description

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5. Environmental Analysis

Chapter 5 examines the environmental setting and impacts associated with the proposed Project. This chapter has two sections, Cultural Resources, which was determined to need further study in the EIR and Energy Conservation. This scope was determined in the Initial Study and NOP, which were published August 21, 2017 (see Appendix A), and through public and agency comments received during the NOP comment period from August 23, 2017 to September 22, 2017 (see Appendix B).

The Initial Study also determined that certain issues under an environmental topic would not be significantly affected by implementation of the Project; these issues are not discussed further in this EIR.

Organization of Environmental Analysis

To assist the reader in reviewing information about the environmental issues, this section is organized as follows:

- Environmental Setting
- Thresholds of Significance
- Environmental Impacts
- Applicable Regulations and Standard Conditions
- Level of Significance Before Mitigation
- Mitigation Measures
- Level of Significance After Mitigation

In addition, Chapter 1. *Executive Summary* includes a table summarizing all the impacts along with any required mitigation.

Impact Terminology

For each impact identified in this EIR, a statement of the level of significance of the impact is provided. Classification of the impacts is based on the following definitions consistent with CEQA and the CEQA Guidelines:

- A designation of **no impact** is given when no changes in the environment would occur.
- A **less than significant impact** would cause no substantial adverse change in the environment.
- A **less than significant impact with mitigation incorporated** avoids substantial adverse impacts on the environment through mitigation measures that are required after consideration of any project design features,

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implementation of Standard Conditions of Approval (SCs) and compliance with federal, state and local laws and regulations.

- A **significant unavoidable impact** would cause a substantial adverse effect on the environment, and there are no feasible mitigation measures, or mitigation measures would reduce impacts but not to less than significant levels, the remaining impacts are considered significant and unavoidable.

5. Environmental Analysis

5.1 CULTURAL RESOURCES

Cultural resources comprise paleontological, archaeological, and historical resources. Paleontological resources are the fossilized remains of plants and animals. Archaeology is the branch of paleontology that studies human artifacts, such as places, objects, and settlements that reflect group or individual religious, cultural, or everyday activities. Historical resources include sites, structures, objects, or places that are generally at least 50 years old and are significant for their engineering, architecture, cultural use or association. Project-related impacts to archaeological resources, paleontological resources, and human remains were determined to be less than significant in the Initial Study, included as Appendix A to this Draft EIR.

This section of the Draft EIR evaluates the potential for implementation of the proposed Project to impact historical resources. The analysis in this section is based in part on the following technical studies:

- *Huntington Park High School Comprehensive Modernization Project: CEQA Historic Resources Technical Report*, ESA, September 2017. (Appendix C-1)
- *Character-Defining Features Memorandum for Huntington Park High School, 6020 Miles Avenue, Huntington Park, California 90255*, PCR Services, July 30, 2015. (Appendix C-2)
- *Los Angeles Unified School District Historic Context Statement, 1870 to 1969*, Sapphos Environmental, March 2014. (Appendix C-3)
- *Los Angeles Unified School District Historic Resources Survey Report*, Sapphos Environmental, June 2014. (Appendix C-4)

Complete copies of these studies are in the Technical Appendices of this Draft EIR under Appendix C.

TERMINOLOGY

Cultural Resources include places, objects, and settlements that reflect group or individual religious, archaeological, or architectural activities, or paleontological resources. Such resources provide information on scientific progress, environmental adaptations, group ideology, or human advancements. Cultural resources analyzed in this section include resources located within the Project site and, for purposes of assessing potential cumulative impacts, resources within a minimum of a one-mile radius beyond the boundaries of the Project site. Throughout this section, historical and archaeological resources are separated from paleontological resources due to the large difference in the types of resources they entail.

Architectural Resources include buildings, structures, objects, and sites of the built environment.

Historical Resources are buildings, structures, objects, sites, and districts that have been formally evaluated and found to meet one or more of the significance criteria identified in CEQA Section 15064.5 (a)(3). While most historical resources are 50 years old or older, resources that have achieved significance in less than 50

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CULTURAL RESOURCES

years may also be considered historic,¹ provided that a sufficient time has passed to understand their historical importance.²

Historic Districts are a concentration of historic buildings, structures, objects, or sites within precise boundaries that share a common historical, cultural, or architectural background and meet one of the criteria for significance.³

Historical Context consists of “those patterns or trends in history by which a specific occurrence, property, or site is understood and its meaning (and ultimately its significance) is made clear.”⁴ A context may be organized by theme, geographic area, or chronology. Regardless of the frame of reference, a historical context is associated with a defined area and an identified period of significance. A historical context, therefore, provides a framework for the evaluation of the significance of a potential historic resource.

Property Types are “a grouping of individual properties characterized by common physical and/or associative attributes.”⁵

Physical Attributes “include style, structural type, size, scale, proportions, design, architectural details, method of construction, orientation, spatial arrangement or plan, materials, workmanship, artistry, and environmental relationships.”⁶

5.1.1 Environmental Setting

5.1.1.1 REGULATORY FRAMEWORK

National, state, regional, and local laws, regulations, plans, and guidelines are summarized below. Compliance with applicable LAUSD Standard Conditions of Approval are also required.

Federal

United States Code, Title 16, Sections 470 et seq.

The **National Historic Preservation Act of 1966** (16 United States Code [U.S.C.] 470 et seq.) authorized the National Register of Historic Places (NRHP) and coordinates public and private efforts to identify, evaluate, and protect the nation’s historic and archaeological resources.

Section 106 (Protection of Historic Properties) of the National Historic Preservation Act of 1966 requires federal agencies to take into account the effects of their undertakings on historic properties. Section 106 Review refers to the federal review process designed to ensure that historic properties are considered during

¹ The District generally acknowledges a 45-year threshold for its historic resources to be evaluated for historic significance.

² 14 CCR, Chapter 11.5, Section 4852(d)(2)

³ 14 CCR, Chapter 11.5, Section 4852(b).

⁴ U.S. Department of the Interior, National Park Service. https://www.nps.gov/nr/publications/bulletins/nrb15/nrb15_5.htm

⁵ U.S. Department of the Interior, National Park Service.
https://www.nps.gov/nr/publications/bulletins/nrb16b/nrb16b_iii.completeing.htm

⁶ U.S. Department of the Interior, National Park Service.
https://www.nps.gov/nr/publications/bulletins/nrb16b/nrb16b_iii.completeing.htm

5. Environmental Analysis CULTURAL RESOURCES

federal project planning and implementation. The Advisory Council on Historic Preservation, an independent federal agency, administers the review process to add resources to the National Register of Historic Places with assistance from state historic preservation offices.

Code of Federal Regulations, Title 36, Chapter I, Part 60

The **National Register of Historic Places** (NRHP) is the nation's official list of buildings, structures, objects, sites, and districts worthy of preservation because of their significance in American history, architecture, archeology, engineering, and culture.⁷ The NRHP recognizes resources of local, state and national significance which have been documented and evaluated according to uniform standards and criteria.

The NRHP includes districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture. The NRHP is administered by the National Park Service. Currently there are more than 76,000 listings that make up the NRHP, including all historic areas in the National Park System, over 2,300 National Historic Landmarks, and properties that have been listed because they are significant to the nation, a state, or a community.

Properties are nominated to the NRHP by the State Historic Preservation Officer (SHPO) of the state in which the property is located, by the Federal Preservation Officer for properties under federal ownership or control, or by the Tribal Historic Preservation Officer if a property is on tribal lands.

Any individual or group may prepare a NRHP nomination. Thorough documentation of physical appearance and historic significance of the property is required. In California, completed nominations are submitted to the Office of Historic Preservation (OHP). After an application has been reviewed by OHP staff, it is submitted to the State Historical Resources Commission (SHRC) to determine whether or not the property meets criteria for evaluation, and the SHRC makes a recommendation to the SHPO to approve or disapprove the designation. Nominations recommended by the SHRC and approved by the SHPO are forwarded for consideration to the Keeper of the National Register at the National Park Service in Washington, D.C.

During the time the proposed nomination is reviewed by the SHPO, property owners and local officials are notified of the intent to nominate. Local officials and property owners are given the opportunity to comment on the nomination, and owners of private property are given an opportunity to object to or concur with the nomination. If the owner of a private property objects or the majority of owners object to the nomination, the SHPO may forward the nomination to the National Park Service only for a determination of eligibility. Without formally listing the property in the NRHP, the National Park Service then determines whether the property is eligible for listing.

Properties may qualify for the NRHP when they meet any of four basic criteria:

1. Are associated with events that have made a significant contribution to the broad patterns of history.
2. Are associated with the lives of persons significant in our past.

⁷ National Register Federal Program Regulations. Title 36—Parks, Forests, and Public Property, Chapter I—National Park Service, Department of the Interior, Part 60—National Register of Historic Places is authorized by National Historic Preservation Act of 1966, as amended, 16 U.S.C. 470 et seq., and E.O. 11593.

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CULTURAL RESOURCES

3. Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction.
4. Have yielded, or may be likely to yield, information important in prehistory or history.

A final critical component of eligibility is “integrity.” Integrity refers to the ability of a property to convey its significance and the degree to which the property retains the identity, including physical and visual attributes, for which it is significant under the four basic criteria. The NRHP criteria recognize seven aspects or qualities of integrity: location, design, setting, materials, workmanship, feeling, and association.

State

California Public Resources Code, Sections 5020–5029.5

This code continued the former Historical Landmarks Advisory Committee as the **State Historical Resources Commission**. The commission oversees the administration of the California Register of Historical Resources and is responsible for the designation of State Historical Landmarks and Historical Points of Interest.

California Public Resources Code, Sections 5079–5079.65

This code defines the functions and duties of the **Office of Historic Preservation** (OHP). The OHP is responsible for the administration of federal- and state-mandated historic preservation programs in California and the California Heritage Fund.

California Public Resources Code, Section 5024.1

The **California Register of Historical Resources** (CRHR) is the state version of the NRHP program. The CRHR was enacted in 1992 and became official January 1, 1993. The CRHR was established to serve as an authoritative guide to the state’s significant historical and archaeological resources.⁸ The program may involve resources listed or eligible for listing in the CRHR. These resources may include properties already under the ownership of the District and properties considered for implementation of the SUP.

Resources that may be eligible for listing include buildings, sites, structures, objects, and historic districts. CEQA identifies a historic resource as a property that is listed on—or eligible for listing on—the CRHR or local registers. NRHP-listed properties are automatically included on the CRHR. The criteria for both are similar and described below with the NRHP letter (A, B, C, and D) followed by the corresponding CRHR number (1, 2, 3, and 4)

- **A/1:** For an association with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
- **B/2:** For an association with the lives of persons important to local, California, or national history;

⁸ Public Resource Code (PRC) Section 5024.1.

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- **C/3:** As an embodiment of the distinctive characteristics of a type, period, region, or method of construction, representative of the work of a master or high artistic values; or
- **D/4:** Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

Resources eligible for listing in the CRHR must retain enough of their historic character or appearance to be “recognizable as historic resources and to convey the reasons for their significance.”⁹ Under CRHR regulations, “it is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the NRHP, but they may still be eligible for listing in the California Register.”¹⁰ OHP has consistently interpreted this to mean that a property eligible for the California Register must retain “substantial” integrity. Because CRHR regulations do not provide substantial written guidance on evaluating integrity, the NRHP bulletin, “How to Apply the National Register Criteria for Evaluation,” is used.

California Historical Landmarks are buildings, structures, sites, or places that have been determined to have statewide historical significance. The resource must be approved for designation by the county board of supervisors or the city/town council in whose jurisdiction it is located; be recommended by the SHRC; and be officially designated by the Director of California State Parks. A resource must meet at least one of these criteria:

- Be the first, last, only, or most significant of its type in the state or within a large geographic region (Northern, Central, or Southern California).
- Be associated with an individual or group having a profound influence on the history of California.
- Be a prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best surviving work in a region of a pioneer architect, designer or master builder.

California Points of Historical Interest are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. Points of Historical Interest designated after December 1997 and recommended by the SHRC are also listed in the CRHR. No historical resource may be designated as both a California Historical Landmark and a Point of Historical Interest. If a Point of Historical Interest is subsequently granted status as a California Historical Landmark, the Point of Historical Interest designation is retired.

To be eligible for designation as a Point of Historical Interest, a resource must meet at least one of the following criteria:

⁹ State of California – The Resources Agency. Office of Historic Preservation. Department of Parks and Recreation. California Office of Historic Preservation Technical Assistance Series #3.
http://ohp.parks.ca.gov/pages/1069/files/03%20cal_%20reg_%20q_and_a.pdf

¹⁰ 14 CCR Section 4852(c).

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- The first, last, only, or most significant of its type within the local geographic region (city or county).
- Associated with an individual or group having a profound influence on the history of the local area.
- A prototype of outstanding example of a period, style, architectural movement, or construction or is one of the more notable works or the best surviving work in the local region of a pioneer architect, designer, or master builder.

California Code of Regulations, Title 24, Part 8

The **California Historical Building Code** (CHBC) provides regulations and standards for the rehabilitation, preservation, restoration (including related reconstruction) or relocation of historical buildings. The standards are intended to allow the restoration or change of occupancy to preserve the historical building's original or restored elements and features. The CHBC also encourages energy conservation and a cost-effective approach to preservation; provides for reasonable safety from fire, seismic forces or other hazards for occupants and users of historical buildings; and provides reasonable availability and usability by the physically disabled. In general, the CHBC provides flexibility in meeting code requirements. Many older buildings do not meet today's building code standards and may have to conform to new codes when doing major renovation or repair if they are not historically designated. A historically designated building would be exempt from some current building code requirements and/or may be able to meet code requirements using alternative means and methods. The CHBC is updated on a three-year cycle; the 2016 CHBC took effect on January 1, 2017.

California State Historical Building Safety Board

The California State Historical Building Safety Board, a unit of the Division of the State Architect in the State Department of General Services, adopts rules and regulations pursuant to the CHBC; adopts and submits alternative building standards for approval by the Building Standards Commission; and is the appeal and review body respecting the CHBC to state and local agencies or any affected party.

California Public Resources Code Sections 21000 et seq. and California Code of Regulations, Title 14 Sections 15000 et seq.

The **California Environmental Quality Act** and the **CEQA Guidelines** have specific provisions relating to the evaluation of a project's impact on historical resources.

PRC Section 21084.1 of CEQA and Section 15064.5 of the CEQA Guidelines together establish the prevailing test for determining whether a resource can or must be considered a historical resource under CEQA. First, a resource is considered a historical resource for purposes of CEQA if it is listed or "deemed eligible for listing" in the CRHR by the SHRC.¹¹ Second, it will be considered a historical resource, based on a presumption of significance, if it is either (1) listed in a local register of historic resources as defined in PRC Section 5010.1¹² or (2) identified in a local survey of historic resources meeting the criteria set forth in PRC

¹¹ PRC Section 21084.1; 14 CCR Section 15064.5(a)(1).

¹² PRC Section 21084.1; 14 CCR Section 15064.5(a)(2).

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Section 5024.1.¹³ If a resource meets either of these criteria, the lead agency must treat the resource as historically significant unless the “preponderance of the evidence” indicates that the resource is not historically significant.

Third, a lead agency may find a resource to be a historical resource even though it is not formally listed in the CRHR, listed in a local register, or identified in a local survey.¹⁴ Any such determination must be based on substantial evidence in light of the whole record.¹⁵

According to the CEQA Guidelines Section 15064.5(b): “A project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.”

A substantial adverse change is defined in the CEQA Guidelines Section 15064.5(4)(b)(1), as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” The significance of a historical resource is materially impaired, according to the CEQA Guidelines Section 15064.5(4)(b)(2), when a project:

- (A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
- (B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of the evidence that the resource is not historically or culturally significant; or
- (C) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

The CEQA Guidelines provide that “generally” a project that follows the Secretary of the Interior’s Standards “shall be considered as mitigated to a level of less than a significant impact on the historical resource.”¹⁶

At the same time, however, a failure to precisely conform to the Secretary of the Interior’s Standards in all respects does not necessarily mean that a project has a significant adverse impact on historical resources. There are circumstances where a project impacting historical resources may fail to conform to the Secretary

¹³ PRC Section 21084.1; 14 CCR Section 15064.5(a)(2).

¹⁴ PRC Sections 21084.1 and 15064.5(a)(3)(4).

¹⁵ 14 CCR Section 15064.5(a)(3).

¹⁶ 14 CCR Sections 15064.5(b)(3) and 15126.4(b).

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of the Interior’s Standards, and yet the lead agency can conclude based on substantial evidence that the overall impact is not a significant adverse impact because the project does not “materially impair” the historical resource within the meaning of Section 15064.5(b).

Local

City of Huntington Park

The City of Huntington Park adopted a historic preservation ordinance in 2006, which allows for the designation of Historic Resources, significant public or semi-public interior spaces and features, Historic Signs, and Historic Districts to the Huntington Park Historic Register. According to the historic preservation ordinance, Historic Resources are a building, structure, site, object, landscape, sign, or contributing member to a historic district that is significant in American history, architecture, engineering, archeology or culture that are designated by the City. These Historic Resources are regulated by the City’s Community Development Director, Historic Preservation Commission, Planning Commission, and City Council.

The City has designated 15 historic resources: 10 residences, four structures (Civic Center, post office, a theater, and a church), and 1 historic district (Malabar Street Historic District). HPHS has not been designated as a historic resource by the City.

Los Angeles Unified School District

Standard Conditions of Approval

This table lists the standard conditions related to cultural resource that are required for this comprehensive modernization Project.

