

December 2020 | Mitigation Monitoring and Reporting Program

State Clearinghouse No. 2020100225

ABRAHAM LINCOLN HIGH SCHOOL

Comprehensive Modernization Project

Prepared for:

LEAD AGENCY: Los Angeles Unified School District

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

Prepared by:

Tetra Tech

3475 East Foothill Boulevard Pasadena, California 91107



Table of Contents

Secti	on	Pag
1.	INTR	ODUCTION
	1.1	PURPOSE
	1.2	PROJECT LOCATION
	1.3	SUMMARY PROJECT DESCRIPTION
	1.4	· ·
2.	MON	IITORING AND REPORTING REQUIREMENTS
	2.1	INTRODUCTION
	2.2	CATEGORIZED MATRIX

List of Tables

<u>Table</u>		Page
		<u> </u>
Table 1	Mitigation Monitoring and Reporting Program	6

Table of Contents

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Page ii Tetra Tech

1.1 PURPOSE

This Mitigation Monitoring and Reporting Program (MMRP) has been developed to provide a vehicle by which to implement and monitor compliance with the Los Angeles Unified School District's (LAUSD's) CEQA-required mitigation measures, identified in the Lincoln High School Comprehensive Modernization Project Initial Study/Mitigated Negative Declaration (IS/MND) (State Clearinghouse No. 2020100225).

This MMRP has been prepared in conformance with Section 21081.6 of the Public Resources Code and LAUSD practice. Section 21081.6 states:

- (a) When making findings required by paragraph (1) of subdivision (a) of Section 21081 or when adopting a mitigated negative declaration pursuant to paragraph (2) of subdivision (c) of Section 21080, the following requirements shall apply:
 - (1) The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead or responsible agency, prepare and submit a proposed reporting or monitoring program.

The Project is subject to the California Department of Education (CDE) design and siting requirements, and the school architectural designs are subject to review and approval by the California Division of the State Architect (DSA). The proposed Project, along with all other School Upgrade Program (SUP) related projects, is required to comply with specific design standards and sustainable building practices. Certain standards assist in reducing environmental impacts, such as the California Green Building Code (CALGreen Code)¹, LAUSD Standard Conditions of Approval (SC), and the Collaborative for High-Performance Schools (CHPS) criteria.²

California Green Building Code. Part 11 of the California Building Standards Code is the California Green Building Standards Code, also known as the CALGreen Code. The CALGreen Code is a statewide green building standards code and is applicable to residential and non-residential buildings throughout California, including schools. The CALGreen Code was developed to reduce GHG from buildings; promote environmentally responsible, cost-effective, healthier places to live and work; reduce energy and water

December 2020 Page 1

California Green Building Standards Code, Title 24, Part 11.

The Board of Education's October 2003 Resolution on Sustainability and Design of High Performance Schools directs staff to continue its efforts to ensure that every new school and modernization project in the District, from the beginning of the design process, incorporate CHPS (Collaborative for High Performance Schools) criteria to the extent possible.

consumption; and respond to the environmental directives of the Department of Housing and Community Development.

Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects. Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects (SCs) were adopted by the Board of Education (BOE) on February 5, 2019 (Board Report Number 241-18/19). SCs are environmental standards that are applied to District construction, upgrade, and improvement projects during the environmental review process by the OEHS California Environmental Quality Act (CEQA) team to offset potential environmental impacts. The SCs were largely compiled from established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs. For each SC, applicability is triggered by factors such as the project type and existing conditions. These SCs are implemented during the planning, construction, and operational phases of the projects. The BOE adopted a previous version of the SCs on November 10, 2015 (Board Report Number 159-15/16). They were originally compiled as a supplement to the Program Environmental Impact Report (Program EIR) for the School Upgrade Program, which was certified by the BOE on November 10, 2015 (also Board Report No. 159-15/16). The most recently adopted SCs were updated in order to incorporate and reflect recent changes in the laws, regulations and the District's standard policies, practices and specifications (e.g., the Design Guidelines and Design Standards, which are routinely updated and are referenced throughout the Standard Conditions).

Collaborative for High-Performance Schools (CHPS). The proposed Project would include CHPS criteria points under seven categories: Integration, Indoor Environmental Quality, Energy, Water, Site, Materials and Waste Management, and Operations and Metrics. LAUSD is committed to sustainable construction principles and has been a member of the CHPS since 2001. CHPS has established criteria for the development of high-performance schools to create a better educational experience for students and teachers by designing the best facilities possible. CHPS-designed facilities are healthy, comfortable, energy efficient, material efficient, easy to maintain and operate, commissioned, environmentally responsive site, a building that teaches, safe and secure, community resource, stimulating architecture, and adaptable to changing needs. The proposed Project would comply with CHPS and LAUSD sustainability guidelines. The design team would be responsible for incorporating sustainability features for the proposed Project, including on-site treatment of stormwater runoff, "cool roof" building materials, lighting that reduces light pollution, water and energy-efficient design, water-wise landscaping, collection of recyclables, and sustainable and/or recycled-content building materials.