LAUSD Standard Conditions of Approval	
SC-CUL-1	<p>Design Team to Include Qualified Historic Architect</p> <p>For campuses with qualifying historical resources under CEQA, the Design team shall include a qualified Historic Architect. The Historic Architect shall provide input to ensure ongoing compliance, as project plans progress, with the Secretary of the Interior’s Standards and LAUSD requirements and guidelines for the treatment of historical resources (specific requirements follow in SC-CUL-2).</p> <p>For projects involving structural upgrades to historic resources, the Design team shall include a qualified Structural Engineer with a minimum of eight (8) years of demonstrated project-level experience in Historic Preservation.</p> <p>The Historic Architect/s shall meet the Secretary of the Interior’s Professional Qualifications Standards and the standards described on page 8 of the LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The Historic Architect shall provide input throughout the design and construction process to ensure ongoing compliance with the above-mentioned standards.</p>
SC-CUL-2	<p>Role of Historic Architect on Design Team</p> <p>The tasks of the Historic Architect on the Design team shall include (but not necessarily be limited to) the following:</p> <ol style="list-style-type: none"> 1. The Historic Architect shall work with the Design team and LAUSD to ensure that project components, including new construction and modernization of existing facilities, continue to comply with applicable historic preservation standards, including the Secretary of the Interior’s Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The Historic Architect shall work with the Design team throughout the design process to develop project options that facilitate compliance with the applicable historic preservation standards. 2. For new construction, the Historic Architect shall work with the Design team and LAUSD to identify options and

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LAUSD Standard Conditions of Approval	
	<p>opportunities for (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors, and (2) ensuring that new construction is designed and sited in such a way that reinforces and strengthens, as much as feasible, character-defining site plan features, landscaping, and circulation corridors throughout campus.</p> <ol style="list-style-type: none"> 3. For modernization and upgrade projects involving contributing (significant) buildings or features, the Historic Architect shall work with the Design team and LAUSD to ensure that specifications for design and implementation of projects comply with the applicable historic preservation standards. 4. The Historic Architect shall participate in design team meetings through all phases of the project through 100 percent construction drawings, pre-construction, and construction phases. 5. The Historic Architect shall produce brief memos, at the 50 percent and 100 percent construction drawings stages, demonstrating how principal project components and treatment approaches comply with applicable historic preservation standards, including the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The memos will be reviewed by LAUSD . 6. The Historic Architect shall participate in pre-construction and construction monitoring activities to ensure continuing conformance with Secretary's Standards and/or avoidance of a material impairment of the historical resources. 7. The Historic Architect shall provide specialized Construction Specifications Institute (CSI) specifications for architectural features or materials requiring restoration, removal, or on-site storage. This shall include detailed instructions on maintaining and protecting in place relevant features. 8. The Design team and Historic Architect shall be responsible for incorporating LAUSD's recommended updates and revisions during the design development and review process.
SC-CUL-3	<p>School Design Guide and LAUSD Design Guidelines and Treatment Approaches for Historic Schools</p> <p>LAUSD has adopted policies and guidelines that apply to projects involving historic resources. The Design-Builder and Historic Architect shall apply these guidelines, which include the <i>LAUSD School Design Guide</i> and <i>LAUSD Design Guidelines and Treatment Approaches for Historic Schools</i> and the <i>Secretary's Standards</i> for all new construction and upgrade/modernization projects. In keeping with the district's adopted policies and goals, LAUSD shall re-use rather than destroy historical resources where feasible.</p> <p>LAUSD shall follow the guidelines outlined in these documents to the maximum extent practicable when planning and implementing projects and adjacent new construction involving historical resources. General guidelines shall include:</p> <ul style="list-style-type: none"> • Retain and preserve the historic character of buildings, structures, landscapes, and site features that are historically significant. • Repair rather than remove, replace, or destroy character-defining features; if replacement is necessary, replace in-kind to match in materials and appearance. • Avoid removing, obscuring, or destroying character-defining features and materials. • Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity. • Conceal reinforcement required for structural stability or the installation of life safety or mechanical systems. • Undertake surface cleaning, preparation of surfaces, and other projects involving character-defining features using the least invasive, gentlest means possible. Avoid sandblasting and chemical treatments.

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LAUSD Standard Conditions of Approval	
SC-CUL-4	<p>Prior to demolition or mothballing activities, LAUSD shall retain a professional architectural photographer and a historian or architectural historian who meets the Secretary of the Interior's Professional Qualifications Standards to prepare HABS-like documentation for the historical resources slated for demolition.</p> <p>The HABS-like package will document in photographs and descriptive and historic narrative the historical resources slated for demolition. Documentation prepared for the package will draw upon primary- and secondary-source research and available studies previously prepared for the Project. Measured drawings shall not be required for the Project.</p> <p>The specifications for the HABS-like package follow:</p> <p>Photographs: Photographic documentation will focus on the historical resources/features slated for demolition, with overview and context photographs for the campus and adjacent setting. Photographs will be taken of interior and exterior features of the buildings using a professional-quality single lens reflex (SLR) digital camera with a minimum resolution of 10 megapixels. Photographs will include context views, elevations/exteriors, architectural details, overall interiors, and interior details (if warranted). Digital photographs will be printed in black and white on archival film paper and also provided in electronic format.</p> <p>Descriptive and Historic Narrative: The historian or architectural historian will prepare descriptive and historic narrative of the historical resources/features slated for demolition. Physical descriptions will detail each resource, elevation by elevation, with accompanying photographs, and information on how the resource fits within the broader campus during its period of significance. The historic narrative will include available information on the campus design, history, architect/contractor/designer as appropriate, area history, and historic context. In addition, the narrative will include a methodology section specifying the name of researcher, date of research, and sources/archives visited, as well as a bibliography. Within the written history, statements shall be footnoted as to their sources, where appropriate.</p> <p>Historic Documentation Package Submittal: The draft package will be assembled by the historian or architectural historian and submitted to LAUSD for review and comment. After final approval, one hard-copy set of the package will be prepared as follows: Photographs will be individually labeled and stored in individual acid-free sleeves. The remaining components of the historic documentation package (site map, photo index, historic narrative, and additional data) will be printed on archival bond, acid-free paper.</p> <p>Upon completion of the descriptive and historic narrative, all materials will be compiled in electronic format and presented to LAUSD for review and approval. Upon approval, one hard-copy version of the historic documentation package will be prepared and submitted to LAUSD. The historian or architectural historian shall offer a hardcopy package and compiled, electronic version of the final package to the Los Angeles Public Library (Central Library), Los Angeles Historical Society, and the South Central Coastal Information Center, to make available to researchers.</p>
SC-CUL-5	<p>LAUSD, consistent with Education Code Section 17540, shall offer to sell any useful features of the school building (e.g., the school bell, chalkboards, lockers) that do not contain hazardous materials for use or display, if features are not retained by LAUSD for reuse or display.</p>
SC-CUL-6	<p>LAUSD, consistent with Education Code Section 17545, shall offer for sale any remaining functional and defining features and building materials from the buildings. These materials could include doors, windows, siding, stones, lighting, doorknobs, hinges, cabinets, and appliances, among others. They shall be made available to the public for sale and reuse, if features are not retained by LAUSD for reuse or display.</p>

5.1.1.2 HISTORICAL SETTING

HPHS was founded in 1909. Completed in 1910, the first school building was destroyed by a fire in 1911. Shortly thereafter, it was rebuilt and several additional buildings were constructed on the campus. The Long Beach Earthquake of March 10, 1933, destroyed and damaged numerous school buildings in southern California, including several HPHS buildings. The magnitude 6.4 earthquake struck at 5:54 PM, when schools were not in session.

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Designed in the PWA (Public Works Administration) Moderne style, the historic core of the campus today extensively renovated or completely replaced buildings damaged or destroyed in the 1933 Long Beach Earthquake.¹⁷ PWA Moderne was an architectural style in the United States between 1933 and 1944, during and shortly after the Great Depression, and characterized relief projects sponsored by the PWA and the Works Progress Administration (WPA). PWA Moderne often incorporates elements of a number of styles, including Classical Revival, Spanish Colonial Revival, Art Deco, and Streamline Moderne.¹⁸

Founding (1909) to 1933

HPHS was founded in 1909. The Huntington Park Union High School District was organized in 1909 and was annexed to the Los Angeles Unified School District in 1932. Completed in 1910, the first HPHS building burned to the ground in 1911. It was rebuilt in the 1920s and supplemented by several additional buildings on the growing campus.

1933 to Late 1930s

Designed in the PWA Moderne style, the historic core of the campus includes the Administrative Building (Building 1) and Cafeteria Building (Building 3; 1936), the Auditorium Building (Building 2) and Mechanical Drawing Building (Building 6; 1937), and the Social Arts Building (Building 12; 1939). PWA Moderne is an architectural style of many buildings in the United States completed between 1933 and 1944, during and shortly after the Great Depression as part of relief projects sponsored by the PWA and WPA. PWA Moderne often incorporates elements of a number of styles, including Classical Revival, Spanish Colonial Revival, Art Deco, and Streamline Moderne.¹⁹

Character-defining features include board-form concrete walls, flat roofs with reeded parapets, symmetrical composition, fluted piers, stylized friezes, bronze panels embellished with a chevron motif, entry surrounds juxtaposing horizontal and vertical detailing, and the original windows.²⁰ Such features are listed in further detail for several school buildings on the HPHS campus in Appendix C-1.

Plans to reconstruct several campus buildings were prepared by architect George M. Lindsey in 1934. At that time, the campus consisted of an Auditorium Building (Building 2), Liberal Arts Building (demolished), and several bungalows that were initially not part of the reconstruction plan, as well as a Central Plant (Building 5), Annex (Building 8), and Home Economics Building (Building 4), which were all slated for reconstruction. Lindsey's plans also included a new Administrative Building (Building 1) and a new Cafeteria Building (Building 3), the latter to be built on the extant foundation of the old cafeteria building. The pre-earthquake Gymnasium Building (Building 13) was also reconstructed in 1935. In 1936 a new Mechanical Drawing

¹⁷ PWA Moderne is an architectural style in the United States completed between 1933 and 1944, during and shortly after the Great Depression as part of relief projects sponsored by the Public Works Administration (PWA) and the Works Progress Administration (WPA).

¹⁸ SWCA. 2015, January. Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools. http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/domain/135/pdf%20files/Final_Design_Guidelines.pdf

¹⁹ SWCA. 2015, January. Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools. http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/domain/135/pdf%20files/Final_Design_Guidelines.pdf

²⁰ Science Applications International Corporation (SAIC). Historic Schools of the Los Angeles Unified School District. The Getty Grant Program. March 2002.

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Building (Building 6) was added to the south of the Manual Arts Building (now demolished), and a new Auditorium Building (Building 2) was constructed south of the Administrative Building (Building 1).²¹

Late 1930s to Present

Between the late 1930s and the late 1950s the campus underwent only minor alterations. Two new shop buildings were added in 1959. The Manual Arts Building, which predated the 1933 earthquake, was demolished in 1960. Various alterations and improvements were made to both the Administrative Building (Building 1) and Home Economics Building (Building 4) in 1961, and a Music Building (Building 18) and Food Services Building 1 (Building 17) were added the following year in 1962. In 1975, seven bungalows were demolished and one moved to allow for the relocation of a Classroom Building 1 (Building 25) to their former site, just southeast of the Auditorium Building (Building 2). A large, two-story portable building (Building 31) was added near the center of the school's campus, south of the Home Economics Building (Building 4), in 1977. Fire damage had to be repaired in the Cafeteria Building (Building 3) in 1985 and 1988. A new Science and Classroom Building (Building 30) was added in 1987. Reconstruction was carried out on the Home Economics Building (Building 4), Cafeteria Building (Building 3), Gymnasium Building (Building 13), and Administrative Building (Building 1) in 1988, though the majority of the work planned appears to have been carried out in order to bring the buildings up to modern code. A fire in the boys' section of the Gymnasium Building (Building 13) required repair work in 2002. In 2010, the auto shop in Shop Building #1 (Building 9) was converted into classroom space.²²

In 1978, the two locations on the HPHS campus were featured in the movie *Grease*. The scene in which depicts a dance contest took place in the Gymnasium. Also, the scene in which the Scorpions were spotted at the football pep rally was filmed on the football field and shows the north elevation of the Gymnasium in the background.

Historical Resources

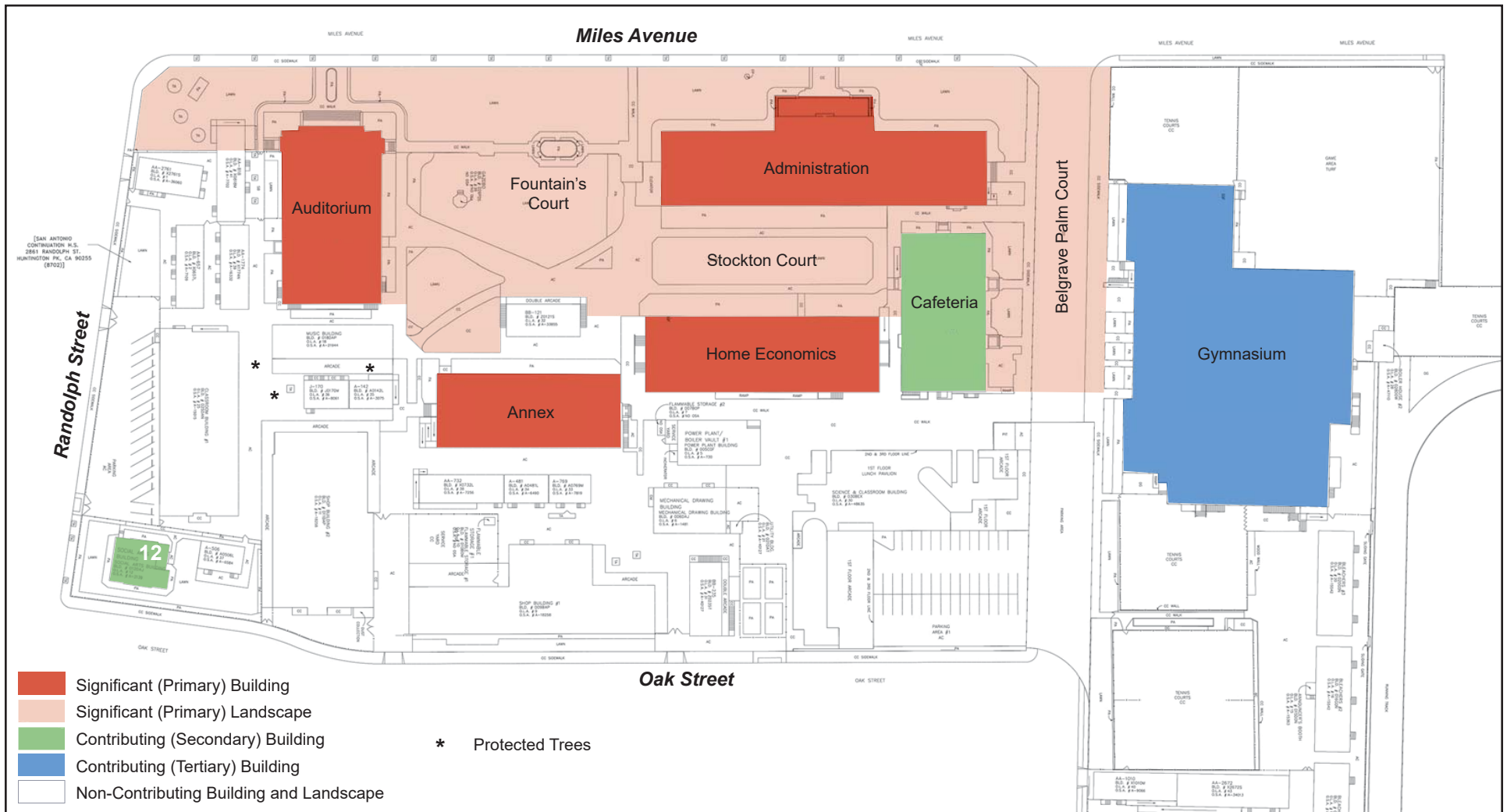
There are three categories of historical resources on the campus by historical significance as primary (significant), secondary (contributing), and tertiary (contributing) resources.²³ Significant character-defining buildings and landscapes determine the eligibility of a historical resource and are the most important features to retain. Contributing character-defining buildings and landscapes are secondary and tertiary features that, taken together with the primary features, convey a property's significance as a historical resource. Historical resources on campus are shown on Figure 5.1-1, *Historical Buildings and Landscapes*. Character-defining features of historical buildings are described in detail in Appendix C-2.

²¹ PCR Services Corporation. 2015, July 30. Character-Defining Features Memorandum for Huntington Park High School, 6020 Miles Avenue, Huntington Park, California 90255.

²² PCR Services Corporation. 2015, July 30. Character-Defining Features Memorandum for Huntington Park High School, 6020 Miles Avenue, Huntington Park, California 90255.

²³ PCR Services Corporation. 2015, July 30. Character-Defining Features Memorandum for Huntington Park High School, 6020 Miles Avenue, Huntington Park, California 90255.

Figure 5.1-1 - Historical Buildings and Landscapes



Source: PCR, 2015



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HPHS appears to meet the criteria for listing in both the NRHP and the CRHR.²⁴ Additionally, the school is listed on the LAUSD Historic Resources Inventory.²⁵

5.1.2 Thresholds of Significance

CEQA Guidelines Section 15064.5 provides direction on determining significance of impacts to archaeological and historical resources. Generally, a resource shall be considered “historically significant” if the resource meets the criteria for listing on the CRHR:

- Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- Is associated the with lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Has yielded, or may be likely to yield, information important in prehistory or history. (PRC § 5024.1; 14 CCR § 4852)

The fact that a resource is not listed in the CRHR, not determined to be eligible for listing, or not included in a local register of historical resources does not preclude a lead agency from determining that it may be a historical resource.

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- C-1 Cause a substantial adverse change in the significance of an historical resource pursuant to Section 15064.5.
- C-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.
- C-3 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- C-4 Disturb any human remains, including those interred outside of dedicated cemeteries.

The Initial Study, included as Appendix A, substantiates that impacts associated with the following thresholds would be less than significant: Thresholds C-2, C-3, and C-4. These impacts will not be addressed in the following analysis.

²⁴ Science Applications International Corporation (SAIC). Historic Schools of the Los Angeles Unified School District. The Getty Grant Program. March 2002.

²⁵ Sapphos Environmental, Inc. June 2014. Los Angeles Unified School District Historic Resources Survey Report.

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5.1.2.1 HISTORICAL RESOURCE THRESHOLDS

According to the State CEQA Guidelines, Section 15064.5(b), a significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.”²⁶ The significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:²⁷

- A. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the California Register of Historical Resources; or
- B. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- C. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Under CEQA, a proposed development must be evaluated to determine how it may impact the potential eligibility of a structure(s) or a site for designation as a historic resource. In general, a project that complies with the Secretary of the Interior’s Standards for the Treatment of Historic Properties (SOI Standards) is considered to have mitigated its impacts to historical resources to a less-than-significant level.²⁸ The Standards under the Treatment of Historic Properties offer four distinct approaches to the treatment of historic properties—preservation, rehabilitation, restoration, and reconstruction with Guidelines for each. The SOI Standards are a series of concepts about maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations. The Guidelines offer general design and technical recommendations to assist in applying the SOI Standards to a specific property. Together, they provide a framework and guidance for decision-making about work or changes to a historic property.

²⁶ CEQA Guidelines Section 15064.5(b)(1)

²⁷ CEQA Guidelines Section 15064.5(b)(2)

²⁸ CEQA Guidelines Section 15064.5(b)(3)

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5.1.3 Environmental Impacts

The following impact analysis addresses thresholds of significance for which the Initial Study identified potentially significant impacts.

Impact 5.1-1: The proposed Project would cause a substantial adverse change in the significance of a historic resource as defined in CEQA Guidelines Section 15064.5. [Threshold C-1]

Impact Analysis: The Project includes demolition and removal of eight relocatable buildings and four permanent buildings: Home Economics Building (Building 4) built in 1924; and Annex Building (Building 8) built in 1925, Gymnasium Building (Building 13) built in 1923, and Central Plant (Building 5) built in 1923;²⁹ construction of two-story Classroom Building A, one-story Specialty Classroom Building B, Gymnasium Building C, and outdoor pool; remodel and modernization of Administrative Building (Building 1); and minor improvements (e.g., exterior/interior paint as needed) for the remaining buildings including the Science & Classroom Building (Building 30) and Classroom Building 1 (Building 25). Other improvements include: domestic water; irrigation; gas; sewer; fire, telephone, and data systems; electrical; storm drainage; ADA compliance; and landscape, hardscape, and exterior paint.

HPHS is eligible for the NRHP and CRHR as an architecturally significant and distinctive example of a PWA Moderne-style school rebuilt following the 1933 Long Beach earthquake. The campus is eligible as a historic district, a single historical resource (a school) with buildings, structures, and other features, such as landscaping, as either contributing (primary, secondary, and tertiary) or noncontributing features of the historic resource.³⁰

Significant (Primary): Interior Courtyard and Landscaped Open Area

This area includes the landscaped open area along Miles Avenue, extending from the south side of the Gymnasium to Randolph Street and includes the areas in front of the Administrative Building and Auditorium Building. It also includes the interior courtyard bordered by Administrative Building, Cafeteria Building, Home Economics Building, Annex Building, and Auditorium Building. Miles Avenue lawn and the oval lily pond, gazebo, and Chinese Elm trees in the historic Fountain Court would be maintained. The double row of Canary Island date palms in the Belgrave Palm Court would be maintained. The jacaranda trees in Stockton Court would be maintained. Additionally, three western sycamore trees are anticipated to be preserved. Several trees on campus have historic plaques; these will be salvaged and incorporated elsewhere on the campus. The historic landscapes would be refreshed with new native and drought tolerant plantings and specimen trees highlighting main entrances, framing entry experiences, clarifying circulation, and providing human-scale gathering areas. Ornamental paving consisting of integral colored concrete and unit pavers would highlight main entrances, create processional entries, clarify campus circulation, and establish outdoor classrooms. Cast-in-place concrete seating defines the perimeter of these outdoor spaces. The proposed Buildings A and B would continue to frame the central courtyard.

²⁹ All three buildings were renovated and remodeled in 1935.

³⁰ ESA. 2017, October, Huntington Park High School Comprehensive Modernization Project: CEQA Historic Resources Technical Report.

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Significant (Primary): Administrative Building (Building 1)

The two-story WPA Moderne-style Administrative Building was constructed in 1936. An exterior elevator structure was installed to the south side of the building. The scope of the Project includes modernization in order to protect the integrity of the building. The proposed modernization improvements include a new HVAC system, security improvements, remodeling of two interior spaces, voluntary programmatic access upgrades to comply with the ADA, and exterior painting.

This building is included in the AB 300 list,³¹ and a structural evaluation was completed. The findings do not suggest any critical deficiencies in the existing seismic force-resisting systems, and based on an evaluation, no seismic upgrades are needed for the Administrative Building.

Significant (Primary): Auditorium Building (Building 2)

The current Auditorium Building was constructed in 1936. The proposed Project would provide designated seating with semi-ambulatory and companion spaces, accessible drinking fountain, signage to accessible public toilet rooms in close proximity (in the adjacent new two-story Classroom Building), and a path of travel to stage level (wheelchair lift).

Significant (Primary): Home Economics Building (Building 4)

The one-story WPA Moderne-style building, with a small partial basement, was constructed in 1924 as a two-story building, and was structurally renovated and remodeled in 1935 after the 1933 Long Beach Earthquake. This renovation included removal of the second floor. This building is included in the AB 300 list, and structural evaluation has determined that significant structural retrofit is required.³²

Based on the amount of structural retrofitting required, and the fact that the existing structural system does not allow the enlargement or combining of undersized classrooms, the District determined it was infeasible to retrofit and modernize this building. The proposed Project includes demolition of the building and replacement with the one-story building in approximately the same footprint. The proposed building will be designed to address the character-defining features of the surrounding buildings and adjacent historically significant Stockton Court.

³¹ In October 1999, AB 300 (Corbett) was chaptered. (The text of the bill is included in the AB 300 report as Appendix A; titled “Seismic Safety Inventory of California Public Schools”) It added Section 17317 to the California Education Code. The law required the Department of General Services (DGS) to survey the state's kindergarten through grade 12 school buildings. The purpose of the report was to provide lawmakers with an overview of the scope of the seismic safety challenge these structures represented, and to quantify the problem so that informed, cost-effective decisions could be made to address the issue. The survey focused on buildings constructed before the 1976 California Building Code (CBC) went into effect, since that edition of the CBC incorporated more stringent seismic safety standards. Also, the survey dealt only with buildings in use and occupied by students and teachers <http://www.dgs.ca.gov/dsa/AboutUs/ab300.aspx>

³² Gonzales Goodale Architects. Los Angeles Unified School District. Huntington Park High School. Final Schematic Design Report. (Section 2, Basis of Design). May 2017

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Significant (Primary): Annex Building (Building 8)

The two-story WPA Moderne-style building was constructed in 1925 and structurally renovated and remodeled in 1935. This building is included in the AB 300 list, and structural evaluation has determined that significant structural retrofit is required.³³

Based on the amount of structural retrofitting required, and the fact that the existing structural system does not allow the enlargement or combining of undersized classrooms, the District determined it was infeasible to retrofit and modernize this building. The proposed Project includes demolition of the building and replacement with a two-story building in approximately the same footprint. The *Podocarpus* trees adjacent to the Annex Building would require removal because of the demolition of the building. The proposed building would be designed to address the character defining features of the surrounding buildings and adjacent historically significant Stockton Court.

Contributing (Secondary): Cafeteria Building (Building 3)

The one-story WPA Modern-style building, with a partial basement, was constructed in 1936. The interior of the cafeteria and kitchen are in good condition. The proposed Project would not make improvements to this building.

Contributing (Secondary): Parent and Family Center (Building 12)

This one-story residential structure with American Colonial-style details is used as a Parent Center for HPHS. The proposed Project would install an access ramp to the raised porch and interior renovations to provide an accessible toilet room.

Contributing (Tertiary): Gymnasium Building (Building 13)

The Gymnasium Building was constructed in 1923 and partially reconstructed in 1935 as a two-story structure. In 1988 a renovation/modernization project was completed, and in 2015 the mechanical system was replaced in the main gym area. This building is included in the AB 300 list, and structural evaluation determined that significant structural retrofit is required. Based on the amount of structural retrofitting required, the District determined it was infeasible to retrofit and modernize this building while ensuring that it would be seismically retrofitted to meet current codes, since it was constructed as three adjoining buildings without any seismic separation.³⁴ As a result, the proposed Project includes demolition and replacement of the building. The building design will address the character-defining features of the surrounding buildings and adjacent historically significant Palm Court and Stockton Court.

Additionally, the Central Plant; Building 5;) is being removed because of inefficiencies in the heating, air conditioning, and ventilation system. The new HVAC systems on top of the buildings would provide measurable enhancement to both student health and the learning environments.

³³ Gonzales Goodale Architects. Los Angeles Unified School District. Huntington Park High School. Final Schematic Design Report. (Section 2, Basis of Design). May 2017

³⁴ Gonzales Goodale Architects. Los Angeles Unified School District. Huntington Park High School. Final Schematic Design Report. (Section 2, Basis of Design). May 2017

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The Administrative Building (Building 1) and the Auditorium Building (Building 2), along with the Fountain Court, may be individually eligible for the NRHP and CRHR as a group following Project completion. The Administrative Building (Building 1) and the Auditorium Building (Building 2) have a prominent location facing the public right-of-way, a relationship with the Fountain Court, and a high-level of PWA Moderne architectural ornamentation from the period of significance. While the Project would retain the potential eligibility of this individual grouping under C/3,³⁵ the eligibility of the HPHS historic district as a whole would be materially changed, and the Project would result in a substantial adverse change in the significance of the historic district as a historical resource.

Secretary of the Interior's Standards Review

The Project was assessed for compliance with the SOI Standards.³⁶ The analysis found that while the new construction would comply with the SOI Standards, the proposed Project as a whole would not fully comply with the SOI Standards, specifically Standards Number 1, 2, 5, 9, and 10, because of the planned demolition of primary Home Economics Building (Building 4) and Annex Building (Building 8) and tertiary Gymnasium Building (Building 13) character-defining buildings.³⁷

- **Rehabilitation Standard No. 1:** A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
- **Rehabilitation Standard No. 2:** The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize the property will be avoided.
- **Rehabilitation Standard No. 5:** Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
- **Rehabilitation Standard No. 9:** New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and environment.
- **Rehabilitation Standard No. 10:** New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

³⁵ The criteria for listing, with the NRHP letter (A, B, C, and D) followed by the corresponding CRHR number (1, 2, 3, and 4). C/3: As an embodiment of the distinctive characteristics of a type, period, region, or method of construction, representative of the work of a master or high artistic values.

³⁶ ESA. 2017, October, Huntington Park High School Comprehensive Modernization Project: CEQA Historic Resources Technical Report.

³⁷ ESA. 2017, October, Huntington Park High School Comprehensive Modernization Project: CEQA Historic Resources Technical Report.

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The new buildings would be designed and placed on campus so that they would comply with the SOI Standards. The design meets each of the relevant Rehabilitation Standards. In particular, the “historic character of the property is retained and preserved” (Standard No. 2), and the new construction is “differentiated from the old” but also “compatible with the massing, size, scale, and architectural features” of its historic context (Standard No. 9).³⁸

Three of the seven character-defining buildings would be demolished; almost half of the character-defining buildings on the campus. Due to the substantial loss of character-defining buildings, HPHS’s integrity of design, materials, workmanship, setting and feeling would be compromised; therefore, following Project completion, the campus as a whole would be ineligible for listing on the National Register and California Register. Thus, the historical significance of the campus as a historic district would be materially impaired, and the Project would result in a significant and unavoidable impact to HPHS. Due to the substantial adverse change in the significance of the school resulting from the demolition of the two primary buildings (Buildings 4 and 8) and one tertiary building (Building 13), the following LAUSD Standard Conditions of Approval are incorporated to reduce adverse impacts: SC-CUL-1 (Historic Architect input), SC-CUL-2 (design and implementation historic preservation standards), and SC-CUL-3 (compliance with LAUSD and SOI standards), SC-CUL-4 (Recordation), SC-CUL-5 (Salvage of Features), and SC-CUL-6 (Salvage of Building Materials). These SCs will ensure that the history and significance of the buildings to be demolished (Buildings 4, 8, and 13) and their relationship with the larger campus will be fully documented and that the character-defining features and materials of demolished buildings (as well as memorabilia and relevant items outlined by the school community that is capable of being preserved) will be salvaged and made available to the public for sale or reuse. To further document the history of the school, implementation of Mitigation Measure MM-CUL-1 would provide information to the public through a permanent interpretive exhibit. However, even with the incorporation of the SCs and MM-CUL-1, impacts to the historical resources at the school would remain significant and unavoidable.

5.1.4 Cumulative Impacts

“A cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts.”³⁹ A project would have a cumulatively considerable impact on cultural resources if it contributes to the cumulative loss of historical resources.

The proposed Project would have a significant and unavoidable impact on historical resources and after Project completion; HPHS would not remain eligible for listing as a historic district in the NRHP or CRHR. However, two individually eligible buildings (Buildings 1 and 2) and a landscape (Fountain Court) would remain intact after Project completion and would remain eligible for listing in the NRHP and CRHR. Following this Project, there are no known or reasonably foreseeable projects identified for this campus. It would be anticipated that minor maintenance activities may occur on the campus following construction however, no other projects of the same type or scale are planned for the campus at this time.

³⁸ Steven Fader Architects. Memorandum. Final Schematic Design Memorandum for the Record (MFR) Huntington Park High School Comprehensive Modernization Project (CMP). May 17, 2017.

³⁹ CEQA Guidelines 15130. Discussion of Cumulative Impacts

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5.1.5 Applicable Standard Conditions

LAUSD Standard Conditions of Approval

- LAUSD Standard Conditions of Approval SC-CUL-1 through SC-CUL-6.

5.1.6 Level of Significance Before Mitigation

Impact 5.1-1 would be potentially significant: the proposed Project would impact historic resources.

5.1.7 Mitigation Measures

MM-CUL-1 To reduce the impact of the removal of character-defining buildings and disruption of the Huntington Park High School (HPHS) historic district, LAUSD shall install an interpretive exhibit at the school to provide historical and architectural information about the campus. The exhibit shall permit staff, students, and the public to understand what was historically on the campus before the comprehensive modernization Project.

The District shall prepare an interpretive exhibit for the HPHS campus as part of the Project. The interpretive exhibit about the history of HPHS during the period of significance (1923–1936) shall be placed within a publicly accessible area on campus (such as the school library) following construction of the Project. The exhibit shall interpret the history of the campus through historical photographs, aerials, Sanborn maps, student photographs, yearbooks, newspapers, artifacts, and written narrative that visually demonstrate physical appearance, activities, and architecture styles of the school including the Beaux Arts (pre-Long Beach earthquake) and PWA Moderne (post-Long Beach earthquake) styles. A qualified architectural historian or historic preservation professional shall provide input and oversight to the contents, design, and installation of an interpretive exhibit.

5.1.8 Level of Significance After Mitigation

Impacts to historical resources would remain significant and unavoidable.

5. Environmental Analysis

5.2 ENERGY CONSERVATION

This section evaluates potential impacts associated with the consumption of energy that would result from the implementation of the proposed Project. The section follows the guidance for the evaluation of energy impacts provided in Appendix F, Energy Conservation, of the State CEQA Guidelines.

The directives in Appendix F are advisory and states: “[p]otentially significant energy implications of a project shall be considered in an EIR to the extent relevant and applicable to the project. The following list of energy impact possibilities and potential conservation measures is designed to assist in the preparation of an EIR. In many instances specific items may not apply or additional items may be needed. Where items listed below are applicable or relevant to the project, they should be considered in the EIR.” Therefore, the evaluation provided in this section does not address every directive in Appendix F. As directed by CEQA, the focus of the analysis is whether the Project would result in a wasteful or inefficient consumption of energy, and whether mitigation is required to avoid or reduce wasteful or inefficient consumption of energy.

5.2.1 Environmental Setting

5.2.1.1 REGULATORY FRAMEWORK

State, regional, and local laws, regulations, plans, and guidelines are summarized below. Compliance with applicable LAUSD Standard Conditions of Approval are also required.

Federal

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (Public Law 110-140) seeks to provide the nation with greater energy independence and security by increasing the production of clean renewable fuels; improving vehicle fuel economy; and increasing the efficiency of products, buildings, and vehicles. It also seeks to improve the energy performance of the federal government. The Act sets increased Corporate Average Fuel Economy Standards; the Renewable Fuel Standard; appliance energy efficiency standards; building energy efficiency standards; and accelerated research and development tasks on renewable energy sources (e.g., solar energy, geothermal energy, and marine and hydrokinetic renewable energy technologies), carbon capture, and sequestration.¹

State

Renewables Portfolio Standard

The California Renewables Portfolio Standard (RPS) was established in 2002 under Senate Bill (SB) 1078 and was amended in 2006 and 2011. The RPS program requires investor-owned utilities, electric service providers, and community choice aggregators to increase the use of eligible renewable energy resources to 33 percent of total procurement by 2020. The California Public Utilities Commission is required to provide quarterly

¹ Energy Independence and Security Act of 2007. 42 USC 17001 <https://www.gpo.gov/fdsys/pkg/PLAW-110publ140/pdf/PLAW-110publ140.pdf>

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progress reports on progress toward RPS goals. This has accelerated the development of renewable energy projects throughout the State. Based on the 3rd quarter 2014 report, the three largest retail energy utilities provided an average of 20.9 percent of its supplies from renewable energy sources. Since 2003, 8,248 megawatts (MW) of renewable energy projects have started operations. SB 350 (de Leon) was signed into law September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. SB 350 also set a new goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures.