Project Design Features. Project design features (PDFs) are environmental protection features that modify a physical element of a site-specific project and are depicted in a site plan or documented in the project design plans. PDFs may be incorporated into a project design or description to offset or avoid a potential environmental impact and do not require more than adhering to a site plan or project design. Unlike mitigation measures, PDFs are not special actions that need to be specifically defined or analyzed for effectiveness in reducing potential impacts.

Mitigation Measures. If, after incorporation and implementation of federal, state, and local regulations; CHPS prerequisite criteria; PDFs; and SCs, there are still significant environmental impacts, then feasible and project-specific mitigation measures are required to reduce impacts to less than significant levels. Mitigation under CEQA Guidelines Section 15370 includes:

Page 2 Tetra Tech

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

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

LAUSD is the responsible party for compliance with all measures related to the proposed Project. Specifically, LAUSD is responsible for compliance with and implementation of all of the mitigation measures that are outlined in this MMRP and stated in the associated IS/MND for the proposed Project.

1.2 PROJECT LOCATION

The approximately 18.6-acre Campus spans across two parcels and is separated by Lincoln Park Avenue. The Campus is located at 3501 North Broadway in the community of Lincoln Heights, in the City of Los Angeles, and in Los Angeles County. The site is identified with Assessor Parcel Numbers (APN) 5208-026-903 and 5209-010-900.

1.3 SUMMARY PROJECT DESCRIPTION

The proposed Project is designed to address the most critical physical concerns of the building and grounds at the Campus while providing renovations, modernizations, and reconfigurations. The proposed Project includes new buildings including a 2-story classroom building, performing arts building, Maintenance and Operations building, facilities for Pueblo de Los Angeles Continuation High School (modular buildings anticipated), and field house restroom building. The proposed Project also includes modernization of existing structures and site improvements including utility upgrades, access upgrades to meet programmatic requirements of the Americans with Disabilities Act, and landscape and hardscape improvements. The proposed Project includes demolition of the music building, storage building, shop building, Pueblo de Los Angeles Continuation High School (3 portable/relocatable structures), and 7 portable buildings. Pueblo de Los Angeles Continuation High School would temporarily be relocated to Glen Alta Elementary School during construction.

December 2020 Page 3

1.4 ENVIRONMENTAL IMPACTS

1.4.1 No Impact and Less Than Significant Impact

The following environmental resource areas were identified as no impact or less than significant in the Initial Study.

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

1.4.2 Less Than Significant with Mitigation

The IS/MND found that the proposed Project would result in one environmental factor having potentially significant impacts without mitigation: Biological Resources. Table 1 lists the mitigation measure that was incorporated into the proposed Project. To reduce impacts associated with biological resources, implementation of Mitigation Measure MM-BIO-1 would provide protective measures. With mitigation, impacts would be less than significant.

Page 4 Tetra Tech

Monitoring and Reporting Requirements

2.1 INTRODUCTION

CEQA requires adoption of a reporting or monitoring program for the conditions of Project approval that are necessary to mitigate, reduce, or avoid significant effects on the environment.³

The purpose of the MMRP is to ensure the effective implementation of the mitigation measures for the Project. In addition, it provides a means for identifying corrective actions, if necessary, before irreversible environmental damage occurs. As the Lead Agency, LAUSD is responsible for review and approval of the Project and adoption of the MMRP.

The program requirements outlined in Table 1 include:

- Mitigation measures;
- Responsibility for implementation;
- Implementation phase (i.e., pre-construction, construction, prior to occupancy, post-occupancy);
- Responsibility for monitoring; and
- Completion date and initials of monitoring party.

2.2 CATEGORIZED MATRIX

Project-specific mitigation measures have been categorized in Table 1. The table serves as the basis for scheduling the implementation of and compliance with the mitigation measure.

December 2020 Page 5

³ Public Resources Code, Section 21081.6.

2. Monitoring and Reporting Requirements

Table 1 Mitigation Monitoring and Reporting Program

Mitigation Measures ⁴		Responsibility for Implementation	Implementation Phase	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)		
BIOLOGICAL RESOURCES							
MM-BIO-1.	Prior to Project commencement, an LAUSD qualified arborist/biologist shall delineate the critical root zone (CRZ) of protected trees within or near to the area of work. No work shall occur within the delineated CRZ; this includes staging and access routes. CRZ delineation can be conducted in conjunction with the nesting bird survey, if timing and personnel are appropriate.	LAUSD OEHS	Pre-construction	LAUSD OEHS / qualified biological monitor			

Page 6 Tetra Tech

⁴ OEHS = Office of Environmental Health and Safety