State Alternative Fuels Plan

Assembly Bill (AB) 1007 requires the California Energy Commission (CEC) to prepare a plan to increase the use of alternative fuels in California.² The State Alternative Fuels Plan was prepared by the CEC with CARB and in consultation with other federal, state, and local agencies to reduce petroleum consumption; increase use of alternative fuels (e.g., ethanol, natural gas, liquefied petroleum gas, electricity, and hydrogen); reduce greenhouse gas (GHG) emissions; and increase in-state production of biofuels. The State Alternative Fuels Plan recommends a strategy that combines private capital investment, financial incentives, and advanced technology that will increase the use of alternative fuels; result in significant improvements in the energy efficiency of vehicles; and reduce trips and vehicle miles traveled through changes in travel habits and land management policies. The Alternative Fuels and Vehicle Technologies Funding Program legislation (AB 118, Statutes of 2007) proactively implements this plan.³

Appliance Efficiency Regulations

California's Appliance Efficiency Regulations (California Code of Regulations [CCR], Title 20, Parts 1600–1608) contain energy performance, energy design, water performance, and water design standards for appliances (including refrigerators, ice makers, vending machines, freezers, water heaters, fans, boilers, washing machines, dryers, air conditioners, pool equipment, and plumbing fittings) that are sold or offered for sale in California. These standards are updated regularly to allow consideration of new energy efficiency technologies and methods.

Title 24, Part 6, Energy Efficiency Standards

The Energy Efficiency Standards for Residential and Nonresidential Buildings (24 CCR Part 6) were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The CEC adopted the 2008 changes to the Building Energy Efficiency Standards in order to (1) "Provide California with an adequate, reasonably-priced, and environmentally-sound supply of energy" and (2) "Respond to Assembly Bill 32, the Global Warming Solutions Act of 2006, which mandates that California must reduce its greenhouse gas emissions to 1990 levels by 2020." Title 24 Part 6 of the 2013 California Building Standards Code, the 2013 California Energy Code, went into effect on July 1, 2014, and includes energy efficiency updates.⁴ Buildings that are constructed in accordance with the 2013 Building and Energy Efficiency

² California Air Resources Board. State Alternatives Fuels Plan. <https://www.arb.ca.gov/fuels/ab1007/ab1007.htm>

³ California Energy Commission. <http://www.energy.ca.gov/altfuels/>

⁴ The 2016 California Building Standards Code (Cal. Code Regs., Title 24) was published July 1, 2016, with an effective date of January 1, 2017. <http://www.bsc.ca.gov/codes.aspx>

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Standards are 25 percent (residential) to 30 percent (nonresidential) more energy efficient than the 2008 standards as a result of better windows, insulation, lighting, ventilation systems, and other features.

Most recently, the CEC adopted the 2016 Building and Energy Efficiency Standards. The 2016 Standards will continue to improve upon the current 2013 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. These standards will go into effect on January 1, 2017. Under the 2016 Standards, residential buildings are 28 percent more energy efficient than the 2013 Standards, and nonresidential buildings are 5 percent more energy efficient than the 2013 Standards.⁵

The 2016 standards will not achieve zero net energy. However, they do get very close to the state's goal and make important steps toward changing residential building practices in California. The 2019 standards will take the final step to achieve zero net energy for newly constructed residential buildings throughout California.⁶

Title 24, Part 11, Green Building Standards

The California Green Building Standards Code (24 CCR Part 11), also known as CALGreen, is a code with mandatory requirements for new residential and nonresidential buildings throughout California. CALGreen is intended to (1) reduce GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. In short, the code is established to reduce construction waste, make buildings more efficient in the use of materials and energy, and reduce environmental impact during and after construction. CALGreen contains requirements for construction site selection; storm water control during construction; construction waste reduction; indoor water use reduction; material selection; natural resource conservation; site irrigation conservation; and more. The code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for verifying that all building systems (e.g., heating and cooling equipment and lighting systems) are functioning at their maximum efficiency.⁷

Assembly Bill 1493

California vehicle GHG emission standards were enacted under AB 1493 (Pavley I). Pavley I is a clean-car standard that reduces GHG emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016 and is anticipated to reduce GHG emissions from new passenger vehicles by 30 percent in 2016. California implements the Pavley I standards through a waiver granted to California by the EPA. In 2012, the EPA issued a Final Rulemaking that sets even more stringent fuel economy and GHG emissions standards for model year 2017 through 2025 light-duty vehicles (see also the discussion on the update to the Corporate Average Fuel Economy standards under *Federal*, above). In January 2012, CARB approved the Pavley Advanced Clean Cars program (formerly known as Pavley II) for model years 2017

⁵ California Energy Commission (CEC). 2016 Building Energy Efficiency Standards, Adoption Hearing Presentation. <http://www.energy.ca.gov/title24/2016standards/rulemaking/documents/>

⁶ California Energy Commission (CEC). 2016 Building Energy and Efficiency Standards Frequently Asked Questions. http://www.energy.ca.gov/title24/2016standards/rulemaking/documents/2016_Building_Energy_Efficiency_Standards_FAQ.pdf

⁷ The 2016 California Building Standards Code (Cal. Code Regs., Title 24). <http://www.bsc.ca.gov/codes.aspx>

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through 2025. The program combines the control of smog, soot, and global warming gases and requirements for greater numbers of zero-emission vehicles into a single package of standards. Under California's Advanced Clean Car program, by 2025, new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions.

County

Countywide Energy and Environmental Policy

The Los Angeles Countywide Energy and Environmental Policy (Policy) was adopted by the County Board of Supervisors on January 16, 2007, to provide guidelines for the development and enhancement of energy conservation and environmental programs within County departments. The Policy was also the County's response for the need for energy conservation and reduction in GHG emissions. It directs the County to track its GHG emissions with the California Climate Action Registry, and to reduce its facilities' energy consumption by 20 percent by the year 2015.

In addition, the County has implemented various internal programs on energy conservation; water conservation; waste reduction and recycling; green purchasing and contracting; and alternative fuel vehicle purchasing. On January 13, 2009, the County created an action plan for developing a Comprehensive Renewable Energy Program to develop renewable energy projects on existing County facilities and properties.

County Renewable Energy Ordinance

The County adopted the Renewable Energy Ordinance and certified the associated FEIR on July 14, 2015.⁸ This Countywide ordinance amends Title 22 (Planning and Zoning) of the County Code to provide a set of definitions, procedures and standards for review and permitting of solar and wind energy projects. These include solar and wind projects generating energy for on-site (small-scale) or off-site (utility-scale) use as well as temporary meteorological towers.

Los Angeles Unified School District

Standard Conditions of Approval

LAUSD Standard Conditions of Approval are uniformly applied development standards and were adopted by the LAUSD BOE in November 2015.⁹ This table lists the energy-related standard conditions that will be included as part of the proposed Project.

⁸ County of Los Angeles. Renewable Energy. Department of Regional Planning. <http://planning.lacounty.gov/energy>.

⁹ LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." Adopted by the Board of Education on November 10, 2015. <http://achieve.lausd.net/ccqa>.

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LAUSD Standard Conditions of Approval	
SC-AQ-2	LAUSD's construction contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.
SC-AQ-4	<p>LAUSD shall prepare an air quality assessment. If site-specific review of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds. LAUSD shall mandate that construction bid contracts include the measures identified in the air quality assessment. Measures shall reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. Specific air emission reduction measures include, but are not limited to, the following:</p> <p>Exhaust Emissions</p> <ul style="list-style-type: none"> • Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM). • Consolidate truck deliveries and/or limit the number of haul trips per day. • Route construction trucks off congested streets. • Employ high pressure fuel injection systems or engine timing retardation. • Utilize ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment. • Use construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower. • Restrict non-essential diesel engine idle time, to not more than five consecutive minutes. • Utilize electrical power rather than internal combustion engine power generators as soon as feasible during construction. • Utilize electric or alternatively fueled equipment, if feasible. • Utilize construction equipment with the minimum practical engine size. • Utilize low-emission on-road construction fleet vehicles. • Ensure construction equipment is properly serviced and maintained to the manufacturer's standards. <p>Fugitive Dust</p> <ul style="list-style-type: none"> • Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for ten days or more). • Replace ground cover in disturbed areas as quickly as possible. • Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water). • Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip. • Pave construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles. • Pave all construction access roads for at least 100 feet from the main road to the project site. • Water the disturbed areas of the active construction site at least three times per day, except during periods of rainfall. • Enclose, cover, water twice daily, or apply non-toxic soil binders according to manufacturers' specifications to exposed piles (i.e., gravel, dirt, and sand) with a five percent or greater silt content. • Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph). • Apply water at least three times daily, except during periods of rainfall, to all unpaved road surfaces. • Limit traffic speeds on unpaved road to 15 mph or less. • Prohibit high emission causing fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD. • Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials. • Limit the amount of daily soil and/or demolition debris loaded and hauled per day. <p>General Construction</p> <ul style="list-style-type: none"> • Utilize ultra-low VOC or zero-VOC surface coatings. • Phase construction activities to minimize maximum daily emissions.

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LAUSD Standard Conditions of Approval

	<ul style="list-style-type: none"> • Configure construction parking to minimize traffic interference. • Provide temporary traffic control during construction activities to improve traffic flow (e.g., flag person). • Develop a trip reduction plan for construction employees. • Implement a shuttle service to and from retail services and food establishments during lunch hours. • Increase distance between emission sources to reduce near-field emission impacts. • Require construction contractors to document compliance with the identified mitigation measures.
SC-GHG-1	During school operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
SC-GHG-2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.
SC-GHG-3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.
SC-GHG-4	LAUSD shall develop a water budget for landscape (both non-recreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources.
SC-GHG-5	LAUSD shall ensure that the time dependent valued energy of the proposed project design is at least 10 percent, with a goal of 20 percent less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the Division of the State Architect.

Note: Text in *italics* shows specific requirement identified in the criteria or condition.

5.2.1.2 EXISTING SETTING

Electricity

Southern California Edison (SCE) provides electrical power to business and residents in the City of Huntington Park. The service area for SCE is 50,000 square miles and includes 180 cities across 15 counties, which serve over 15 million people in central, coastal, and Southern California.¹⁰ SCE's service territory ranges from Mono County in the northeast to San Bernardino County in the southeast and Orange County in the southwest. As of this writing, SCE is currently generating 22,965 megawatts (MW) of power, and is approved for another 2,054 MW.¹¹ SCE delivered approximately 87 billion kWh of electricity in 2015.¹² SCE currently maintains 12,782 miles of transmission lines, 90,401 miles of distribution lines, 1,433,336 electric poles, 720,800 distribution transformers, and 2,959 substation transformers. SCE continues to expand their service territory (within their existing service area) on a project-by-project basis. Power lines are located along the streets surrounding HPHS.

Natural Gas

Natural gas provides the source of more electricity generation than any energy source in California. According to the CEC, data gathered as of September 10, 2015 indicates that 60 percent of all electric generation in California comes from natural gas.¹³ In 2012, natural gas was used in California to produce electricity (45.6

¹⁰ Southern California Edison 'Who We Are'. <https://www.sce.com/wps/portal/home/about-us/who-we-are/>

¹¹ California Energy Commission - Energy Facility Status Power Plant Projects Since 1996. http://www.energy.ca.gov/sitingcases/all_projects.html.

¹² Southern California Edison 'Who We Are'. <https://www.sce.com/wps/portal/home/about-us/who-we-are/>

¹³ SoCalGas. <https://www.socalgas.com/smart-energy/reliable-natural-gas-for-the-future>

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percent), in residential uses (20.8 percent), in industrial uses (14.5 percent), in oil and gas industry operations (9.4 percent), in commercial uses and for transportation (8.6 percent), agriculture (0.5 percent), and other unspecified uses (0.6 percent). The total natural gas usage in 2012 was 23,323 million therms.¹⁴ Natural gas is provided and distributed to residents and businesses in the City of Huntington Park by the Southern California Gas Company (SoCalGas). More than 101,000 miles of transmission and distribution pipes and four natural gas storage facilities make up the natural gas infrastructure needed to provide natural gas throughout the SoCalGas service territory.¹⁵ According to the 2016 California Gas Report, SoCalGas is expected to provide an average of 2,526,000 Kilo British Thermal Unit (kBtu) per day by 2021.¹⁶ In addition, due to modest economic growth, energy efficiency standards and programs, renewable electricity goals and the decline in commercial and industrial demand, natural gas demands are projected to decline at an annual rate of 0.6 percent throughout the SoCalGas service area.¹⁷ SoCalGas purchases gas supplies on a daily, monthly and longer-term basis from producers and marketers in California, Canada, the Rockies, and elsewhere in the U.S. Southwest.

Petroleum Based Fuel

In 2016, 15.5 billion gallons of gasoline (non-diesel)¹⁸ and 3 billion gallons of diesel fuel¹⁹ were sold statewide. The estimated 2015 gasoline sales for Los Angeles County were approximately 3.47 billion gallons (non-diesel), and 313 million gallons of diesel fuel.²⁰

5.2.2 Thresholds of Significance

Neither Appendix F of the **State CEQA Guidelines** nor PRC Section 21100(b)(3) provides a threshold of significance that might be used to evaluate the potential significance of energy consumption of a project. Rather, the emphasis is on reducing “the wasteful, inefficient, and unnecessary consumption of energy.” Based on this focus of the State CEQA Guidelines, for purposes of this Draft EIR, the proposed Project would have a significant impact related to energy consumption if it would:

ENE-1 Involve the wasteful, inefficient, and unnecessary consumption of energy, especially fossil fuels such as coal, natural gas, and petroleum, associated with Project design, Project location, the use of

¹⁴ The therm is a unit of heat energy equal to 100,000 British thermal units (BTU). It is approximately the energy equivalent of burning 100 cubic feet of natural gas. Since natural gas meters measure volume and not energy content, a therm factor is used by natural gas companies to convert the volume of gas used to its heat equivalent, and thus calculate the actual energy use. California Energy Commission, Energy Almanac, Overview of Natural Gas in California, Natural Gas Supply.
http://www.energy.ca.gov/almanac/naturalgas_data/

¹⁵ SoCalGas. <https://www.socalgas.com/smart-energy/reliable-natural-gas-for-the-future>

¹⁶ 2016 California Gas Report, prepared by the California Gas and Electric Utilities, Table 1-SCG.
<https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf>

¹⁷ 2016 California Gas Report, prepared by the California Gas and Electric Utilities, pg. 64.
<https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf>

¹⁸ California Energy Commission, California Gasoline Data, Facts, and Statistics.
http://www.boe.ca.gov/sptaxprog/reports/MVF_10_Year_Report.pdf

¹⁹ California Energy Commission, Diesel Fuel Data, Facts, and Statistics.
http://www.boe.ca.gov/sptaxprog/reports/Diesel_10_Year_Report.pdf

²⁰ California Energy Commission, California Annual Retail Fuel Outlet Report Results (CEC-A15) Spreadsheets.
http://www.energy.ca.gov/almanac/transportation_data/gasoline/2015_A15_Results.xlsx

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electricity and/or natural gas, and/or the use of fuel by vehicles anticipated to travel to and from the Project.

5.2.3 Environmental Impacts

The following impact analysis addresses thresholds of significance for energy conservation.

Impact 5.2-1: Involve the wasteful, inefficient, and unnecessary consumption of energy, especially fossil fuels such as coal, natural gas, and petroleum, associated with Project design, Project location, the use of electricity and/or natural gas, and/or the use of fuel by vehicles anticipated to travel to and from the Project. [Threshold ENE-1]

Construction Impacts

Project construction would require minor demolition, grading, utility installation, foundation construction, building construction, paving, and landscaping installation. All construction would be typical for the region and building type. During construction, energy would be consumed in the form of petroleum-based fuels (i.e., gasoline and diesel) used to power off-road construction vehicles and equipment on the Project site, for construction worker travel to and from the Project site, as well as for delivery truck trips; and to operate generators to provide temporary power for lighting and electronic equipment. The manufacturing of construction materials used by the proposed Project would also involve energy use. Due to the large number of materials and manufacturers involved in the production of the construction materials that may be used for the Project, upstream energy use cannot be reasonably estimated. However, it is reasonable to assume that manufacturers of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business and to support the District's design and energy efficiency standards.²¹ Furthermore, neither the City of Huntington Park nor the District has control over or the ability to influence energy resource use by the manufacturers of construction materials. Therefore, this analysis does not evaluate upstream energy use.

The average annual and total consumption of gasoline and diesel fuel during Project construction was estimated using the same assumptions and factors from CalEEMod that were used in estimating construction air emissions in the Initial Study (see Appendix A). A total of approximately 224,958 gallons of fuel would be consumed by construction equipment during construction of the Project. Additionally, 3,497 gallons of fuel for workers and 46,463 gallons for soil haul trucks traveling to and from the school (see Appendix D of this EIR for calculations).

Construction activities would not consume measurable amounts of electricity or natural gas. Although construction would consume fuel energy resources, construction activities would be temporary and would cease at the end of construction. Therefore, there would be no long-term energy impacts associated with construction activities.

²¹ LAUSD (Facilities Services Division). 2016. School Design Guide. Available at: <http://www.laschools.org/new-site/asset-management/school-design-guide>.

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Required compliance with Collaborative for High Performance Schools (CHPS) criteria and LAUSD Standard Conditions of Approval the Project would incorporate energy efficiency measures during Project construction.

- **SC-AQ-2:** Requires properly tuned and maintained construction equipment; these uses less fuel than unmaintained equipment.
- **SC-AQ-3:** Requires the use of Tier 3 (model year 2006 or newer) and Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower; these engines are more fuel efficient than older models. It also requires restricting non-essential diesel engine idle time; using construction equipment with the minimum engine size uses less gas than larger engines; a trip reduction plan for construction employees to encourage carpooling, and shuttle service to and from retail services and food establishments during lunch hours thereby reducing the number of cars and amount of gas used by construction workers.

Diesel motor vehicle idling limits and construction equipment maintenance is also required under the Air Resources Board's Airborne Toxic Control Measures.²²

For the reasons discussed above, the proposed Project would not involve the inefficient, wasteful, and unnecessary use of energy during construction and the construction-phase impact related to energy consumption would be less than significant.

Operational Impacts

There are currently approximately 1,611 students enrolled in grades 9 through 12 at HPHS. The proposed Project consists of improvements to the existing school. There would be no increase in capacity or enrollment with the Project, and therefore no net increase in vehicular trips. The proposed Project includes infrastructure improvements but would not change existing operations at the school. The school would continue to house the existing school programs and continue to serve the same current and future students after Project completion. No changes to operations including school-related events, or community use would occur as the result of this Project. The levels of traffic that would be generated by the school and the geographical distribution of the school traffic on the public street network would remain unchanged compared to existing conditions and no Project-related impact would occur.

The proposed Project would reduce the fuel and energy consumption on campus by incorporating the current building codes. The new buildings are required to comply with California Code of Regulations (CCR) Title 24, which establishes Building Energy Efficiency Standards (Part 6) and CALGreen (Part 11). Compliance with these standards ensures a 35 percent increase in building energy efficiency compared to 2008 standards. Additionally, implementation of the CHPS Prerequisite Criteria and other criteria; buildings that are solar ready, automatic shut-off controls for indoor lighting, reduced water use with low-flow fixtures, and restrictions on bus idling, will further reduce energy consumption at the campus. LAUSD Standard Conditions of Approval that would be incorporated into the proposed Project include:

²² 13 CCR Chapter 10 § 2485

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- **SC-GHG-1, SC-GHG-2, SC-GHG-3, and SC-GHG-4:** Requires water conservation at the school through 1) regular preventative maintenance, 2) early morning hours to reduce water loss from evaporation, 3) reset automatic sprinkler timers to water less during cooler months and rainy season, and 4) development of a water budget for landscape. Water conservation reduces the amount of energy required to process and deliver the water.
- **SC-GHG-5:** Requires that project design be at least 10 percent less than a standard design that is in minimum compliance with the CCR, Title 24, Part 6 (Building Energy Efficiency Standards).

Therefore, replacement of older buildings with new buildings that comply with CCR Title 24, CHPS criteria, and LAUSD Standard Conditions of Approval would reduce long-term energy use on the campus, which would have a beneficial impact on the environment.

For the reasons discussed above, the proposed Project would not involve the inefficient, wasteful, and unnecessary use of energy during the operation-phase of the Project, and impacts related to energy consumption would be less than significant.

5.2.4 Cumulative Impacts

“A cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts.”²³

The Proposed Project would not result wasteful, inefficient, or unnecessary use of energy during construction. The proposed Project consists of new construction which would reduce wasteful energy consumption at the existing campus by replacing the existing old utility systems with improved systems that achieve the current California Building Energy and Efficiency Standards (Title 24, Part 6) and CALGreen (Title 24, Part 11). Energy use from other related projects is unknown. Because this Project would not result in a inefficient, wasteful and unnecessary consumption of energy, its contribution would be less than significant and cumulative impacts would be less than significant.

5.2.5 Applicable Standard Conditions

LAUSD Standard Conditions of Approval

- LAUSD Standard Conditions of Approval SC0AQ-2, SC-AQ-4, and SC-GHG-1 through SC-GHG-5.

5.2.6 Level of Significance Before Mitigation

Impact 5.2 would be less than significant.

5.2.7 Mitigation Measures

No mitigation measures are required.

²³ CEQA Guidelines 15130. Discussion of Cumulative Impacts.

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5.2.8 Level of Significance After Mitigation

Impacts to energy conservation would be less than significant.

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6. Significant Unavoidable Adverse Impacts

As concluded in the individual topical sections of Initial Study attached as Appendix A to this Draft EIR, which the exception of historic resources, no significant impacts would be anticipated as a result of the proposed Project. Chapter 5.1 of this Draft EIR found significant impact related to historic resources.

CEQA Guidelines Section 15126.2(b) requires a discussion of any significant impacts that cannot be reduced to levels of insignificance. Although a mitigation measure has been identified, the Project would result in one impact (historic resource) that is significant and unavoidable even after implementation of the available, feasible mitigation measure as discussed in Chapter 5.1, *Cultural Resources*.

The HPHS historic district appears to meet the criteria for listing in both the NRHP and CRHR.¹ Contributors to this designation are:

- Significant (Primary): Interior Courtyard and Landscaped Open Area
- Significant (Primary): Administrative Building (Building 1)
- Significant (Primary): Auditorium Building (Building 2)
- Significant (Primary): Home Economics Building (Building 4)
- Significant (Primary): Annex Building (Building 8)
- Contributing (Secondary): Cafeteria Building (Building 3)
- Contributing (Secondary): Parent and Family Center (Building 12)
- Contributing (Tertiary): Gymnasium Building (Building 13)

Three of the seven character-defining buildings would be demolished; almost half of the character-defining buildings on the campus. Due to the substantial loss of character-defining buildings, HPHS's integrity of design, materials, workmanship, setting and feeling would be compromised; therefore, following Project completion, the campus as a whole would be ineligible for listing on the NRHP and CRHR. Thus, the historical significance of the campus as a historic district would be materially impaired, and the Project would result in a significant and unavoidable impact to cultural resources (specifically to HPHS as a historic resource/historic district). Due to the substantial adverse change in the significance of the school resulting from the demolition of the two primary buildings (Buildings 4 and 8) and one tertiary building (Building 13), the following LAUSD Standard Conditions of Approval are incorporated to reduce adverse impacts: SC-CUL-4 (Recordation), SC-CUL-5 (Salvage of Features), and SC-CUL-6 (Salvage of Building Materials). These three SCs will ensure that the history and significance of the buildings to be demolished (Buildings 4, 8, and 13) and their relationship with the larger campus will be fully documented and that the character-defining

¹ Science Applications International Corporation (SAIC). Historic Schools of the Los Angeles Unified School District. The Getty Grant Program. March 2002. (Appendix C-5)

6. Significant Unavoidable Adverse Impacts

features and materials of demolished buildings (as well as memorabilia and relevant items outlined by the school community that is capable of being preserved) will be salvaged and made available to the public for sale or reuse. To further document the history of the school, implementation of Mitigation Measure MM-CUL-1 would provide information to the public through a permanent interpretive exhibit.

Additionally, the Project was assessed for compliance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (SOI Standards; Appendix C-1). The analysis found that the proposed Project would not fully comply with the SOI Standards, specifically Standards 1, 2, 5, 9 and 10, because of the planned demolition of the Home Economics Building (Building 4), Annex Building (Building 8), and Gymnasium Building (Building 13) buildings.²

Even with the incorporation of LAUSD SCs and Mitigation Measure MM-CUL-1 impacts to the historical resources at HPHS would remain significant and unavoidable.

² ESA. 2017, October. Huntington Park High School Comprehensive Modernization Project: CEQA Historic Resources Technical Report.

7. Alternatives to the Project

7.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that an EIR include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives.”¹ This chapter identifies potential alternatives to the proposed Project and evaluates them, as required by CEQA.

Key provisions of the CEQA Guidelines on alternatives are summarized below to explain the foundation and legal requirements for the alternatives analysis in the EIR.²

- “The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.”³
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact.”⁴
- “The no project analysis shall discuss the existing conditions at the time the Notice of Preparation (NOP) is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.”⁵
- “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.”⁶
- “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or

¹ 14 CCR Section 15126.6

² 14 CCR Sections 15126.6(a) through (f)

³ 14 CCR Section 15126.6(b)

⁴ 14 CCR Section 15126.6(e)(1)

⁵ 14 CCR Section 15126.6(e)(2)

⁶ 14 CCR Section 15126.6(f)

7. Alternatives to the Project

regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).⁷ The District also considers “educational programming” in the identification of a feasible project and alternatives on its campuses.

- “For alternative locations, “only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.”⁸
- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.”⁹

For each alternative to the Project, this analysis:

- Describes the alternative.
- Analyzes the impact of the alternative compared to the proposed Project.
- Identifies the impacts of the Project that would be avoided, or lessened by, the alternative.
- Assesses whether the alternative would meet most of the basic Project objectives.
- Evaluates the comparative merits of the alternative and the Project.

Per the CEQA Guidelines Section 15126.6(d), additional significant effects of the alternatives are discussed in less detail than the significant effects of the Project as proposed.

7.2 STATEMENT OF OBJECTIVES

The following objectives have been established for the Project and will aid decision makers in their review of the Project and Project alternatives.¹⁰

- Objective #1: Increase the safety and security of the staff and students through the campus modifications and configuration.
- Objective #2: Repair and seismically retrofit aging facilities while also bringing buildings to code to meet the Americans with Disabilities Act (ADA) programmatic access requirements.

⁷ 14 CCR Section 15126.6(f)(1)

⁸ 14 CCR Section 15126.6(f)(2)(A)

⁹ 14 CCR Section 15126.6(f)(3)

¹⁰ The objectives are numbered for ease of reference. The number does not indicate any priority.

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- Objective #3: Upgrade buildings to include modern classroom spaces that can accommodate the California Department of Education's and District's standard classroom space of 960 square feet and modern technology and efficiencies, including HPHS's priority and specialty campus programs such as multimedia computer technology, culinary arts, video/sound, and digital imaging, which are designed to meet the educational needs of the students and campus.
- Objective #4: Promote a healthier environment through the use of green technology.
- Objective #5: Design buildings and facilities that align with the current programmatic and operational needs of the campus while retaining or enhancing opportunities for future planning.
- Objective #6: Respect the history of the campus through the rehabilitation, retention, and reuse of features that have been established as character-defining or otherwise relevant to the school community (i.e., current and former students, alumni, staff, etc.) to the extent feasible, while modernizing the campus to address the current needs of the campus.
- Objective #7: Limit the disruption of the educational experience of students during construction of the Project by limiting the number and/or duration of phases.

7.3 POTENTIALLY SIGNIFICANT IMPACTS OF THE PROJECT

A primary consideration in defining project alternatives is their potential to reduce or eliminate significant impacts and to meet most of the objectives. Pursuant to CEQA Guidelines Section 15126.6[b], alternatives to the proposed Project include those that are capable of avoiding or substantially lessening any significant effects of the Project, even if these alternatives would impede to some degree the attainment of the Project objectives or would be more costly.

Due to the demolition of the two primary contributors (Buildings 4 and 8) and one tertiary contributor (Building 13), HPHS's integrity of design, materials, workmanship, setting, and feeling would be compromised, and the Historic District would no longer be a cohesive, PWA Moderne-style campus (period of significance 1923–1936). Therefore, following completion of the Project, the Historic District would be ineligible for listing on the NRHP and the CRHR due to the substantial loss of integrity. Several buildings would remain individually eligible for the NRHP and the CRHR under criteria C/3 following the Project—Administration (Building 1) and the Auditorium (Building 2), both of which are primary character-defining buildings, along with their associated landscape setting (the Fountain's Court). Nevertheless, removal of the Historic District would be a significant and unavoidable impact.

7.4 ALTERNATIVES CONSIDERED AND REJECTED DURING THE PLANNING PROCESS

The following is a discussion of the alternatives considered during the scoping and planning process and the reasons why they were not selected for analysis in this EIR.

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7.4.1 Alternative Site

CEQA requires that the discussion of alternatives focus on alternatives to the Project or its location that are capable of avoiding or substantially lessening any significant effects of the Project. The key question and first step in the analysis is whether any of the significant effects of the Project would be avoided or substantially lessened by putting the Project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the Project need be considered for inclusion in the EIR.¹¹

Off-Site Alternative: As a campus modernization Project for an existing campus, an alternative off-site location is not a feasible option. The Project by design is intended to occur on the HPHS campus. Consequently, an alternative off-site site location was not a feasible alternative and would not meet the Project objectives. For these reasons, this alternative was not considered.

On-Site Alternatives: During the Project planning and design review process, various alternative building configurations were explored and presented as conceptual designs to the school administration, staff, students, and parents; stakeholders; and the community during meetings. These options included the construction of a new 3-story building; alternative setbacks and locations for one or two new buildings; the reconfiguration of the specialty classrooms (such as the culinary arts classroom) in the Home Economics Building (Building 4); and alternative uses for the undersized classrooms (some less than 700 square feet) in both the Home Economics Building (Building 4) and Annex Building. However, due to site constraints and the physical constraints of the buildings (i.e., the existing structural systems in these buildings do not allow the enlargement or combining of the existing classrooms), these alternatives were rejected.

The available spaces identified for new construction on the existing campus are limited. Each of the alternate on-site locations would require the removal of permanent buildings or spaces on the campus that were comparable to or the same as the proposed Project, but without providing the same benefits (e.g., enhanced security, classrooms designed to accommodate the programmatic needs of the campus, sensitivity to the remaining historic resources). Through this process, it was determined that the proposed Project most closely aligned with the school's programmatic needs and Project objectives.

7.5 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

The following four options were determined to represent a reasonable range of alternatives, have the potential to feasibly attain most of the Project objectives, and may substantially lessen the significant effect of the Project.

- Alternative 1. No Project
- Alternative 2. Retain 1 Historic Building
- Alternative 3. Retain 2 Historic Buildings
- Alternative 4. Retain All 3 Historic Buildings

¹¹ 14 CCR Section 15126(5)(B)(1).

7. Alternatives to the Project

An EIR must identify an “environmentally superior” alternative, and where the No Project Alternative is identified as environmentally superior, the EIR is then required to identify as environmentally superior an alternative from among the others evaluated. Each alternative’s environmental impacts are compared to the proposed Project and determined to be environmentally superior, neutral, or inferior. Only the impacts found significant and unavoidable are used in making the determination of whether an alternative is environmentally superior or inferior to the proposed Project. Only the impacts involving cultural resources were found to be significant and unavoidable, as outlined in Section 7.3, *Potentially Significant Impacts of the Project*. Section 7.7, *Environmentally Superior Alternative*, identifies the alternative that was determined to be environmentally superior. The proposed Project is analyzed in detail in Chapter 5, *Environmental Analysis*, of this Draft EIR.

Section 7.6, *Alternatives Analysis*, provides a detailed discussion of the potential for Alternatives 1 to 4 to meet the Project objectives; their ability to be feasibly incorporated; and their ability to align with the Board-approved goals and principles and core objectives for the School Upgrade Program (SUP). The overarching goals and principals of the SUP which drive the upgrade, building, and repair of District school facilities required to improve student health, safety and educational quality within specific categories of need, are:

- Facilities should align with instructional requirements and vision
- Schools should be safe and secure
- School building systems should be sound and efficient¹²

Furthermore, six core objectives have been established for comprehensive modernization projects undertaken under the SUP:

- The buildings that have been identified as requiring seismic upgrades must be addressed.
- The buildings, grounds and site infrastructure determined to have significant/severe physical conditions that already do, or are highly likely (in the near future) to pose a health and safety risk or negatively impact a school’s ability to deliver the instructional program and/or operate must be addressed.
- The school’s reliance on relocatable buildings, especially for K-12 instruction, should be significantly reduced.
- Necessary and prioritized upgrades must be made throughout the school site in order to comply with the program accessibility requirements of the Americans with Disabilities Act (ADA) Title II Regulations, and the provisions of the Modified Consent Decree (MCD)
- The exterior conditions of the school site should be addressed to improve the visual appearance including landscape, hardscape, and painting.

¹² Los Angeles Unified School District. 2015. School Upgrade Program Final Environmental Impact Report, <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.

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- The interior physical conditions of classroom buildings that would otherwise not be addressed should be improved.

The District worked to balance these goals and objectives with the District's use of limited bond funds to upgrade and modernize educational facilities with the greatest need in order to ensure that they are equitably available throughout the District (particularly at aged campuses where significant seismic/structural challenges and deterioration were identified by the District's Facilities Condition Assessment).¹³

Seven buildings on the HPHS campus are listed on the State of California's AB-300 List. The AB-300 List identifies kindergarten through twelfth-grade school buildings that require detailed seismic evaluations to determine if they would be able to achieve the required life-safety performance metrics (which include a range of evaluations from structural support, foundation system, load resisting) during a seismic event.¹⁴ The District's preliminary planning site assessment tasks for the Project included the evaluation of seven buildings on the HPHS campus that were listed on the AB-300 list.¹⁵ The seismic evaluations were completed in accordance with DSA PR08-03 for the School Facility Program/Seismic Mitigation Program and LAUSD requirements. Based upon the seismic evaluation, the scope of the voluntary seismic upgrading, the smaller-than-standard-sized classrooms (less than 700 square feet), and the overall renovation cost estimate that was completed, it was determined that the Home Economics Building (Building 4), Annex Building (Building 8), and Gymnasium Building (Building 13) would be demolished and replaced with classroom buildings and athletic facilities that meet California Department of Education, Division of the State Architect, and the District's current educational standards and building codes.¹⁶

Under the Project (or any alternative), all structural and non-structural components of the Home Economics Building (Building 4), Annex Building (Building 8), and Gymnasium Building (Building 13) that would be deemed non-compliant after exploratory testing and further review would be required to be retrofitted, which may include, among other things, complete replacement of components considered sufficiently degraded for functionality, strengthening and repair of components as required for lateral loads, and providing additional bracing and anchorage for the prescribed force levels.¹⁷ The other four buildings were the Administration Building, which does not require voluntary seismic retrofits;¹⁸ Shop Buildings #1 and #2, which were seismically retrofitted in 2009; and the adult-school Welding Shop, which is not a part of the Project.¹⁹ The alternatives presented in the following sections provide options that would retain one or all of the three buildings—Home Economics Building (Building 4), Annex Building (Building 8), and Gymnasium Building (Building 13)—that would be demolished and replaced as a part of the proposed Project.

¹³ LAUSD. 2017. Facilities Condition Assessment. Los Angeles, CA.

¹⁴ Division of State Architects (DSA). Accessed 2017. AB 300. Available at: <http://www.dgs.ca.gov/dsa/AboutUs/ab300.aspx>

¹⁵ LAUSD. 2016. LAUSD AB-300 Criteria Building List. Available at: <http://www.dgs.ca.gov/dsa/AboutUs/ab300.aspx>

¹⁶ LAUSD. 2017. Huntington Park High School Final Schematic Design Report. Los Angeles, CA.

¹⁷ LAUSD, Prepared by Englekirk Institutional for Gonzalez Goodale Architects. 2016. Building No.4 –Home Economics Building ASCE 41-13 Mandatory Seismic Evaluation and Retrofit.

¹⁸ SEAOC. 2012. Navigating the Building Code Requirements for the Seismic Rehabilitation of Schools in California. San Diego, CA.

¹⁹ LAUSD. 2017. Huntington Park High School Final Schematic Design Report. Los Angeles, CA.

7. Alternatives to the Project

7.5.1 Comparison of Project Alternatives

Table 7-1, *Project Alternatives Description*, provides a comparison of the key campus facilities associated with each alternative and the proposed Project.

Table 7-1 Project Alternatives Description

Project Components	Building Area (square feet)	Proposed Project	Alternative 1. No Project	Alternative 2. Retain 1 Historic Building Home Economics (Building 4)	Alternative 3. Retain 2 Historic Buildings Home Economics (Building 4) and Annex (Building 8)	Alternative 4. Retain All 3 Historic Buildings Home Economics (Building 4), Annex (Building 8), and Gymnasium (Building 13)
Administrative Building (Building 1): 1936 ^a	39,375	Modernize, Upgrade, Renovate	Not modernized	Same as Project	Same as Project	Same as Project
Auditorium Building (Building 2): 1937 ^a	17,927	Minor upgrades	Same as Project	Same as Project	Same as Project	Same as Project
Cafeteria Building (Building 3): 1936 ^b	17,949	No change	Same as Project	Same as Project	Same as Project	Same as Project
Home Economics Building (Building 4): 1924 ^a	19,479	Remove & Replace with Building B	Not removed	Modernize, Upgrade, Renovate; Building B is not constructed	Modernize, Upgrade, Renovate; Building B is not constructed	Modernize, Upgrade, Renovate; Building B is not constructed
Central Plant (Building 5): 1923 (reconstructed 1934)	2,807	Remove & Replace with walkway and landscape (functions to be incorporated into the new and some existing campus buildings)	Not removed	Same as Project	Same as Project	Same as Project
Mechanical Drawing Building (Building 6): 1937	2,506	No change	Same as Project	Same as Project	Same as Project	Same as Project
Annex Building (Building 8): 1925 ^a	20,946	Remove & Replace with Building A	Not removed	Same as Project	Modernize, Upgrade, Renovate; Building A is not constructed	Modernize, Upgrade, Renovate; Building A is not constructed
Shop Building #1 (Building 9): 1960	14,749	Move weight room to new gymnasium & convert remaining space to flex lab	Not converted	Same as Project	Same as Project	Same as Project
Shop Building #2 (Building 11): 1960	15,328	No change	Same as Project	Same as Project	Same as Project	Same as Project
Social Arts/Parent and Family Center (Building 12): 1939 ^b	1,722	Minor upgrades (ADA features & restroom upgrades)	Same as Project	Same as Project	Same as Project	Same as Project
Gymnasium Building (Building 13): 1923 (reconstructed 1935) ^c	55,750	Remove & Replace with Building C	Not removed	Same as Project	Same as Project	Modernize, Upgrade, Renovate; Building C is not constructed

7. Alternatives to the Project

Table 7-1 Project Alternatives Description

Project Components	Building Area (square feet)	Proposed Project	Alternative 1. No Project	Alternative 2. Retain 1 Historic Building Home Economics (Building 4)	Alternative 3. Retain 2 Historic Buildings Home Economics (Building 4) and Annex (Building 8)	Alternative 4. Retain All 3 Historic Buildings Home Economics (Building 4), Annex (Building 8), and Gymnasium (Building 13)
Music Building (Building 18): 1963	3,468	No change	Same as Project	Same as Project	Same as Project	Same as Project
Classroom Building 1 (Building 25): 1957	10,708	No change	Same as Project	Same as Project	Same as Project	Same as Project
Science Building (Building 30): 1991	50,496	Modernize, Upgrade, Renovate ⁴	Not modernized	Same as Project	Same as Project	Same as Project
Two-Story Relocatable (Building 31): 1977	4,173	Remove & Replace with 25 parking spaces	Not removed	Same as Project	Same as Project	Same as Project
8 Portables 31–36, 38, 41: 1948–2000	15,274 total sf	Remove & Replace with other campus improvements	Not removed	8 portables would be removed; up to 6 new portables would replace the older outdated portables.	8 new portable buildings (containing 11 classrooms) would replace the older outdated portables	8 portables would be removed; up to 15 new portables would replace the older outdated portables.
Landscape Elements ^{a,d}	N/A	Upgrades to utilities, ADA features, & landscape, building repairs & paint	Not constructed	Less improvements	Significantly less improvements	Less improvements
New Construction						
Building A (2-story classrooms)	26,292	Replaces Annex (Building 8): 1925 ¹	Not constructed	Same as Project	Not constructed	Not constructed
Building B (1-story specialty classrooms)	14,696	Replaces Home Economics (Building 4): 1924 ¹	Not constructed	Not constructed	Not constructed	Not constructed
Building C Gymnasium, pool support building, & outdoor pool	Gym: 45,638 sf; support 2,810 sf; Pool ~12,884 sf	Replaces Gymnasium (Building 13): 1923 ³	Not constructed	Same as Project	Same as Project	Not constructed
Parking	N/A	51 parking spaces parking spaces would be added to the existing 159 spaces.	No additional parking	Same as Project	Same as Project	No additional parking

^a "primary" (significant) character-defining buildings and landscape

^b "secondary" (contributing) character-defining building

^c "tertiary" (contributing) character-defining building. Includes an inoperable indoor pool.

^d A full description is in Chapter 5.1, *Cultural Resources*, of this EIR.

7. Alternatives to the Project

Table 7-2, *Project Objectives Assessment*, provides a comparison of which Project objectives are met by the proposed Project and the alternatives.

Table 7-2 Project Objectives Assessment

Project Objective	Proposed Project	Alternative 1. No Project	Alternative 2. Retain 1 Historic Building Home Economics (Building 4)	Alternative 3. Retain 2 Historic Buildings Home Economics (Building 4) and Annex (Building 8)	Alternative 4. Retain All 3 Historic Buildings Home Economics (Building 4), Annex (Building 8), and Gymnasium (Building 13)
Objective #1: Increase the safety and security of the staff and students through the campus modifications and configuration	Yes	No	Yes	No	No
Objective #2: Repair and seismically retrofit aging facilities while also bringing buildings to code to meet the ADA programmatic access requirements	Yes	No	Yes	No	No
Objective #3: Upgrade buildings to include modern classroom spaces that can accommodate the California Department of Education's and District's standard classroom space of 960 square feet and modern technology and efficiencies including HPHS's priority and specialty campus programs such as multimedia computer technology, culinary arts, video/sound, and digital imaging which are designed to meet educational needs of the students and campus	Yes	No	No	No	No
Objective #4: Promote a healthier environment through the use of green technology	Yes	No	Yes	No	No
Objective #5: Design buildings and facilities that align with the current programmatic and operational needs of the campus while retaining or enhancing opportunities for future planning	Yes	No	No	No	No
Objective #6: Respect the history of the campus through the rehabilitation, retention and reuse of features that have been established as character-defining or otherwise relevant to the school community (i.e., current and former students, alumni, staff, etc.) to the extent feasible, while modernizing the campus to address the current needs of the campus	Yes	Yes	Yes	Yes	Yes
Objective #7: Limit the disruption of the educational experience of students during construction of the Project by limiting the number and/or duration of phases.	Yes	Yes	Yes	Yes	Yes

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Only the impacts found to be significant without mitigation (historic resources) are used in this alternatives analysis.

7.5.2 Alternative 1. No Project Alternative

CEQA Guidelines require the analysis of a No Project Alternative. This analysis must discuss the existing site conditions as well as what would be reasonably expected to occur in the foreseeable future based on any current plans if the Project were not approved. The No Project Alternative must be consistent with available infrastructure and community services. This discussion compares the environmental effects of the campus and school program remaining in their existing states against the environmental effects that would occur if the Project were approved.

Under the No Project Alternative, the Project would not occur at HPHS. The proposed modernization activities and campus-wide improvements would not be completed and the campus would remain in its current state. No physical changes would occur on the campus. Students would continue to attend classes in outdated portable buildings (some dating from 1948). Additionally, students would continue to attend classes in undersized classrooms in Home Economics Building (Building 4) and Annex (Building 8) that do not accommodate the needs of the educational programs at the campus. All buildings and facilities, including Central Plant (Building 5) and Gymnasium (Building 13), would remain in their current place on-site without any upgrades or modifications. Utilities and buildings would continue to operate in an inefficient manner (e.g., water and electricity). The No Project Alternative would not incorporate any of the structural seismic strengthening or ADA improvements that are required for this campus.

7.5.3 Alternative 2. Retain 1 Historic Building: Home Economics (Building 4)

Primary Buildings: Under Alternative 2, the District would retain Home Economics (Building 4), a primary significant character-defining building that significantly contributes to the eligibility of the campus as a historic district. Instead of demolition and removal, Alternative 2 would modernize, seismically retrofit, and renovate this building. However, students would continue to attend classes in undersized classrooms in this building that do not accommodate the needs of the educational programs at the campus and do not meet the California Department of Education's or District's standard classroom space of 960 square feet, since the existing structural system does not allow the enlargement or combining of undersized classrooms in this building.²⁰ All work would be completed in compliance with the SOI Standards and the LAUSD Design Guidelines and Treatment Approaches for Historic Schools as required under SC-CUL-1, -2, and -3.²¹ Because Home Economics (Building 4) would remain on the campus, space for a new building would not be available, and the new classroom building, Building B would not be constructed.

²⁰ California Department of Education. 2000. Guide to School Site Analysis and Development (2000 Edition). <https://www.cde.ca.gov/ls/fa/sf/guideschoolsite.asp>.

²¹ LAUSD (SWCA). 2015, January. Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools. http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/domain/135/pdf%20files/Final_Design_Guidelines.pdf per the Los Angeles Unified School District. 2015. School Upgrade Program Final Environmental Impact Report, <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015 and LAUSD. 2017. Huntington Park High School Final Schematic Design Report. Los Angeles, CA.

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Similar to the proposed Project, the Annex (Building 8), a primary character-defining campus building, would be demolished and replaced by Building A (2-story classrooms). Other primary features—Administration (Building 1) and Auditorium (Building 2)—would be modernized and landscapes would be upgraded.

Secondary Buildings: Secondary (contributing) character-defining Cafeteria (Building 3) and Parent and Family Center (Building 12) would be modernized and renovated as described in the Project.

Tertiary Buildings: Similar to the Project, this alternative includes demolition and reconstruction of Gymnasium (Building 13).

All other campus improvements would be the same as the proposed Project, including modernization and renovation of non-contributing Classroom Building 1 (Building 25) and Science (Building 30), and removal of the Central Plant (Building 5). Additionally, other campus-wide improvements would be comparable to those of the proposed Project.

7.5.4 Alternative 3. Retain 2 Historic Buildings: Annex (Building 8) and Home Economics (Building 4)

Primary Buildings: Under Alternative 3, the District would retain the Annex (Building 8) and Home Economics (Building 4), both primary significant character-defining buildings that significantly contribute to the eligibility of the campus as a historic district. Instead of demolition and removal, Alternative 3 would modernize, seismically retrofit, and renovate these buildings. However, students would continue to attend classes in undersized classrooms in these buildings that do not accommodate the needs of the educational programs at the campus and do not meet the California Department of Education's or District's standard classroom space of 960 square feet, since the existing structural system does not allow the enlargement or combining of undersized classrooms in these buildings.²² All work would be completed in compliance with the SOI Standards and the LAUSD Design Guidelines and Treatment Approaches for Historic Schools as required under SC-CUL-1, -2, and -3.²³ Because Annex (Building 8) and Home Economics (Building 4) would remain on the campus, space for new buildings would not be available, and the new classroom buildings, Buildings A and B, would not be constructed.

Similar to the proposed Project, other primary features, Administration (Building 1) and Auditorium (Building 2), would be modernized and landscapes would be upgraded.

Secondary Buildings: Secondary (contributing) character-defining Cafeteria (Building 3) and Parent and Family Center (Building 12) would be modernized and renovated as described in the Project.

²² California Department of Education. 2000. Guide to School Site Analysis and Development (2000 Edition).

<https://www.cde.ca.gov/ls/fa/sf/guideschoolsite.asp>. per the Los Angeles Unified School District. 2015. School Upgrade Program Final Environmental Impact Report, <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015 and LAUSD. 2017. Huntington Park High School Final Schematic Design Report. Los Angeles, CA.

²³ LAUSD (SWCA). 2015, January. Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools. http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/domain/135/pdf%20files/Final_Design_Guidelines.pdf

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Tertiary Buildings: Similar to the Project, this alternative includes demolition and reconstruction of Gymnasium (Building 13).

7.5.5 Alternative 4. Retain All Historic Buildings: Annex (Building 8), Home Economics (Building 4), and Gymnasium (Building 13)

Primary Buildings: Under Alternative 4, the District would retain the Annex (Building 8), Home Economics Building (Building 4), and Gymnasium Building (Building 13); all three are primary significant character-defining buildings that significantly contribute to the eligibility of the campus as a historic district. Instead of demolition and removal, Alternative 4 would modernize, seismically retrofit, and renovate these buildings. However, it is unlikely that the Gymnasium Building could be seismically retrofitted, since it was constructed as three adjoining buildings without any seismic separation and cannot be updated in its current configuration. All work would be completed in compliance with the SOI Standards and the LAUSD Design Guidelines and Treatment Approaches for Historic Schools as required under SC-CUL-1, -2, and -3.²⁴ Because the Annex Building (Building 8), Home Economics Building (Building 4), and Gymnasium Building (Building 13) would remain on the campus, space for new buildings would not be available, and the new classroom buildings, Buildings A, B, and C, would not be constructed.

The interiors of the Annex Building (Building 8) and the Home Economics Building (Building 4) would be redesigned, but would not provide the needed educational programming capabilities, and classrooms would be undersized. Up to 11 new portable buildings would be required to replace the outdated 8 portables on campus that would be removed in order to accommodate the student enrollment.

Similar to the proposed Project, other primary features, Administration Building (Building 1) and Auditorium Building (Building 2), would be modernized and landscapes would be upgraded.

Secondary Buildings: Secondary (contributing) character-defining Cafeteria (Building 3) and Parent and Family Center (Building 12) would be modernized and renovated as described in the Project.

7.6 ALTERNATIVES ANALYSIS

7.6.1 No Project Alternative

Under the No Project Alternative, the Project would not occur at HPHS. The proposed modernization activities and campus-wide improvements would not be completed and the campus would remain in its current state. No physical changes would occur on the campus. The No Project Alternative would avoid demolition of historic buildings. This alternative would not incorporate any of the structural seismic strengthening or ADA improvements that are required for this campus although it would be anticipated that standard ongoing maintenance would occur without the proposed Project.

²⁴ LAUSD (SWCA). 2015, January. Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools. http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/domain/135/pdf%20files/Final_Design_Guidelines.pdf

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The existing buildings and landscapes would deteriorate, most noticeably cosmetically, as nonessential maintenance and repairs are deferred.

Historic Resources

This alternative would not involve demolition or alterations to existing historic buildings except for critical repairs needed for health and safety. The Home Economics Building (Building 4), Annex Building (Building 8), Central Plant (Building 5), and Gymnasium Building (Building 13) would remain in their current places on-site without any upgrades or modifications. Utilities and buildings would continue to operate in an inefficient manner (e.g., water and electricity). The No Project Alternative would not incorporate any of the structural seismic strengthening or ADA improvements that are required for this campus.

However, because these buildings are already some of the oldest in the District, they would deteriorate and may lose some essential defining features. These features could potentially be repaired later when a safety issue arises. Because physical damage and demolition cause the greatest impacts to historic districts and buildings, under this alternative impacts to historical resources would be significantly reduced, but in the long run some age-related damage may occur.

Objectives

Alternative 1 would not meet Project Objectives #1, #2, #3, #4, and #5:

- Objective #1: Increase the safety and security of the staff and students through the campus modifications and configuration.
- Objective #2: Repair and seismically retrofit aging facilities while also bringing buildings to code to meet the Americans with Disabilities Act (ADA) programmatic access requirements.
- Objective #3: Upgrade buildings to include modern classroom spaces that can accommodate the California Department of Education's and District's standard classroom space of 960 square feet and modern technology and efficiencies including HPHS's priority and specialty campus programs such as multimedia computer technology, culinary arts, video/sound, and digital imaging which are designed to meet educational needs of the students and campus.
- Objective #4: Promote a healthier environment through the use of green technology.
- Objective #5: Design buildings and facilities that align with the current programmatic and operational needs of the campus while retaining or enhancing opportunities for future planning.

This alternative would not meet five of the Project objectives because no improvements or new building construction would occur on campus. This alternative would not increase safety and security because the campus would not be modified to create more open spaces and visual access between buildings, since all buildings would remain on campus. None of the campus buildings would be repaired or seismically retrofitted. Additionally, Building 4 and Building 8 would remain undersized and would not meet the California

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Department of Education's and the District's standard classroom space of 960 square feet. These buildings and the Gymnasium would not accommodate the programmatic needs of the campus. New classroom buildings would not be constructed so green technology would not be employed.

This alternative would meet Objectives #6 and #7:

- Objective #6: Respect the history of the campus through the rehabilitation, retention and reuse of features that have been established as character-defining or otherwise relevant to the school community (i.e., current and former students, alumni, staff, etc.) to the extent feasible, while modernizing the campus to address the current needs of the campus.
- Objective #7: Limit the disruption of the educational experience of students during construction of the Project by limiting the number and/or duration of phases.

The No Project Alternative would not entail any physical changes to the campus. In doing so, there would be no potential alternatives or modifications to the historic buildings or historic district. Additionally, because this alternative does not entail construction, students would not be disrupted during construction.

Conclusion

Significant and unavoidable Project-related historic resource impacts would be eliminated. Therefore, this alternative would be superior to the Project. Additionally, this alternative would meet two of the Project objectives to: Respect the history of the campus through the character-defining features through rehabilitation, retention and reuse of features that have been established as character-defining or otherwise relevant to the school community (i.e., current and former students, alumni, staff, etc.) to the extent feasible, while modernizing the campus to address the current needs of the campus (Objective #6) and limit the disruption of the educational experience of students during construction of the Project by limiting the number and/or duration of phases (Objective #7). However, this alternative would not meet Project Objectives #1 through #5 or the goals or objectives for the SUP. The security, programmatic, accessibility, and seismic stability challenges that are associated with the current campus would remain unresolved. Specifically, the challenges related to: site constraints and limited visibility throughout the campus; incompatible programmatic spacing on the campus (including the undersized classrooms in the Home Economics Building and Annex Building and inoperable pool in the Gymnasium); limited path of travel/ADA-related accessibility; inefficiencies (which can be both costly and environmentally impactful); and non-compliance with structural/non-structural compliance challenges in the Home Economics Building, Annex Building, and Gymnasium would remain. This alternative would not have the ability to be feasibly incorporated, and it would not align with the Board-approved goals and principles and core objectives. It is for these reasons that this alternative would not be feasible.

7.6.2 Alternative 2. Retain 1 Historic Building: Home Economics (Building 4)

Under Alternative 2, the District would retain the Home Economics Building (Building 4), a primary significant character-defining building that significantly contributes to the eligibility of the campus as a

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historic district. Instead of demolition and removal, this alternative would modernize, seismically retrofit, and renovate this building, to the extent feasible.

Historic Resources

The Home Economics Building (Building 4) would require considerable seismic stability retrofitting. The District completed a Mandatory Seismic Evaluation and Retrofit evaluation for the Home Economics Building (Building 4).²⁵ The evaluation recommended substantial retrofitting and reconstruction work to the Home Economics Building (Building 4) to improve the seismic “deficiencies and/or inadequacies” that were outlined in the evaluation; recommendations included: wood diaphragm strengthening (of the existing floor and roof); anchorage of the unreinforced masonry back-up walls (there is no existing anchorage or structural/out-of-plane support); retrofits contingent upon results of exploratory testing/Division of the State Architect requirements; concrete wall out-of-plane anchorage to wood joists; wall-to-foundation connections retrofit; retrofitting the foundations; and non-structural components (e.g., degraded or nonfunctioning components, strengthening and repair components, additional bracing and anchorage) that would be subject to exploratory testing and other variables.²⁶

It is understood that unreinforced masonry buildings can be particularly vulnerable to earthquake damage.²⁷ There is a possibility that any unexpected conditions encountered during testing or construction may cause an exceedance in costs identified for this Project and add time to the overall Project schedule as the best approach to address unanticipated challenges is resolved. The evaluation notes that the replacement value for the existing building would fall under the mandatory seismic rehabilitation Section 4-309(c) of the California Administrative Code.²⁸

However, even with the retention of the Home Economics Building (Building 4), due to the age of the existing structural integrity and the limitations in construction methods for structural strengthening, it is anticipated that this strengthening would be extensive and would include considerable testing and assessments prior to and through the seismic strengthening process,²⁹ which have the likely potential to result in additional considerations such as increased cost and major scheduling delays, which may not be adequately measured without such assessments.

Extensive exploratory testing that would require the removal of components of the building would occur prior to and potentially during the construction in order to address and confirm unknown building design elements or challenges associated with the seismic stabilization of the building (the structural drawings of the

²⁵ LAUSD. Prepared by Englekirk Institutional for Gonzalez Goodale Architects. 2016. Building No.4 –Home Economics Building ASCE 41-13 Mandatory Seismic Evaluation and Retrofit.

²⁶ LAUSD. Prepared by Englekirk Institutional for Gonzalez Goodale Architects. 2016. Building No.4 –Home Economics Building ASCE 41-13 Mandatory Seismic Evaluation and Retrofit.

²⁷ US Department of the Interior, National Park Service. 2016. The Seismic Rehabilitation of Historic Buildings (Preservation Brief 41). Washington, D.C.

²⁸ LAUSD, Prepared by Englekirk Institutional for Gonzalez Goodale Architects. 2016. Building No.4 –Home Economics Building ASCE 41-13 Mandatory Seismic Evaluation and Retrofit.

²⁹ LAUSD. Prepared by Englekirk Institutional for Gonzalez Goodale Architects. 2016. Building No.4 –Home Economics Building ASCE 41-13 Mandatory Seismic Evaluation and Retrofit.

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building are not available). Performance-based evaluation methods for historic buildings allow more flexibility to certain codes than what is required for new buildings.³⁰ This flexibility does not imply less-stringent design criteria than what is contained in ASCE 41-06, CBC Section 3417.7, and CBC Section 3419.1.³¹ However, additional testing (specifically to identify and test the previously discussed unknowns) and assessments for the proper treatment of the building (i.e., to ensure that the retrofitting does not damage or destroy character-defining features) would be required.

This alternative would enable certain structural and nonstructural components of existing buildings to be seismically strengthened and rehabilitated. However, assuming the unknown structural and nonstructural deficiencies that may exist in the building are minor and any alterations associated with the extensive testing only require several months to complete, the classrooms in the Home Economics (Building 4) would still remain undersized and would not meet the California Department of Education's and the District's standard 960-square-foot classroom size.³² Additionally, the building does not accommodate the programmatic needs of the campus (multimedia computer technology, culinary arts, video/sound, and digital imaging, etc.), which require particular building and classroom infrastructure, layouts, and arrangements. Redesigning the building's interiors would require eliminating spaces within the existing building and would not provide enough classroom space to accommodate existing student enrollment. Additionally, the existing structural layout of shear walls throughout the building will not allow for the expansion of classrooms to meet current District educational specifications and programming requirements.³³ Therefore, to accommodate existing student enrollment, six new portable buildings would be required to replace the older outdated portables on campus. To accommodate the six new portable buildings, the additional parking options would need to be eliminated.

Under Alternative 2, the Home Economics Building (Building 4) would be retained and rehabilitated, and the design and placement of the Building A, in the approximate footprint of the existing Annex Building (Building 8), would conform to the Secretary of the Interior's Standards No. 9 and 10.

9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

³⁰ US Department of the Interior, National Park Service. 2016. The Seismic Rehabilitation of Historic Buildings (Preservation Brief 41). Washington, D.C.

³¹ Division of State Architect. 2012. Navigating the Building Code Requirements for the Seismic Rehabilitation of Schools in California. San Diego, CA.

³² California Department of Education. 2000. Guide to School Site Analysis and Development (2000 Edition). <https://www.cde.ca.gov/ls/fa/sf/guideschoolsite.asp>.

³³ LAUSD, Prepared by Englekirk Institutional for Gonzalez Goodale Architects. 2016. Building No.4 –Home Economics Building ASCE 41-13 Mandatory Seismic Evaluation and Retrofit.

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10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.³⁴

With the retention of one of the contributing building, Home Economics Building (Building 4), and the demolition of Building 8 and Building 13, two of the seven character-defining buildings would be demolished. The District would comply with the Design Guidelines and Treatment Approaches for Historic Schools³⁵ as required under Standard Condition of Approval SC-CUL-1, -2, and -3 for construction of Buildings A and C. The campus would remain eligible for the NRHP and CRHR as an architecturally significant and distinctive example of a PWA Moderne-style school rebuilt following the 1933 Long Beach earthquake, and impacts would be less than significant.

Objectives

Alternative 2 would not meet Project Objectives #3 and #5:

- Objective #3: Upgrade buildings to include modern classroom spaces that can accommodate the California Department of Education's and District's standard classroom space of 960 square feet and modern technology and efficiencies including HPHS's priority and specialty campus programs such as multimedia computer technology, culinary arts, video/sound, and digital imaging which are designed to meet educational needs of the students and campus.
- Objective #5: Design buildings and facilities that align with the current programmatic and operational needs of the campus while retaining or enhancing opportunities for future planning.

Alternative 2 would not fully meet two of the Project objectives because Building 4 would remain on campus and would remain undersized and would not meet the California Department of Education's and the District's standard classroom space of 960 square feet. Additionally, Building 4 would not accommodate the programmatic needs of the campus.

This alternative would meet Project Objectives #1, #2, #4, #6, and #7:

- Objective #1: Increase the safety and security of the staff and students through the campus modifications and configuration.
- Objective #2: Repair and seismically retrofit aging facilities while also bringing buildings to code to meet the Americans with Disabilities Act (ADA) programmatic access requirements.
- Objective #4: Promote a healthier environment through the use of green technology.

³⁴ National Park Service US Department of the Interior, "Rehabilitation as Treatment," The Secretary of the Interior's Standards, <https://www.nps.gov/tps/standards/four-treatments/treatment-rehabilitation.htm>,

³⁵ LAUSD (SWCA). 2015, January. Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools. http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/domain/135/pdf%20files/Final_Design_Guidelines.pdf

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- Objective #6: Respect the history of the campus through the rehabilitation, retention and reuse of features that have been established as character-defining or otherwise relevant to the school community (i.e., current and former students, alumni, staff, etc.) to the extent feasible, while modernizing the campus to address the current needs of the campus.
- Objective #7: Limit the disruption of the educational experience of students during construction of the Project by limiting the number and/or duration of phases.

Alternative 2 would retain one building. The remaining aspects of this alternative would be the same as the proposed Project, except for the construction of Building B, and would meet most of the same objectives because of significant campus improvements. This alternative would repair and seismically retrofit all buildings required, except those being demolished. By constructing two new classroom buildings, additional open space would be created to increase safety and security. This alternative would limit the students' disruption during construction; would respect the history of the campus; and would be expected to retain the campus' eligibility for both the NRHP and the CRHR.

Conclusion

Overall, this alternative would reduce environmental impacts in comparison to the proposed Project by reducing the demolition of the historic buildings. Under Alternative 2, the District would retain the Home Economics Building (Building 4), a primary significant character-defining building that significantly contributes to the eligibility of the campus as a historic district. Instead of demolition and removal, this alternative would modernize, seismically retrofit, and renovate this building, to the extent feasible. All construction work would be completed in compliance with the SOI Standards and LAUSD Design Guidelines and Treatment Approaches for Historic Schools³⁶ as required under Standard Condition of Approval SC-CUL-1, -2, and -3 for construction of Buildings A and C. The campus would remain eligible for the NRHP and the CRHR, and impacts would be less than significant. However, this alternative would not meet the California Department of Education's and District's standard 960-square-foot classroom size, nor would it provide the necessary facilities for the current and future operational and programmatic needs of the campus.

Alternative 2 would meet five of the seven Project Objectives. This alternative would not meet Objectives #3 and #5 or the goals or objectives for the SUP. Although some campus issues would be resolved by replacement of the Annex Building and Gymnasium, the undersized classrooms in the Home Economics Building and limited path of travel/ADA-related accessibility would remain. The Home Economics Building would continue to operate with energy usage inefficiencies which can be both costly and environmentally impactful. Finally, existing building and access structural and non-structural compliance challenges in the Home Economics Building would remain. This alternative would not have the ability to be feasibly incorporated, and it would not align with the Board-approved goals and principles and core objectives. It is for these reasons that this alternative would not be feasible.

³⁶ LAUSD (SWCA). 2015, January. Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools. http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/domain/135/pdf%20files/Final_Design_Guidelines.pdf

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7.6.3 Alternative 3. Retain 2 Historic Buildings: Annex (Building 8) and Home Economics (Building 4)

Under Alternative 3, the District would retain the Home Economics Building (Building 4) and Annex Building (Building 8), both primary significant character-defining buildings that significantly contribute to the eligibility of the campus as a historic district. Instead of demolition and removal, this alternative would modernize, seismically retrofit, and renovate these buildings, to the extent feasible.

Historic Resources

The Home Economics Building (Building 4) and the Annex Building (Building 8) would require similar considerable seismic stability retrofitting. As described under Alternative 2, this alternative would require structural components of existing buildings to be strengthened. This was explored at length during the planning phase for the proposed Project. However, even with the retention of the Annex Building (Building 8) and the Home Economics Building (Building 4), due to the age of the existing structures and the limitations in construction methods for structural strengthening, it is anticipated that this strengthening would be extensive and would include considerable testing and assessments prior to and through the seismic strengthening process,³⁷ which have the likely potential to result in additional considerations such as increased cost and major scheduling delays, which may not be adequately measured without such assessments.³⁸

The classrooms in the Annex Building (Building 8) and the Home Economics Building (Building 4) are both undersized and do not meet the California Department of Education's and the District's standard 960-square-foot classroom size.³⁹ The existing structural layout of shear walls will not allow expansion of classrooms to current District educational specifications and programming requirements. According to school administration, during rain storms there is routine flooding in the Home Economics (Building 4) basement, which causes damage to stored textbooks and prohibits access to the space. The interior of Annex Building (Building 8) and Home Economics Building (Building 4) would require redesigning; however, a redesign could not provide enough classroom space to accommodate existing enrollment and educational program needs for the high school. Therefore, to accommodate these needs, up to 11 new portable buildings would be required to replace the outdated eight portables on campus that would be removed. To accommodate the portable classrooms, all additional parking would need to be eliminated.

With the retention and rehabilitation of the Annex Building (Building 8) and the Home Economics Building (Building 4) and demolition of the Gymnasium, one of the seven character-defining buildings would be demolished.

³⁷ LAUSD. Prepared by Englekirk Institutional for Gonzalez Goodale Architects. 2016. Building No.4 –Home Economics Building ASCE 41-13 Mandatory Seismic Evaluation and Retrofit.

³⁸ LAUSD, Prepared by Englekirk Institutional for Gonzalez Goodale Architects. 2016. Building No.4 –Home Economics Building ASCE 41-13 Mandatory Seismic Evaluation and Retrofit.

³⁹ California Department of Education. 2000. Guide to School Site Analysis and Development (2000 Edition). <https://www.cde.ca.gov/ls/fa/sf/guideschoolsite.asp>.

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The District would comply with the Design Guidelines and Treatment Approaches for Historic Schools⁴⁰ as required under Standard Condition of Approval SC-CUL-1, -2, and -3 for construction of Building C. The campus would remain eligible for the NRHP and CRHR as an architecturally significant and distinctive example of a PWA Moderne-style school rebuilt following the 1933 Long Beach earthquake, and impacts would be less than significant.

Objectives

Alternative 3 would not meet Project Objectives #1, #2, #3, #4, and #5:

- Objective #1: Increase the safety and security of the staff and students through the campus modifications and configuration.
- Objective #2: Repair and seismically retrofit aging facilities while also bringing buildings to code to meet the Americans with Disabilities Act (ADA) programmatic access requirements.
- Objective #3: Upgrade buildings to include modern classroom spaces that can accommodate the California Department of Education's and District's standard classroom space of 960 square feet and modern technology and efficiencies including HPHS's priority and specialty campus programs such as multimedia computer technology, culinary arts, video/sound, and digital imaging which are designed to meet educational needs of the students and campus.
- Objective #4: Promote a healthier environment through the use of green technology.
- Objective #5: Design buildings and facilities that align with the current programmatic and operational needs of the campus while retaining or enhancing opportunities for future planning.

Alternative 3 would not meet five of the seven Project objectives. This alternative would not significantly increase safety and security because the campus would not be modified to create more open spaces and visual access between buildings, since Building 4 and Building 8 would remain on campus. Additionally, Building 4 and Building 8 would remain undersized and would not meet the California Department of Education's and the District's standard 960-square-foot classroom size, and they would not accommodate the programmatic needs of the campus. New classroom buildings would not be constructed, so green technology would not be employed.

This alternative would meet Project Objectives #6 and #7:

- Objective #6: Respect the history of the campus through the rehabilitation, retention and reuse of features that have been established as character-defining or otherwise relevant to the school community

⁴⁰ LAUSD (SWCA). 2015, January. Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools. http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/domain/135/pdf%20files/Final_Design_Guidelines.pdf

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(i.e., current and former students, alumni, staff, etc.) to the extent feasible, while modernizing the campus to address the current needs of the campus.

- **Objective #7:** Limit the disruption of the educational experience of students during construction of the Project by limiting the number and/or duration of phases.

Alternative 3 would retain two buildings, and would only construct Building C (replacement of the Gymnasium). This alternative would repair and seismically retrofit all buildings required, except Building C, and in doing so would respect the history of the campus and, by limiting construction, would limit disruption of the educational experience during construction.

Conclusion

Overall, this alternative would reduce environmental impacts in comparison to the proposed Project by reducing the demolition of the historic buildings. Under Alternative 3, the District would retain Annex Building (Building 8) and the Home Economics Building (Building 4), both primary significant character-defining buildings that significantly contribute to the eligibility of the campus as a historic district. Instead of demolition and removal, this alternative would modernize, seismically retrofit, and renovate these buildings to the extent feasible (i.e., using the California Historic Building Code). All construction work would be completed in compliance with the SOI Standards and LAUSD Design Guidelines and Treatment Approaches for Historic Schools as required under Standard Condition of Approval SC-CUL-1, -2, and -3 for upgrades to the two buildings and construction of the new gymnasium (Building C). The campus would not be reconfigured to provide the safety, security, accessibility, and other programmatic and operational improvements that are associated with the proposed Project. However, the campus would remain eligible for the NRHP and the CRHR, and impacts would be less than significant. Additionally, this alternative would meet two of the seven Project Objectives. The significant and unavoidable project-related historic resource impact would be eliminated. Therefore, Alternative 3 would be superior to the Project.

However, this alternative would not meet Project Objectives #1 through #5 or the goals or objectives for the SUP. The security, programmatic, accessibility, and seismic stability challenges that are associated with the current campus would remain unresolved. Specifically, the challenges related to: site constraints and limited visibility throughout the campus; incompatible programmatic spacing on the campus (including the undersized classrooms in the Home Economics Building and Annex Building); limited path of travel/ADA-related accessibility; energy inefficiencies (which can be both costly and environmentally impactful); and non-compliance with structural/non-structural compliance challenges in the Home Economics Building and Annex Building would remain. This alternative would not have the ability to be feasibly incorporated, and it would not align with the Board-approved goals and principles and core objectives. It is for these reasons that this alternative would not be feasible.

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7.6.4 Alternative 4. Retain All Historic Buildings: Annex (Building 8), Home Economics (Building 4), and Gymnasium (Building 13)

Under Alternative 4, the District would retain Annex Building (Building 8), Home Economics Building (Building 4), and Gymnasium (Building 13). Gymnasium Building (Building 13) is a contributing (tertiary) building, and Annex (Building 8) and Building 4 are primary significant character-defining buildings that significantly contribute to the eligibility of the campus as a historic district. Instead of demolition and removal, this alternative would modernize, seismically retrofit, and renovate these buildings to the extent feasible. However, it is unlikely the Gymnasium could be seismically retrofitted, since it was constructed as three adjoining buildings without any seismic separation and cannot be updated in its current configuration. All work would be completed in compliance with the SOI Standards and the LAUSD Design Guidelines and Treatment Approaches for Historic Schools.⁴¹

Historic Resources

Rather than demolishing and removing any of the historic buildings on campus, this alternative would modernize and renovate these three historic buildings, to the extent feasible, largely through internal seismic upgrades and internal tenant improvements. No new buildings could be constructed on the campus without removing the existing on-campus parking and, as with the previous alternatives, this alternative would require certain structural components of the existing buildings to be strengthened. The District explored a variation of this alternative in a pre-planning survey that was completed in 2011 and revisited it for this analysis.⁴²

The 2011 analysis preceded the historic evaluation of Home Economics Building (Building 4), and subsequent assessments have determined that the existing Annex Building (Building 8), Home Economics Building (Building 4), and Gymnasium Building (Building 13) are not able to accommodate the existing and proposed campus educational programming and spacing needs without extensive testing and modernization. At minimum, a new building would be required or recommended to accommodate the educational programming needs and to provide standardized classroom spaces. However, the addition of a new building without removing any of the existing buildings may limit the programmatic access throughout the campus; may not accommodate all of the educational programming; would take away the landscape, parking, and open space on the campus; and may alter the safety, which is currently a concern, by blocking views throughout the campus and creating new “blind spots” that limit the staff’s ability to provide adequate supervision. The addition of a new building under this alternative would further alter the campus layout and historic district by placing a new building on campus near or between the remaining buildings or in courtyard spaces.

However, with the retention and rehabilitation of the Annex Building (Building 8), Home Economics Building (Building 4), and Gymnasium Building (Building 13), the campus would remain eligible for the NRHP and CRHR as an architecturally significant and distinctive example of a PWA Moderne-style school

⁴¹ LAUSD (SWCA). 2015, January. Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools. http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/domain/135/pdf%20files/Final_Design_Guidelines.pdf

⁴² LAUSD. 2011. Huntington Park High School: Campus Pre-Planning Survey. Los Angeles, CA.

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rebuilt following the 1933 Long Beach earthquake. Historic impacts under Alternative 4 would be less than significant.

Objectives

Alternative 3 would not meet Project Objectives #1, #2, #3, #4, and #5:

- Objective #1: Increase the safety and security of the staff and students through the campus modifications and configuration.
- Objective #2: Repair and seismically retrofit aging facilities while also bringing buildings to code to meet the Americans with Disabilities Act (ADA) programmatic access requirements.
- Objective #3: Upgrade buildings to include modern classroom spaces that can accommodate the California Department of Education's and District's standard classroom space of 960 square feet and modern technology and efficiencies including HPHS's priority and specialty campus programs such as multimedia computer technology, culinary arts, video/sound, and digital imaging which are designed to meet educational needs of the students and campus.
- Objective #4: Promote a healthier environment through the use of green technology.
- Objective #5: Design buildings and facilities that align with the current programmatic and operational needs of the campus while retaining or enhancing opportunities for future planning.

Alternative 4 would not fully meet five of the seven Project objectives. This alternative would not increase safety and security because the campus would not be modified to create more open spaces and visual access between buildings, since Building 4 and Building 8 would remain on campus. Additionally, Building 4 and Building 8 would remain undersized and would not meet the California Department of Education's and the District's standard 960-square-foot classroom size. These buildings and the Gymnasium would not accommodate the programmatic needs of the campus. New classroom buildings would not be constructed, so green technology would not be employed.

This alternative would meet Objectives #6 and #7:

- Objective #6: Respect the history of the campus through the rehabilitation, retention and reuse of features that have been established as character-defining or otherwise relevant to the school community (i.e., current and former students, alumni, staff, etc.) to the extent feasible, while modernizing the campus to address the current needs of the campus.
- Objective #7: Limit the disruption of the educational experience of students during construction of the Project by limiting the number and/or duration of phases.

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Alternative 4 would retain all three buildings. This alternative would repair and seismically retrofit all buildings required and in doing so would respect the history of the campus and limit the amount of disruption that students would otherwise experience during construction.

Conclusion

Overall, Alternative 4 would reduce environmental impacts in comparison to the proposed Project by eliminating the demolition of the historic buildings. Under Alternative 4, the District would retain Annex Building (Building 8), the Home Economics Building (Building 4), and the Gymnasium Building (Building 13), all character-defining buildings that contribute to the eligibility of the campus as a historic district. Instead of demolition and removal, this alternative would modernize, seismically retrofit, and renovate these buildings to the extent feasible (i.e., using the CHBC). All construction work would be completed in compliance with the SOI Standards and LAUSD Design Guidelines and Treatment Approaches for Historic Schools as required under Standard Condition of Approval SC-CUL-1, -2, and -3 for upgrades to the buildings. The campus would not be reconfigured to provide the safety, security, accessibility, and other programmatic and operational improvements that are associated with the proposed Project. However, the campus would remain eligible for the NRHP and the CRHR, and impacts would be less than significant. Additionally, this alternative would meet two of the seven Project objectives. The significant and unavoidable project-related historic resource impact would be eliminated. Therefore, this alternative would be superior to the Project.

However, this alternative would not meet Project Objectives #1 through #5 or the goals or objectives for the SUP. The security, programmatic, accessibility, and seismic stability challenges that are associated with the current campus would remain unresolved. Specifically, the challenges related to: site constraints and limited visibility throughout the campus; incompatible programmatic spacing on the campus (including the undersized classrooms in the Home Economics Building and Annex Building and inoperable pool in the Gymnasium); limited path of travel/ADA-related accessibility; energy inefficiencies (which can be both costly and environmentally impactful); and non-compliance with structural/non-structural compliance challenges in the Home Economics Building, Annex Building, and Gymnasium would remain. Retaining all historic buildings is not feasible and it would not align with the Board-approved goals and principles and core objectives. It is for these reasons that this alternative would not be feasible.

7.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the “environmentally superior alternative.” The No Project Alternative is the environmentally superior alternative to the proposed Project because it retains all historic buildings and landscapes on campus. However, the No Project Alternative would not meet a majority of the Project objectives (Objectives #1 through #5) or the goals or objectives for the SUP. The security, programmatic, accessibility and seismic stability challenges that are associated with the current campus would remain unresolved and is not a feasible solution for addressing the needs of the campus. Additionally, If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an

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environmentally superior alternative among the other alternatives.⁴³ In this case, among the other alternatives, Alternative 4, Retain All Historic Buildings: Annex Building (Building 8), Home Economics Building (Building 4), and Gymnasium Building (Building 13) has been identified as “environmentally superior” to the proposed Project. This alternative would reduce historic resource impacts by not demolishing the three historic buildings. Under Alternative 4, the campus would remain eligible for the NRHP and the CRHR, and impacts to historic resources would be less than significant. However, this alternative would not meet five of the seven objectives and would not provide space or facilities that would accommodate the safety, security, accessibility, and other programmatic and operational improvements that are necessary for the campus.

⁴³ 14 CCR Section 15126.6(e)(2).

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8. Impacts Found Not to Be Significant

8.1 INTRODUCTION

California Public Resources Code Section 21003(f) states: "...it is the policy of the state that...[a]ll persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment." This policy is reflected in the CEQA Guidelines Section 15126.2(a), which states that "[a]n EIR [Environmental Impact Report] shall identify and focus on the significant environmental impacts of the proposed project" and Section 15143, which states that "[t]he EIR shall focus on the significant effects on the environment." The environmental topics identified below were evaluated and determine to have no impact or less than significant impact on the environment.

8.2 CEQA INITIAL STUDY FINDINGS

The Initial Study prepared for the proposed Project in August 2017 determined that the impacts listed below would be less than significant. Consequently, they have not been further analyzed in this Draft EIR. Please refer to Appendix A for explanation of the basis of these conclusions. Impact categories and questions below are summarized directly from the CEQA Environmental Checklist, as contained in the Initial Study.

8. Impacts Found Not to Be Significant

Table 8-1 Impacts Found Not to Be Significant

Environmental Issues	Initial Study Determination
I. AESTHETICS. Would the project:	
a) Have a substantial adverse effect on a scenic vista?	No Impact
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Impact
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	Less Than Significant Impact
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less Than Significant Impact
II. AGRICULTURE AND FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	
a) Conflict with or obstruct implementation of the applicable air quality plan?	Less Than Significant Impact
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Less Than Significant Impact
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	Less Than Significant Impact
d) Expose sensitive receptors to substantial pollutant concentrations?	Less Than Significant Impact
e) Create objectionable odors affecting a substantial number of people?	Less Than Significant Impact
IV. BIOLOGICAL RESOURCES. Would the project:	
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	No Impact
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	No Impact

8. Impacts Found Not to Be Significant

Table 8-1 Impacts Found Not to Be Significant

Environmental Issues	Initial Study Determination
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Less Than Significant Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less Than Significant Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No Impact
V. CULTURAL RESOURCES. Would the project:	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	Less Than Significant Impact
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less Than Significant Impact
d) Disturb any human remains, including those interred outside of dedicated cemeteries?	Less Than Significant Impact
VI. GEOLOGY AND SOILS. Would the project:	
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	Less Than Significant Impact
ii) Strong seismic ground shaking?	Less Than Significant Impact
iii) Seismic-related ground failure, including liquefaction?	Less Than Significant Impact
iv) Landslides?	No Impact
b) Result in substantial soil erosion or the loss of topsoil?	Less Than Significant Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Less Than Significant Impact
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	Less Than Significant Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	No Impact
VII. GREENHOUSE GAS EMISSIONS. Would the project:	
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less Than Significant Impact
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less Than Significant Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:	
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less Than Significant Impact
b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less Than Significant Impact

8. Impacts Found Not to Be Significant

Table 8-1 Impacts Found Not to Be Significant

Environmental Issues	Initial Study Determination
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less Than Significant Impact
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less Than Significant Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	No Impact
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	No Impact
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	No Impact
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	No Impact
IX. HYDROLOGY AND WATER QUALITY. Would the project:	
a) Violate any water quality standards or waste discharge requirements?	Less Than Significant Impact
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	Less Than Significant Impact
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in a substantial erosion or siltation on- or off-site	Less Than Significant Impact
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	No Impact
e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	Less Than Significant Impact
f) Otherwise substantially degrade water quality?	Less Than Significant Impact
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	No Impact
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	No Impact
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	Less Than Significant Impact
j) Inundation by seiche, tsunami, or mudflow?	Less Than Significant Impact
X. LAND USE AND PLANNING. Would the project:	
a) Physically divide an established community?	No Impact
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	No Impact
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	No Impact

8. Impacts Found Not to Be Significant

Table 8-1 Impacts Found Not to Be Significant

Environmental Issues	Initial Study Determination
XI. MINERAL RESOURCES. Would the project:	
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	No Impact
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	No Impact
XII. NOISE. Would the project result in:	
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less Than Significant Impact
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	Less Than Significant Impact
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	Less Than Significant Impact
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Less Than Significant Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No Impact
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	No Impact
XIII. PEDESTRIAN SAFETY. Would the project:	
a) Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses?	Less Than Significant Impact
b) Create unsafe routes to schools for students walking from local neighborhoods?	Less Than Significant Impact
c) Be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard?	Less Than Significant Impact
XIV. POPULATION AND HOUSING. Would the project:	
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	No Impact
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	No Impact
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	No Impact
XV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	
a) Fire protection?	Less Than Significant Impact
b) Police protection?	Less Than Significant Impact
c) Schools?	No Impact
d) Parks?	Less Than Significant Impact
e) Other public facilities?	No Impact
XVI. RECREATION.	
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less Than Significant Impact

8. Impacts Found Not to Be Significant

Table 8-1 Impacts Found Not to Be Significant

Environmental Issues	Initial Study Determination
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	No Impact
XVII. TRANSPORTATION/TRAFFIC. Would the project:	
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	Less Than Significant Impact
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	Less Than Significant Impact
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	No Impact
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less Than Significant Impact
e) Result in inadequate emergency access?	No Impact
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	No Impact
XVIII. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	No Impact
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:	
a) Exceed waste water treatment requirements of the applicable Regional Water Quality Control Board?	Less Than Significant Impact
b) Require or result in the construction of new water or waste water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	No Impact
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	No Impact
d) Have sufficient water supplies available to serve the project from existing entitlements and resources or are new or expanded entitlements needed?	No Impact
e) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	No Impact
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	Less Than Significant Impact

8. Impacts Found Not to Be Significant

Table 8-1 Impacts Found Not to Be Significant

Environmental Issues	Initial Study Determination
g) Comply with federal, state, and local statutes and regulations related to solid waste?	No Impact
XX. MANDATORY FINDINGS OF SIGNIFICANCE.	
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	Less Than Significant Impact
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	Less Than Significant Impact

8. Impacts Found Not to Be Significant

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9. Significant Irreversible Changes Due to the Proposed Project

Section 15126.2(c) of the CEQA Guidelines requires that an EIR describe any significant irreversible environmental changes that would be caused by implementation of the proposed Project. Specifically, the CEQA Guidelines state:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highways improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

The proposed improvements to the HPHS campus would entail the commitment of nonrenewable and/or slowly renewable energy sources such as gasoline, diesel fuel, and electricity; human resources; and natural resources such as lumber and other forest products; sand and gravel; asphalt; steel, copper, lead, other metals; and water. A very minor increased commitment of social services and public maintenance services (e.g., police, fire, sewer, water, solid waste, natural gas, and electricity services) would also be required during construction. Such commitments are currently required for the operation of the existing high school. While not irreversible, the minor increased commitment of social and public maintenance services would not be a long-term obligation because following construction of the proposed Project, the increased commitments would be expected to return back to the current status. In some instances, these commitments may be reduced with new buildings and proposed improvements that include efficiencies such as electricity and water and do not require the same levels of maintenance and up keep as the current buildings.

However, given the low likelihood that the Project site would revert to a less intense land use requiring fewer services, energy, or physical resources in the future, implementation of the proposed Project would continue to commit future generations to the same environmental changes associated with the current school use.

9. Significant Irreversible Changes Due to the Proposed Project

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10. Growth-Inducing Impacts of the Proposed Project

Pursuant to Sections 15126(d) and 15126.2(d) of the CEQA Guidelines, this section is provided to examine ways in which the proposed Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Also required is an assessment of other projects that would foster other activities which could effect the environment, individually or cumulatively. To address this issue, potential growth-inducing effects is examined through following questions:

- Would this Project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?
- Would this Project result in the need to expand one or more public services to maintain desired levels of service?
- Would this Project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
- Would approval of this Project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

Growth-inducing effects are is presented to provide additional information on ways in which this project could contribute to significant changes in the environment, beyond the direct consequences of campus improvements analyzed in this EIR.

Would this project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?

The proposed Project would not extend major infrastructure to places currently unserved by such facilities. The Project site and surrounding community are already developed, and are being served by existing infrastructure such as water, sewer mains, electricity and natural gas services. The Project site is already operating as a high school and no land use changes would be required to implement the proposed Project. Therefore, the campus proposed Project would not have result in this growth-inducing impact.

10. Growth-Inducing Impacts of the Proposed Project

Would this project result in the need to expand one or more public services to maintain desired levels of service?

The proposed Project would not increase the total District enrollment or the student population at HPHS. The proposed Project would serve the existing HPHS population and programs and would not necessitate an expansion of other services or facilities (e.g., police and fire protection, parks, schools, and libraries) in order to maintain the current or desired levels of service. Therefore, the proposed Project would not result in this growth-inducing impact.

Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?

During construction, a slight increase in the number of design, engineering, and construction-related jobs would be created. This would last until the Project's construction is completed and would be a direct, but temporary, employment increase. The proposed Project would serve the existing school programs and would not encourage or facilitate long-term economic effects that could result in other environmental effects. The proposed Project would not result in this indirect growth-inducing effect.

Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

As previously noted, the Project site and its surrounding area are already developed. The proposed Project consists of campus improvements, new buildings, and the removal of three school buildings that are historically significant. This action would not promote growth because it involves the demolition and replacement of buildings within an existing school campus. Construction would not extend outside of the existing campus boundaries. Pressures to develop other land in the surrounding area would derive from regional economic conditions and market demands for housing, commercial, and industrial land uses that are not directly or indirectly influenced by the proposed Project. Approval of the proposed Project would not, therefore, involve a precedent setting action that could be applied to other properties and thereby encourage or facilitate growth that would not otherwise occur.

11. Persons Preparing EIR

Lead Agency: Los Angeles Unified School District

Eimon Smith

CEQA Project Manager - Contract Professional.
Office of Environmental Health & Safety

Gwenn Godek

CEQA Advisor - Contract Professional.
Office of Environmental Health & Safety

CEQA Consultant: PlaceWorks

Dwayne Mears, AICP

Principal, School Facilities Planning

Alice Houseworth, AICP, LEED AP

Senior Associate/Project Manager

Michael Milroy

Associate

Justin Rickenbach

Planner

Cary Nakama

Graphic Artist

Gina Froelich

Senior Editor

Laura Muñoz

Document Specialist

11. Persons Preparing EIR

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